



Ally Financial Inc

2024 CDP Corporate Questionnaire 2024

Word version

Important: this export excludes unanswered questions

This document is an export of your organization's CDP questionnaire response. It contains all data points for questions that are answered or in progress. There may be questions or data points that you have been requested to provide, which are missing from this document because they are currently unanswered. Please note that it is your responsibility to verify that your questionnaire response is complete prior to submission. CDP will not be liable for any failure to do so.

[Terms of disclosure for corporate questionnaire 2024 - CDP](#)

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Contents

C1. Introduction

(1.3) Provide an overview and introduction to your organization.

(1.3.1) Type of financial institution

Select from:

Bank

(1.3.2) Organization type

Select from:

Publicly traded organization

(1.3.3) Description of 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 customers through a full range of online banking services (including deposits, mortgage, 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, and Ally Credit Card, and reclassifications and eliminations between the reportable operating segments. Ally Bank's assets and operating results are included within our Automotive Finance, Mortgage Finance, and Corporate Finance segments, as well as Corporate and Other, based on its underlying business activities. As of December 31, 2023, Ally Bank had total assets of 186.1 billion, and total nonaffiliate deposits of 154.7 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 deepening relationships, (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, 2023, our subsequent Quarterly Reports on Form 10-Q or Current Reports on Form 8-K, or other applicable documents that are filed or furnished with the U.S. Securities and Exchange Commission (collectively, our SEC filings). Any forward-looking statement made by us or on our behalf speaks only as of the date that it was made. We do not undertake to update any forward-looking statement to reflect the impact of events, circumstances or results that arise after the date that the statement was made, except as required by applicable securities laws. You, however, should consult further disclosures (including disclosures of a forward-looking nature) that we may make in any subsequent SEC filings.

[Fixed row]

(1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.

(1.4.1) End date of reporting year

12/31/2023

(1.4.2) Alignment of this reporting period with your financial reporting period

Select from:

Yes

(1.4.3) Indicate if you are providing emissions data for past reporting years

Select from:

Yes

(1.4.4) Number of past reporting years you will be providing Scope 1 emissions data for

Select from:

Not providing past emissions data for Scope 1

(1.4.5) Number of past reporting years you will be providing Scope 2 emissions data for

Select from:

- Not providing past emissions data for Scope 2

(1.4.6) Number of past reporting years you will be providing Scope 3 emissions data for

Select from:

- 2 years

[Fixed row]

(1.5) Provide details on your reporting boundary.

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

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

ISIN code - bond

(1.6.1) Does your organization use this unique identifier?

Select from:

- Yes

(1.6.2) Provide your unique identifier

US02005NBA72

ISIN code - equity

(1.6.1) Does your organization use this unique identifier?

Select from:

Yes

(1.6.2) Provide your unique identifier

US02005N1000

CUSIP number

(1.6.1) Does your organization use this unique identifier?

Select from:

Yes

(1.6.2) Provide your unique identifier

02005N100

Ticker symbol

(1.6.1) Does your organization use this unique identifier?

Select from:

Yes

(1.6.2) Provide your unique identifier

ALLY

SEDOL code

(1.6.1) Does your organization use this unique identifier?

Select from:

Yes

(1.6.2) Provide your unique identifier

B72XK05 US

LEI number

(1.6.1) Does your organization use this unique identifier?

Select from:

Yes

(1.6.2) Provide your unique identifier

549300JBN1OSM8YNAI90

D-U-N-S number

(1.6.1) Does your organization use this unique identifier?

Select from:

Yes

(1.6.2) Provide your unique identifier

6984298

Other unique identifier

(1.6.1) Does your organization use this unique identifier?

Select from:

No

[Add row]

(1.10) Which activities does your organization undertake, and which industry sectors does your organization lend to, invest in, and/or insure?

Banking (Bank)

(1.10.1) Activity undertaken

Select from:

Yes

(1.10.3) Reporting the portfolio value and % of revenue associated with the portfolio

Select from:

No

(1.10.6) Type of clients

Select all that apply

Retail clients

Corporate and institutional clients (companies)

Business and private clients (banking)

(1.10.7) Industry sectors your organization lends to, invests in, and/or insures

Select all that apply

- Retail
- Services
- Materials
- Fossil Fuels
- Manufacturing
- Infrastructure
- Transportation services
- Food, beverage & agriculture
- Biotech, health care & pharma

Investing (Asset manager)

(1.10.1) Activity undertaken

Select from:

- Yes

(1.10.3) Reporting the portfolio value and % of revenue associated with the portfolio

Select from:

- No

(1.10.6) Type of clients

Select all that apply

- Retail clients

(1.10.7) Industry sectors your organization lends to, invests in, and/or insures

Select all that apply

- Retail
- Apparel
- Services
- Materials
- Hospitality
- Fossil Fuels
- Manufacturing
- Infrastructure
- Power generation
- International bodies

- Transportation services
- Food, beverage & agriculture
- Biotech, health care & pharma

Investing (Asset owner)

(1.10.1) Activity undertaken

Select from:

- Yes

(1.10.3) Reporting the portfolio value and % of revenue associated with the portfolio

Select from:

- No

(1.10.6) Type of clients

Select all that apply

- Asset owners

(1.10.7) Industry sectors your organization lends to, invests in, and/or insures

Select all that apply

- | | |
|---|--|
| <input checked="" type="checkbox"/> Retail | <input checked="" type="checkbox"/> Fossil Fuels |
| <input checked="" type="checkbox"/> Apparel | <input checked="" type="checkbox"/> Manufacturing |
| <input checked="" type="checkbox"/> Services | <input checked="" type="checkbox"/> Infrastructure |
| <input checked="" type="checkbox"/> Materials | <input checked="" type="checkbox"/> Power generation |
| <input checked="" type="checkbox"/> Hospitality | <input checked="" type="checkbox"/> International bodies |
| <input checked="" type="checkbox"/> Transportation services | |
| <input checked="" type="checkbox"/> Food, beverage & agriculture | |
| <input checked="" type="checkbox"/> Biotech, health care & pharma | |

Insurance underwriting (Insurance company)

(1.10.1) Activity undertaken

Select from:

Yes

(1.10.2) Insurance types underwritten

Select all that apply

General (non-life)

(1.10.3) Reporting the portfolio value and % of revenue associated with the portfolio

Select from:

No

(1.10.6) Type of clients

Select all that apply

Retail clients

Business and private clients (banking)

(1.10.7) Industry sectors your organization lends to, invests in, and/or insures

Select all that apply

Transportation services

[Fixed row]

(1.24) Has your organization mapped its value chain?

(1.24.1) Value chain mapped

Select from:

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

(1.24.8) Primary reason for not mapping your upstream value chain or any value chain stages

Select from:

- Not an immediate strategic priority

(1.24.9) Explain why your organization has not mapped its upstream value chain or any value chain stages

Ally has not had the opportunity to map any value chain stages. Ally understands the value of conducting these activities and will continue to evaluate opportunities for advancement in this area; at this time Ally is not able to forecast when this will be complete.

[Fixed row]

(1.24.1) Have you mapped where in your direct operations or elsewhere in your value chain plastics are produced, commercialized, used, and/or disposed of?

(1.24.1.1) Plastics mapping

Select from:

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

(1.24.1.5) Primary reason for not mapping plastics in your value chain

Select from:

- Not an immediate strategic priority

(1.24.1.6) Explain why your organization has not mapped plastics in your value chain

Ally has not had the opportunity to map plastics in the value chain. Ally understands the value of conducting these activities and will continue to evaluate opportunities for advancement in this area; at this time Ally is not able to forecast when this will be complete.

[Fixed row]

C2. Identification, assessment, and management of dependencies, impacts, risks, and opportunities

(2.1) How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?

	Is your long-term time horizon open ended?	How this time horizon is linked to strategic and/or financial planning
Short-term	Select from:	N/A
Medium-term	Select from:	N/A
Long-term	Select from: <input checked="" type="checkbox"/> No	N/A

[Fixed row]

(2.2) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?

(2.2.1) Process in place

Select from:

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

(2.2.4) Primary reason for not evaluating dependencies and/or impacts

Select from:

Not an immediate strategic priority

(2.2.5) Explain why you do not evaluate dependencies and/or impacts and describe any plans to do so in the future

Ally's environmental sustainability strategy is focused on stakeholder education and engagement and the importance of building a solid data foundation to identify and accurately quantify our impacts to, and dependencies on, nature. As Ally expands our climate and environmental risk expertise and capacity, we will seek to evaluate our nature dependencies and impacts and set science-based targets accordingly.

[Fixed row]

(2.2.1) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities?

(2.2.1.1) Process in place

Select from:

Yes

(2.2.1.2) Risks and/or opportunities evaluated in this process

Select from:

Risks only

(2.2.1.6) Explain why you do not have a process for evaluating both risks and opportunities that is informed by a dependencies and/or impacts process

Ally's environmental sustainability strategy is focused on stakeholder education and engagement and the importance of building a solid data foundation to identify and accurately quantify our impacts to, and dependencies on, nature. As Ally expands our climate and environmental risk expertise and capacity, we will refine our ability to evaluate our nature dependencies, impacts and opportunities.

[Fixed row]

(2.2.2) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities.

Row 1

(2.2.2.1) Environmental issue

Select all that apply

- Climate change

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

- Risks

(2.2.2.3) Value chain stages covered

Select all that apply

- Direct operations

(2.2.2.4) Coverage

Select from:

- Partial

(2.2.2.7) Type of assessment

Select from:

- Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

- Not defined

(2.2.2.10) Integration of risk management process

Select from:

- A specific environmental risk management process

(2.2.2.11) Location-specificity used

Select all that apply

- Sub-national

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

- Other commercially/publicly available tools, please specify :Aon provided catastrophe model ELEMENTS

Enterprise Risk Management

- Enterprise Risk Management

Other

- Scenario analysis

(2.2.2.13) Risk types and criteria considered

Acute physical

- Cyclones, hurricanes, typhoons

Chronic physical

- Increased severity of extreme weather events

Policy

- Carbon pricing mechanisms

(2.2.2.14) Partners and stakeholders considered

Select all that apply

Customers

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

Yes

(2.2.2.16) Further details of process

Ally leveraged its Enterprise Risk Management (ERM) framework to identify potential existing and emerging climate-related risks. Pursuant to our ERM framework, emerging risks include newly identified or evolving risks. These risks have the potential to impact Ally, but their nature and magnitude may not yet be fully known or may be rapidly changing. As a result, emerging risks may require the creation of new controls. Emerging risks have the potential to materialize rapidly or over several years. Potential existing and emerging risks are identified by conducting qualitative risk reviews to help us better understand potential risk transmission channels that could impact our business, results of operations, financial condition, prospects, reputation or employees or the business, operations, or financial condition of customers, counterparties, and service providers on whom we rely. 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. Ally has continued to use climate risk scenario analysis, which is a valuable input in assessing the potential impact of climate risk on Ally's business. In 2022, Ally conducted an analysis of potential impacts from river flooding and wildfires on our commercial insurance portfolio. In 2023, Ally has continued to build out climate scenario analysis capabilities. Ally conducted a physical risk scenario analysis leveraging a portion of the guidance published by the Federal Reserve Board (FRB) Pilot Climate Scenario Analysis exercise outlining specific physical risk climate scenarios. This exercise assessed borrower level credit impacts to consumer and commercial real estate loans from a severe hurricane in the northeast region of the United States. To evaluate the potential range of effects from climate change over long-term time horizons, characteristics of a climate change impacted hurricane in the year 2050 were assumed, under two potential global warming scenarios. Ally also considered the FRB Pilot Climate Scenario Analysis to perform a qualitative assessment of climate-related transition risk within Ally's corporate lending portfolio, including a review of sectoral concentrations that may have elevated carbon asset risk exposure. Ally plans to continue to develop and execute climate scenario analyses through customized scenarios relevant to Ally's business model and risk exposure.

[Add row]

(2.2.4) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts related to your portfolio activities?

Banking (Bank)

(2.2.4.1) Process in place covering this portfolio

Select from:

- No, but we plan to within the next two years

(2.2.4.3) Primary reason for not evaluating dependencies and/or impacts related to this portfolio

Select from:

- Not an immediate strategic priority

(2.2.4.4) Explain why you do not evaluate dependencies and/or impacts related to this portfolio and describe any plans to evaluate this in the future

Ally's environmental sustainability strategy is focused on stakeholder education and engagement and the importance of building a solid data foundation to identify and accurately quantify our impacts to, and dependencies on, nature. As Ally expands our climate and environmental risk expertise and capacity, we will refine our ability to evaluate our nature dependencies and impacts and set science-based targets accordingly.

Investing (Asset manager)

(2.2.4.1) Process in place covering this portfolio

Select from:

- No, but we plan to within the next two years

(2.2.4.3) Primary reason for not evaluating dependencies and/or impacts related to this portfolio

Select from:

- Not an immediate strategic priority

(2.2.4.4) Explain why you do not evaluate dependencies and/or impacts related to this portfolio and describe any plans to evaluate this in the future

Ally's environmental sustainability strategy is focused on stakeholder education and engagement and the importance of building a solid data foundation to identify and accurately quantify our impacts to, and dependencies on, nature. As Ally expands our climate and environmental risk expertise and capacity, we will refine our ability to evaluate our nature dependencies and impacts and set science-based targets accordingly.

Investing (Asset owner)

(2.2.4.1) Process in place covering this portfolio

Select from:

- No, but we plan to within the next two years

(2.2.4.3) Primary reason for not evaluating dependencies and/or impacts related to this portfolio

Select from:

- Not an immediate strategic priority

(2.2.4.4) Explain why you do not evaluate dependencies and/or impacts related to this portfolio and describe any plans to evaluate this in the future

Ally's environmental sustainability strategy is focused on stakeholder education and engagement and the importance of building a solid data foundation to identify and accurately quantify our impacts to, and dependencies on, nature. As Ally expands our climate and environmental risk expertise and capacity, we will refine our ability to evaluate our nature dependencies and impacts and set science-based targets accordingly.

Insurance underwriting (Insurance company)

(2.2.4.1) Process in place covering this portfolio

Select from:

- No, but we plan to within the next two years

(2.2.4.3) Primary reason for not evaluating dependencies and/or impacts related to this portfolio

Select from:

- Not an immediate strategic priority

(2.2.4.4) Explain why you do not evaluate dependencies and/or impacts related to this portfolio and describe any plans to evaluate this in the future

Ally's environmental sustainability strategy is focused on stakeholder education and engagement and the importance of building a solid data foundation to identify and accurately quantify our impacts to, and dependencies on, nature. As Ally expands our climate and environmental risk expertise and capacity, we will refine our ability to evaluate our nature dependencies and impacts and set science-based targets accordingly.

[Fixed row]

(2.2.5) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities related to your portfolio activities?

Banking (Bank)

(2.2.5.1) Process in place covering this portfolio

Select from:

Yes

(2.2.5.2) Risks and/or opportunities related to this portfolio are evaluated in this process

Select from:

Risks only

(2.2.5.6) Explain why you do not have a process for evaluating both risks and opportunities related to this portfolio that is informed by a dependencies and/or impacts process

Ally's environmental sustainability strategy is focused on stakeholder education and engagement and the importance of building a solid data foundation to identify and accurately quantify our impacts to, and dependencies on, nature. As Ally expands our climate and environmental risk expertise and capacity, we will refine our ability to evaluate our nature dependencies, impacts and opportunities.

Investing (Asset manager)

(2.2.5.1) Process in place covering this portfolio

Select from:

Yes

(2.2.5.2) Risks and/or opportunities related to this portfolio are evaluated in this process

Select from:

Risks only

(2.2.5.6) Explain why you do not have a process for evaluating both risks and opportunities related to this portfolio that is informed by a dependencies and/or impacts process

Ally's environmental sustainability strategy is focused on stakeholder education and engagement and the importance of building a solid data foundation to identify and accurately quantify our impacts to, and dependencies on, nature. As Ally expands our climate and environmental risk expertise and capacity, we will refine our ability to evaluate our nature dependencies, impacts and opportunities.

Investing (Asset owner)

(2.2.5.1) Process in place covering this portfolio

Select from:

Yes

(2.2.5.2) Risks and/or opportunities related to this portfolio are evaluated in this process

Select from:

Risks only

(2.2.5.6) Explain why you do not have a process for evaluating both risks and opportunities related to this portfolio that is informed by a dependencies and/or impacts process

Ally's environmental sustainability strategy is focused on stakeholder education and engagement and the importance of building a solid data foundation to identify and accurately quantify our impacts to, and dependencies on, nature. As Ally expands our climate and environmental risk expertise and capacity, we will refine our ability to evaluate our nature dependencies, impacts and opportunities.

Insurance underwriting (Insurance company)

(2.2.5.1) Process in place covering this portfolio

Select from:

Yes

(2.2.5.2) Risks and/or opportunities related to this portfolio are evaluated in this process

Select from:

Risks only

(2.2.5.6) Explain why you do not have a process for evaluating both risks and opportunities related to this portfolio that is informed by a dependencies and/or impacts process

Ally's environmental sustainability strategy is focused on stakeholder education and engagement and the importance of building a solid data foundation to identify and accurately quantify our impacts to, and dependencies on, nature. As Ally expands our climate and environmental risk expertise and capacity, we will refine our ability to evaluate our nature dependencies, impacts and opportunities.

[Fixed row]

(2.2.6) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities related to your portfolio activities.

Banking (Bank)

(2.2.6.1) Environmental issue

Select all that apply

Climate change

(2.2.6.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this portfolio

Select all that apply

Risks

(2.2.6.3) % of portfolio covered by the assessment process in relation to total portfolio value

8.21

(2.2.6.4) Type of assessment

Select from:

Qualitative and quantitative

(2.2.6.6) Frequency of assessment

Select from:

Not defined

(2.2.6.7) Time horizons covered

Select all that apply

Not defined

(2.2.6.8) Integration of risk management process

Select from:

A specific environmental risk assessment process

(2.2.6.9) Location-specificity used

Select all that apply

Sub-national

(2.2.6.10) Tools and methods used

Select all that apply

- Internal tools/methods
- Risk models
- Scenario analysis

(2.2.6.11) Risk type and criteria considered

Acute physical

- Cyclones, hurricanes, typhoons

(2.2.6.12) Partners and stakeholders considered

Select all that apply

- Customers

(2.2.6.13) Further details of process

Ally leveraged its Enterprise Risk Management (ERM) framework to identify potential existing and emerging climate-related risks. Pursuant to our ERM framework, emerging risks include newly-identified or evolving risks. These risks have the potential to impact Ally, but their nature and magnitude may not yet be fully known or may be rapidly changing. As a result, emerging risks may require the creation of new controls. Emerging risks have the potential to materialize rapidly or over several years. Potential existing and emerging risks are identified by conducting qualitative risk reviews to help us better understand potential risk transmission channels that could impact our business, results of operations, financial condition, prospects, reputation or employees or the business, operations, or financial condition of customers, counterparties, and service providers on whom we rely. Ally conducted a physical risk scenario analysis leveraging a portion of the guidance published by the Federal Reserve Board (FRB) Pilot Climate Scenario Analysis exercise outlining specific physical risk climate scenarios. This exercise assessed borrower level credit impacts to consumer and commercial real estate loans from a severe hurricane in the northeast region of the United States. To evaluate the potential range of effects from climate change over long-term time horizons, characteristics of a climate change impacted hurricane in the year 2050 were assumed, under two potential global warming scenarios. Ally plans to continue to develop and execute climate scenario analyses through customized scenarios relevant to Ally's business model and risk exposure.

Investing (Asset manager)

(2.2.6.1) Environmental issue

Select all that apply

- Climate change

(2.2.6.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this portfolio

Select all that apply

- Risks

(2.2.6.4) Type of assessment

Select from:

- Qualitative only

(2.2.6.6) Frequency of assessment

Select from:

- Not defined

(2.2.6.7) Time horizons covered

Select all that apply

- Not defined

(2.2.6.8) Integration of risk management process

Select from:

- A specific environmental risk assessment process

(2.2.6.9) Location-specificity used

Select all that apply

- National

(2.2.6.10) Tools and methods used

Select all that apply

- Internal tools/methods

(2.2.6.11) Risk type and criteria considered

Policy

- Carbon pricing mechanisms

(2.2.6.12) Partners and stakeholders considered

Select all that apply

- Customers

(2.2.6.13) Further details of process

Ally leveraged its Enterprise Risk Management (ERM) framework to identify potential existing and emerging climate-related risks. Pursuant to our ERM framework, emerging risks include newly-identified or evolving risks. These risks have the potential to impact Ally, but their nature and magnitude may not yet be fully known or may be rapidly changing. As a result, emerging risks may require the creation of new controls. Emerging risks have the potential to materialize rapidly or over several years. Potential existing and emerging risks are identified by conducting qualitative risk reviews to help us better understand potential risk transmission channels that could impact our business, results of operations, financial condition, prospects, reputation or employees or the business, operations, or financial condition of customers, counterparties, and service providers on whom we rely. Ally conducted a physical risk scenario analysis leveraging a portion of the guidance published by the Federal Reserve Board (FRB) Pilot Climate Scenario Analysis exercise outlining specific physical risk climate scenarios. This exercise assessed borrower level credit impacts to consumer and commercial real estate loans from a severe hurricane in the northeast region of the United States. To evaluate the potential range of effects from climate change over long-term time horizons, characteristics of a climate change impacted hurricane in the year 2050 were assumed, under two potential global warming scenarios. Ally plans to continue to develop and execute climate scenario analyses through customized scenarios relevant to Ally's business model and risk exposure.

Investing (Asset owner)

(2.2.6.1) Environmental issue

Select all that apply

- Climate change

(2.2.6.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this portfolio

Select all that apply

- Risks

(2.2.6.4) Type of assessment

Select from:

- Qualitative only

(2.2.6.6) Frequency of assessment

Select from:

- Not defined

(2.2.6.7) Time horizons covered

Select all that apply

- Not defined

(2.2.6.8) Integration of risk management process

Select from:

- A specific environmental risk assessment process

(2.2.6.9) Location-specificity used

Select all that apply

- Not location specific

(2.2.6.10) Tools and methods used

Select all that apply

- Internal tools/methods

(2.2.6.12) Partners and stakeholders considered

Select all that apply

- Customers

(2.2.6.13) Further details of process

Ally leveraged its Enterprise Risk Management (ERM) framework to identify potential existing and emerging climate-related risks. Pursuant to our ERM framework, emerging risks include newly-identified or evolving risks. These risks have the potential to impact Ally, but their nature and magnitude may not yet be fully known or may be rapidly changing. As a result, emerging risks may require the creation of new controls. Emerging risks have the potential to materialize rapidly or over several years. Potential existing and emerging risks are identified by conducting qualitative risk reviews to help us better understand potential risk transmission channels that could impact our business, results of operations, financial condition, prospects, reputation or employees or the business, operations, or financial condition of customers, counterparties, and service providers on whom we rely.

Insurance underwriting (Insurance company)

(2.2.6.1) Environmental issue

Select all that apply

- Climate change

(2.2.6.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this portfolio

Select all that apply

- Risks

(2.2.6.3) % of portfolio covered by the assessment process in relation to total portfolio value

16.46

(2.2.6.4) Type of assessment

Select from:

- Qualitative and quantitative

(2.2.6.6) Frequency of assessment

Select from:

- Not defined

(2.2.6.7) Time horizons covered

Select all that apply

- Not defined

(2.2.6.8) Integration of risk management process

Select from:

- A specific environmental risk assessment process

(2.2.6.9) Location-specificity used

Select all that apply

- National

(2.2.6.10) Tools and methods used

Select all that apply

- Internal tools/methods
- Risk models
- Scenario analysis

(2.2.6.11) Risk type and criteria considered

Chronic physical

- Increased severity of extreme weather events

(2.2.6.12) Partners and stakeholders considered

Select all that apply

- Customers

(2.2.6.13) Further details of process

Ally leveraged its Enterprise Risk Management (ERM) framework to identify potential existing and emerging climate-related risks. Pursuant to our ERM framework, emerging risks include newly-identified or evolving risks. These risks have the potential to impact Ally, but their nature and magnitude may not yet be fully known or may be rapidly changing. As a result, emerging risks may require the creation of new controls. Emerging risks have the potential to materialize rapidly or over several years. Potential existing and emerging risks are identified by conducting qualitative risk reviews to help us better understand potential risk transmission channels that could impact our business, results of operations, financial condition, prospects, reputation or employees or the business, operations, or financial condition of customers, counterparties, and service providers on whom we rely. 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. Ally has continued to use climate risk scenario analysis, which is a valuable input in assessing the potential impact of climate risk on Ally's business. In 2022, Ally conducted an analysis of potential impacts from river flooding and wildfires on our commercial insurance portfolio. In 2023, Ally has continued to build out climate scenario analysis capabilities.

[Add row]

(2.2.7) Are the interconnections between environmental dependencies, impacts, risks and/or opportunities assessed?**(2.2.7.1) Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed**

Select from:

- No

(2.2.7.3) Primary reason for not assessing interconnections between environmental dependencies, impacts, risks and/or opportunities

Select from:

- Lack of internal resources, capabilities, or expertise (e.g., due to organization size)

(2.2.7.4) Explain why you do not assess the interconnections between environmental dependencies, impacts, risks and/or opportunities

Ally's environmental sustainability strategy is focused on stakeholder education and engagement and the importance of building a solid data foundation to identify and quantify our risks, opportunities, impacts, and/or dependencies. As Ally continues to better understand trends and expands climate and environmental risk expertise and capacity, we will refine our ability to assess the interconnections.

[Fixed row]

(2.2.8) Does your organization consider environmental information about your clients/investees as part of your due diligence and/or environmental dependencies, impacts, risks and/or opportunities assessment process?

Banking (Bank)

(2.2.8.1) We consider environmental information

Select from:

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

(2.2.8.2) Explain why you do not consider environmental information

Ally recognizes that climate change-related risk assessment practices are increasingly important to the financial services industry. Ally is contemplating appropriate mechanisms to collect and incorporate client information that is relevant to evaluating climate-related financial risks as a part of our underwriting and ongoing monitoring efforts consistent with the Principles for Climate-Related Financial Risk Management for Large Financial institutions, jointly released by the FRB, the FDIC, and the OCC. 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)

(2.2.8.1) We consider environmental information

Select from:

Yes

Investing (Asset owner)

(2.2.8.1) We consider environmental information

Select from:

No, but we plan to within the next two years

(2.2.8.2) Explain why you do not consider environmental information

Ally recognizes that climate change-related risk assessment practices are increasingly important to the financial services industry. As the regulatory environment evolves and information on environmental practices of companies becomes increasingly standardized and consistent, Ally intends to incorporate environmental information as a part of its counterparty review process.

Insurance underwriting (Insurance company)

(2.2.8.1) We consider environmental information

Select from:

No, but we plan to within the next two years

(2.2.8.2) Explain why you do not consider environmental information

Ally recognizes that climate change-related risk assessment practices are increasingly important to the financial services industry. Ally is contemplating appropriate mechanisms to collect and incorporate client information that is relevant to evaluating climate-related financial risks as a part of our underwriting and ongoing monitoring efforts consistent with the Principles for Climate-Related Financial Risk Management for Large Financial institutions, jointly released by the FRB, the FDIC, and the OCC. 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.
[Fixed row]

(2.2.9) Indicate the environmental information your organization considers about clients/investees as part of your due diligence and/or environmental dependencies, impacts, risks and/or opportunities assessment process, and how this influences decision-making.

Investing (Asset manager)

(2.2.9.1) Environmental issues covered

Select all that apply

Climate change

(2.2.9.2) Type of environmental information considered

Select all that apply

Other, please specify :Socially Responsible Investment preference

(2.2.9.3) Process through which information is obtained

Select all that apply

Directly from the client/investee

(2.2.9.5) % of portfolio covered by the process in relation to total portfolio value

100

(2.2.9.6) Total portfolio value covered by the process

0

[Add row]

(2.4) How does your organization define substantive effects on your organization?

Risks

(2.4.1) Type of definition

Select all that apply

Qualitative

(2.4.6) Metrics considered in definition

Select all that apply

Other, please specify :Applicable impacts within Enterprise Risk Management Policy (e.g. Financial, Customer or Employee, Compliance, Reputation).

(2.4.7) Application of definition

Four factors are evaluated to determine the substantive effect on Ally: Financial, Customer or Employee, Compliance and Reputation, as outlined in the Enterprise Risk Management Policy. Climate risk is currently defined as an emerging risk and Ally is still determining the substantive effect of climate risk on Ally which will inform our identification of relevant and actionable metrics to measure and monitor climate risks going forward.

Opportunities

(2.4.1) Type of definition

Select all that apply

Qualitative

(2.4.6) Metrics considered in definition

Select all that apply

Other, please specify :Applicable impacts within Enterprise Risk Management Policy (e.g. Financial, Customer or Employee, Compliance, Reputation).

(2.4.7) Application of definition

Four factors are evaluated to determine the substantive effect on Ally: Financial, Customer or Employee, Compliance and Reputation, as outlined in the Enterprise Risk Management Policy. Climate risk is currently defined as an emerging risk and Ally is still determining the substantive effect of climate risk on Ally which will inform our identification of relevant and actionable metrics to measure and monitor climate risks going forward.

[Add row]

C3. Disclosure of risks and opportunities

(3.1) Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.1.1) Environmental risks identified

Select from:

Yes, both within our direct operations or upstream value chain, and within our portfolio

Forests

(3.1.1) Environmental risks identified

Select from:

No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

Not an immediate strategic priority

(3.1.3) Please explain

Ally recognizes that environmental risk management is increasingly important to the financial services industry. Ally has not yet identified any substantive forests-related risks, but as Ally's sustainability program evolves, Ally intends to consider these risks in the future.

Water

(3.1.1) Environmental risks identified

Select from:

No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

Not an immediate strategic priority

(3.1.3) Please explain

Ally recognizes that environmental risk management is increasingly important to the financial services industry. Ally has not yet identified any substantive water-related risks, but as Ally's sustainability program evolves, Ally intends to consider these risks in the future.

Plastics

(3.1.1) Environmental risks identified

Select from:

No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

Not an immediate strategic priority

(3.1.3) Please explain

Ally recognizes that environmental risk management is increasingly important to the financial services industry. Ally has not yet identified any substantive plastics-related risks, but as Ally's sustainability program evolves, Ally intends to consider these risks in the future.

[Fixed row]

(3.1.1) Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.1.1.1) Risk identifier

Select from:

Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical

Storm (including blizzards, dust and sandstorm)

(3.1.1.4) Value chain stage where the risk occurs

Select from:

Insurance underwriting portfolio

(3.1.1.5) Risk type mapped to traditional financial services industry risk classification

Select all that apply

Insurance risk

(3.1.1.6) Country/area where the risk occurs

Select all that apply

United States of America

(3.1.1.9) Organization-specific description of risk

Ally understands the potential for event-driven acute physical risks, such as increased frequency and severity of extreme weather events, including hail, tornadoes, hurricanes, floods, or wildfires. This weather-related physical risk can present in our P&C insurance portfolio.

(3.1.1.10) % of portfolio value vulnerable to this risk

Select from:

51-60%

(3.1.1.11) Primary financial effect of the risk

Select from:

Increased insurance claims liability

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

The risk has already had a substantive effect on our organization in the reporting year

(3.1.1.14) Magnitude

Select from:

Low

(3.1.1.15) Effect of the risk on the financial position, financial performance and cash flows of the organization in the reporting year

During the year ended December 31, 2023, weather-related loss and loss adjustment expenses from our vehicle inventory insurance program was 90 million, compared to 34 million during the same period in 2022. We utilized our excess of loss reinsurance and ceded weather-related losses on our vehicle inventory insurance program for the first and third quarters of 2023 as losses exceeded the retention limits of 14 million and 21 million, respectively.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

Yes

(3.1.1.18) Financial effect figure in the reporting year (currency)

90000000

(3.1.1.26) Primary response to risk

Policies and plans

Increase insurance coverage

(3.1.1.29) Description of response

To support risk mitigation activities, we utilize a system of controls and governance including the use of a risk appetite framework to govern the amount and types of insurance risks we accept, including the consideration of concentration risks, volatility of products, and a number of other factors. In April 2023, Ally renewed our annual excess of loss reinsurance agreement and continues to utilize this coverage for our vehicle inventory insurance to manage our risk of weather-related losses under which retention limits vary for each quarter.

Climate change

(3.1.1.1) Risk identifier

Select from:

Risk2

(3.1.1.3) Risk types and primary environmental risk driver

Market

Changing customer behavior

(3.1.1.4) Value chain stage where the risk occurs

Select from:

- Banking (Bank) portfolio

(3.1.1.5) Risk type mapped to traditional financial services industry risk classification

Select all that apply

- Market risk
- Strategic risk

(3.1.1.6) Country/area where the risk occurs

Select all that apply

- United States of America

(3.1.1.9) Organization-specific description of risk

We have dealer-centric automotive finance and insurance businesses, and a change in the key role of dealers within the automotive industry or our ability to maintain or build relationships with them, or evolve with the industry, could have an adverse effect on our business. A number of trends are affecting the automotive industry and the role of dealers within it, including alternative-energy vehicles, the impact of demographic shifts on attitudes and behaviors toward vehicle ownership. While it is not currently clear how and how quickly these trends may develop, any one or more of them could adversely affect the key role of dealers and their business models, profitability, and viability, and if this were to occur, our dealer-centric automotive finance and insurance businesses could suffer as well. Vehicle loans and operating leases make up a significant part of our earning assets. If we experience higher losses on the sale of repossessed vehicles or lower or more volatile residual values for off lease vehicles, our business or financial results could be adversely affected. Many factors heavily influence used vehicle prices, including the shift from gasoline to electric vehicles and volatility in gasoline or diesel fuel prices. To the extent that used vehicle prices are significantly lower than our expectations or our estimate of loss frequency is underestimated, our profit on vehicle loans and operating leases could be substantially less than our expectations.

(3.1.1.11) Primary financial effect of the risk

Select from:

- Change in revenue mix and sources

(3.1.1.14) Magnitude

Select from:

Unknown

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

No

(3.1.1.26) Primary response to risk

Diversification

Develop new products, services and/or markets

(3.1.1.29) Description of response

Ally recognizes that both demand and supply for EVs is expected to increase. 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 Dealer Financial Services supports its customers by providing dealerships working capital loans to make their facilities EV-ready. In addition, Ally Dealer Financial Services dealerships and customers evolve with the industry through lease and retail installment contracts that support consumer EV demand.

[Add row]

(3.1.2) Provide the amount and proportion of your financial metrics from the reporting year that are vulnerable to the substantive effects of environmental risks.

Climate change

(3.1.2.1) Financial metric

Select from:

Other, please specify :Loss and loss adjustment expense.

(3.1.2.7) Explanation of financial figures

During the year ended December 31, 2023, weather-related loss and loss adjustment expenses from our vehicle inventory insurance program was 90 million, compared to 34 million during the same period in 2022. We utilized our excess of loss reinsurance and recognized weather-related losses on our vehicle inventory insurance program for the first and third quarters of 2023 as losses exceeded the retention limits of 14 million and 21 million, respectively.

[Add row]

(3.6) Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.6.1) Environmental opportunities identified

Select from:

Yes, we have identified opportunities, and some/all are being realized

Forests

(3.6.1) Environmental opportunities identified

Select from:

No

(3.6.2) Primary reason why your organization does not consider itself to have environmental opportunities

Select from:

Not an immediate strategic priority

(3.6.3) Please explain

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

(3.6.1) Environmental opportunities identified

Select from:

No

(3.6.2) Primary reason why your organization does not consider itself to have environmental opportunities

Select from:

Not an immediate strategic priority

(3.6.3) Please explain

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.

[Fixed row]

(3.6.1) Provide details of the environmental opportunities identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

Opp1

(3.6.1.2) Commodity

Select all that apply

Not applicable

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Resource efficiency

- Move to more energy/resource efficient buildings

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

- Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

- United States of America

(3.6.1.8) Organization 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. In the same year we also conducted a solar feasibility study at an owned site, that resulted in an investment in a solar panel canopy, estimated to offset almost 90% of the building's power in the future. 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.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

- Reduced indirect (operating) costs

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

- Short-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

Very likely (90–100%)

(3.6.1.12) Magnitude

Select from:

Medium-low

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Optimized energy usage with an overall reduction in operational costs.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

Yes

(3.6.1.17) Anticipated financial effect figure in the short-term - minimum (currency)

800000

(3.6.1.23) Explanation of financial effect figures

The minimum potential financial impact is calculated by annualizing estimated reductions in energy relative to baseline usage, multiplied by local energy rates. The maximum financial impact figure takes into consideration the adjusted energy cost after installation of the solar panel canopy.

(3.6.1.24) Cost to realize opportunity

6700000

(3.6.1.25) Explanation of cost calculation

Cost to realize this opportunity is a result of a direct capital investment to replace an existing gas-powered HVAC system with a more efficient electric system, as well as a solar panel canopy and associated infrastructure.

(3.6.1.26) Strategy to realize opportunity

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 with a more efficient electric system and reduce overall emissions, as well as an investment in a solar panel canopy, estimated to offset almost 90% of the building's power in the future. 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.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

Opp2

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Products and services

Shift in consumer preferences

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

Insurance underwriting portfolio

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

United States of America

(3.6.1.8) Organization specific description

Ally recognizes that both demand and supply for EVs is expected to increase. 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.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

- Increased revenues resulting from increased demand for products and services

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

- Long-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

- Virtually certain (99–100%)

(3.6.1.12) Magnitude

Select from:

- Low

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Not able to be determined yet given the unknowns with EV adoption within the marketplace.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

- No

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

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

(3.6.1.26) Strategy to realize opportunity

Ally will continue to monitor EV adoption rates and adapt the Major Guard EV product offering as appropriate.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

Opp3

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Products and services

Shift in consumer preferences

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

Banking portfolio

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

United States of America

(3.6.1.8) Organization specific description

Ally recognizes that both demand and supply for EVs is expected to increase. 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 Dealer Financial Services supports dealers by providing working capital loans to make their facilities EV-ready.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

- Increased revenues resulting from increased demand for products and services

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

- Short-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

- Likely (66–100%)

(3.6.1.12) Magnitude

Select from:

- Low

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Ally anticipates this opportunity to be largely immaterial to the overall financial position, financial performance, and cash flows of the organization.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

- Yes

(3.6.1.17) Anticipated financial effect figure in the short-term - minimum (currency)

100000

(3.6.1.18) Anticipated financial effect figure in the short-term – maximum (currency)

1400000

(3.6.1.23) Explanation of financial effect figures

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.

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

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

(3.6.1.26) Strategy to realize opportunity

Opportunity is realized as a part of BAU activities.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

Opp4

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Products and services

- Shift in consumer preferences

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

- Banking portfolio

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

- United States of America

(3.6.1.8) Organization specific description

Ally recognizes that both demand and supply for EVs is expected to increase. Ally Dealer Financial Services supports dealerships and consumers through EV lease and retail installment contracts.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

- Increased revenues resulting from increased demand for products and services

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

- Short-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

- Very likely (90–100%)

(3.6.1.12) Magnitude

Select from:

Low

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

We anticipate the impact on the financial position of Ally to be minimal as we expect lifetime economics of EV originations to be similar to non EV originations, leaving Ally at a net neutral position.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

No

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

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

(3.6.1.26) Strategy to realize opportunity

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

[Add row]

(3.6.2) Provide the amount and proportion of your financial metrics in the reporting year that are aligned with the substantive effects of environmental opportunities.

Climate change

(3.6.2.1) Financial metric

Select from:

CAPEX

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

6700000

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:

11-20%

(3.6.2.4) Explanation of financial figures

Cost to install the solar system and replace an existing gas-powered HVAC system a more efficient electric system and reduce overall emissions at an Ally-owned site in Texas. The installation began in 2023 and is planned for completion in 2024.

Climate change

(3.6.2.1) Financial metric

Select from:

Revenue

(3.6.2.4) Explanation of financial figures

The proportion of revenue from Ally's Major Guard EV product is less than 1% for the reporting year. Given uncertainty related to EV market adoption, future financial figures cannot be quantified at this time. Ally will continue to monitor the market as it evolves and as Ally's EV customer base grows.

Climate change

(3.6.2.1) Financial metric

Select from:

Revenue

(3.6.2.4) Explanation of financial figures

The proportion of revenue from the dealer working capital loan product is less than 1% for the reporting year. Given uncertainty related to EV market adoption, future financial figures cannot be quantified at this time. Ally will continue to monitor the market as it evolves.

[Add row]

C4. Governance

(4.1) Does your organization have a board of directors or an equivalent governing body?

(4.1.1) Board of directors or equivalent governing body

Select from:

Yes

(4.1.2) Frequency with which the board or equivalent meets

Select from:

More frequently than quarterly

(4.1.3) Types of directors your board or equivalent is comprised of

Select all that apply

Executive directors or equivalent

Independent non-executive directors or equivalent

(4.1.4) Board diversity and inclusion policy

Select from:

No

[Fixed row]

(4.1.1) Is there board-level oversight of environmental issues within your organization?

Climate change

(4.1.1.1) Board-level oversight of this environmental issue

Select from:

Yes

Forests

(4.1.1.1) Board-level oversight of this environmental issue

Select from:

No, but we plan to within the next two years

(4.1.1.2) Primary reason for no board-level oversight of this environmental issue

Select from:

Not an immediate strategic priority

(4.1.1.3) Explain why your organization does not have board-level oversight of this environmental issue

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.

Water

(4.1.1.1) Board-level oversight of this environmental issue

Select from:

No, but we plan to within the next two years

(4.1.1.2) Primary reason for no board-level oversight of this environmental issue

Select from:

- Not an immediate strategic priority

(4.1.1.3) Explain why your organization does not have board-level oversight of this environmental issue

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.

Biodiversity

(4.1.1.1) Board-level oversight of this environmental issue

Select from:

- No, but we plan to within the next two years

(4.1.1.2) Primary reason for no board-level oversight of this environmental issue

Select from:

- Not an immediate strategic priority

(4.1.1.3) Explain why your organization does not have board-level oversight of this environmental issue

Ally recognizes the increasing importance of assessing the ways that the organization may be potentially impacted by biodiversity 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

[Fixed row]

(4.1.2) Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board's oversight of environmental issues.

Climate change

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

- Chief Executive Officer (CEO)
- Chief Risk Officer (CRO)
- Board-level committee
- Other, please specify :Chief Administrative Officer

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

- Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

- Other policy applicable to the board, please specify :Compensation, Nominating, and Governance Committee Charter

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

- Scheduled agenda item in some board meetings – at least annually

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

- Overseeing and guiding scenario analysis
- Approving corporate policies and/or commitments
- Overseeing and guiding public policy engagement
- Approving and/or overseeing employee incentives
- Monitoring the implementation of the business strategy
- Overseeing reporting, audit, and verification processes

- Overseeing and guiding the development of a business strategy
- Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
- Other, please specify :The Board and management regularly consider all risks to the business, including those relating to climate.

(4.1.2.6) Scope of board-level oversight

Select all that apply

- Risks and opportunities to our own operations
- Risks and opportunities to our banking activities
- Risks and opportunities to our investment activities
- Risks and opportunities to our insurance underwriting activities
- The impact of our own operations on the environment

(4.1.2.7) Please explain

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. 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 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. The Audit Committee assists the Board in overseeing Ally's accounting and financial reporting, including in connection with any climate-related issues.

[Fixed row]

(4.2) Does your organization's board have competency on environmental issues?

Climate change

(4.2.1) Board-level competency on this environmental issue

Select from:

- No, but we plan to within the next two years

(4.2.4) Primary reason for no board-level competency on this environmental issue

Select from:

- Not an immediate strategic priority

(4.2.5) Explain why your organization does not have a board with competence on this environmental issue

The Board and management regularly review all risks including those related to climate change. As Ally continues to mature 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.

Forests

(4.2.1) Board-level competency on this environmental issue

Select from:

- No, but we plan to within the next two years

(4.2.4) Primary reason for no board-level competency on this environmental issue

Select from:

- Not an immediate strategic priority

(4.2.5) Explain why your organization does not have a board with competence on this environmental issue

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

(4.2.1) Board-level competency on this environmental issue

Select from:

- No, but we plan to within the next two years

(4.2.4) Primary reason for no board-level competency on this environmental issue

Select from:

- Not an immediate strategic priority

(4.2.5) Explain why your organization does not have a board with competence on this environmental issue

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.
[Fixed row]

(4.3) Is there management-level responsibility for environmental issues within your organization?

Climate change

(4.3.1) Management-level responsibility for this environmental issue

Select from:

- Yes

Forests

(4.3.1) Management-level responsibility for this environmental issue

Select from:

- Yes

Water

(4.3.1) Management-level responsibility for this environmental issue

Select from:

Yes

Biodiversity

(4.3.1) Management-level responsibility for this environmental issue

Select from:

No, but we plan to within the next two years

(4.3.2) Primary reason for no management-level responsibility for environmental issues

Select from:

Not an immediate strategic priority

(4.3.3) Explain why your organization does not have management-level responsibility for environmental issues

Executive management regularly reviews all risks including those related to environmental impacts and dependencies. As Ally continues to mature its environmental risk management processes and mitigation strategies, ongoing education and overall understanding of the potential impacts of biodiversity related issues, will remain a priority.

[Fixed row]

(4.3.1) Provide the highest senior management-level positions or committees with responsibility for environmental issues (do not include the names of individuals).

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Executive level

Chief Executive Officer (CEO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- Assessing environmental dependencies, impacts, risks, and opportunities
- Managing environmental dependencies, impacts, risks, and opportunities

(4.3.1.3) Coverage of responsibilities

Select all that apply

- Dependencies, impacts, risks, and opportunities related to our banking activities
- Dependencies, impacts, risks, and opportunities related to our investing activities
- Dependencies, impacts, risks, and opportunities related to our insurance underwriting activities
- Dependencies, impacts, risks and opportunities related to our own operations and/or upstream value chain

(4.3.1.4) Reporting line

Select from:

- Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- Quarterly

(4.3.1.6) Please explain

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. The process by which the CEO is informed of, and monitors climate-related issues is through regular reports from the Chief Risk Officer and periodic updates from the Sustainability Risk Executive, as needed.

Forests

(4.3.1.1) Position of individual or committee with responsibility

Executive level

- Chief Executive Officer (CEO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- Assessing environmental dependencies, impacts, risks, and opportunities
- Managing environmental dependencies, impacts, risks, and opportunities

(4.3.1.3) Coverage of responsibilities

Select all that apply

- Dependencies, impacts, risks, and opportunities related to our banking activities
- Dependencies, impacts, risks, and opportunities related to our investing activities
- Dependencies, impacts, risks, and opportunities related to our insurance underwriting activities

(4.3.1.4) Reporting line

Select from:

- Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- As important matters arise

(4.3.1.6) Please explain

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 forest-related issues. The process by which the CEO is informed of, and monitors climate-related issues is through regular reports from the Chief Risk Officer and periodic updates from the Sustainability Risk Executive, as needed.

Water

(4.3.1.1) Position of individual or committee with responsibility

Executive level

- Chief Executive Officer (CEO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- Assessing environmental dependencies, impacts, risks, and opportunities
- Managing environmental dependencies, impacts, risks, and opportunities

(4.3.1.3) Coverage of responsibilities

Select all that apply

- Dependencies, impacts, risks, and opportunities related to our banking activities
- Dependencies, impacts, risks, and opportunities related to our investing activities
- Dependencies, impacts, risks, and opportunities related to our insurance underwriting activities

(4.3.1.4) Reporting line

Select from:

- Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- As important matters arise

(4.3.1.6) Please explain

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 water-related issues. The process by which the CEO is informed of, and monitors climate-related issues is through regular reports from the Chief Risk Officer and periodic updates from the Sustainability Risk Executive, as needed.

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Executive level

- Chief Risks Officer (CRO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- Assessing environmental dependencies, impacts, risks, and opportunities
- Managing environmental dependencies, impacts, risks, and opportunities

Strategy and financial planning

- Conducting environmental scenario analysis

(4.3.1.3) Coverage of responsibilities

Select all that apply

- Dependencies, impacts, risks, and opportunities related to our banking activities
- Dependencies, impacts, risks, and opportunities related to our investing activities
- Dependencies, impacts, risks, and opportunities related to our insurance underwriting activities
- Dependencies, impacts, risks and opportunities related to our own operations and/or upstream value chain

(4.3.1.4) Reporting line

Select from:

- Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- Quarterly

(4.3.1.6) Please explain

The Chief Risk Officer (CRO) oversees senior management's responsibility to execute on Ally's climate strategy in alignment with the enterprise risk framework, which recognizes Climate Risk as an emerging risk with transverse and dynamic risk characteristic. The process by which the CRO is informed of, and monitors climate-related issues is through regular reports from the Sustainability Risk Executive, as needed.

Forests

(4.3.1.1) Position of individual or committee with responsibility

Executive level

- Chief Risks Officer (CRO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- Assessing environmental dependencies, impacts, risks, and opportunities
- Managing environmental dependencies, impacts, risks, and opportunities

Strategy and financial planning

- Conducting environmental scenario analysis

(4.3.1.3) Coverage of responsibilities

Select all that apply

- Dependencies, impacts, risks, and opportunities related to our banking activities
- Dependencies, impacts, risks, and opportunities related to our investing activities
- Dependencies, impacts, risks, and opportunities related to our insurance underwriting activities

(4.3.1.4) Reporting line

Select from:

- Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- As important matters arise

(4.3.1.6) Please explain

The Chief Risk Officer (CRO) oversees senior management's responsibility to execute on Ally's climate strategy in alignment with the enterprise risk framework, including forests-related issues. The process by which the CRO is informed of, and monitors forests-related issues is through regular reports from the Sustainability Risk Executive, as needed

Water

(4.3.1.1) Position of individual or committee with responsibility

Executive level

- Chief Risks Officer (CRO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- Assessing environmental dependencies, impacts, risks, and opportunities
- Managing environmental dependencies, impacts, risks, and opportunities

Strategy and financial planning

- Conducting environmental scenario analysis

(4.3.1.3) Coverage of responsibilities

Select all that apply

- Dependencies, impacts, risks, and opportunities related to our banking activities
- Dependencies, impacts, risks, and opportunities related to our investing activities
- Dependencies, impacts, risks, and opportunities related to our insurance underwriting activities

(4.3.1.4) Reporting line

Select from:

- Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- As important matters arise

(4.3.1.6) Please explain

The Chief Risk Officer (CRO) oversees senior management's responsibility to execute on Ally's climate strategy in alignment with the enterprise risk framework, including water-related issues. The process by which the CRO is informed of, and monitors water-related issues is through regular reports from the Sustainability Risk Executive, as needed.

[Add row]

(4.5) Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?

	Provision of monetary incentives related to this environmental issue	% of total C-suite and board-level monetary incentives linked to the management of this environmental issue
Climate change	Select from: <input checked="" type="checkbox"/> Yes	0
Forests	Select from: <input checked="" type="checkbox"/> No, and we do not plan to introduce them in the next two years	`Numeric input [must be between [0 - 100]
Water	Select from: <input checked="" type="checkbox"/> No, and we do not plan to introduce them in the next two years	`Numeric input [must be between [0 - 100]

[Fixed row]

(4.5.1) Provide further details on the monetary incentives provided for the management of environmental issues (do not include the names of individuals).

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

Chief Risks Officer (CRO)

(4.5.1.2) Incentives

Select all that apply

- Other, please specify :Discretionary incentive pay plan with climate risk objectives.

(4.5.1.3) Performance metrics

Engagement

- Other engagement-related metrics, please specify

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

- The incentives are not linked to an incentive plan, or equivalent (e.g. discretionary bonus in the reporting year)

(4.5.1.5) Further details of incentives

Incentive-compensation decisions are determined by Company and individual performance to a balanced scorecard and pre-established risk and sustainability objectives.

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

N/A

[Add row]

(4.6) Does your organization have an environmental policy that addresses environmental issues?

(4.6.1) Does your organization have any environmental policies?

Select from:

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

(4.6.2) Primary reason for not having an environmental policy

Select from:

Other, please specify :Ally has identified and defined climate-related risk as an emerging risk.

(4.6.3) Explain why you do not have an environmental policy

Ally has identified and defined climate-related risk as an emerging risk. Pursuant to our ERM framework, emerging risks include newly-identified or evolving risk. These risks have the potential to impact Ally, but their nature and magnitude may not yet be fully known or may be rapidly changing. As a result, Emerging Risks may require the creation of new controls. Emerging Risks have the potential to materialize rapidly or over several years. Since 2021, Ally has expanded the use of climate risk scenario analysis to begin evaluating the extent to which climate risk drivers could exacerbate or accelerate existing risks to better understand climate risk materiality to Ally. The results will inform the strategy to incorporate climate into our existing enterprise risk management framework in a manner consistent with safe and sound business practices.

[Fixed row]

(4.7) Does the policy framework for the portfolio activities of your organization include environmental requirements that clients/investees need to meet, and/or exclusion policies?

Banking (Bank)

(4.7.1) Policy framework for portfolio activities include environmental requirements for clients/investees, and/or exclusion policies

Select from:

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

(4.7.2) Primary reason for not including both policies with environmental client/investee requirements and environmental exclusion policies in your policy framework for portfolio activities

Select from:

Not an immediate strategic priority

(4.7.3) Explain why the policy framework for your portfolio activities does not include both policies with environmental client/investee requirements and environmental exclusion policies

Ally continues to make progress on refining its climate risk 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.

Investing (Asset manager)

(4.7.1) Policy framework for portfolio activities include environmental requirements for clients/investees, and/or exclusion policies

Select from:

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

(4.7.2) Primary reason for not including both policies with environmental client/investee requirements and environmental exclusion policies in your policy framework for portfolio activities

Select from:

Not an immediate strategic priority

(4.7.3) Explain why the policy framework for your portfolio activities does not include both policies with environmental client/investee requirements and environmental exclusion policies

Ally continues to make progress on refining its climate risk 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.

Investing (Asset owner)

(4.7.1) Policy framework for portfolio activities include environmental requirements for clients/investees, and/or exclusion policies

Select from:

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

(4.7.2) Primary reason for not including both policies with environmental client/investee requirements and environmental exclusion policies in your policy framework for portfolio activities

Select from:

- Not an immediate strategic priority

(4.7.3) Explain why the policy framework for your portfolio activities does not include both policies with environmental client/investee requirements and environmental exclusion policies

Ally continues to make progress on refining its climate risk 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.

Insurance (Insurance company)

(4.7.1) Policy framework for portfolio activities include environmental requirements for clients/investees, and/or exclusion policies

Select from:

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

(4.7.2) Primary reason for not including both policies with environmental client/investee requirements and environmental exclusion policies in your policy framework for portfolio activities

Select from:

- Not an immediate strategic priority

(4.7.3) Explain why the policy framework for your portfolio activities does not include both policies with environmental client/investee requirements and environmental exclusion policies

Ally continues to make progress on refining its climate risk 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.

[Fixed row]

(4.8) Does your organization include covenants in financing agreements to reflect and enforce your environmental policies?

	Covenants included in financing agreements to reflect and enforce policies	Primary reason for not including covenants in financing agreements	Explain why your organization does not include covenants in financing agreements
	<i>Select from:</i> <input checked="" type="checkbox"/> No, and we do not plan to in the next two years	<i>Select from:</i> <input checked="" type="checkbox"/> Not an immediate strategic priority	<i>As Ally's own climate-related policies mature, Ally will evaluate its ability to incorporate covenants into financing agreements in the future.</i>

[Fixed row]

(4.9) Does your organization offer its employees a pension scheme that incorporates environmental criteria in its holdings?

Climate change

(4.9.1) Pension scheme incorporates environmental criteria in its holdings

Select from:

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

(4.9.3) Explain why your organization does not incorporate criteria for this environmental issue into the pension scheme holdings

Ally recognizes that climate-related practices are increasingly important to the financial services industry. Ally does not currently offer retirement program elections related to environmental issues, but as Ally's sustainability requirements mature, Ally will consider ways to balance climate considerations with the fiduciary responsibilities of the programs.

Forests

(4.9.1) Pension scheme incorporates environmental criteria in its holdings

Select from:

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

(4.9.3) Explain why your organization does not incorporate criteria for this environmental issue into the pension scheme holdings

Ally recognizes that climate-related practices are increasingly important to the financial services industry. Ally does not currently offer retirement program elections related to environmental issues, but as Ally's sustainability requirements mature, Ally will consider ways to balance environmental considerations with the fiduciary responsibilities of the programs.

Water

(4.9.1) Pension scheme incorporates environmental criteria in its holdings

Select from:

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

(4.9.3) Explain why your organization does not incorporate criteria for this environmental issue into the pension scheme holdings

Ally recognizes that climate-related practices are increasingly important to the financial services industry. Ally does not currently offer retirement program elections related to environmental issues, but as Ally's sustainability requirements mature, Ally will consider ways to balance environmental considerations with the fiduciary responsibilities of the programs.

[Fixed row]

(4.10) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

	<p>Are you a signatory or member of any environmental collaborative frameworks or initiatives?</p>
	<p>Select from: <input checked="" type="checkbox"/> No, and we do not plan to within the next two years</p>

[Fixed row]

(4.11) In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?

(4.11.1) External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

Select all that apply

Yes, we engaged indirectly through, and/or provided financial or in-kind support to a trade association or other intermediary organization or individual whose activities could influence policy, law, or regulation

(4.11.2) Indicate whether your organization has a public commitment or position statement to conduct your engagement activities in line with global environmental treaties or policy goals

Select from:

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

(4.11.5) Indicate whether your organization is registered on a transparency register

Select from:

No

(4.11.8) Describe the process your organization has in place to ensure that your external engagement activities are consistent with your environmental commitments and/or 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.

[Fixed row]

(4.11.2) Provide details of your indirect engagement on policy, law, or regulation that may (positively or negatively) impact the environment through trade associations or other intermediary organizations or individuals in the reporting year.

Row 1

(4.11.2.1) Type of indirect engagement

Select from:

Indirect engagement via a trade association

(4.11.2.4) Trade association

North America

Other trade association in North America, please specify :American Bankers Association (ABA)

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

- Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

- No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual'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 ongoing policy considerations specific to a changing climate. Ally's participation in these organizations provides the opportunity to influence and develop consistent taxonomy, framework and standards which will support well informed and relevant policy and regulatory proposals.

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

- Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

- Paris Agreement

Row 2

(4.11.2.1) Type of indirect engagement

Select from:

- Indirect engagement via a trade association

(4.11.2.4) Trade association

North America

- Other trade association in North America, please specify :The Bank Policy Institute (BPI).

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

- Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

- Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

- No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual'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 ongoing policy considerations specific to a changing climate. Ally's participation in these organizations provides the opportunity to influence and develop consistent taxonomy, framework and standards which will support well informed and relevant policy and regulatory proposals

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

- Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

- Paris Agreement

Row 3

(4.11.2.1) Type of indirect engagement

Select from:

- Indirect engagement via a trade association

(4.11.2.4) Trade association

North America

- Other trade association in North America, please specify :Risk Management Association (RMA).

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

- Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

- Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

- No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual'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 ongoing policy considerations specific to a changing climate. Ally's participation in these organizations provides the opportunity to influence and develop consistent taxonomy, framework and standards which will support well informed and relevant policy and regulatory proposals

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

- Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

- Paris Agreement

[Add row]

(4.12.1) Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.

Row 1

(4.12.1.1) Publication

Select from:

- In other regulatory filings

(4.12.1.3) Environmental issues covered in publication

Select all that apply

- Climate change

(4.12.1.4) Status of the publication

Select from:

- Complete

(4.12.1.5) Content elements

Select all that apply

- Governance
- Risks & Opportunities
- Strategy
- Value chain engagement

(4.12.1.6) Page/section reference

2023 Annual Report (30-31)

(4.12.1.8) Comment

N/A

Row 2

(4.12.1.1) Publication

Select from:

- In other regulatory filings

(4.12.1.3) Environmental issues covered in publication

Select all that apply

- Climate change

(4.12.1.4) Status of the publication

Select from:

- Complete

(4.12.1.5) Content elements

Select all that apply

- Governance
- Risks & Opportunities
- Strategy
- Value chain engagement

(4.12.1.6) Page/section reference

2024 Proxy Statement (13; 24; 41-42; 70-71)

(4.12.1.8) Comment

N/A

Row 3

(4.12.1.1) Publication

Select from:

- In mainstream reports

(4.12.1.3) Environmental issues covered in publication

Select all that apply

- Climate change

(4.12.1.4) Status of the publication

Select from:

- Complete

(4.12.1.5) Content elements

Select all that apply

- Governance
- Risks & Opportunities
- Strategy
- Value chain engagement
- Emissions figures

(4.12.1.6) Page/section reference

2023 CSR (44-48; 55-72)

(4.12.1.7) Attach the relevant publication

ally-corporate-social-responsibility-report-2023_Optimized4.pdf

(4.12.1.8) Comment

N/A

[Add row]

C5. Business strategy

(5.1) Does your organization use scenario analysis to identify environmental outcomes?

Climate change

(5.1.1) Use of scenario analysis

Select from:

Yes

(5.1.2) Frequency of analysis

Select from:

Not defined

Forests

(5.1.1) Use of scenario analysis

Select from:

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

(5.1.3) Primary reason why your organization has not used scenario analysis

Select from:

Not an immediate strategic priority

(5.1.4) Explain why your organization has not used scenario analysis

Ally has not evaluated forest-related environmental outcomes and their potential strategic impact. Ally recognizes the importance of forest-related issues and may consider opportunities for analysis in the future.

Water

(5.1.1) Use of scenario analysis

Select from:

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

(5.1.3) Primary reason why your organization has not used scenario analysis

Select from:

- Not an immediate strategic priority

(5.1.4) Explain why your organization has not used scenario analysis

Ally has not evaluated water-related environmental outcomes and their potential strategic impact. Ally recognizes the importance of water-related issues and may consider opportunities for analysis in the future.

[Fixed row]

(5.1.1) Provide details of the scenarios used in your organization's scenario analysis.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

- RCP 4.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

- No SSP used

(5.1.1.3) Approach to scenario

Select from:

- Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

- Product-level

(5.1.1.5) Risk types considered in scenario

Select all that apply

- Acute physical

(5.1.1.6) Temperature alignment of scenario

Select from:

- 1.6°C - 1.9°C

(5.1.1.7) Reference year

2022

(5.1.1.8) Timeframes covered

Select all that apply

- 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

- Climate change (one of five drivers of nature change)

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The analysis assessed borrower level credit impacts to December 2022 consumer and commercial real estate loan portfolios from a severe hurricane in the northeast region of the United States. To evaluate the potential range of effects from climate change over long-term time horizons, characteristics of a climate change impacted hurricane in the year 2050 were assumed, under two potential global warming scenarios. The online tool 'Climate Impact Explorer', published by the global climate science and policy institute Climate Analytics, was utilized to derive hurricane damage by incorporating future increases in damage due to climate change into catastrophe model outputs. Damage is assumed to impact the physical structure of the asset for this exercise; property land value was not evaluated. Due to limitations of readily available loan-level data on insurance information, a deductible of 5000 was assumed for properties requiring National Flood Insurance Program coverage.

(5.1.1.11) Rationale for choice of scenario

In 2022, Ally conducted an analysis of potential impacts from river flooding and wildfires on our commercial insurance portfolio. In 2023, Ally endeavored to expand our climate scenario analysis capabilities by evaluating additional business lines and incorporating additional modeling capabilities. By conducting a physical climate risk scenario analysis that was included in the FRB Pilot Climate Scenario Analysis exercise, Ally was able to assess our own relevant consumer and commercial real estate portfolios exposed to hurricane risk that may be affected by climate change. While Ally was not a participant in the FRB's exercise, by performing our scenario analysis in parallel, Ally was able to compare our approaches, results, challenges, and data gaps to those of the participants included in the FRB Pilot Climate Scenario exercise

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

RCP 8.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

No SSP used

(5.1.1.3) Approach to scenario

Select from:

- Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

- Product-level

(5.1.1.5) Risk types considered in scenario

Select all that apply

- Acute physical

(5.1.1.6) Temperature alignment of scenario

Select from:

- 3.5°C - 3.9°C

(5.1.1.7) Reference year

2022

(5.1.1.8) Timeframes covered

Select all that apply

- 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

- Climate change (one of five drivers of nature change)

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The analysis assessed borrower level credit impacts to December 2022 consumer and commercial real estate loan portfolios from a severe hurricane in the northeast region of the United States. To evaluate the potential range of effects from climate change over long-term time horizons, characteristics of a climate change impacted hurricane in the year 2050 were assumed, under two potential global warming scenarios. The online tool 'Climate Impact Explorer', published by the global climate science and policy institute Climate Analytics, was utilized to derive hurricane damage by incorporating future increases in damage due to climate change into catastrophe model outputs. Damage is assumed to impact the physical structure of the asset for this exercise; property land value was not evaluated. Due to limitations of readily available loan-level data on insurance information, a deductible of 5000 was assumed for properties requiring National Flood Insurance Program coverage.

(5.1.1.11) Rationale for choice of scenario

In 2022, Ally conducted an analysis of potential impacts from river flooding and wildfires on our commercial insurance portfolio. In 2023, Ally endeavored to expand our climate scenario analysis capabilities by evaluating additional business lines and incorporating additional modeling capabilities. By conducting a physical climate risk scenario analysis that was included in the FRB Pilot Climate Scenario Analysis exercise, Ally was able to assess our own relevant consumer and commercial real estate portfolios exposed to hurricane risk that may be affected by climate change. While Ally was not a participant in the FRB's exercise, by performing our scenario analysis in parallel, Ally was able to compare our approaches, results, challenges, and data gaps to those of the participants included in the FRB Pilot Climate Scenario exercise
[Add row]

(5.1.2) Provide details of the outcomes of your organization's scenario analysis.

Climate change

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply

Capacity building

(5.1.2.2) Coverage of analysis

Select from:

Portfolio

(5.1.2.3) Summarize the outcomes of the scenario analysis and any implications for other environmental issues

Ally conducted a physical risk scenario analysis leveraging a portion of the guidance published by the Federal Reserve Board (FRB) Pilot Climate Scenario Analysis exercise outlining specific physical risk climate scenarios. This exercise allowed us to expand the business lines evaluated in climate scenario analysis to include consumer and commercial real estate portfolios, and compare our approaches, results, challenges, and data gaps to those of the participants included in exercise. Ally incorporated, for the first time, the use of catastrophe models and credit models to assess the credit impacts of a potential hazard affected by climate. This exercise continued to build our capacity for climate scenario analysis which provides valuable insights into our potential climate risk exposure and helps inform future mitigation strategies.

[Fixed row]

(5.2) Does your organization's strategy include a climate transition plan?

(5.2.1) Transition plan

Select from:

No and we do not plan to develop a climate transition plan within the next two years

(5.2.15) Primary reason for not having a climate transition plan that aligns with a 1.5°C world

Select from:

Not an immediate strategic priority

(5.2.16) Explain why your organization does not have a climate transition plan that aligns with a 1.5°C world

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.

[Fixed row]

(5.3) Have environmental risks and opportunities affected your strategy and/or financial planning?

(5.3.1) Environmental risks and/or opportunities have affected your strategy and/or financial planning

Select from:

- Yes, both strategy and financial planning

(5.3.2) Business areas where environmental risks and/or opportunities have affected your strategy

Select all that apply

- Products and services
- Upstream/downstream value chain
- Operations

[Fixed row]

(5.3.1) Describe where and how environmental risks and opportunities have affected your strategy.

Products and services

(5.3.1.1) Effect type

Select all that apply

- Risks
- Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

- Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Ally has identified and defined climate-related risk as an emerging risk. Pursuant to our ERM framework, emerging risks include newly-identified or evolving risk. These risks have the potential to impact Ally, but their nature and magnitude may not yet be fully known or may be rapidly changing. As a result, Emerging Risks may require the creation of new controls. Emerging Risks have the potential to materialize rapidly or over several years. As Ally seeks to evolve and mature its environmental strategy, the company is evaluating climate-related opportunities that deliver value for its stakeholders. Ally is working strategically to integrate climate-related insights into its decision-making where relevant; including exploring opportunities to develop products and services that create environmental and social

benefits, such as: - Dealer Financial Services provides loans to dealerships to grow their electric vehicle infrastructure needs as well as finance and lease products for consumers to purchase electronic vehicles. - Vehicle service contract offering to provide coverage for EV drivers.

Upstream/downstream value chain

(5.3.1.1) Effect type

Select all that apply

- Risks
- Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

- Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Ally has identified and defined climate-related risk as an emerging risk Pursuant to our ERM framework, emerging risks include newly-identified or evolving risk. These risks have the potential to impact Ally, but their nature and magnitude may not yet be fully known or may be rapidly changing. As a result, Emerging Risks may require the creation of new controls. Emerging Risks have the potential to materialize rapidly or over several years. As Ally seeks to evolve and mature its environmental strategy, the company is evaluating climate-related opportunities that deliver value for its stakeholders. Ally is working strategically to integrate climate-related insights into its decision-making where relevant and striving to help our suppliers do the same. In 2023, Ally joined the Sustainable Purchasing Leadership Council, a global community of purchasers, suppliers, advocates and experts dedicated to driving positive impact through sustainable procurement. The membership enables access to resources, partnerships and capacity building tools as Ally takes steps to establish a supply chain sustainability program. Additionally, Ally initiated a relationship with a sustainability ratings provider to improve our ability to evaluate the sustainability performance of certain key third parties within our supply chain.

Operations

(5.3.1.1) Effect type

Select all that apply

- Risks
- Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area*Select all that apply* Climate change**(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area**

Ally has identified and defined climate-related risk as an emerging risk. Pursuant to our ERM framework, emerging risks include newly-identified or evolving risks. These risks have the potential to impact Ally, but their nature and magnitude may not yet be fully known or may be rapidly changing. As a result, emerging risks may require the creation of new controls. Emerging risks have the potential to materialize rapidly or over several years. As Ally seeks to evolve and mature its environmental strategy, the company is evaluating climate-related opportunities that deliver value for its stakeholders. Ally is working strategically to integrate climate-related insights into its decision-making where relevant; including exploring opportunities that focus on more sustainable operations: - Testing environmental processes and technologies across Ally-owned facilities to identify emission, waste and water reduction initiatives and determine which will have the greatest impact - Installed EV charging stations, now over 53% of employees at an Ally location have access to EV chargers - Facilitated an energy consumption test 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 - Centralized trash and composting to divert waste from landfills - Enhanced strategic approach when identifying new office locations and/or renovation initiatives to include sustainability improvements, where possible. The most recent renovation initiative in Lewisville, Texas, included the following sustainability enhancements: implementation of centralized trash and composting program; planned installation of EV charging stations; installed solar panels that will generate renewable energy to offset almost 90% of the building's electrical needs and provide weather protection to over 300 parking spaces; upgraded existing gas-powered HVAC system to a 25% more efficient electric system, reducing overall emissions; promoted biodiversity with the landscape redesign by planting native species that have a lower water intensity and will attract pollinators

[Add row]

(5.3.2) Describe where and how environmental risks and opportunities have affected your financial planning.**Row 1****(5.3.2.1) Financial planning elements that have been affected***Select all that apply* Revenues Capital expenditures**(5.3.2.2) Effect type**

Select all that apply

- Risks
- Opportunities

(5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

Select all that apply

- Climate change

(5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements

Ally has identified and defined climate-related risk as an emerging risk. Pursuant to our ERM framework, emerging risks include newly-identified or evolving risks. These risks have the potential to impact Ally, but their nature and magnitude may not yet be fully known or may be rapidly changing. As a result, emerging risks may require the creation of new controls. Emerging risks have the potential to materialize rapidly or over several years. Climate-related risks and opportunities have influenced Ally's financial planning process for both Capital Expenditures and Revenues. Capital Expenditures to facilitate sustainable operations of Ally-owned sites.

- *Installed additional EV charging stations, now over 53% of employees at an Ally location have access to EV chargers.*
- *Installation of solar panels at Ally's facility in Lewisville, Texas which will generate renewable energy to offset almost 90% of the building's electrical needs and provide weather protection to over 300 parking spaces*

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. 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 Dealer 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.

[Add row]

(5.10) Does your organization use an internal price on environmental externalities?

	Use of internal pricing of environmental externalities	Primary reason for not pricing environmental externalities
	<i>Select from:</i> <input checked="" type="checkbox"/> No, and we do not plan to in the next two years	<i>Select from:</i> <input checked="" type="checkbox"/> Not an immediate strategic priority

[Fixed row]

(5.11) Do you engage with your value chain on environmental issues?

Clients

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

Yes

Investees

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

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

(5.11.3) Primary reason for not engaging with this stakeholder on environmental issues

Select from:

Not an immediate strategic priority

(5.11.4) Explain why you do not engage with this stakeholder on environmental issues

Ally has not had the opportunity to evaluate opportunities. 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.

Suppliers

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

Yes

(5.11.2) Environmental issues covered

Select all that apply

Climate change

Smallholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

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

(5.11.3) Primary reason for not engaging with this stakeholder on environmental issues

Select from:

Not an immediate strategic priority

(5.11.4) Explain why you do not engage with this stakeholder on environmental issues

Ally has not had the opportunity to evaluate opportunities. 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.

Investors and shareholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

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

(5.11.3) Primary reason for not engaging with this stakeholder on environmental issues

Select from:

- Not an immediate strategic priority

(5.11.4) Explain why you do not engage with this stakeholder on environmental issues

Ally has not had the opportunity to evaluate opportunities. 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.

Other value chain stakeholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

- Yes

(5.11.2) Environmental issues covered

Select all that apply

- Climate change
- Forests
- Water
- Plastics

[Fixed row]

(5.11.3) Provide details of your environmental engagement strategy with your clients.

Row 1

(5.11.3.1) Type of clients

Select from:

- Clients of Asset Managers

(5.11.3.2) Environmental issues covered by the engagement strategy

Select all that apply

- Climate change

(5.11.3.3) Type and details of engagement

Information collection

- Other information collection activity, please specify

(5.11.3.4) % of client-associated scope 3 emissions as reported in question 12.1.1

Select from:

- None

(5.11.3.5) % of portfolio covered in relation to total portfolio value

Select from:

- 100%

(5.11.3.6) Explain the rationale for the coverage of your engagement

Ally Invest Advisors seeks to provide investment advice and recommendations that are aligned with each client's preferences, which include their financial goals, risk tolerances, and values. As part of the onboarding process, Ally Invest Advisors requests clients' preferences regarding socially responsible investments and impact portfolios. This information allows Ally Invest Advisors to better match clients to portfolios that align with their preferences, ensuring that their investments meet their financial objectives and their values.

(5.11.3.7) Describe how you communicate your engagement strategy to your clients and/or to the public

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. As part of onboarding conversations for prospective Personal advice clients, information is sought by the Personal advice 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.

(5.11.3.9) Staff in your organization carrying out the engagement

Select all that apply

Specialized in-house engagement teams

(5.11.3.11) Effect of engagement, including measures of success

If Ally Invest Advisors' prospective clients choose the Socially Responsible Investments option, Ally Invest Advisors recommends an ESG portfolio that includes ESG related ETFs, which use the MSCI Focus Benchmark. For prospective Personal advice clients interested in Impact Portfolios, defined as diversified asset allocation strategies designed for purpose and impact, such as exposure to environmental, social and governance ("ESG") ETFs, the Personal advice Advisor includes those specific portfolio types for consideration.

(5.11.3.12) Escalation process for engagement when dialogue is failing

Select from:

No, we don't have an escalation process

[Add row]

(5.11.7) Provide further details of your organization's supplier engagement on environmental issues.

Climate change

(5.11.7.2) Action driven by supplier engagement

Select from:

Other, please specify :Capture additional sustainability information from suppliers and improve data quality.

(5.11.7.3) Type and details of engagement

Capacity building

- Provide training, support and best practices on how to measure GHG emissions
- Provide training, support and best practices on how to mitigate environmental impact

Information collection

- Other information collection activity, please specify :Initiated a new relationship with an independent sustainability ratings and assessment provider to begin evaluating the sustainability performance of third parties within our supply chain

(5.11.7.4) Upstream value chain coverage

Select all that apply

- Tier 1 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

- Unknown

(5.11.7.6) % of tier 1 supplier-related scope 3 emissions covered by engagement

Select from:

- Unknown

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

Initiated a new relationship with an independent sustainability ratings and assessment provider to begin evaluating the sustainability performance of third parties within our supply chain.

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

Yes

[Add row]

(5.11.9) Provide details of any environmental engagement activity with other stakeholders in the value chain.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

Other value chain stakeholder, please specify :Employees and the communities in which the company operates.

(5.11.9.2) Type and details of engagement

Education/Information sharing

Educate and work with stakeholders on understanding and measuring exposure to environmental risks

Share information on environmental initiatives, progress and achievements

Innovation and collaboration

Other innovation and collaboration, please specify :In 2023, Ally collaborated with Envision Charlotte and Bee Downtown to launch a community apiary, comprised of three beehives. This project underscores how critical biodiversity conservation is to preserve a sustainable future for all.

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

Unknown

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

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.

(5.11.9.6) Effect of engagement and measures of success

Increased environmental volunteerism through Green Teams with 3,500 volunteer hours in 2023, up 52% from the year prior, focused on land and water use, community impact, air quality, biodiversity, and recycling.

[Add row]

(5.14) Do your external asset managers have to meet environmental requirements as part of your organization's selection process and engagement?

(5.14.1) External asset managers have to meet specific environmental requirements as part of the selection process and engagement

Select from:

No, and we do not plan to include environmental requirements in the next two years

(5.14.3) Primary reason for not including environmental requirements in selection process and engagement with external asset managers

Select from:

Not an immediate strategic priority

(5.14.4) Explain why environmental requirements are not included in selection process and engagement with external asset managers

Ally recognizes that climate-related practices are increasingly important to the financial services industry. Ally has not yet requested any climate-related information directly from its long-term asset managers, but as Ally's sustainability requirements mature, Ally will consider ways to incorporate these practices into the oversight of asset managers.

[Fixed row]

(5.15) Does your organization exercise voting rights as a shareholder on environmental issues?

(5.15.1) Exercise voting rights as a shareholder on environmental issues

Select from:

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

(5.15.2) Primary reason for not exercising voting rights as a shareholder on environmental issues

Select from:

Not an immediate strategic priority

(5.15.3) Explain why you do not exercise voting rights on environmental issues

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.

[Fixed row]

C6. Environmental Performance - Consolidation Approach

(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.

Climate change

(6.1.1) Consolidation approach used

Select from:

Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

The operational control consolidation approach enables Ally to focus on emissions sources that we can directly influence.

Forests

(6.1.1) Consolidation approach used

Select from:

Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

As Ally continues to mature our calculation of environmental performance data, including forests, we plan to use an operational control consolidation approach.

Water

(6.1.1) Consolidation approach used

Select from:

Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

As Ally continues to mature our calculation of environmental performance data, including water, we plan to use an operational control consolidation approach.

Plastics

(6.1.1) Consolidation approach used

Select from:

Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

As Ally continues to mature our calculation of environmental performance data, including plastics, we plan to use an operational control consolidation approach.

Biodiversity

(6.1.1) Consolidation approach used

Select from:

Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

As Ally continues to mature our calculation of environmental performance data, including biodiversity, we plan to use an operational control consolidation approach.
[Fixed row]

C7. Environmental performance - Climate Change

(7.1.1) 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?

	Has there been a structural change?
	<i>Select all that apply</i> <input checked="" type="checkbox"/> No

[Fixed row]

(7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

(7.1.2.1) Change(s) in methodology, boundary, and/or reporting year definition?

Select all that apply

Yes, a change in methodology

(7.1.2.2) Details of methodology, boundary, and/or reporting year definition change(s)

Ally has recategorized a portion of Scope 3 Category 1 Purchased Goods and Services emissions as Scope 3 Category 3 Upstream Transportation and Distribution emissions generated from auto freight logistics to more accurately represent the emissions source. Additionally, Ally has included emissions from employee telework in Scope 3 Category 7 Employee Commuting.

[Fixed row]

(7.1.3) Have your organization's base year emissions and past years' emissions been recalculated as a result of any changes or errors reported in 7.1.1 and/or 7.1.2?

(7.1.3.1) Base year recalculation

Select from:

Yes

(7.1.3.2) Scope(s) recalculated

Select all that apply

Scope 3

(7.1.3.3) Base year emissions recalculation policy, including significance threshold

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.

(7.1.3.4) Past years' recalculation

Select from:

Yes

[Fixed row]

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

(7.3.1) Scope 2, location-based

Select from:

We are reporting a Scope 2, location-based figure

(7.3.2) Scope 2, market-based

Select from:

We are reporting a Scope 2, market-based figure

(7.3.3) Comment

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

[Fixed row]

(7.4.1) 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.

Row 1

(7.4.1.1) Source of excluded emissions

Fugitive emissions from refrigerants

(7.4.1.2) Scope(s) or Scope 3 category(ies)

Select all that apply

Scope 1

(7.4.1.3) Relevance of Scope 1 emissions from this source

Select from:

Emissions are not relevant

(7.4.1.10) Explain why this source is excluded

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

(7.4.1.11) Explain how you estimated the percentage of emissions this excluded source represents

Refrigerant data is not currently available for Ally operated facilities. Given the nature of the business and assessment of facilities, emissions from refrigerants were determined to be de minimis. As Ally continues to develop its data collection capabilities, inclusion of fugitive emissions will be re-assessed for inclusion in the future.
[Add row]

(7.5) Provide your base year and base year emissions.

Scope 1

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO₂e)

4139

(7.5.3) Methodological details

Ally's Scope 1 emissions sources include leased vehicles and stationary combustion within Ally facilities. The fuel-based method is used to calculate emissions from fleet vehicles. Fuel invoices are collected and used in stationary combustion emissions calculations. If facility invoicing data is unavailable, portfolio average intensity estimates are used.

Scope 2 (location-based)

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

7822

(7.5.3) Methodological details

Ally's Scope 2 emissions are calculated using facility energy invoices and eGRID emissions factors. If invoicing data is unavailable, portfolio average intensity estimates are used.

Scope 2 (market-based)

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Ally's Scope 2 emissions are calculated using facility energy invoices and eGRID emissions factors. If invoicing data is unavailable, portfolio average intensity estimates are used.

Scope 3 category 1: Purchased goods and services

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

176295

(7.5.3) Methodological details

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.

Scope 3 category 2: Capital goods

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

27694

(7.5.3) Methodological details

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.

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

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

3

Scope 3 category 4: Upstream transportation and distribution

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

18787

(7.5.3) Methodological details

Ally assessed procurement spend on upstream truck transportation. Spend was categorized into NAICS industry sector 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.

Scope 3 category 5: Waste generated in operations

(7.5.1) Base year end

12/31/2020

Scope 3 category 6: Business travel

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

1824

Scope 3 category 7: Employee commuting

(7.5.1) Base year end

12/31/2020

(7.5.2) Base year emissions (metric tons CO2e)

8541

(7.5.3) Methodological details

Based on Ally's annual screening results, 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 (using zip codes) 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. Telework emissions were calculated using occupancy data to estimate the number of teleworking days. Emissions calculation methodology is based on the Eco-Act, "Homeworking Emissions Whitepaper".

Scope 3 category 8: Upstream leased assets

(7.5.1) Base year end

12/31/2020

Scope 3 category 9: Downstream transportation and distribution

(7.5.1) Base year end

12/31/2020

Scope 3 category 10: Processing of sold products

(7.5.1) Base year end

12/31/2020

Scope 3 category 11: Use of sold products

(7.5.1) Base year end

12/31/2020

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

(7.5.1) Base year end

12/30/2020

Scope 3 category 13: Downstream leased assets

(7.5.1) Base year end

12/31/2020

Scope 3 category 14: Franchises

(7.5.1) Base year end

12/31/2020
[Fixed row]

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

Reporting year

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

5402

(7.6.3) Methodological details

Ally's Scope 1 emissions sources include leased vehicles and stationary combustion within Ally facilities. The fuel-based method is used to calculate emissions from fleet vehicles. Fuel invoices are collected and used in stationary combustion emissions calculations. If facility invoicing data is unavailable, portfolio average intensity estimates are used.

[Fixed row]

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

Reporting year

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

9016

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e) (if applicable)

0

(7.7.4) Methodological details

Ally's Scope 2 emissions are calculated using facility energy invoices and eGRID emissions factors. If invoicing data is unavailable, portfolio average intensity estimates are used.

[Fixed row]

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

Purchased goods and services

(7.8.1) Evaluation status

Select from:

Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

165872

(7.8.3) Emissions calculation methodology

Select all that apply

- Spend-based method

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

0

(7.8.5) 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

(7.8.1) Evaluation status

Select from:

- Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

10611

(7.8.3) Emissions calculation methodology

Select all that apply

- Spend-based method

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

0

(7.8.5) 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.

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

(7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

(7.8.5) Please explain

Based on Ally's annual screening results, 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

(7.8.1) Evaluation status

Select from:

Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

14251

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

0

(7.8.5) Please explain

Ally assessed procurement spend on upstream truck transportation. Spend was categorized into NAICS industry sector 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.

Waste generated in operations

(7.8.1) Evaluation status

Select from:

- Not relevant, explanation provided

(7.8.5) Please explain

Based on Ally's annual screening results, waste generation is not a material portion of Scope 3 emissions because of the nature of Ally's operations as a financial services company.

Business travel

(7.8.1) Evaluation status

Select from:

- Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO₂e)

6597

(7.8.3) Emissions calculation methodology

Select all that apply

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

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

99

(7.8.5) Please explain

Based on Ally's annual screening results, 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, rideshare/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**(7.8.1) Evaluation status**

Select from:

 Relevant, calculated**(7.8.2) Emissions in reporting year (metric tons CO₂e)**

12471

(7.8.3) Emissions calculation methodology

Select all that apply

 Distance-based method Other, please specify**(7.8.5) Please explain**

Based on Ally's annual screening results, 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 (using zip codes) 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. Telework emissions

were calculated using occupancy data to estimate the number of teleworking days. Emissions calculation methodology is based on the Eco-Act, "Homeworking Emissions Whitepaper".

Upstream leased assets

(7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

(7.8.5) 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

(7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

(7.8.5) Please explain

Based on Ally's annual screening results, 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

(7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

(7.8.5) Please explain

Based on Ally's annual screening results, 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

(7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

(7.8.5) Please explain

Based on Ally's annual screening results, 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

(7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

(7.8.5) Please explain

Based on Ally's annual screening results, end of life treatment 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

(7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

(7.8.5) 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, downstream leased assets are not a material portion of Scope 3 emissions as Ally does not lease assets to other entities.

Franchises

(7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

(7.8.5) Please explain

*Based on Ally's annual screening results, franchises are not a material portion of Scope 3 emissions as Ally does not operate any franchises.
[Fixed row]*

(7.8.1) Disclose or restate your Scope 3 emissions data for previous years.

Past year 1

(7.8.1.1) End date

12/31/2022

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

153633

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

8297

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

11291

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

6312

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

11883

Past year 2

(7.8.1.1) End date

12/31/2021

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

160499

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

28680

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

17467

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

2438

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

5443
 [Fixed row]

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

	Verification/assurance status
Scope 1	Select from: <input checked="" type="checkbox"/> Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	Select from: <input checked="" type="checkbox"/> Third-party verification or assurance process in place
Scope 3	Select from: <input checked="" type="checkbox"/> Third-party verification or assurance process in place

[Fixed row]

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

Row 1

(7.9.1.1) Verification or assurance cycle in place

Select from:
 Annual process

(7.9.1.2) Status in the current reporting year

Select from:

Complete

(7.9.1.3) Type of verification or assurance

Select from:

Limited assurance

(7.9.1.4) Attach the statement

Ally Financial 2023 - Apex CDP Verification Statement Limited_05152024.pdf

(7.9.1.5) Page/section reference

Verification Opinion Declaration Greenhouse Gas Emissions (Full Document)

(7.9.1.6) Relevant standard

Select from:

ISO14064-3

(7.9.1.7) Proportion of reported emissions verified (%)

100

[Add row]

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

Row 1

(7.9.2.1) Scope 2 approach

Select from:

- Scope 2 location-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

- Annual process

(7.9.2.3) Status in the current reporting year

Select from:

- Complete

(7.9.2.4) Type of verification or assurance

Select from:

- Limited assurance

(7.9.2.5) Attach the statement

Ally Financial 2023 - Apex CDP Verification Statement Limited_05152024.pdf

(7.9.2.6) Page/ section reference

Verification Opinion Declaration Greenhouse Gas Emissions (Full Document).

(7.9.2.7) Relevant standard

Select from:

- ISO14064-3

(7.9.2.8) Proportion of reported emissions verified (%)

100

Row 2

(7.9.2.1) Scope 2 approach

Select from:

- Scope 2 market-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

- Annual process

(7.9.2.3) Status in the current reporting year

Select from:

- Complete

(7.9.2.4) Type of verification or assurance

Select from:

- Limited assurance

(7.9.2.5) Attach the statement

Ally Financial 2023 - Apex CDP Verification Statement Limited_05152024.pdf

(7.9.2.6) Page/ section reference

Verification Opinion Declaration Greenhouse Gas Emissions (Full Document).

(7.9.2.7) Relevant standard

Select from:

- ISO14064-3

(7.9.2.8) Proportion of reported emissions verified (%)

100

[Add row]

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

Row 1

(7.9.3.1) Scope 3 category

Select all that apply

- Scope 3: Purchased goods and services
- Scope 3: Capital goods
- Scope 3: Upstream transportation and distribution
- Scope 3: Business travel
- Scope 3: Employee commuting

(7.9.3.2) Verification or assurance cycle in place

Select from:

- Annual process

(7.9.3.3) Status in the current reporting year

Select from:

- Complete

(7.9.3.4) Type of verification or assurance

Select from:

Limited assurance

(7.9.3.5) Attach the statement

Ally Financial 2023 - Apex CDP Verification Statement Limited_05152024.pdf

(7.9.3.6) Page/section reference

Verification Opinion Declaration Greenhouse Gas Emissions (Full Document).

(7.9.3.7) Relevant standard

Select from:

ISO14064-3

(7.9.3.8) Proportion of reported emissions verified (%)

100

[Add row]

(7.10.1) 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.

Other emissions reduction activities

(7.10.1.1) Change in emissions (metric tons CO₂e)

1095

(7.10.1.2) Direction of change in emissions

Select from:

Decreased

(7.10.1.3) Emissions value (percentage)

7.1

(7.10.1.4) Please explain calculation

The primary drivers of decreased Scope 1 & Scope 2 emissions are reduced electricity usage due to HVAC run-time optimization, shut down of a facility for construction, and consolidation of office buildings.

[Fixed row]

(7.30) 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)	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired electricity	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired heat	Select from: <input checked="" type="checkbox"/> No
Consumption of purchased or acquired steam	Select from: <input checked="" type="checkbox"/> No
Consumption of purchased or acquired cooling	Select from:

	<p>Indicate whether your organization undertook this energy-related activity in the reporting year</p>
	<p><input checked="" type="checkbox"/> No</p>
<p>Generation of electricity, heat, steam, or cooling</p>	<p>Select from: <input checked="" type="checkbox"/> No</p>

[Fixed row]

(7.30.1) Report your organization’s energy consumption totals (excluding feedstocks) in MWh.

Consumption of fuel (excluding feedstock)

(7.30.1.1) Heating value

Select from:

HHV (higher heating value)

(7.30.1.2) MWh from renewable sources

0

(7.30.1.3) MWh from non-renewable sources

17145

(7.30.1.4) Total (renewable and non-renewable) MWh

17145

Consumption of purchased or acquired electricity

(7.30.1.1) Heating value

Select from:

HHV (higher heating value)

(7.30.1.2) MWh from renewable sources

25478

(7.30.1.3) MWh from non-renewable sources

0

(7.30.1.4) Total (renewable and non-renewable) MWh

25478

Total energy consumption

(7.30.1.1) Heating value

Select from:

HHV (higher heating value)

(7.30.1.2) MWh from renewable sources

25478

(7.30.1.3) MWh from non-renewable sources

17145

(7.30.1.4) Total (renewable and non-renewable) MWh

42623
[Fixed row]

(7.30.16) Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.

Canada

(7.30.16.1) Consumption of purchased electricity (MWh)

0

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

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

0

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

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

0.00

United States of America

(7.30.16.1) Consumption of purchased electricity (MWh)

25478

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

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

0

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

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

25478.00
[Fixed row]

(7.45) 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.

Row 1

(7.45.1) Intensity figure

1.3

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

14418

(7.45.3) Metric denominator

Select from:

full time equivalent (FTE) employee

(7.45.4) Metric denominator: Unit total

11100

(7.45.5) Scope 2 figure used

Select from:

Location-based

(7.45.6) % change from previous year

2.87

(7.45.7) Direction of change

Select from:

Decreased

(7.45.8) Reasons for change

Select all that apply

Other, please specify

(7.45.9) Please explain

Reduction in headcount and reduced energy usage.

Row 2

(7.45.1) Intensity figure

0.00000177

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

14418

(7.45.3) Metric denominator

Select from:

unit total revenue

(7.45.4) Metric denominator: Unit total

8155

(7.45.5) Scope 2 figure used

Select from:

Location-based

(7.45.6) % change from previous year

1.02

(7.45.7) Direction of change

Select from:

Decreased

(7.45.8) Reasons for change

Select all that apply

Change in revenue

Other, please specify

(7.45.9) Please explain

Lower energy usage offset by lower revenue.

Row 3

(7.45.1) Intensity figure

6.6e-7

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

5402

(7.45.3) Metric denominator

Select from:

unit total revenue

(7.45.4) Metric denominator: Unit total

8155

(7.45.5) Scope 2 figure used

Select from:

Market-based

(7.45.6) % change from previous year

4.72

(7.45.7) Direction of change

Select from:

Increased

(7.45.8) Reasons for change

Select all that apply

Change in revenue

[Add row]

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

(7.53.3.1) Primary reason

Select from:

We are planning to introduce a target in the next two years

(7.53.3.2) Five-year forecast

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 and expands climate risk expertise and capacity, Ally will refine its ability to accurately project operational emissions and the potential for emission reduction strategies that will enable Ally to set a science-based emissions target in line with the Paris Climate Agreement.

(7.53.3.3) Please explain

Having now calculated greenhouse gas emissions for the third year, Ally is approaching a business-as-usual operating environment that gives valuable insight into normalized emissions patterns. Given a base year of 2020, when operations (and emissions) were impacted by a COVID shutdown, it is not surprising to see operational emission increases in both 2021 and 2022 as the company began to return to normal levels of operations to support the business. This is particularly relevant for Scope 1 emissions related to auto fleet activity, as the auto salesforce returned to regular in-person visits to dealer customers. Scope 2 emissions in 2021 were temporarily impacted by an overlap of building occupancy while consolidating Charlotte employees to one location in our Ally Charlotte Center (ACC). In 2022, Scope 2 emissions again increased, as employees returned to the office; though increases were substantially moderated by the realization of efficiencies from the ACC consolidation and corresponding reduction in leased office space and the intentional implementation of other operating initiatives to reduce energy usage. Scope 3 emissions declined for the second year in 2022, as a result of reduced spend associated with the completion of ACC reflected in reductions in emissions associated with Category 1, Purchased Goods and Services and Category 2, Capital Goods. With normalizing business operations and return to office, Ally experienced expected increases in both Category 6, Business Travel and Category 7, Employee Commuting (which was included in emissions calculations for the first time in 2022). While we continue to refine and improve our emissions calculations, our confidence in delivering emissions reductions over time, particularly as it relates to

Scope 3 emissions, remains low. We will continue to evaluate our ability to set and achieve a science-based emissions target in line with the Paris Climate Agreement.

[Fixed row]

(7.54.1) Provide details of your targets to increase or maintain low-carbon energy consumption or production.

Row 1

(7.54.1.1) Target reference number

Select from:

Low 1

(7.54.1.2) Date target was set

01/01/2023

(7.54.1.3) Target coverage

Select from:

Organization-wide

(7.54.1.4) Target type: energy carrier

Select from:

Electricity

(7.54.1.5) Target type: activity

Select from:

Consumption

(7.54.1.6) Target type: energy source

Select from:

Renewable energy source(s) only

(7.54.1.7) End date of base year

12/31/2020

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

20560

(7.54.1.9) % share of low-carbon or renewable energy in base year

100

(7.54.1.10) End date of target

12/31/2023

(7.54.1.11) % share of low-carbon or renewable energy at end date of target

100

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

100

(7.54.1.14) Target status in reporting year

Select from:

New

(7.54.1.16) Is this target part of an emissions target?

No

(7.54.1.17) Is this target part of an overarching initiative?

Select all that apply

No, it's not part of an overarching initiative

(7.54.1.19) Explain target coverage and identify any exclusions

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

(7.54.1.20) Target objective

This voluntary offsetting project 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.

(7.54.1.21) 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.
[Add row]

(7.54.2) Provide details of any other climate-related targets, including methane reduction targets.

Row 1

(7.54.2.1) Target reference number

Select from:

Oth 1

(7.54.2.2) Date target was set

12/31/2017

(7.54.2.3) Target coverage

Select from:

Organization-wide

(7.54.2.4) Target type: absolute or intensity

Select from:

Intensity

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

Low-carbon buildings

Percentage of buildings with a green building certificate

(7.54.2.6) Target denominator (intensity targets only)

Select from:

square foot

(7.54.2.7) End date of base year

12/31/2017

(7.54.2.8) Figure or percentage in base year

20.5

(7.54.2.9) End date of target

12/31/2023

(7.54.2.10) Figure or percentage at end of date of target

30

(7.54.2.11) Figure or percentage in reporting year

40

(7.54.2.12) % of target achieved relative to base year

205.2631578947

(7.54.2.13) Target status in reporting year

Select from:

Achieved

(7.54.2.15) Is this target part of an emissions target?

No, it is not part of an emissions target

(7.54.2.16) Is this target part of an overarching initiative?

Select all that apply

No, it's not part of an overarching initiative

(7.54.2.18) 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.

Row 2

(7.54.2.1) Target reference number

Select from:

Oth 2

(7.54.2.2) Date target was set

12/31/2023

(7.54.2.3) Target coverage

Select from:

Organization-wide

(7.54.2.4) Target type: absolute or intensity

Select from:

Intensity

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

Low-carbon buildings

Percentage of buildings with a green building certificate

(7.54.2.6) Target denominator (intensity targets only)

Select from:

square foot

(7.54.2.7) End date of base year

12/31/2017

(7.54.2.8) Figure or percentage in base year

20.5

(7.54.2.9) End date of target

12/31/2024

(7.54.2.10) Figure or percentage at end of date of target

71

(7.54.2.11) Figure or percentage in reporting year

42.4

(7.54.2.12) % of target achieved relative to base year

43.3663366337

(7.54.2.13) Target status in reporting year

Select from:

New

(7.54.2.15) Is this target part of an emissions target?

No, it is not part of an overarching initiative.

(7.54.2.16) Is this target part of an overarching initiative?

Select all that apply

No, it's not part of an overarching initiative

(7.54.2.18) 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.

[Add row]

(7.55.1) 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	`Numeric input
To be implemented	0	0
Implementation commenced	1	693
Implemented	4	2744
Not to be implemented	0	`Numeric input

[Fixed row]

(7.55.2) Provide details on the initiatives implemented in the reporting year in the table below.

Row 1

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in buildings

- Heating, Ventilation and Air Conditioning (HVAC)

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

1783

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

Select all that apply

- Scope 2 (location-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

Voluntary

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

539580

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

2000

(7.55.2.7) Payback period

Select from:

<1 year

(7.55.2.8) Estimated lifetime of the initiative

Select from:

Ongoing

(7.55.2.9) 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.

[Add row]

(7.55.3) What methods do you use to drive investment in emissions reduction activities?

Row 1

(7.55.3.1) Method

Select from:

- Employee engagement

Row 2

(7.55.3.1) Method

Select from:

- Dedicated budget for other emissions reduction activities

[Add row]

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

Row 1

(7.79.1.1) Project type

Select from:

- Reforestation

(7.79.1.2) Type of mitigation activity

Select from:

- Carbon removal

(7.79.1.3) 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. 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.

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

5402

(7.79.1.5) Purpose of cancelation

Select from:

Voluntary offsetting

(7.79.1.6) Are you able to report the vintage of the credits at cancelation?

Select from:

Yes

(7.79.1.7) Vintage of credits at cancelation

2019

(7.79.1.8) Were these credits issued to or purchased by your organization?

Select from:

Purchased

(7.79.1.9) Carbon-crediting program by which the credits were issued

Select from:

ACR (American Carbon Registry)

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

Select all that apply

- 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.

(7.79.1.11) Approaches by which the selected program requires this project to address reversal risk

Select all that apply

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

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

Select all that apply

- Activity-shifting
- Market leakage

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

No further issues noted

(7.79.1.14) Please explain

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."

[Add row]

C12. Environmental performance - Financial Services

(12.1) Does your organization measure the impact of your portfolio on the environment?

Banking (Bank)

(12.1.1) We measure the impact of our portfolio on the climate

Select from:

No, but we plan to do so in the next two years

(12.1.3) Primary reason for not measuring portfolio impact on climate

Select from:

Not an immediate strategic priority

(12.1.4) Explain why your organization does not measure its portfolio impact on climate

In previous years, Ally has performed annual portfolio-level screenings to identify which Scope 3 activities throughout the value chain were relevant and material, using the World Resources Institute (WRI) Scope 3 Evaluator tool to quantitatively estimate Ally's Scope 3 GHG emissions footprint. The results of these screenings indicated that category 15, investments, was both relevant and material to the company. In 2023, Ally made progress toward calculating initial emissions estimates for a portion of our investments. As this process matures and additional methodologies become available, Ally will continue to expand its analysis with intention to disclose these emissions.

Investing (Asset manager)

(12.1.1) We measure the impact of our portfolio on the climate

Select from:

No, but we plan to do so in the next two years

(12.1.3) Primary reason for not measuring portfolio impact on climate

Select from:

- Not an immediate strategic priority

(12.1.4) Explain why your organization does not measure its portfolio impact on climate

In previous years, Ally has performed annual portfolio-level screenings to identify which Scope 3 activities throughout the value chain were relevant and material, using the World Resources Institute (WRI) Scope 3 Evaluator tool to quantitatively estimate Ally's Scope 3 GHG emissions footprint. The results of these screenings indicated that category 15, investments, was both relevant and material to the company. In 2023, Ally made progress toward calculating initial emissions estimates for a portion of our investments. As this process matures and additional methodologies become available, Ally will continue to expand its analysis with intention to disclose these emissions.

Investing (Asset owner)

(12.1.1) We measure the impact of our portfolio on the climate

Select from:

- No, but we plan to do so in the next two years

(12.1.3) Primary reason for not measuring portfolio impact on climate

Select from:

- Not an immediate strategic priority

(12.1.4) Explain why your organization does not measure its portfolio impact on climate

In previous years, Ally has performed annual portfolio-level screenings to identify which Scope 3 activities throughout the value chain were relevant and material, using the World Resources Institute (WRI) Scope 3 Evaluator tool to quantitatively estimate Ally's Scope 3 GHG emissions footprint. The results of these screenings indicated that category 15, investments, was both relevant and material to the company. In 2023, Ally made progress toward calculating initial emissions estimates for a portion of our investments. As this process matures and additional methodologies become available, Ally will continue to expand its analysis with intention to disclose these emissions.

Insurance underwriting (Insurance company)

(12.1.1) We measure the impact of our portfolio on the climate

Select from:

- No, but we plan to do so in the next two years

(12.1.3) Primary reason for not measuring portfolio impact on climate

Select from:

- Not an immediate strategic priority

(12.1.4) Explain why your organization does not measure its portfolio impact on climate

In previous years, Ally has performed annual portfolio-level screenings to identify which Scope 3 activities throughout the value chain were relevant and material, using the World Resources Institute (WRI) Scope 3 Evaluator tool to quantitatively estimate Ally's Scope 3 GHG emissions footprint. The results of these screenings indicated that category 15, investments, was both relevant and material to the company. In 2023, Ally made progress toward calculating initial emissions estimates for a portion of our investments. As this process matures and additional methodologies become available, Ally will continue to expand its analysis with intention to disclose these emissions.

[Fixed row]

(12.3) State the values of your financing and insurance of fossil fuel assets in the reporting year.

Lending to all fossil fuel assets

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

- No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

Select from:

- Not an immediate strategic priority

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

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 thermal coal

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

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

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

Select from:

Not an immediate strategic priority

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

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 met coal

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

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

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

Select from:

Not an immediate strategic priority

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

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

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

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

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

Select from:

Not an immediate strategic priority

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

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 gas

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

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

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

Select from:

Not an immediate strategic priority

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

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 fossil fuel assets (Asset manager)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

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

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

Select from:

Not an immediate strategic priority

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

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 thermal coal (Asset manager)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

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

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

Select from:

Not an immediate strategic priority

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

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 met coal (Asset manager)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

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

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

Select from:

Not an immediate strategic priority

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

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 (Asset manager)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

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

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

Select from:

Not an immediate strategic priority

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

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 gas (Asset manager)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

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

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

Select from:

Not an immediate strategic priority

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

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 fossil fuel assets (Asset owner)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

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

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

Select from:

Not an immediate strategic priority

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

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 thermal coal (Asset owner)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

0

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0

(12.3.6) Details of calculation

Ally does not have any outstanding investments in thermal coal

Investing in met coal (Asset owner)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

0

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0

(12.3.6) Details of calculation

Ally does not have any outstanding investments in met coal

Investing in oil (Asset owner)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

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

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

Select from:

Not an immediate strategic priority

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

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 gas (Asset owner)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

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

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

Select from:

Not an immediate strategic priority

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

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 fossil fuel assets

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

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

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

Select from:

Not an immediate strategic priority

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

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 thermal coal

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

Yes

(12.3.4) Total premium written in reporting year (unit currency - as specified in 1.2)

0

Insuring met coal

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

Yes

(12.3.4) Total premium written in reporting year (unit currency - as specified in 1.2)

0

Insuring oil

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

Yes

(12.3.4) Total premium written in reporting year (unit currency - as specified in 1.2)

0

Insuring gas

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

Yes

(12.3.4) Total premium written in reporting year (unit currency - as specified in 1.2)

0

[Fixed row]

(12.4) Does your organization provide finance and/or insurance to companies in the commodity value chain? If so, for each commodity and portfolio, state the values of your financing and/or insurance in the reporting year.

Lending to companies operating in the timber products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Lending to companies operating in the palm oil value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Lending to companies operating in the cattle products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Lending to companies operating in the soy value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Lending to companies operating in the rubber value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Lending to companies operating in the cocoa value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Lending to companies operating in the coffee value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Investing (asset manager) to companies operating in the timber products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Investing (asset manager) to companies operating in the palm oil value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Investing (asset manager) to companies operating in the cattle products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Investing (asset manager) to companies operating in the soy value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Investing (asset manager) to companies operating in the rubber value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Investing (asset manager) to companies operating in the cocoa value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Investing (asset manager) to companies operating in the coffee value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Investing (asset owner) to companies operating in the timber products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Investing (asset owner) to companies operating in the palm oil value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Investing (asset owner) to companies operating in the cattle products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Investing (asset owner) to companies operating in the soy value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Investing (asset owner) to companies operating in the rubber value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Investing (asset owner) to companies operating in the cocoa value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Investing (asset owner) to companies operating in the coffee value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Insuring companies operating in the timber products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

No

Insuring companies operating in the palm oil value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

No

Insuring companies operating in the cattle products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

No

Insuring companies operating in the soy value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

No

Insuring companies operating in the rubber value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Insuring companies operating in the cocoa value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

No

Insuring companies operating in the coffee value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

No

[Fixed row]

(12.5) In the reporting year, did your organization finance and/or insure activities or sectors that are aligned with, or eligible under, a sustainable finance taxonomy? If so, are you able to report the values of that financing and/or underwriting?

	Reporting values of the financing and/or insurance of activities or sectors that are eligible under or aligned with a sustainable finance taxonomy	Primary reason for not providing values of the financing and/or insurance	Explain why you are not providing values of the financing and/or insurance
Banking (Bank)	<i>Select from:</i> <input checked="" type="checkbox"/> No, and we do not plan to report in the next two years	<i>Select from:</i> <input checked="" type="checkbox"/> Not an immediate strategic priority	<i>We have not evaluated our portfolio for alignment to a sustainable finance taxonomy and cannot estimate when that will be completed.</i>

[Fixed row]

(12.6) Do any of your existing products and services enable clients to mitigate and/or adapt to the effects of environmental issues?

(12.6.1) Existing products and services enable clients to mitigate and/or adapt to the effects of environmental issues

Select from:

No, and we do not plan to address this in the next two years

(12.6.2) Primary reason for not offering products and services that enable clients to mitigate and/or adapt to the effects of environmental issues

Select from:

Not an immediate strategic priority

(12.6.3) Explain why your organization does not offer products and services that enable clients to mitigate and/or adapt to the effects of environmental issues

Ally has not had the opportunity to evaluate products and services that enable clients to mitigate and/or adapt to the effects of environmental 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.

[Fixed row]

(12.7) Has your organization set targets for deforestation and conversion-free and/or water-secure lending, investing and/or insuring?

Forests

(12.7.1) Target set

Select from:

No, we have not set such targets and we do not plan to in the next two years

(12.7.2) Explain why your organization has not set targets for deforestation- and conversion-free and/or water-secure lending, investing and/or insuring

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

(12.7.1) Target set

Select from:

No, we have not set such targets and we do not plan to in the next two years

(12.7.2) Explain why your organization has not set targets for deforestation- and conversion-free and/or water-secure lending, investing and/or insuring

Ally has not had the opportunity to evaluate water scarcity 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.

[Fixed row]

C13. Further information & sign off

(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

(13.1.1) Other environmental information included in your CDP response is verified and/or assured by a third party

Select from:

No, and we do not plan to obtain third-party verification/assurance of other environmental information in our CDP response within the next two years

(13.1.2) Primary reason why other environmental information included in your CDP response is not verified and/or assured by a third party

Select from:

Not an immediate strategic priority

(13.1.3) Explain why other environmental information included in your CDP response is not verified and/or assured by a third party

The CDP response is reviewed by the Disclosure Committee, which is established by the Chief Financial Officer, with the purpose to ensure that public financial and other disclosures, including voluntary and/or required climate-related disclosures, made by the Company and affiliates are accurate and complete, fairly present our financial condition and results of operations in all material respects and are made on a timely basis as required by applicable laws and SEC or other self-regulatory organization requirements. Prior to submission to the Disclosure Committee, relevant business units and support functions review the CDP response and provide attestation to the accuracy of the information. Additionally, Apex Companies provides a third-party verification to a limited level of assurance of Ally's greenhouse gas emissions. Additional third-party verification of other environmental information included in the CDP response is not an immediate strategic priority, and the Company is unable to forecast at this time when this will be established.

[Fixed row]

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

(13.3.1) Job title

Chief Executive Officer (CEO)

(13.3.2) Corresponding job category

Select from:

Chief Executive Officer (CEO)

[Fixed row]

