Ceres Accelerator for Sustainable Capital Markets

August 2023

Responsible Policy Engagement Benchmarking for Banks

Introduction

In November 2022, Ceres released its second Responsible Policy Engagement Benchmark looking at the largest companies in the U.S. The benchmark measured the alignment between corporate climate targets and their direct and indirect climate policy engagement. The analysis provided a snapshot of how consistently the leading U.S. companies are lobbying on climate policy. The findings were that most companies had adequate systems in place to oversee climate risks within their enterprises but, in many cases, their climate lobbying was inconsistent with their announced climate and net zero plans.

As Managing Director of the Monetary Authority of Singapore and Chair of the Network for Greening the Financial System Ravi Menon makes clear in a recent statement, “the world is still not on a transition path that is aligned with the goals of the Paris agreement. According to the latest report by the Intergovernmental Panel on Climate Change, we need to cut global greenhouse gas emissions by 43% in the next seven years to reach net zero by 2050. We are now one third of the way through this ‘critical decade’ and nowhere near this target. Emissions are still rising, not falling.” U.S. financial regulators have also publicly acknowledged climate as an emerging or current systemic risk, as highlighted in Ceres’ financial regulator climate risk scorecard.

Given this backdrop, investors have stepped up their focus on the lobbying practices of the companies they are invested in, calling on companies, including banks, to disclose how their direct and indirect climate lobbying aligns with climate science. In 2021, six shareholder proposals asking for a report on climate lobbying went to a vote and were passed with majority support from large asset managers, including BlackRock and Vanguard. In 2022, 24 agreements were reached between investors and companies on climate lobbying proposals at various companies. This year, 19 climate-related proposals were filed at banks alone, with four being filed on climate lobbying disclosure and four banks engaging in dialogue on the issue.

Investors are concerned when a company is expending resources on lobbying that is pushing in a direction inconsistent with its publicly stated strategy—and that is quite often the case when companies are members of trade associations that do not lobby in favor of some members’ climate commitments. Contributing money and resources towards trade organizations that do not lobby in favor of—or actually undermine—a bank's climate goals is a major investor concern and a large driving factor behind the increased support for shareholder resolutions on climate lobbying.

Climate engagement on risk management and policy advocacy in the banking sector has never been more critical. As a result, Ceres, as part of the Ceres Ambition 2030 initiative that works with investors and corporate leaders to decarbonize the top six emitting sectors, extended the analysis of the 2022 Responsible Policy Engagement Benchmark to 13 banks that are among the largest by market capitalization in the U.S. This benchmarking uses the same Advocate (direct lobbying) and Engage (indirect lobbying) metrics used in the 2022 Responsible Policy Engagement Benchmark.

We found that most of the banks analyzed had set some form of net zero target and two-thirds had generally supported climate policies that align with the Paris Agreement over the past three years.

Yet, examining the data in greater detail reveals that the bank sector's climate policy engagement is not as effective as it could be, and is even contradictory at times.

Banks are not fully capitalizing on their influence in policy advocacy, and their lobbying efforts often lag the banks' own stated public support for policies and regulations aligned with the Paris Agreement. In fact, some banks, as well as their industry lobbying groups or trade associations, continue to advocate for policies that run contrary to their climate commitments. Given how quickly the window for real impact on climate risk is narrowing, this analysis serves as a call to ramp up bank engagement.

A report published by U.K.-based nonprofit InfluenceMap in June 2023 echoes the trends of this report, concluding that there is disconnect between many banks' statements in support of climate action and their lobbying efforts. In turn, this is holding up the creation of a favorable policy environment that would enable effective climate risk management. Prioritizing policies that treat climate as an emerging or systemic risk to the financial system while incentivizing other sectors to decarbonize is critical to maintaining the stability of the economy.

Banks have the power to contribute to a policy environment that will help both themselves and their borrowers mitigate climate risks and take advantage of sustainable finance opportunities as we transition to a net zero carbon economy by 2050.

Direct Policy Engagement by Banks

Unlike many companies that generate emissions from their own operations, most of banks' climate impact is a result of the real-economy corporate activities they finance through the products and services they provide borrowers, including loans, investments, and derivatives. These indirect emissions are called scope 3 financed and facilitated emissions and, in the case of the financed emissions, can be up to 700 times larger than a bank's operational emissions. Consequently, advocacy from the banking community for Paris-aligned climate policies is essential for the U.S. to meet its ambitious target of cutting greenhouse gas emissions by 50% to 52% by 2030 and for the world to meets its collective goal of limiting global warming to 1.5°C. Public policy engagement that is consistent with decarbonization goals is critical—incongruence between a bank's public statements and private actions creates significant reputational risk.

Table 1 · Advocate Scores

Company	Has the company stated support for climate action?	In the past three years, has the company publicly and individually advocated for Paris-aligned climate policies?	In the past three years, has the company advocated for Paris-aligned climate policies as part of a coalition of companies?	In the past three years, has the company refrained from opposition to Paris-aligned climate policies?
Bank of America	Meets expectations	Meets expectations	Meets expectations	Meets some expectations
Bank of New York Mellon	Meets expectations	Meets expectations	Does not meet expectations	Meets some expectations
Capital One Financial	Meets expectations	Does not meet expectations	Meets expectations	Meets some expectations
Charles Schwab	Meets some expectations	Meets some expectations	Does not meet expectations	Meets expectations
Citigroup	Meets expectations	Meets expectations	Meets expectations	Meets some expectations
Goldman Sachs	Meets expectations	Meets expectations	Meets expectations	Meets some expectations
HSBC	Meets expectations	Meets some expectations	Meets expectations	Meets some expectations
JPMorgan Chase	Meets expectations	Meets some expectations	Does not meet expectations	Does not meet expectations
Morgan Stanley	Meets expectations	Meets expectations	Meets expectations	Meets some expectations
State Street	Meets expectations	Meets some expectations	Meets expectations	Meets some expectations
Truist Financial	Meets expectations	Does not meet expectations	Does not meet expectations	Meets some expectations
U.S. Bank	Meets some expectations	Does not meet expectations	Does not meet expectations	Meets some expectations
Wells Fargo	Meets expectations	Meets some expectations	Meets expectations	Does not meet expectations

Meets expectations · Meets some expectations · Does not meet expectations

This table details the banks' performance on the Advocate indicators in the RPE Benchmark. The Blueprint on Responsible Policy Engagement calls on companies to publicly state their support for climate action by affirming the science of climate change, supporting the Paris Agreement and stating the need for ambitious climate policies. Additionally, it calls on companies to advocate for Paris-aligned climate policies consistently across their engagement platforms. These metrics capture how banks have engaged directly on climate policy, either on their own and/or as part of a coalition, and whether they have lobbied against climate policy.

Has the company stated support for climate action?

Every bank assessed publicly acknowledges the reality of climate change and the need for policies to address climate risk and meet U.S. emissions reduction goals.

- According to data from InfluenceMap, 12 out of 13 banks (or 92%) have stated support for policies and regulations designed to mitigate the impacts of climate change and keeping warming aligned with the goal of the Paris Agreement.

- 11 out of 13 (85%) banks have voiced support for the Paris Agreement, indicating that these banks support a coordinated global approach to resolving the climate crisis and addressing the systemic risk to financial markets.

For example, in 2020, Capital One demonstrated its support for the Paris Agreement via a Twitter post. Bank of New York Mellon stated on its website that "governments have a role to play to help redirect more capital and investment away from 'dirty' capital to clean capital."

Banks have made similar statements of support for both the Paris Agreement and the need for policies and regulations to address climate risk through their public social media platforms, sustainability reports, and climate disclosures.

In the past three years, has the company publicly and individually advocated for Paris-aligned climate policies?

In the past three years, has the company publicly advocated for Paris-aligned climate policies as a part of a coalition?

The 2022 Responsible Policy Engagement Benchmark found that 50% of S&P 100 companies had directly advocated for Paris-aligned climate policies in the last three years, either individually or as a group. Applying this methodology to the banking sector, our analysis shows that:

- 38% of banks have lobbied in favor of Paris-aligned climate policies individually.
- 62% of banks have lobbied in favor of Paris-aligned climate policies as a group.
- 69% of banks have lobbied in favor of Paris-aligned climate policies in the last three years, either individually or as part of coalition.

In 2022, Calvert Research and Management (part of Morgan Stanley) provided comments to the EPA in favor of strengthening the agencies' proposed standards on methane regulation, a cost-effective way for the oil and gas industry to reduce emissions, given the low cost of compliance.

Goldman Sachs CEO David Solomon expressed support for the clean energy tax credits as a part of the Build Back Better package in Goldman's 2021 Sustainability Report.

A letter organized by the Center for Climate and Energy Solutions to Congress in July 2021 was signed by banks, including Bank of America, Citi, and Wells Fargo, advocating for the net zero infrastructure investments in the Biden administration's infrastructure package.

A Closer Look at Engagement on the SEC Climate Rule

In response to calls from investors, companies, and the public to give financial markets the comparable data they need to make informed decisions, the U.S. Securities and Exchange Commission in March 2022 proposed an important new rule on climate risk disclosure by issuers. Among the roughly 15,000 letters submitted during the public comment period were comments from three banks that are part of this assessment—Bank of America, Citi, and Wells Fargo. Overall, these banks were largely constructive with their comment letters and stated broad support for the rule and the direction of travel for mandatory climate risk disclosure. While the banks did not support every provision within the rule, their direct engagement in the rulemaking process is positive, and their proposed amendments could improve the quality of disclosures.

Every bank should adopt the most impactful lobbying practice of engaging with policymakers both individually and as a group. Advocating as a part of a coalition is preferable to not engaging or lobbying against climate policies, and the collective impact of both individual and group advocacy on climate policy by the banking sector could have a profound effect on the U.S.' ability to reach its emissions goal.

In the past three years, has the company publicly refrained from opposition to Paris-aligned climate policies?

- 92% of banks have advocated against or pushed back on Paris-aligned climate policies in the last three years.
- Of that group, 16% advocated individually, while 83% advocated as a group.
- 75% of those that have advocated against or pushed back on climate policies have advocated in favor of other Paris-aligned policies, highlighting the apparently inconsistent nature of this cohort's climate policy engagement.

Details on this kind of lobbying are hard to come by. Only a few examples are known publicly, such as one from 2021, where JPMorgan Chase reached out directly to the Treasury to advocate for policies that would protect fossil fuel companies and banks against heavy losses that could have resulted from volatile oil prices during the pandemic.

Additionally, the difference between constructive feedback and negative lobbying is not always black and white. For example, multiple banks engaged with the Office of the Comptroller of the Currency to discuss challenges around implementing draft principles for climate-related financial risk management but did not disclose their concerns publicly. This contrasts with the SEC example above, where banks fully disclosed concerns about the SEC proposed rule (which were constructive in nature). Without further disclosure, we cannot conclude that any banks have entirely refrained from negative lobbying, except for Charles Schwab, which does not appear to have engaged substantively on these issues (a different concern for which Schwab's performance on this indicator does not excuse it).

Direct support from the banking sector on climate policy is especially crucial at this time, as certain states have introduced or passed legislation that would interfere with a bank's internal risk management process, allowing politicians to decide who banks can and cannot lend to. Other states have also interfered in the normal running of the free markets. In March 2023, Alabama, Alaska, Arkansas, Florida, Georgia, Idaho, Iowa, Mississippi, Missouri, Montana, Nebraska, New Hampshire, North Dakota, Oklahoma, South Dakota, Tennessee, Utah, West Virginia, and Wyoming formed an alliance to limit investments into ESG funds, constraining the freedom of businesses to invest as they see fit. Fortunately for the cause of investor freedom, a growing number of these proposed measures are failing because of pushback from the private sector, including some banking industry groups (see below). Unfortunately, even though this issue is of critical importance to banks and their clients, the individual banks in this assessment have been publicly mute in supporting the freedom of Americans to invest.

In both target-setting and responsible policy realms, banks have made progress. However, they need to go further and faster to be fully aligned. Generally speaking, banks' lobbying doesn't match their stated support for Paris-aligned policies and regulations. Banks have also been slow to take advantage of recent Paris-aligned advocacy opportunities, such as the passing of the bipartisan Infrastructure Investment and Jobs Act and the Inflation Reduction Act, the latter being the largest and most significant climate legislation in U.S. history. Less than half of the banks in the benchmark (5 out of 13) advocated independently in favor of specific climate policies and not a single one of them publicly supported the Inflation Reduction Act prior to its passing. However, Bank of America, Citi, Goldman Sachs, JPMorgan Chase, Morgan Stanley and Wells Fargo, among others, have encouraged clients to take advantage of the implementation opportunities in the legislation.

Indirect Policy Engagement by Banks

While it is understood that banks are not expected to be fully aligned with all their trade associations' positions, our analysis finds that banks' publicly stated climate strategy and indirect climate policy engagement (through industry associations) are often at odds with one another.

Previous Responsible Policy Engagement reports covered the lobbying activity of major, cross-sectoral trade associations like the U.S. Chamber of Commerce and Business Roundtable, as well as banks' efforts to positively influence them (such as Citi, Bank of America, and Morgan Stanley's work with the U.S. Chamber and JPMorgan Chase's work with the Business Roundtable on methane). This report in turn, explores bank-specific industry associations including the following:

- The American Bankers Association (ABA)
- The Bank Policy Institute (BPI)
- The Institute of International Finance (IIF)
- The Securities Industry and Financial Markets Association (SIFMA)

Table 2 • Engage Scores

Company	Has the company disclosed a list of its trade association memberships?	Has the company conducted an internal assessment of its trade associations for alignment on climate policies in line with the Paris Agreement?	Is the company a member of any of the following industry associations? ABA	BPI	IIF	SIFMA	Has the company engaged with key U.S. industry associations to influence their stance on climate change?
Bank of America	✓	–	Y	Y	Y	Y	–
Bank of New York Mellon	✓	✗	Y	Y	Y	Y	✗
Capital One Financial	✓	✗	Y	Y	N	Y	✗
Charles Schwab	✓	✗	Y	Y	N	Y	✗
Citigroup	✓	✓	Y	Y	Y	Y	–
Goldman Sachs	–	✗	Y	Y	Y	Y	✗
HSBC	–	✗	Y	Y	Y	Y	✗
JPMorgan Chase	✓	✗	Y	Y	Y	Y	✗
Morgan Stanley	✓	✗	Y	Y	Y	Y	–
State Street	✓	✗	Y	Y	Y	Y	✗
Truist Financial	✓	✓	Y	Y	N	Y	–
U.S. Bank	✓	✗	Y	Y	N	Y	✗
Wells Fargo	✓	✗	Y	Y	Y	Y	✗

✓ Meets expectations – Meets some expectations ✗ Does not meet expectations

This table details the banks' performance on the Engage indicators in the RPE Benchmark. The Blueprint on Responsible Policy Engagement calls on companies to assess the extent to which their trade associations engage on climate policy and whether that engagement aligns with the Paris Agreement. Based on the results of such an assessment, companies should publicly engage with their trade groups to ensure their positions are aligned.

Has the company disclosed a list of its trade association memberships?

Of the banks in this assessment, 77% disclosed a list of trade associations that receive over $25,000 in dues, with 23% of banks partially disclosing.

Comprehensive disclosure provides information on where the bank is deploying its resources and provides investors with more transparency about the organizations working in the banks' interests.

Has the company conducted an internal assessment of its trade associations for alignment on climate policies in line with the Paris Agreement?

Across the board, our 2022 assessment shows that banks are underperforming in disclosing their alignment with their trade associations on climate policy engagement. Consistent advocacy by trade associations in line with the large banks' climate goals at the state and federal level would have overarching implications for climate policy, as a synchronized approach would be significantly more effective for the passage of robust climate policies.

Only 15% of banks have conducted an internal assessment of their trade associations' alignment on Paris-aligned climate policies. This trend falls in line with the results from the 2022 benchmark, which revealed that only 8% of companies had conducted a trade association assessment.

While it is promising to see most banks being transparent about their trade association memberships, only two banks, Truist and Citi, conducted an internal trade association assessment. Truist was the only bank that publicly disclosed its efforts to address misalignment with its industry associations.

Is the company a member of any of the following industry associations: ABA, BPI, IIF, or SIFMA?

- All 13 (100%) of the banks are members of the ABA
- All 13 (100%) of the banks are members of the BPI
- 9 out of 13 (69%) of the banks are members of the IIF
- All 13 (100%) of the banks are members of SIFMA

It should be noted that companies are not receiving credit or being penalized for being members of any of the listed trade associations.

The industry associations in this benchmark have stated they are in favor of taking actions to address climate change, yet they have been reluctant to publicly support regulations as a tool to address climate risk or reduce emissions.

- In a post on its website, the ABA urged federal agencies to retract a rule that would require federal contractors to disclose their climate footprint.
- Regarding the incorporation of ESG factors in prudential regulation, the IIF has argued for a more incremental approach around certain proposed climate risk management provisions.
- The ABA, BPI, and SIFMA have all voiced objections to California's greenhouse gas disclosure bill, SB 253.

As mentioned earlier, on a more positive note, several banking associations during the past nine months have stepped forward to push back against legislation banning responsible investing and protecting the rights of banks to invest and lend as they see fit. For example, the Kentucky Bankers Association filed a lawsuit in October 2022 against the state's attorney general, challenging his investigation of six large banks. The North Dakota Bankers Association also publicly expressed concerns about lawmakers dictating who banks should and shouldn't conduct business with. Finally, the American Bankers Association has stated that legislation banning the freedom to invest undermines "the organization's own commitment to free markets and limited government and that "government should not be dictating business decisions to the private sector."

Has the company publicly engaged with key U.S. trade associations to influence their stance on climate change?

Truist and Citi were the only banks to receive full credit for their trade association assessments, but Truist's assessment was especially notable as it detailed the steps the bank took to address the degree of misalignment, as well as engagement efforts undertaken with its trade associations. In its climate lobbying report, Truist clearly detailed levels of alignment with its trade associations and included a set of actions it would take for each level of alignment (see Table 4 in the appendix). The bank also reached out to its trade associations with a survey asking about advocacy on climate change-related legislation, support for the Paris agreement and its goals, and advocacy on specific climate policies.

However, both Truist and Citi did not disclose their trade associations' positions on specific climate policies and limited it to the associations' top-line statements on climate change. Furthermore, they did not provide any examples of how they were working with their trade associations to influence their stance on specific climate policies.

Lobbying Framework Alignment

Given the increased priority from investors on climate lobbying disclosure, a number of frameworks have emerged to guide companies towards best practice around responsible policy engagement.

- AAA Framework for Climate Policy Leadership
- Global Standard on Responsible Corporate Climate Lobbying
- The Erb Principles for Corporate Political Responsibility

Additionally, Climate Action 100+, the investor-led initiative made up of 700 investors with $68 trillion in assets who are engaging with the highest-emitting companies on climate action, and CDP, a leader in global environmental disclosure, have metrics on climate lobbying disclosure in their assessments.

The We Mean Business Coalition's Responsible Policy Engagement framework launched in June 2023 collated all the publicly available resources on corporate advocacy to create a framework requesting disclosure and policy engagement aligned with the company's long-term interest, including management of climate change risk.

While banks have set climate targets (see Table 3 in the appendix) and are lobbying directly for Paris-aligned climate policies, they are missing a critical component of climate policy engagement by not engaging with their trade associations in a transparent manner visible to all stakeholders. When membership in a trade association is integral to their business strategy, banks need to address misalignments between their climate goals and the lobbying of their trade associations. This trade association assessment not only assists banks in identifying misallocated resources but also provides investors with information on where misalignment exists and what is being done to address it.

Recommendations for Banks

This is a key moment for banks as they pursue sustainable finance opportunities and implement transition plans to address the climate-related financial risk in their portfolios. However, both these risk management and revenue generation efforts will be undermined if their lobbying on climate change, whether directly or through their trade associations, is not fully aligned with their own publicly stated corporate goals.

Banks must urgently and proactively work to align all elements of their direct and indirect lobbying on climate change to create a policy and regulatory environment that supports decarbonization and sustainable growth in line with their own strategy and the Paris Agreement.

Recent U.S. policies and regulations are increasingly making it easier for banks to meet their decarbonization goals. The Inflation Reduction Act, with its hundreds of billions in tax credits and investments, will incentivize companies to go green while minimizing the financial risks to bank lenders associated with clean energy projects.

As such, Ceres recommends that banks:

1. Advocate for policies that support their borrowers' transition to a decarbonized economy

Key advocacy opportunities include directly and indirectly supporting federal policymaking that will accelerate the implementation of the Inflation Reduction Act and the Infrastructure Investment and Jobs Act. In the near future, banks can assist lawmakers on the proper formulation and execution of other critical pieces of legislation, including the reforming of the permitting processes for clean energy infrastructure, as well as negotiations on the 2023 Farm Bill that will help farmers adopt climate solutions to ensure long-term farm resilience.

2. Advocate for policies to reduce climate-related risk to the financial system

As part of their direct and indirect advocacy efforts, banks should leverage their technical expertise to ensure that climate-related financial risks are properly incorporated into enterprise risk management, in a timely and actionable manner. This includes promoting standardized disclosures of all climate-related financial risks and ensuring that investors, regulators, employees and other key stakeholders have access to relevant information to determine the amount of climate-related financial risks the company is running in pursuit of appropriate shareholder returns. And of course, banks should continue to ensure that their prudential regulators are properly measuring and monitoring systemic and emerging climate-related financial risks as part of their supervisory activities.

3. Position themselves and their clients for long-term success

Banks should also continue to deploy their policy advocacy resources to position their business for success in a decarbonizing world. To do this, banks must work closely with lawmakers and regulators to ensure that climate policies are implemented in a manner that balances macro- and micro-prudential safety with cost effectiveness. Said differently, banks should build their policy engagement strategy around the climate targets they have set and the need to maintain or enhance the profitability and resilience of their business across the full range of plausible climate scenarios. While each bank's analysis of which policies best support their goals will differ (based on factors such as geolocation and business strategy), common threads exist. Most banks will have an interest in supporting:

- climate adaptation and infrastructure resiliency policies (as physical risks intensify in their key markets)
- further investments to help scale clean energy technology (to enable the transition)
- social and financial stability legislation (to support orderly transition policies that will limit the negative impact on low-and moderate-income communities that are most disadvantaged by climate change

Given the global scale and massive resources of the largest U.S. banks, they have both the privilege and the obligation to not watch from the sidelines as the world negotiates its future. Unlike smaller financial institutions, global systemically important banks could measurably affect national (and possibly global) GHG trajectories should they pursue an “all-in” approach to climate action. Banks should be focused on their long-term financial and reputational standing, as well as that of the financial system as a whole. The evidence is clear that the global economy will be best served by limiting global warming to 1.5°C, and all U.S. banks have a responsibility to both the system and their stakeholders to ensure their policy advocacy consistently reflects this.

Appendix

This report assesses whether the banking sector's climate policy engagement is enough to drive effective climate action, or if it is holding back progress. The banks analyzed are among the largest U.S. banks by market capitalization.

Table 3 · Emissions Reduction Targets

Company	Net Zero by 2050?	2030 Target
Bank of America	✓	Carbon emissions reductions for operations and supply chain, and financing in auto manufacturing, energy and power generation. Carbon neutral for operations.
Bank of New York Mellon	✓	Not yet established.
Capital One Financial	✓	Reduce scope 1 direct emissions by 50% and reduce scope 3 emissions (categories 1–14) by 50%.
Charles Schwab	✗	Not yet established.
Citigroup	✓	Reduction in financed emissions for energy, power, auto manufacturing, commercial real estate, steel, and thermal coal mining; net zero operational emissions.
Goldman Sachs	✓	Financed emissions reduction in oil and gas, power, and auto manufacturing sectors.
HSBC	✓	Net zero carbon emissions in operations and supply chain. Reduction in financed emissions in oil and gas, power and utilities, cement, iron, steel and aluminum, aviation and automotive sectors.
JPMorgan Chase	✓	Portfolio level emissions reduction in oil and gas, electric power, auto manufacturing, iron and steel, cement, and aviation.
Morgan Stanley	✓	Financed emissions reduction in auto manufacturing, energy, and power sectors; carbon neutral for operations.
State Street	✓	Reduce financed scope 1 and 2 emissions intensity 50% relative to 2019 baseline at portfolio level. Ensure that 70% of financed emissions in material sectors are net zero, aligned with a net zero pathway, or the subject of direct or collective engagement and stewardship actions and increase this ratio to at least 90%.
Truist Financial	✓	Reduce scope 1 and 2 emissions by 35% each.
U.S. Bank	✓	Reduce operational GHG emissions by 40% by 2029 and 60% by 2044, from a 2014 baseline.
Wells Fargo	✓	Financed emissions reduction of oil and gas and power sectors.

Table 4 • Truist's Action Items by Levels of Alignment

Status	Action plan
Aligned	Continue to monitor and assess the trade association's practices; continue to actively engage and advocate for Truist's climate goals.
Partially aligned	Continue to monitor and assess the trade association's practices; review areas of potential engagement and advocacy for Truist's climate goals; engage on areas of partial alignment.
Not applicable	Continue to engage directly on the merits of advancing climate-related advocacy in the event the trade association is willing to take a position on the issue.
Not aligned	Engage directly on this issue as appropriate and if necessary, reevaluate membership. Continue to monitor public statements.

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Supported by the We Mean Business Coalition.

About Ceres

Ceres is a nonprofit organization working with the most influential capital market leaders to solve the world's greatest sustainability challenges. Through our powerful networks and global collaborations of investors, companies, and nonprofits, we drive action and inspire equitable market-based and policy solutions throughout the economy to build a just and sustainable future. For more information, visit ceres.org and follow @CeresNews.

About Ceres Accelerator for Sustainable Capital Markets

The Ceres Accelerator for Sustainable Capital Markets is a center of excellence within Ceres that aims to transform the practices and policies that govern capital markets to reduce the worst financial impacts of the climate crisis. It spurs action on climate change as a systemic financial risk—driving the large-scale behavior and systems change needed to achieve a net zero emissions economy through key financial actors including investors, banks, and insurers. The Ceres Accelerator also works with corporate boards of directors on improving governance of climate change and other sustainability issues. For more information, visit ceres.org/accelerator.