

# Appendix 3: GRI Indicators

		Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation	Reported in
1	Strategy and analysis						
1.1	Statement from the most senior decision-maker of the organization.	●	2				
1.2	Description of key impacts, risks, and opportunities.	●	'4-5: key impacts Annex 1: KPI 1, 2, 3, 4 key impacts 54-58, 62-63; opportunities 59-61; risks'				
2	Organizational profile						
2.1	Name of the organization.	●	Colophon				
2.2	Primary brands, products, and/or services.	●	16-17				
2.3	Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures.	●	25				
2.4	Location of organization's headquarters.	●	Colophon				
2.5	Number of countries where the organization operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report.	●	25				
2.6	Nature of ownership and legal form.	●	16 + colophon				
2.7	Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries).	●	7, 13-15, 25				
2.8	Scale of the reporting organization.	●	4-5				
2.9	Significant changes during the reporting period regarding size, structure, or ownership.	●	16-17				
2.10	Awards received in the reporting period.	●	6, 28, 65, 72, 83				
● Fully reported      ● Partially reported      ○ Not reported							

		Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation	Reported in
3.	Report parameters						
3.1	Reporting period (e.g., fiscal/calendar year) for information provided.	●	Colophon, see reporting principles in annex 2				
3.2	Date of most recent previous report (if any).	●	April 2011				
3.3	Reporting cycle (annual, biennial, etc.)	●	Annual, see reporting principles in annex 2				
3.4	Contact point for questions regarding the report or its contents.	●	Colophon				
3.5	Process for defining report content.	●	59-60, see reporting principles in annex 2				
3.6	Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers). See GRI Boundary Protocol for further guidance.	●	16-17, colophon, see reporting principles in annex 2				
3.7	State any specific limitations on the scope or boundary of the report (see completeness principle for explanation of scope).	●	None, see reporting principles in annex 2				
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations.	●	16-17, colophon, see reporting principles in annex 2				
3.9	Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report. Explain any decisions not to apply, or to substantially diverge from, the GRI Indicator Protocols.	●	See reporting principles in annex 2				
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g., mergers/acquisitions, change of base years/periods, nature of business, measurement methods).	●	No material effects				
● Fully reported      ● Partially reported      ○ Not reported							

		Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation	Reported in
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.	●	No material changes, see reporting principles in annex 2				
3.12	Table identifying the location of the Standard Disclosures in the report.	●	See annex 3 GRI content index				
3.13	Policy and current practice with regard to seeking external assurance for the report.	●	Colophon				
4	Governance, commitments, and engagement						
	Governance						
4.1	Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight.	●	87-93				
4.2	Indicate whether the Chair of the highest governance body is also an executive officer.	●	98-99				
4.3	For organizations that have a unitary board structure, state the number of members of the highest governance body that are independent and/or non-executive members.	○			Not applicable		
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	●	87-93				
4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organization's performance (including social and environmental performance).	●	85-86, 97, 107				
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	●	95-96, 101, 106				
● Fully reported      ○ Partially reported      ○ Not reported							

		Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation	Reported in
4.7	Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organization's strategy on economic, environmental, and social topics.	●	96, 101, 105				
4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation.	●	18-24, 54-56, 87				
4.9	Procedures of the highest governance body for overseeing the organization's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles.	●	87-93				
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance.	●	100-102				
4.11	Explanation of whether and how the precautionary approach or principle is addressed by the organization.	●	43, 97				
4.12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses.	●	56				
4.13	Memberships in associations (such as industry associations) and/or national/international advocacy organizations in which the organization: * Has positions in governance bodies; * Participates in projects or committees; * Provides substantive funding beyond routine membership dues; or * Views membership as strategic.	●	39, 56				
● Fully reported      ● Partially reported      ○ Not reported							

		Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation	Reported in
4.14	List of stakeholder groups engaged by the organization.	●	59, 60, Rabobank is into a dialogue concerning issues that have a major impact on the bank, its stakeholders and society at large. The annual report includes a summary of the dialogue based on the materiality principle.				
4.15	Basis for identification and selection of stakeholders with whom to engage.	●	59				
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.	●	18-24, 39, 59-61, see reporting principles in annex 2. All local Rabobanks have a members council in place to facilitate the stakeholder dialogue. The members council is a formal statutory instrument. The members council represents all types of local stakeholders and is involved in major policy. The statutes of the member bank require the members council to meet at least 1x per year, but usually maintains a frequency of 4 times per year. This mechanism is fundamental to the cooperative structure of Rabobank. At group level the dialogue with internal and external stakeholders is institutionalized in policy development and employee participation through the works council. It is based on an issue management and stakeholder engagement plan, and also occurs initiated by stakeholders. All types of engagement are admissible and used in practice. Wider and highly structured engagement on future agenda topics takes place every three years with external stakeholders.				
4.17	Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting.	●	59-61				
● Fully reported      ● Partially reported      ○ Not reported							

		Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation	Reported in
<b>Disclosure on Management Approach PS</b>							
FS1	Policies with specific environmental and social components applied to business lines.	●	54-58				
FS2	Procedures for assessing and screening environmental and social risks in business lines.	●	95				
FS3	Processes for monitoring clients' implementation of and compliance with environmental and social requirements included in agreements or transactions.	●	Client due diligence policies and procedures are implemented throughout the business lines. For project finance, projects are assessed according to Rabobank's norms.				
FS4	Process(es) for improving staff competency to implement the environmental and social policies and procedures as applied to business lines.	●	Part of the policies referred to under FS3				
FS5	Interactions with clients/investees/business partners regarding environmental and social risks and opportunities.	●	5, 38, 66-67, 101				
<b>DMA PS Disclosure on Management Approach EC</b>							
	- Economic Performance	●	6-12				
	- Market presence	●	25, 27-30				
	- Indirect economic impacts	●	13, 21				
<b>DMA Disclosure on Management Approach EN</b>							
	- Materials	●	62-63, annex 1 KPI 4				
	- Energy	●	62-63, annex 1 KPI 4				
	- Water	●	62-63, annex 1 KPI 4				
	- Biodiversity	●	39, 59-61				
	- Emissions, effluents and waste	●	62-63, annex 1 KPI 4				
	- Products and services	●	13-15				
	- Compliance	●	105-106				
	- Transport	●	62-63, annex 1 KPI 4				
	- Overall	●	62-63, annex 1 KPI 4				
<b>DMA LA Disclosure on Management Approach LA</b>							
	- Employment	●	81-86				
	- Labor/management relations	●	85				
	- Occupational health and safety	●	84				
	- Training and education	●	81-82				
	- Diversity and equal opportunity	●	82				
● Fully reported      ● Partially reported      ○ Not reported							

		Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation	Reported in
DMA HR	Disclosure on Management Approach HR						
	- Investment and procurement practices	●	59-61, 62-63				
	- Non-discrimination	●	59-61				
	- Freedom of association and collective bargaining	●	59-61				
	- Child labor	●	59-61				
	- Forced and compulsory labor	●	59-61				
	- Security practices	◐	30		Not material	See the corresponding indicator	
	- Indigenous rights	○			Not applicable	See the corresponding indicator	
DMA SO	Disclosure on Management Approach SO						
	- Community	●	21				
	- Corruption	●	Accepting or giving personal gifts that could affect the integrity of business decision-making is not permitted. Corruption or involvement in corruption is not acceptable, based on our Code of Conduct and other business principles. See <a href="http://www.rabobank.com/csr-guidelines">www.rabobank.com/csr-guidelines</a> .				
	- Public policy	●	The policy is to not donate to or sponsor political actors.				
	- Anti-competitive behavior	●	All legislation, regulations and signed covenants are strictly adhered to.				
	- Compliance	●	All legislation, regulations and signed covenants are strictly adhered to. Compliance policies are based on our Code of Conduct and other business principles. See <a href="http://www.rabobank.com/csr-guidelines">www.rabobank.com/csr-guidelines</a> .				
DMA PR	Disclosure on Management Approach PR						
	- Customer health and safety	●	18-20, 95				
	- Product and service labelling	●	18-20, 95				
FS15	Policies for the fair design and sale of financial products and services.	●	18-20, 95				
	- Marketing communications	●	18-20, 95				
	- Customer privacy	●	30				
	- Compliance	●	95				
● Fully reported      ◐ Partially reported      ○ Not reported							

		Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation	Reported in
<b>Product and Service Impact</b>							
<b>Product portfolio</b>							
FS6	Percentage of the portfolio for business lines by specific region, size (e.g. micro/SME/large) and by sector.	●	6-10	Specific data by region, size and client type	Proprietary information	Comptetion-sensitive information	
FS7	Monetary value of products and services designed to deliver a specific social benefit for each business line broken down by purpose.	●	21-23, annex 1 KPI 1 and KPI 2				
FS8	Monetary value of products and services designed to deliver a specific environmental benefit for each business line broken down by purpose.	●	Annex 1 KPI 1 and KPI 2				
<b>Audit</b>							
FS9	Coverage and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures.	●	43-53, tools, procedures and information of our CSR monitoring system are externally audited on an annual basis.				
<b>Active ownership</b>							
FS10	Percentage and number of companies held in the institution's portfolio with which the reporting organization has interacted on environmental or social issues.	●		Percentage and number	Not available	Rabobank has implemented such interaction in its credit policies, and interactions take place fully embedded in the loan process wherever necessary.	2015
FS11	Percentage of assets subject to positive and negative environmental or social screening.	●	37-38, 66-67				
FS12	Voting polic(ies) applied to environmental or social issues for shares over which the reporting organization holds the right to vote shares or advises on voting.	●	66-67				
<b>Economic</b>							
<b>Economic performance</b>							
EC1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments.	●	5, 21, 108-114				
● Fully reported      ● Partially reported      ○ Not reported							

		Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation	Reported in
EC2	Financial implications and other risks and opportunities for the organization's activities due to climate change.	●	39, 59, 60, 71, 76-77, see also Annex 1 KPI1 and KPI2, on sustainable finance and asset management				
EC3	Coverage of the organization's defined benefit plan obligations.	●	84				
EC4	Significant financial assistance received from government.	○			Not applicable	Rabobank does not receive financial assistance from government	
<b>Market presence</b>							
EC5	Range of ratios of standard entry level wage compared to local minimum wage at significant locations of operation.	○			Not material		
EC6	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation.	●	62		Not material	It is common practice for local member banks in the Netherlands to work with local based suppliers as much as possible.	
EC7	Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation.	○			Not material	No specific policy available because this is not material to Rabobank nor to stakeholders	
<b>Indirect economic impacts</b>							
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.	●	22, 37-40				
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts.	●	30, 37-39				
<b>Environmental</b>							
<b>Materials</b>							
EN1	Materials used by weight or volume.	●	62-63, annex 1 KPI 4				
EN2	Percentage of materials used that are recycled input materials.	○			Not material	Use of recycled materials is not material to our business.	
<b>Energy</b>							
EN3	Direct energy consumption by primary energy source.	●	62-63, annex 1 KPI 4				
EN4	Indirect energy consumption by primary source.	●	62-63, annex 1 KPI 4				
● Fully reported      ● Partially reported      ○ Not reported							

		Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation	Reported in
EN5	Energy saved due to conservation and efficiency improvements.	●	Annex 1 KPI 4				
EN6	Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives.	●	62-63, annex 1 KPI 4				
EN7	Initiatives to reduce indirect energy consumption and reductions achieved.	●	62-63, annex 1 KPI 4				
<b>Water</b>							
EN8	Total water withdrawal by source.	●	Annex 1 KPI 4				
EN9	Water sources significantly affected by withdrawal of water.	○			Not material	Not material to our business	
EN10	Percentage and total volume of water recycled and reused.	○			Not material	Not material to our business	
<b>Biodiversity</b>							
EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	○			Not applicable	Not relevant to our business	
EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.	○			Not material	In 2011 WWF and Rabobank entered into a partnership. One of the objectives of this partnership is identifying and analysing issues related to biodiversity with which clients might be confronted.	
EN13	Habitats protected or restored.	○			Not material		
EN14	Strategies, current actions, and future plans for managing impacts on biodiversity.	●	61				
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk.	○			Not material	Under review in the context of our biodiversity policy	
<b>Emissions, effluents and waste</b>							
EN16	Total direct and indirect greenhouse gas emissions by weight.	●	62-63, annex 1 KPI 4				
EN17	Other relevant indirect greenhouse gas emissions by weight.	●	62-63, annex 1 KPI 4				
● Fully reported      ● Partially reported      ○ Not reported							

		Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation	Reported in
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved.	●	62-63, annex 1 KPI 4				
EN19	Emissions of ozone-depleting substances by weight.	●	62-63, annex 1 KPI 4				
EN20	NOx, SOx, and other significant air emissions by type and weight.	◐	62-63, annex 1 KPI 4	No breakdown by type of emission/gas.	Not material	Climate footprint almost completely consists of carbon emissions. Other greenhouse gasses are expressed in carbon equivalents and included in our greenhouse gas emission statements. The methodology is explained in Annex 2 of this document.	
EN21	Total water discharge by quality and destination.	○			Not material	Not material to our business	
EN22	Total weight of waste by type and disposal method.	◐	62-63, annex 1 KPI 4	Incomplete information by types and disposal methods	Not material	Such breakdowns are not deemed material, neither business-wise nor volume-wise.	
EN23	Total number and volume of significant spills.	○			Not applicable	Not applicable to our business	
EN24	Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally.	○			Not applicable	Not applicable to our business	
EN25	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organization's discharges of water and runoff.	○			Not applicable	Not applicable to our business	
<b>Products and services</b>							
EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation.	●	13-14, 38, 61-63, 66-67, 71, 76-77, the page numbers cover strategy, WWF partnership, KPI's, initiatives per business activity and internal operations.				
EN27	Percentage of products sold and their packaging materials that are reclaimed by category.	○			Not applicable	Not applicable to our business	
● Fully reported      ◐ Partially reported      ○ Not reported							

		Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation	Reported in
<b>Compliance</b>							
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	●	None, no significant fines or non-monetary sanctions in 2011		Not applicable		
<b>Transport</b>							
EN29	Significant environmental impacts of transporting products and other goods and materials used for the organization's operations, and transporting members of the workforce.	●	62-63, included in climate footprint				
<b>Overall</b>							
EN30	Total environmental protection expenditures and investments by type.	○			Not material	Not material to our business	
<b>Social: Labor Practices and Decent Work</b>							
<b>Employment</b>							
LA1	Total workforce by employment type, employment contract, and region.	●	Annex 1 social indicators				
LA2	Total number and rate of employee turnover by age group, gender, and region.	●	Annex 1 social indicators	Aggregate group data only	Not material	Benefits and material relevance do not outweigh the costs of implementation.	
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations.	○			Not available	Non-core indicator. Cost of implementation outweighs benefits	2013
<b>Labor/management relations</b>							
LA4	Percentage of employees covered by collective bargaining agreements.	●	100% in the Netherlands with the exception of senior and executive management (salary scales senior and executive kader). Abroad, the percentages vary considerable by region and country, depending on local market and legal circumstances.				
LA5	Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements.	●	In the Netherlands 1 month, Internationally the notice periods vary due to legal requirements.				
● Fully reported      ● Partially reported      ○ Not reported							

		Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation	Reported in
<b>Occupational health and safety</b>							
LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs.	○			Not available	Non-core indicator. Cost of implementation outweighs benefits	2015
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region.	●	5	Rates of injury, occupational diseases, lost days, workrelated fatalities.	Not material	Other breaddowns and variables are not deemed material because lost days, injury rates and occupational diseases are included in the absenteeism figures.	
LA8	Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases.	○			Not material	Not relevant to our business	
LA9	Health and safety topics covered in formal agreements with trade unions.	●	83-85				
<b>Training and education</b>							
LA10	Average hours of training per year per employee by employee category.	○			Not material	Training cost figures are reported in the social indicators in annex 1. Benefits and materiality of training in terms of hours spent do not outweigh the cost of implementation.	
LA11	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	●	81-82				
LA12	Percentage of employees receiving regular performance and career development reviews.	●	Annex 1 social indicators				
<b>Diversity and equal opportunity</b>							
LA13	Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity.	●	Annex 1 social indicators	Minority breakdown not available	Not material	Legal reasons prevent adequate measurement	
LA14	Ratio of basic salary of men to women by employee category.	●	Annex 1 social indicators				
● Fully reported      ● Partially reported      ○ Not reported							

		Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation	Reported in
Social: Human Rights							
Investment and procurement practices							
HR1	Percentage and total number of significant investment agreements that include human rights clauses or that have undergone human rights screening.	○			Not material	Rabobank's human rights policy was updated in 2011. This policy is in line with the UN's new human rights framework for multinationals.	
HR2	Percentage of significant suppliers and contractors that have undergone screening on human rights and actions taken.	●	61, 62, CSR criteria for supplier selection are available, and Rabobank has included its human rights policy in its requirements to suppliers and business partners. Engagement with most significant suppliers is ongoing.				
HR3	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained.	○			Not available	Non-core indicator. Cost of implementation outweighs benefits	2015
Non-discrimination							
HR4	Total number of incidents of discrimination and actions taken.	●	Four incidents reported in 2011				
Freedom of association and collective bargaining							
HR5	Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk, and actions taken to support these rights.	●	55, 66-67, Rabobank's human rights policy was updated in 2011. The principles of this policy are embedded in credit policies, and in the principles of responsible investing.				
Child labor							
HR6	Operations identified as having significant risk for incidents of child labor, and measures taken to contribute to the elimination of child labor.	●	55, 66-67, Rabobank's human rights policy was updated in 2011. The principles of this policy are embedded in credit policies, and in the principles of responsible investing.				
Forced and compulsory labor							
HR7	Operations identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of forced or compulsory labor.	●	55, 66-67, Rabobank's human rights policy was updated in 2011. The principles of this policy are embedded in credit policies, and in the principles of responsible investing.				
● Fully reported      ● Partially reported      ○ Not reported							

		Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation	Reported in
<b>Security practices</b>							
HR8	Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations.	○			Not material	This is not deemed a materially significant indicator in view of the nature of our sector.	
<b>Indigenous rights</b>							
HR9	Total number of incidents of violations involving rights of indigenous people and actions taken.	○			Not applicable	Not applicable to our business	
<b>Social: Society</b>							
<b>Community</b>							
SO1	Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting.	●	22, 37-38, 55-57				
FS13	Access points in low-populated or economically disadvantaged areas by type.	●	4, 25, 37-38				
FS14	Initiatives to improve access to financial services for disadvantaged people.	●	16-17, 22, 26-27				
<b>Corruption</b>							
SO2	Percentage and total number of business units analyzed for risks related to corruption.	○			Proprietary information	Disclosing this information could be potentially harmful to the company. Rabobank Group has anti-corruption policies in place.	
SO3	Percentage of employees trained in organization's anti-corruption policies and procedures.	○			Proprietary information	Disclosing this information could be potentially harmful to the company. Rabobank Group has anti-corruption policies in place.	
SO4	Actions taken in response to incidents of corruption.	●	78				
<b>Public policy</b>							
SO5	Public policy positions and participation in public policy development and lobbying.	●	The policy is to not donate to or sponsor political actors.				
SO6	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.	●	Total value is zero. Consequence of our position on SO5				
● Fully reported      ● Partially reported      ○ Not reported							

		Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation	Reported in
<b>Anti-competitive behavior</b>							
SO7	Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes.	●	No legal actions to be reported in 2011				
<b>Compliance</b>							
SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.	●	No significant fines, no non-monetary sanctions in 2011				
<b>Social: Product Responsibility</b>							
<b>Customer health and safety</b>							
PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures.	●	18-20, 95				
PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.	○			Not applicable	Not applicable in view of the type of products and services	
<b>Product and service labelling</b>							
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements.	○			Not material	Product and service information is largely regulated and leaves little room for discretion. To further improve the transparency of financial products, the details of our mortgage proposals have been rewritten so that they are easier to understand.	
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes.	●	18 incidents				
● Fully reported      ○ Partially reported      ○ Not reported							

		Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation	Reported in
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.	●	18-20, 26-27				
FS16	Initiatives to enhance financial literacy by type of beneficiary.	●	18-20, 22, 26-27				
<b>Marketing communications</b>							
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.	●	18-20				
PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes.	●	8 incidents				
<b>Customer privacy</b>							
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.	●	30				
<b>Compliance</b>							
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.	●	No significant fines or non-monetary sanctions in 2011				
● Fully reported      ① Partially reported      ○ Not reported							