

# GRI Index

GRI Standard

Disclosure

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## General Disclosures

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<b>GRI 2: General Disclosures 2021</b>	2-1 Organizational details	<a href="#">2023 ESG Report</a> , Company Profile, pg. 8
	2-2 Entities included in the organization's sustainability reporting	<a href="#">2023 ESG Report</a> , About this Report, pgs. 6-7
	2-3 Reporting period, frequency and contact point	<a href="#">2023 ESG Report</a> , About this Report, pgs. 6-7
	2-4 Restatements of information	<a href="#">2023 ESG Report</a> , Sustainability Overview, pgs. 12-13 <a href="#">2023 ESG Report</a> , Metrics and Targets, pgs. 23-24, 27-28
	2-5 External assurance	<a href="#">2023 ESG Report</a> , About this Report, pgs. 6-7 <a href="#">2023 ESG Report</a> , Apex Companies LLC Verification Opinion Declaration, pgs. 82-84
	2-6 Activities, value chain and other business relationships	<a href="#">2023 ESG Report</a> , Company Profile, pg. 8 <a href="#">2023 ESG Report</a> , Business Overview, pg. 9 <a href="#">2023 ESG Report</a> , Sustainability Overview, pgs. 12-13 <a href="#">2023 ESG Report</a> , Supplier Diversity, pgs. 43-44 <a href="#">2023 ESG Report</a> , Community Engagement and Social Impact, pgs. 53-65 <a href="#">2023 Form 10-K</a> , pgs. 4, 6, 29-30, 105 <a href="#">Third Party Code of Business Conduct and Ethics</a>
	2-7 Employees	<a href="#">2023 ESG Report</a> , Workforce Representation, pg. 36 <a href="#">2023 ESG Report</a> , U.S. Workforce by Job Category, pg. 37
	2-9 Governance structure and composition	<a href="#">2023 ESG Report</a> , Corporate Governance and ESG Oversight, pgs. 68-72 <a href="#">2024 Proxy Statement</a> , pgs. 21-25, 40, 48

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	2-11 Chair of the highest governance body	<a href="#">2023 ESG Report</a> , Corporate Governance and ESG Oversight, pgs. 68-70 <a href="#">2024 Proxy Statement</a> , pgs. 12-13
	2-12 Role of the highest governance body in overseeing the management of impacts	<a href="#">2023 ESG Report</a> , Climate Governance, pgs. 15-16 <a href="#">2023 ESG Report</a> , Privacy and Data Security, pg. 66 <a href="#">2023 ESG Report</a> , Oversight of Management of ESG, pg. 73 <a href="#">2023 ESG Report</a> , Business Ethics and Responsible Business Practices, pgs. 74-75 <a href="#">2023 Form 10-K</a> , pg. 18 <a href="#">2024 Proxy Statement</a> , pgs. 34-35, 47-48
	2-13 Delegation of responsibility for managing impacts	<a href="#">2023 ESG Report</a> , Climate Governance, pgs. 15-16 <a href="#">2023 ESG Report</a> , Oversight and Management of ESG, pg. 73 <a href="#">2023 ESG Report</a> , Business Ethics and Responsible Business Practices, pgs. 74-75 <a href="#">2023 ESG Report</a> , Risk Management, pgs. 78-80 <a href="#">2024 Proxy Statement</a> , pgs. 47-48
	2-14 Role of the highest governance body in sustainability reporting	<a href="#">2023 ESG Report</a> , Climate Governance, pgs. 15-16 <a href="#">2023 ESG Report</a> , Oversight and Management of ESG, pg. 73 <a href="#">2024 Proxy Statement</a> , pgs. 48-49
	2-15 Conflicts of interest	<a href="#">Corporate Governance Guidelines</a> , pg. 7 <a href="#">2024 Proxy Statement</a> , pgs. 19, 28, 46-47 <a href="#">Code of Conduct</a> <a href="#">Third Party Code of Business Conduct and Ethics</a>

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GRI 2: General Disclosures 2021	2-16 Communication of critical concerns	<a href="#">2023 ESG Report</a> , Business Ethics and Responsible Business Practices, pg. 74 <a href="#">2023 Form 10-K</a> , pg. 85 <a href="#">Code of Conduct</a> <a href="#">2024 Proxy Statement</a> , pg. 32
	2-17 Collective knowledge of the highest governance body	<a href="#">2024 Proxy Statement</a> , pgs. 12-18, 21-22, 26-29
	2-18 Evaluation of the performance of the highest governance body	<a href="#">2023 ESG Report</a> , Board Governance Best Practices, pg. 71 <a href="#">2024 Proxy Statement</a> , pgs. 23, 29-32
	2-19 Remuneration policies	<a href="#">2023 ESG Report</a> , Oversight and Management of ESG, pg. 73 <a href="#">2024 Proxy Statement</a> , pgs. 55-127
	2-20 Process to determine remuneration	<a href="#">2024 Proxy Statement</a> , pgs. 55-127
	2-21 Annual total compensation ratio	<a href="#">2024 Proxy Statement</a> , pg. 119
	2-22 Statement on sustainable development strategy	<a href="#">2023 ESG Report</a> , A Message from Rich Fairbank, pgs. 3-5
	2-23 Policy commitments	<a href="#">2023 ESG Report</a> , Business Ethics and Responsible Business Practices, pgs. 74-75
	2-24 Embedding policy commitments	<a href="#">2023 ESG Report</a> , Business Ethics and Responsible Business Practices, pgs. 74-75 <a href="#">Code of Conduct</a> <a href="#">Third Party Code of Business Conduct and Ethics</a> <a href="#">Online Privacy Policy</a> <a href="#">Subpoena Policy</a>
	2-25 Processes to remediate negative impacts	<a href="#">2023 ESG Report</a> , Business Ethics and Responsible Business Practices, pgs. 74-75 <a href="#">Code of Conduct</a> <a href="#">Third Party Code of Business Conduct and Ethics</a> <a href="#">Capital One's Ethics Line</a>

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<b>GRI 2: General Disclosures 2021</b>	2-26 Mechanisms for seeking advice and raising concerns	<a href="#">2023 ESG Report</a> , Business Ethics and Responsible Business Practices, pgs. 74-75 <a href="#">Code of Conduct</a> <a href="#">Third Party Code of Business Conduct and Ethics</a> <a href="#">Capital One's Ethics Line</a>
	2-27 Compliance with laws and regulations	<a href="#">2023 Form 10-K</a> , pg. 217
	2-28 Membership associations	<a href="#">2023 ESG Report</a> , Political Activity, pgs. 76-77 <a href="#">2023 Government and Policy Affairs Group Mid-Year Report</a>
	2-29 Approach to stakeholder engagement	<a href="#">2023 ESG Report</a> , Our Approach to ESG, pg. 10 <a href="#">2023 ESG Report</a> , Stockholder Engagement and Stockholder Role in Governance, pg. 71 <a href="#">2023 Form 10-K</a> , pg. 88 <a href="#">2024 Proxy Statement</a> , pgs. 36-39
	2-30 Collective bargaining agreements	None of our associates are covered under a collective bargaining agreement, and management believes we have a positive working environment for our associates.
<b>Material Topics</b>		
<b>GRI 3: Material Topics 2021</b>	3-1 Process to determine material topics	<a href="#">2023 ESG Report</a> , About this Report, pgs. 6-7 <a href="#">2023 ESG Report</a> , Our Approach to ESG, pg. 10 <a href="#">2023 ESG Report</a> , Risk Management, pgs. 78-80
	3-2 List of material topics	<a href="#">2023 ESG Report</a> , Our Approach to ESG, pg. 10
	3-3 Management of material topics	<a href="#">2023 Form 10-K</a>

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## Economic Performance

<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	<a href="#">2023 Form 10-K</a>
<b>GRI 201: Economic Performance 2016</b>	201-1 Direct economic value generated and distributed	<a href="#">2023 Form 10-K</a> , pgs. 50, 127
	201-3 Defined benefit plan obligations and other retirement plans	<a href="#">2023 Form 10-K</a> , pg. 196
	201-4 Financial assistance received from government	<a href="#">2023 ESG Report</a> , Business Highlights: Commercial Bank, pgs. 19-20 <a href="#">2023 ESG Report</a> , Supporting Affordable Housing and Community Revitalization, pg. 60 <a href="#">2023 Form 10-K</a> , pgs. 69-70, 169-171, 199

## Indirect Economic Impacts

<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Refer to 203-1 and 203-2 below
<b>GRI 203: Indirect Economic Impacts 2016</b>	203-1 Infrastructure investments and services supported	<a href="#">2023 ESG Report</a> , Business Highlights: Commercial Bank, pgs. 19-20 <a href="#">2023 ESG Report</a> , Community Engagement and Social Impact, pg. 53-65 <a href="#">2023 Form 10-K</a> , pgs. 169-171
	203-2 Significant indirect economic impacts	<a href="#">2023 ESG Report</a> , Business Highlights: Commercial Bank, pgs. 19-20 <a href="#">2023 ESG Report</a> , Supporting Renewable Energy, pg. 25 <a href="#">2023 ESG Report</a> , Consumer Well-Being and Financial Inclusion, pgs. 45-52 <a href="#">2023 ESG Report</a> , Community Engagement and Social Impact, pgs. 53-65

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<b>Energy</b>		
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	<a href="#">2023 ESG Report</a> , Our Climate Strategy, pg. 17 <a href="#">2023 ESG Report</a> , Climate Risk Management, pg. 22 <a href="#">2023 ESG Report</a> , Metrics and Targets, pg. 23 <a href="#">2023 ESG Report</a> , Supporting Renewable Energy, pg. 25
<b>GRI 302: Energy 2016</b>	302-1 Energy consumption within the organization	<a href="#">2023 ESG Report</a> , Metrics and Targets, pgs. 23-25
	302-4 Reduction of energy consumption	<a href="#">2023 ESG Report</a> , Metrics and Targets, pgs. 23-25
<b>Water and Effluents</b>		
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	<a href="#">2023 ESG Report</a> , Sustainability Overview, pgs. 12-13
<b>GRI 303: Water and Effluents 2018</b>	303-5 Water consumption	<a href="#">2023 ESG Report</a> , Reducing Water Consumption, pg. 25
<b>Emissions</b>		
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	<a href="#">2023 ESG Report</a> , Sustainability Overview, pgs. 12-13 <a href="#">2023 ESG Report</a> , Our Climate Strategy, pg. 17 <a href="#">2023 ESG Report</a> , Climate Risk Management, pg. 22 <a href="#">2023 ESG Report</a> , Metrics and Targets, pg. 23
<b>GRI 305: Emissions 2016</b>	305-1 Direct (Scope 1) GHG emissions	<a href="#">2023 ESG Report</a> , Metrics and Targets, pgs. 23-24, 27-28 <a href="#">2023 ESG Report</a> , Apex Companies LLC Verification Opinion Declaration, pgs. 82-84
	305-2 Energy indirect (Scope 2) GHG emissions	<a href="#">2023 ESG Report</a> , Metrics and Targets, pgs. 23-24, 27-28 <a href="#">2023 ESG Report</a> , Apex Companies LLC Verification Opinion Declaration, pgs. 82-84
	305-3 Other indirect (Scope 3) GHG emissions	<a href="#">2023 ESG Report</a> , Metrics and Targets, pgs. 23-24, 27-28 <a href="#">2023 ESG Report</a> , Apex Companies LLC Verification Opinion Declaration, pgs. 82-84
	305-5 Reduction of GHG emissions	<a href="#">2023 ESG Report</a> , Metrics and Targets, pgs. 23-24, 27-28

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<b>Waste</b>		
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	<a href="#">2023 ESG Report</a> , Sustainability Overview, pgs. 12-13
<b>GRI 306: Waste 2020</b>	306-3 Waste generated	<a href="#">2023 ESG Report</a> , Sustainability Overview, pgs. 12-13
	306-5 Waste directed to disposal	<a href="#">2023 ESG Report</a> , Sustainability Overview, pgs. 12-13
<b>Employment</b>		
<b>GRI 3: Material Topics</b>	3-3 Management of material topics	<a href="#">2023 ESG Report</a> , Human Capital, pg. 30 <a href="#">2023 ESG Report</a> , Workplace Diversity, Inclusion and Belonging, pg. 34 <a href="#">2023 Form 10-K</a> , pg. 18 <a href="#">2024 Proxy Statement</a> , pg. 47
<b>GRI 401: Employment 2016</b>	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	<a href="#">2023 Form 10-K</a> , pgs. 19, 144, 194, 196 <a href="#">Health Benefits: Healthy Body, Healthy Mind</a>
<b>Diversity and Equal Opportunity</b>		
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	<a href="#">2023 ESG Report</a> , Workplace Diversity, Inclusion and Belonging, pgs. 34-35 <a href="#">2023 Form 10-K</a> , pg. 18 <a href="#">2024 Proxy Statement</a> , pgs. 47-49
<b>GRI 405: Diversity and Equal Opportunity 2016</b>	405-1 Diversity of governance bodies and employees	<a href="#">2023 ESG Report</a> , Workforce Representation, pg. 36 <a href="#">2023 ESG Report</a> , U.S. Workforce by Job Category, pg. 37 <a href="#">2023 ESG Report</a> , Board Overview, pg. 72 <a href="#">2023 Form 10-K</a> , pg. 18 <a href="#">2024 Proxy Statement</a> , pgs. 19, 26, 49, 51
	405-2 Ratio of basic salary and remuneration of women to men	<a href="#">2023 ESG Report</a> , Pay Equity, pg. 39 <a href="#">2024 Proxy Statement</a> , pg. 49