BNY

SUSTAINABILITY REPORT 2025

CONTENTS

2 INTRODUCTION

3 MESSAGE FROM OUR LEADERSHIP
4 BNY OVERVIEW
5 ABOUT THIS REPORT
6 2025 SUSTAINABILITY HIGHLIGHTS
7 LOCATION HIGHLIGHTS

17 SUSTAINABILITY AT BNY

18 OUR APPROACH
20 A FOUNDATION OF STRONG GOVERNANCE
22 SUSTAINABLE SOLUTIONS

27 FINANCIAL OPPORTUNITY

28 FINANCIAL ACCESS
29 COMMUNITY EMPOWERED

32 ENVIRONMENT

33 ENVIRONMENTAL SUSTAINABILITY
35 SUSTAINABLE OPERATIONS
36 ENVIRONMENTAL SUSTAINABILITY AMBASSADORS IN ACTION

37 TRUST

38 RISK MANAGEMENT
39 RESPONSIBLE USE OF DATA & ARTIFICIAL INTELLIGENCE
40 RESPONSIBLE BUSINESS
41 HUMAN RIGHTS

42 THRIVE TOGETHER

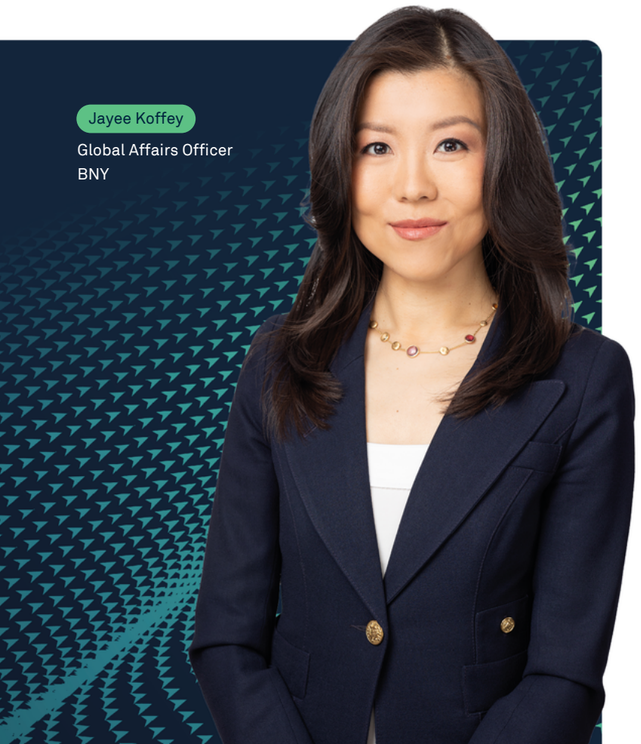
43 CAREER JOURNEY

47 APPENDIX

48 GRI INDEX
55 SUSTAINABLE ACCOUNTING STANDARDS BOARD INDEX
57 LEGAL NOTICE

MESSAGE FROM OUR LEADERSHIP

BNY's approach to sustainability is grounded in the belief that long-term business success depends on maintaining trust in the financial systems we help power, supporting our people and strengthening our communities.



Global Growth and Local Engagement

As BNY grows in key markets, we are investing in the places where our people work and our clients do business. In 2025, that included opening or enhancing offices in Amsterdam, Dublin, Pune, Lake Mary and Pittsburgh.

We are also bringing our leaders and resources closer to the markets where we are growing. New country leaders are strengthening our relationships locally, while Executive Committee members are spending more time on the ground in key markets.

Earlier this year, we launched our Executive-in-Residence initiative to enable our Executive Committee members to spend an extended period working from key locations — creating more time to listen, learn and build lasting relationships.

I spent time in continental Europe, meeting with colleagues and clients and hearing directly about the opportunities and challenges they see in their markets. My Executive Committee colleagues have had similar experiences in India, Japan and across the Middle East. These engagements reinforce a core part of our approach: listen closely, understand the local context and make decisions with the long term in mind.

Financial Resilience and Opportunity

As a company at the center of the global financial system, BNY has an important role to play in helping people save, invest and prepare for the future.

Through the infrastructure we provide and our participation in public- and private-sector initiatives, we help connect individuals to retirement savings and long-term investment opportunities. This includes supporting new savings programs for children in the United States and contributing to policy discussions about personal investment accounts in Ireland.

These efforts reflect how BNY can bring together financial infrastructure, innovation and public-private collaboration to expand opportunity and strengthen confidence in the financial system.

Financial Opportunities for Employees

We are also continuing to invest in employee financial resilience. In 2025, BNY introduced a homeownership affordability initiative to help eligible U.S. employees build greater financial security.

This complements our programs that are designed to help employees plan for important moments in their financial lives — including student loan assistance and retirement benefits. When our employees feel more financially secure, they are better able to thrive at work and at home.

While the homeownership initiative began in the United States, affordability and financial access are global issues. We will continue listening to our employees and exploring where additional support could make the greatest difference.

Responsible Innovation

In 2025, we continued integrating AI across our business and working with leading partners to explore how it can deliver value responsibly and at scale.

We see significant potential for data and AI to improve how we operate, help our employees work more effectively and enable us to serve clients in new ways. As a financial institution, we also have a responsibility to put strong guardrails around how these technologies are developed and used. Innovation and trust must move forward together.

We will continue advancing AI in ways that deliver meaningful value while considering the energy and infrastructure required to support it.

Environmental Impact

More broadly, we are modernizing our offices and facilities to manage our environmental impact in line with the needs of our business. Having achieved our 2025 environmental sustainability goals, we have extended our ambitions to 2030, focusing on the areas most meaningful to our strategy and where we can make the greatest difference.

Looking Ahead

Across these efforts, BNY's focus remains clear: supporting our people, serving our clients and strengthening the financial system for the future.

We made meaningful progress in 2025. We will continue building on it with purpose — and with a clear view of the responsibility and opportunity that come with BNY's role in the world.

BNY OVERVIEW

BNY is a global financial services platforms company at the heart of the world's capital markets. For more than 240 years BNY has partnered alongside clients, using its expertise and platforms to help them operate more efficiently and accelerate growth.

Today BNY serves over 90% of Fortune 100 companies and nearly all the top 100 banks globally. BNY supports governments in funding local projects and works with over 90% of the top 100 pension plans to safeguard investments for millions of individuals.

As of September 30, 2026, BNY oversees $63.4 trillion in assets under custody and/or administration and $2.2 trillion in assets under management.

SPOTLIGHT

Awards and Recognition

Named one of World's Most Admired Companies™ for 2026, Fortune
29th appearance on list

Named one of America's Most JUST Companies, JUST Capital
5th appearance on list

Named one of America's Most Innovative Companies, Fortune
4th appearance on list

Listed on FTSE4Good Russell Index
15 consecutive years

ABOUT THIS REPORT

"Our sustainability approach reflects who we are as a global company: committed to supporting local communities, expanding financial opportunity, and driving innovation in ways that strengthen long-term resilience. We also help our clients navigate evolving market expectations and transition with confidence, creating sustainable value over time."

Meaghan Muldoon
Chief Sustainability Officer, BNY



All data in the report is for the year ended December 31, 2025, unless otherwise noted. Disclosures aligned with the Global Reporting Initiative (GRI) Standards and Sustainability Accounting Standards Board (SASB) Standards are included in the Appendix. Our disclosure based on the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) is available here.

This report is structured around BNY's key sustainability pillars:

Financial Opportunity

27

Read More

Environment

32

Read More

Trust

37

Read More



Additional information about our sustainability performance can be found in our Annual Report and Proxy Statement, regulatory filings, sustainability webpages and other public documents.

The following documents further describe our sustainability approach.

- 2026 Proxy Statement
- 2025 BNY Annual Report
- 2025 BNY TCFD Report
- BNY Employee Code of Conduct
- BNY Environmental Sustainability Statement
- BNY Human Rights Statement
- BNY Modern Slavery Statement
- BNY Supplier Code of Conduct
- BNY Sustainability

Our investment firms continue to report on their stewardship approach and sustainability performance, including TCFD reporting by firms regulated by the U.K.'s Financial Conduct Authority.

- BNY Investments

2025 SUSTAINABILITY HIGHLIGHTS

Financial Opportunity

$49M

Total Global Community Support[1]

~$88M

in total, BNY has made 3 new investments supporting affordable housing at a value of approx. $88 million

Environment

57%

of the square footage of our real estate footprint is LEED (Leadership in Energy & Environmental Design) certified or holds other certifications[2]

CARBON NEUTRAL IN 2025[3]

Trust

ISO/IEC

27001:2022 certification for our Information Security Management System

~100%

in 2025, nearly 100% of employees completed the Ethics and Code of Conduct training course

Thrive Together

$1,000.00

baseline employer 401k contribution for employees in the U.S. earning $100,000 or less.

~3,000

analysts and interns joined BNY in 2025

$25 PER HOUR

effective March 1, 2025, BNY increased its minimum hourly wage for U.S.-based employees to $25 per hour

Sustainable Solutions

$46B

in new green, social and sustainable bond issuances[4]

121

total new green, social and sustainable bond issuances[4]

$7.9B

in assets under management (AUM) as of June 30, 2026 for SPARK℠, SPARK℠ Future, BOLD® and BOLD® Future shares, part of the BNY Dreyfus Government Cash Management flagship fund.

1 This includes employee giving, corporate matching gifts, the value of pro bono volunteerism, foundations giving, and corporate grants and sponsorships.
2 U.S. EPA's ENERGY STAR®, and international standards, such as ISO14001 and BREEAM.
3 For additional information about BNY's approach to carbon neutrality, including purchases of carbon offsets and renewable energy instruments, please see our California Voluntary Carbon Markets (VCMDA) disclosure.
4 Green, social and sustainability bond data reflect FY25 issuances for which BNY served as a trustee and/or agent. The reported volume and count represent client issuances administered by BNY. Data and methodology from Dealogic and Refinitiv.

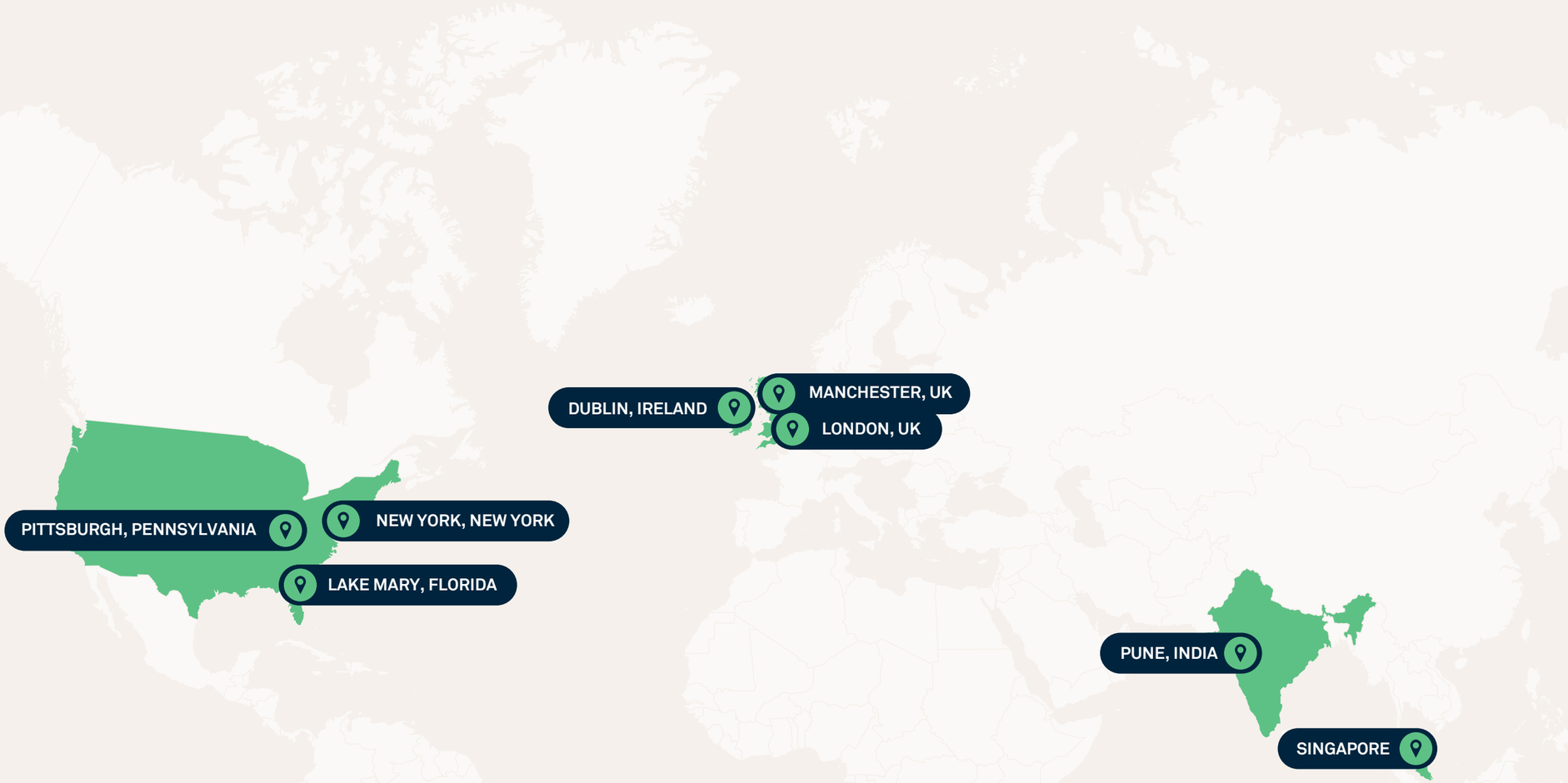
LOCATION HIGHLIGHTS

Through philanthropy, volunteering, investments in sustainable workplaces and engagement, BNY employees are helping create positive outcomes in the communities where we live and work. The following highlights demonstrate the local impact of these efforts across key BNY locations.

Employee & Business Resource Groups (E/BRGs) are open to all employees and offer valuable networks to create conditions for our people to succeed and deliver more — for clients, investors, stakeholders and each other.

Environmental Sustainability Ambassadors (ESA) complement these efforts by engaging employees in environmental awareness, education and volunteer initiatives that support our sustainability priorities.

GENEDGE >BNY
PRISM >BNY
IMPACT >BNY
HEART >BNY
WIN >BNY
VETNET >BNY
ESA >BNY



LOCATION HIGHLIGHTS CONTINUED

Key: Community Environment Inclusion Talent/Education

NEW YORK, NEW YORK



America250 field trip

As a founding sponsor of America250's America's Field Trip, BNY welcomed student winners from across the United States to New York City for an immersive educational experience. The visit began with a walking tour of lower Manhattan, where students explored historic sites connected to America's founding. At BNY's headquarters, participants spent time with senior leaders, and took part in a guided artifacts tour highlighting the firm's historic collections. The experience concluded with a visit to Broadway, where students attended a performance of Hamilton and met members of the cast, connecting history, culture and civic engagement.

GENEDGE Client And Industry Forum

GENEDGE co-hosted a Multi-Bank Forum that convened peers from across the financial services industry for an evening of dialogue and networking. The event brought together clients and partners, to exchange perspectives and strengthen relationships across the sector. Together, these initiatives reflect BNY employees' focus on connection, collaboration and industry engagement.

Rahway River Cleanup

The New York Metro ESA chapter partnered with Friends of Rahway River Parkway for a cleanup at Rahway River Park. Volunteers helped restore and beautify the Lakeside Picnic Area following a busy summer season, collecting several bags of trash and recyclables to support the local environment.

Career Pathways With City University Of New York

BNY supports the City University of New York's Inclusive Economy Initiative, which connects students to career pathways by embedding an integrated academic-and-career advisor and a dedicated industry specialist directly into academic departments — aligning students' coursework with their career goals while sourcing the work opportunities in which they apply their knowledge and skills.

Headquarters Decarbonization Planning

BNY completed an engineering study at our global headquarters in New York City, resulting in plans to convert the perimeter heating system from district steam to electric heat pumps. The study also identified opportunities to support further electrification. The building will also receive a new facade which will improve thermal performance.

Supporting Families In New York City

To kick off Global Community Month, employees in New York assembled care packages for families experiencing housing instability in support of Good+Foundation. Volunteers prepared essential infant items and handmade gifts to support families and help celebrate Mother's and Father's Day, reinforcing BNY's commitment to community well-being across the city.

Wall Street Run & Heart Walk

More than 1,000 BNY employees participated in the American Heart Association's annual Wall Street Run & Heart Walk in Lower Manhattan.

Together, BNY employees raised approximately $267,000 to support the American Heart Association, helping fund lifesaving CPR training and heart health education programs across the United States. This record-breaking year marked BNY's highest level of employee participation and fundraising to date.



LOCATION HIGHLIGHTS CONTINUED

Key: Community Environment Inclusion Talent/Education

PITTSBURGH, PENNSYLVANIA



The UpPrize Social Innovation Challenge

In 2025, the BNY UpPrize Social Innovation Challenge marked its 8th year.[5] UpPrize unites innovators and changemakers to create technology that advances the southwestern Pennsylvania community. The program supported two tracks of innovators for advancing both early- and advanced-stage ideas.

Supporting Food Access

During BNY's Global Community Month in April, employee volunteers in Pittsburgh supported Hilltop Urban Farm through hands-on service focused on advancing food access. Volunteers helped maintain nearly 30 acres of farmland, contributing to planting, pathway maintenance, composting and orchard care.

123
BNY Volunteers

492
Volunteer hours

Strengthening Pathways to Economic Opportunity

BNY's foundation provided support to Neighborhood Allies for their Economic Opportunity initiatives, which help individuals and families build financial knowledge, skills and assets. The initiatives focus on the building blocks of financial health, including income, savings, credit, banking access and investments. Practical steps, such as contributing to an emergency fund or paying down credit card balances, can help participants strengthen financial resilience over time.

Sustainable Operations

BNY is progressing a significant renovation at our Pittsburgh office, targeting LEED Interior Design & Construction Gold certification, alongside investments in on-site solar generation and replacing generator resistance heaters with electric heat pumps.



Environmental Volunteering

In 2025, BNY's ESA Pittsburgh chapter hosted several volunteer events with Tree Pittsburgh, an environmental non-profit organization dedicated to strengthening and building community vitality by restoring and protecting the urban forest through tree planting and care, education, advocacy, and land conservation. BNY volunteers planted approximately 100 trees on a steep hillside to support a landslide mitigation project, conducted street tree maintenance across approximately 20 city blocks, and helped Tree Pittsburgh prepare their Heritage Nursery for winter by moving saplings into covered greenhouses.

ESA >BNY

Employee Engagement And Workplace Culture

In Pittsburgh, E/BRG activity spanned volunteer service, community partnership and employee connection. Initiatives included a PRISM volunteer event at the Greater Pittsburgh Community Food Bank, WIN's International Women's Day initiative with Project Helping to support women in rehabilitation, and a Multicultural Food Fest, hosted by IMPACT, that brought employees together around shared traditions and culture. Together, these programs reflect BNY's focus on community engagement and workplace culture.

WIN >BNY IMPACT >BNY PRISM >BNY

5 https://upprize.org/

LOCATION HIGHLIGHTS CONTINUED

Key: Community Environment Inclusion Talent/Education

LAKE MARY, FLORIDA



Supporting Food Security and Family Stability in Lake Mary

During BNY's Global Community Month in April, 72 BNY employees contributed 288 volunteer hours supporting food security, hygiene access, and family empowerment. At United Against Poverty's warehouse, volunteers organized and prepared supplies while contributing to programs focused on financial literacy and employment training.

72 BNY volunteers

288 Volunteer hours

Community Engagement

BNY employees supported local families and schools through cross E/BRG collaboration and hands-on service. Highlights included a Habitat for Humanity Seminole-Apopka partnership between WIN and IMPACT, which brought together employees to support affordable housing initiatives through volunteering. Other activities included a community event supporting Harbor House, a local domestic violence shelter and a school supply drive for Loughman Oaks Elementary School.

Together, these efforts demonstrate how BNY employees in Lake Mary are creating sustained, locally focused impact both within the workplace and in the surrounding community.

IMPACT BNY WIN BNY

Bringing Markets into the Classroom

BNY supported Bethune-Cookman University's College of Business and Entrepreneurship Market Lab, which provides students with hands-on access to Bloomberg Terminals and real-world market tools to build the skills sought by today's employers. In addition to enhancing workforce readiness, the Lab serves as a hub for financial education, offering programs and resources that benefit both students and the broader community.

Environmental Volunteering in Lake Mary

In 2025, BNY established a new ESA chapter in Lake Mary to engage colleagues in environmental stewardship. The chapter organized a park clean-up to help maintain public green spaces and a volunteer day at the local zoo supporting habitat preparation. It also partnered with the BNY Lake Mary Run/Walk Club for an Earth Day "plogging" event, where employees collected litter while walking or jogging along the trail.



LOCATION HIGHLIGHTS CONTINUED

Key: Community Environment Inclusion Talent/Education

DUBLIN, IRELAND

Building Digital Skills for Employment

BNY is contributing to the Rethink Ireland Empower Tech Futures Fund in Dublin, Ireland, a three-year fund supporting five organizations committed to breaking down barriers to employment for vulnerable young adults. The fund focuses on building transferable digital and technology skills, while also helping organizations scale training, mentorship, job-search guidance, personal development and financial literacy. Through this support, the fund aims to expand access to quality employment pathways for young adults facing challenges such as limited awareness of career opportunities, skills gaps and insufficient support networks.

LEED Platinum Certification for the Dublin Office

BNY's new Dublin office achieved LEED Platinum certification under LEED v4 Interior Design & Construction. The office's central urban location, together with access to public transport, bicycle facilities and electric vehicle charging stations, enables our employees to choose from a variety of commuting options. The renovation was designed to deliver environmental benefits such as greater water and energy efficiency.

Further, the office incorporates effective ventilation and acoustic design that contributed to an improved environmental footprint and a more comfortable working environment.

Education, Care, and Pride

In Dublin, employees supported their local communities through education, caregiving, and inclusion-focused programming. Activities included Junior Achievement Ireland workshops and virtual career talks for young people, a Ronald McDonald House cooking initiative, hosted by HEART, to provide meals for parents caring for sick children, and PRISM's participation in the Dublin Pride March. Together, these activities reflect BNY's focus on community service, workplace culture and employee engagement.

PRISM BNY HEART BNY



LOCATION HIGHLIGHTS CONTINUED

Key: Community Environment Inclusion Talent/Education

MANCHESTER, UK

Community Engagement

In 2025, BNY employees in Manchester contributed more than 7,000 volunteering hours with local community partners.

To celebrate the site's 20th Anniversary, BNY selected Salford Foundation as its signature community partner for 2025, continuing a 20-year relationship with the charity.

Through this partnership, BNY supported young adults across Greater Manchester through volunteering-led work-readiness activities, employer engagement and skills development focused on employability, financial literacy and career exploration. BNY employees contributed time and expertise across programs that helped participants build confidence, understand career pathways and prepare for the world of work. The program reached 867 young adults, exceeding its original target and extending support to more individuals facing barriers to employment.

Supporting Career Returners

The Manchester Women's Committee was established in 2024 to attract, retain and advance women in the workplace.

In 2025, the committee founded the BNY Returner Hub and hosted its first "Returner" event, designed to support people returning to the workforce after a significant career break.

Environmental Volunteering

In 2025, ESA Manchester advanced environmental engagement through workplace awareness initiatives and community volunteering. ESA Manchester hosted a panel discussion on growing your own food and allotments, organized an e-waste awareness talk, and led a Reusable Cup Week initiative that encouraged colleagues to reduce single-use waste through everyday habits. supported by a raffle to win reusable cups. Colleagues also volunteered with Blossom – Health Through Activity, a charity based at Wythenshawe Park Horticultural Centre in Manchester, which helps people to live healthier and more sustainable lives through education. BNY volunteers supported a range of horticultural activities, as well as practical maintenance and improvements across the site, helping Blossom to maintain the community green space.

ESA BNY



20th Anniversary

BNY has had a presence in Manchester since 2005, and in 2025 the site celebrated its 20th Anniversary as a Strategic Global Location.

To mark the Anniversary, the site hosted a number of events including a formal client dinner, and internal colleague celebrations, such as a summer party, E/BRG events, sports and fitness activities and an internal newsletter series celebrating 20 Manchester colleagues over 20 years.

20
Manchester colleagues

20 YEARS

LOCATION HIGHLIGHTS CONTINUED

MANCHESTER, UK

SPOTLIGHT

From Apprentice to Managing Director



For 20 years, Manchester has supported early-career development through apprenticeship programs, helping individuals build valuable skills, gain practical experience, and pursue long-term careers in financial services. The 2025 program continued this commitment by providing participants with opportunities to develop professionally while contributing meaningful work across the business.

Sean Turner, Manchester Site Executive, began his BNY career at the age of 18 in 2005 after completing his A-levels and working in a local pub. At a time when university was widely seen as the traditional route into a professional career, he took a chance on an apprenticeship in financial services.

Today, Sean is Managing Director and Global Head of Corporate Trust Operations. He was also appointed Manchester Site Executive in 2023. His leadership focuses on creating an environment where people feel valued and supported to grow.

"Being one of the first people through the doors in the Manchester office was an extraordinary experience. I was offered 'hands on' training, not only to do my job as a Settlements Clerk better, but to map my own understanding of financial services generally. Over the coming years, I was successful in several applications for promotions into more complex and senior roles, which offered me the opportunity to work in a number of operational teams across the business.

Every apprentice is a leader in the making. When you nurture their talents, provide meaningful challenges, and support their growth with patience and encouragement, you don't just develop skills — you ignite ambition, resilience, and innovation. The apprentices you guide today will be the visionaries and decision-makers shaping BNY's future tomorrow."

Sean Turner, Global Head, Corporate Trust Operations & Manchester Site Executive

LOCATION HIGHLIGHTS CONTINUED

Key: Community Environment Inclusion Talent/Education

LONDON, UK



Financial Education for People with a Learning Disability

BNY partnered with Mencap to support a new financial education program for people with a learning disability. Funded by BNY and co-produced with people with a lived experience of a learning disability, the program is designed to build financial literacy, confidence and independence.

Financial Wellbeing and Leadership in London

In London, E/BRG activity focused on financial wellbeing, leadership and employee engagement. Initiatives included a joint WIN-hosted panel with speakers from across the financial industry to promote financial literacy investing. VETNET also hosted a panel exploring mission-driven leadership and resilience from the perspective of veteran colleagues. Together, these activities reflect BNY's focus on employee engagement, professional development and a strong workplace culture.

WIN BNY VETNET BNY

Scaling Sustainability Engagement in London

In 2025, BNY's ESA chapter in London continued to engage employees on practical sustainability topics, building on the success of the sessions conducted in 2024.

Discussion panels explored heat pumps, sustainable gardening and electric vehicles, helping employees consider more sustainable choices at home and in their daily lives.

ESA BNY

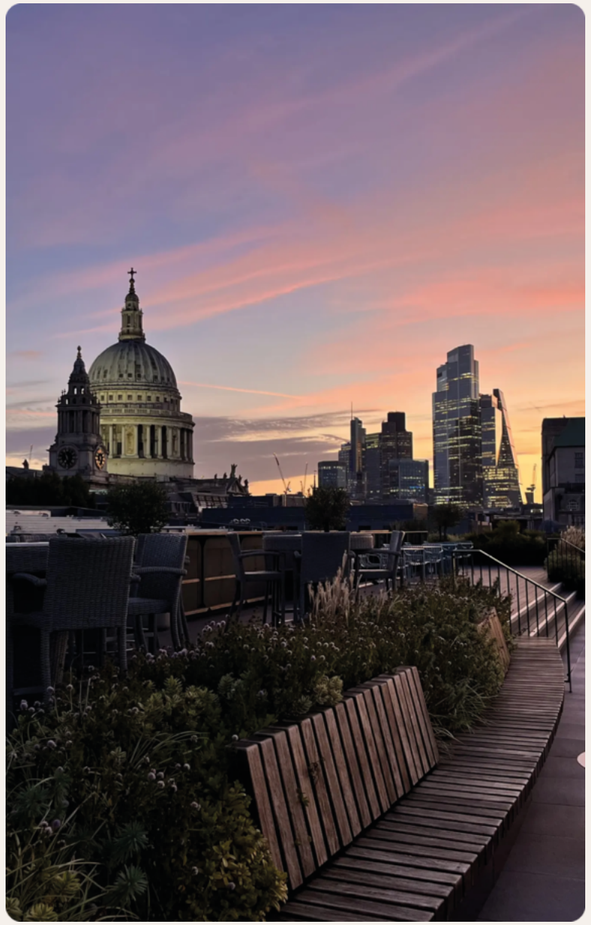
London Office Achieves LEED Gold Certification

In 2025, two floors of BNY's London office achieved LEED Gold certification under the LEED v4.1 Interior Design & Construction rating system.

The office's central urban location, access to public transport and cycling infrastructure support more energy efficient commuting for employees.

The renovated space was designed to reduce resource use through water-efficient fixtures, energy-efficient lighting and equipment, and controls that adjust lighting in response to daylight. Responsible material selection, embodied carbon considerations, and design-for-disassembly principles were integrated into the design process to help support circularity.

Employee health and comfort were also central to the design. Enhanced ventilation, indoor air quality testing, improved acoustic performance and access to quality views were incorporated to support occupant wellbeing.



LOCATION HIGHLIGHTS CONTINUED

Key: Community Environment Inclusion Talent/Education

PUNE, INDIA

Expanding Access to Practical Learning

In Pune, BNY employees supported education and career readiness by connecting with the local community.

Through WIN's STEM education initiative for girls from underresourced communities, BNY volunteers planned workshops and training sessions to help students explore science concepts through hands-on activities and build early career-related skills.

Employees also marked the 77th Army Day Parade at Bombay Sappers Center, Khadki, Pune. Activities led by VETNET included military drills, engaging equipment displays, and moving personal stories shared by veteran colleagues.

WIN BNY VETNET BNY



Building Digital Skills for Employment

BNY partnered with Poona School and Home for the Blind Trust and Little Flower Convent Higher Secondary School for the Deaf and Blind to support inclusive learning experiences for students with visual and hearing impairments.

Through this collaboration, BNY volunteers supported the Smart Spend Financial Literacy Carnival, a multisensory initiative introducing everyday financial concepts through braille currency and guided, choice-based activities. Creative expression and sensory-based stations reinforced learning through touch, sound and smell, while giving students opportunities for expression and interaction.

BNY also partnered with Poona School and Home for the Blind Trust to re-imagine the celebration of Holi in an accessible format for students with visual impairments. Using music, sound, scent, and touch, volunteers helped students explore the concept of color through non-visual senses.

Pune Office Designed for LEED Platinum Certification

BNY's new Pune office has been designed as a high-performance workplace and is currently pursuing LEED Platinum certification under LEED v4 Interior Design & Construction. Its location in a well-connected commercial district provides easy access to public transport, walkable infrastructure and nearby amenities, supporting more efficient commuting and use of urban space.

The project includes energy- and water-efficient systems, along with interior materials and furnishing that incorporate recycled content, environmental product disclosures, responsibly sourced materials, and durable finishes to help reduce life cycle impacts. Enhanced ventilation, air filtration and acoustic design also help create a healthier, more comfortable and productive working environment for employees.



LOCATION HIGHLIGHTS CONTINUED

Key: Community Environment Inclusion Talent/Education

SINGAPORE



Financial Education with Aidha

Students who completed the financial education program funded by BNY and delivered through Aidha in Singapore increased their average monthly savings by 41%. Amongst the whole cohort, 92% reported increased savings. This progress reflects meaningful improvements in financial behaviors among participants and demonstrates the program's impact in strengthening financial resilience.

Employee Wellbeing and Workplace Culture

In Singapore, employee programs promoted workplace wellbeing and greater awareness of neurodiversity. Activities included a World Autism Day discussion on kindness and neurodivergent experiences, a senior leadership conversation, and wellbeing activities such as yoga, running, badminton and meditation. Together, these initiatives helped raise awareness, support employee wellbeing and foster a more connected workplace.

WIN BNY IMPACT BNY HEART BNY

Environmental Volunteering and Community Action

In 2025, BNY's ESA in Singapore encouraged employees to turn environmental awareness into practical action. A month-long car-free challenge marked World Environment Day, encouraging employees to commute by public transport, bicycle or on foot, and consider lower-carbon travel choices.

Employees also volunteered with The Food Bank Singapore to pack food bundles for people experiencing food insecurity, helping redistribute surplus food and reduce waste. Through a workshop with Junior Achievement Singapore, volunteers worked alongside students to build SolarBuddy lights for children without access to safe and reliable lighting, connecting environmental education with a tangible community benefit.

ESA BNY

Singapore Office Targets LEED and WELL Platinum Certification

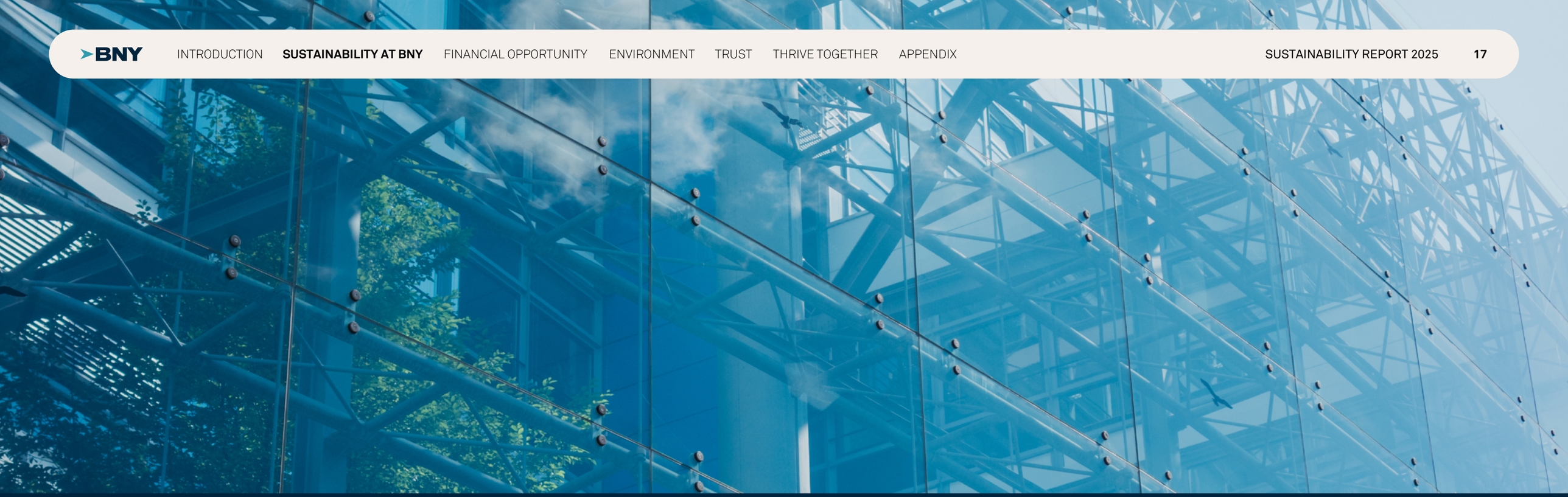
In 2025, BNY employees in Singapore moved into a new office designed to support both environmental performance and employee wellbeing.

BNY is pursuing LEED Platinum certification for the office, which recognizes measures to improve resource efficiency and reduce the environmental impact of the space.

The office is also targeting WELL Platinum certification, reflecting BNY's focus on creating a healthier and more comfortable workplace. The space has been designed to support employee physical and mental wellbeing through features such as access to natural light, clean air and water, and thermal comfort, which are intended to help BNY employees feel and perform at their best.







SUSTAINABILITY AT BNY

IN THIS SECTION

OUR APPROACH
See page 18 →

A FOUNDATION OF STRONG GOVERNANCE
See page 20 →

SUSTAINABLE SOLUTIONS
See page 22 →

OUR APPROACH

BNY plays an important role in enabling the global financial system, and that foundation drives our approach to sustainability.

We manage our firm with a focus on resilience, and we operate to enable an inclusive, sustainable and trusted financial system. We empower our clients and partners with solutions to meet their own sustainability objectives.

As markets change, our expertise, platforms and infrastructure help clients access opportunities, manage complexity and adapt to evolving requirements.

Sustainability considerations help us adapt our business to meet the needs of our clients and the broader economy, and address risks along the way. Our approach is aligned to business objectives to do more for our clients, run our company better and power our culture.

In a rapidly changing landscape, we strive to engage and support more investors, more institutions and more people in the financial system at every stage of their journey. We leverage our expertise, platforms and infrastructure to help clients access new markets and financial instruments, navigate regulations and policy developments, and expand their capabilities.

We continue to optimize and invest in our global operations to enhance the experiences of our employees and clients, including through sustainable design and construction standards across key office locations.

Trust and good governance underpin our work and our ability to be resilient in the face of market disruption and societal change. We practice effective corporate governance and strong risk management, while upholding ethical and transparent business standards and operations.

We continue to report on progress and the evolution of our approach and priorities in the context of emerging stakeholder expectations, including investors, clients, regulators and employees.

Key Sustainability Topics

To manage our sustainability impacts, risks and opportunities over the long term, we strive to identify and focus on topics most relevant to our various stakeholders.

Themes within our sustainability approach include corporate culture, innovation and technology, supply chain management, energy consumption and emissions, privacy and data security, and financial opportunities for clients.

Our 2024 assessment evaluated BNY's impact on various sustainability topics and their potential impact on our financial performance.

The topics that were identified as material were largely aligned with prior sustainability-related materiality assessments and continue to support the direction of our existing sustainability strategy as we adapt BNY to meet the diverse needs of our clients.

The results will continue to be assessed on an ongoing basis to reflect changes to our business model.

Materiality

We acknowledge different concepts of materiality as defined under different standards and regulations. The topics addressed in the report are not meant to be exhaustive, rather they highlight BNY's key focus areas. Sustainability-related requirements and standards continue to emerge and evolve across global jurisdictions, including those where BNY operates. Global regulators have adopted, and may continue to adopt, differing approaches on "materiality" in the context of sustainability reporting.

While the issues discussed in this report may be important to many stakeholders, their inclusion should not be interpreted as necessarily meeting the threshold of materiality under U.S. federal securities laws and regulations, or other legal standards globally, even where terms like "material" or "materiality" are used.

Read More on additional disclaimers within the Legal Notice

OUR APPROACH CONTINUED

As we move into 2026, we are building on our progress to engage and support our key stakeholders through a period of transition. This includes further integrating sustainability across our platforms to advance our business priorities and long-term value creation for our clients, employees and global communities.

WHERE WE HAVE BEEN

Progress in 2025

- Achieved our 2025 Environmental Sustainability goals for our operational footprint and refreshed our approach to align to our global Location Strategy
- Progressed our global emissions reduction strategy across our interim goals for Scope 1 and 2 operational emissions and Scope 3, Category 15 financed emissions
- Launched a strategic initiative that expands our commitment to financial education for community banks, nonprofits and our employees, including hosting a Community Banking Summit to connect local leaders with insights, solutions and experts
- Continued to help our clients realize their own responsible investing goals through thematic research on topics like nature and biodiversity and integrated tools across our investment management firms
- Helped our employees and their families access financial opportunities through student loan matching, enhanced 401(k) features in the U.S. and expanded support for saving and investing at every career stage
- Advanced and embedded AI through training and development programs for every employee, scalable agentic solutions to reimagine workflows and innovations that deepen our client impact

WHERE ARE WE FOCUSED

Priorities in 2026

- Making strategic investments in select offices to create spaces that are welcoming to clients and fosters our culture
- Partnering across our platforms to develop commercially viable strategies that support both commercial growth and our global emissions reduction strategy
- Scaling our efforts to expand long-term financial access and opportunities through strategic alliances, employee benefits programs and philanthropy
- Enhancing BNY products to better serve clients as they achieve their sustainability objectives, meet evolving disclosure obligations, and build resilience
- Continuing to invest in our employees and their families through employee financial resilience initiatives
- Accelerating our journey to embed multi-agentic AI solutions and expand our capabilities while working to reduce energy and water consumption, and ensure trust across the stakeholder ecosystem

A FOUNDATION OF STRONG GOVERNANCE

Our governance structure is designed to support a unified and effective approach to sustainability, with groups responsible for overseeing the development and implementation of key initiatives. This framework helps BNY identify, monitor and address sustainability-related risks and opportunities. It is designed to maintain a corporate governance framework that reflects leading practices for public companies.

Board Oversight of Sustainability

The Board's Corporate Governance, Nominating and Social Responsibility (CGNSR) Committee provides oversight of sustainability-related matters, among other things.

BNY's directors bring a wide-ranging and diverse set of skills, experience and expertise on relevant sustainability issues. They provide thoughtful guidance and constructive challenge to management as we shape and strengthen our sustainability strategy and responsible business practices.

Additional Information can be found in the 2026 Proxy Statement

Sustainability Management

The Sustainability Hub, led by the Chief Sustainability Officer, sets the strategic direction for sustainability at BNY and drives its integration across BNY to support commercial and business objectives and meet global regulatory obligations.

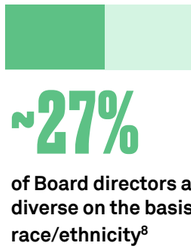
The Sustainability Hub reports to the Chief Global Affairs Officer.

Several Councils and Committees support the development and implementation of sustainability strategy, as shown to the right.

~97%
Average 2025 director attendance at Board and committee meetings[7]

91%
Board independence[6, 7]

5
meetings held in 2025 by the CGNSR Committee, which is comprised entirely of independent directors[7]



~27%
of Board directors are diverse on the basis of race/ethnicity[8]

~45%
of Board directors are women[8]

BOARD OVERSIGHT

Corporate Governance, Nominating and Social Responsibility Committee
Monitors a significant range of activities related to sustainability, public policy and government affairs

Risk Committee
Oversees BNY's risk management framework, including sustainability-related risks

EXECUTIVE OVERSIGHT

Business Management and Client Committee (BMCC)
Reviews strategies, guidelines and policies, including those related to sustainability, to guide enterprise-wide integration and monitor ongoing progress

Enterprise Risk Committee (ERC)
Provides an escalation point for risks, including those arising from sustainability-related matters

MANAGEMENT & IMPLEMENTATION

Sustainability Steering Council (SSC)
Provides strategic guidance and recommendations on BNY's sustainability strategy in line with commercial objectives

Sustainability Strategy Implementation Council (SSIC)
Provides platforms and regions with direct visibility and representation in enterprise-level sustainability strategy development and initiative execution

Climate Strategy Implementation Group (CSIG)
Monitors progress against BNY's emissions reduction targets and supports the execution of our global climate strategy

Internal Audit: Plays a key role in providing objective assurance and advice on sustainability matters, including data management and controls

6 Director independence is determined by the Board based on our Corporate Governance Guidelines and NYSE and SEC requirements. For additional information, see the 2026 Proxy statement.
7 Sourced from the 2026 BNY Proxy Statement: https://www.bny.com/assets/corporate/documents/pdf/investor-relations/bny-2026-proxy-statement.pdf
8 As of our last annual shareholder meeting, April 14, 2026

A FOUNDATION OF STRONG GOVERNANCE CONTINUED

Integrating Stakeholder Perspectives

We learn the most about delivering impact and value to our clients and other stakeholders by actively listening and learning from their views and experiences. Ongoing engagement helps us to deepen our market expertise, assess peer and industry practices, and understand evolving expectations. BNY's global presence gives us access to a broad range of regional perspectives, and we strive to maintain ongoing engagement across multiple channels.

Our Clients

We have direct conversations with prospective and existing clients, including on sustainability-related topics, to understand their priorities and how BNY's capabilities can support their needs. We also participate in relevant initiatives and membership affiliations that align with our commercial objectives and support client choice.

Industry & Public Policy

BNY engages constructively with policymakers and market participants to support effective functioning of the financial services industry, in compliance with applicable legal and regulatory requirements.

Read More on Industry & Public Policy here

Our Investors

Our Corporate Governance, Sustainability, Executive Compensation and Investor Relations teams conduct extensive investor outreach throughout the year. Through our investor engagement process in 2025 and 2026, we reached out to stockholders holding approximately two-thirds of our outstanding common stock. Investor discussions addressed topics including business and company strategy, executive compensation, reporting on political contributions and lobbying, Enterprise Sustainability strategy and reporting, and Board-level oversight of artificial intelligence initiatives.

Our People

We engage directly with employees through ongoing engagement surveys, performance management and development programs. Our E/BRGs, which are open to all employees, provide networks for employees to connect and contribute to BNY's culture.

Our Communities

We work with local and nonprofit organizations and connect directly with communities through volunteer work. These relationships help us evolve our philanthropic strategy and initiatives.

SUSTAINABLE SOLUTIONS

BNY provides solutions that help clients identify opportunities, manage complexity and support their own sustainability and business objectives across the financial life cycle.

We apply our broad expertise, platforms and data capabilities to support clients as they invest, move and manage money.

This includes providing data and reporting capabilities to support asset managers, wealth managers, asset allocators and market infrastructure participants as they navigate evolving sustainability-related disclosure requirements and manage portfolio exposures in line with their own priorities.

We focus on strengthening data management, accounting, risk analytics, compliance monitoring, and reporting for public and private markets.

Through our financing and payment solutions, we facilitate safe and secure digital payments that support the global economy.

Across our business, we seek to deliver value through next-generation services and insights that align with our clients' sustainability and business priorities and applicable regulatory obligations.

For Further Information please refer to the Financial Opportunity section

Learn More about BNY Investments and BNY Wealth and their sustainable and ESG-integrated products

Insights for DR Clients

BNY's Depositary Receipts Market Insights and Initiatives team seeks to equip our corporate clients with clarity on capital markets dynamics and investor expectations. We bring benchmarking, educational resources, and practical guidance to help clients align narratives with strategic objectives.

In 2025, we produced a series of analyses for Depositary Receipts clients in the financial sector, including banks and insurers to assess the scale and accessibility of capital held by sustainability-focused equity funds.[9] These studies evaluated whether targeting such investors for equity investment remains a relevant strategy amid shifting regulation and fund flows.

We segmented clients by region, subsector and market capitalization to identify where investor demand is most concentrated. The output provided investor relations teams with practical guidance on which sustainability-focused funds to prioritize, where meaningful ownership opportunities exist, and how to position disclosures and engagement to align with investor expectations and support credible outreach.

Expanding Sustainability Insights for Smaller Issuers

BNY's Depositary Receipts business serves a diverse client base, ranging from large-cap multinational issuers to smaller companies seeking access to international capital markets. For many smaller issuers that wish to have an independent assessment of their sustainability performance, obtaining independent sustainability assessments can be challenging, as they are often not covered by the largest ESG ratings providers.

To address our issuer clients' demand for ESG assessments where gaps exist, BNY expanded its advisory capabilities in 2025 by onboarding an additional third-party sustainability data provider with broader issuer coverage. This enhanced offering enabled more clients to access independent, third-party evaluations of their sustainability performance and identify areas for improvement.

One Scandinavian client received its first external sustainability assessment through this initiative. Working closely with the company, BNY helped interpret the results, benchmark performance against peers, and identify practical opportunities to strengthen disclosures and sustainability practices. Within a year, the company transformed its sustainability profile, moving from one of the lowest-rated companies in its peer group to a position above the industry average, enhancing its visibility with sustainability-focused investors and providing a stronger foundation for future investor engagement.

9 Refers to equity funds that incorporate environmental, social, and governance (ESG) factors into investment selection, through screening, integration, or explicit sustainability objectives.

SUSTAINABLE SOLUTIONS CONTINUED

Catastrophe Bonds Enable a Resilient Financial Market

By enabling disaster risk to be distributed more broadly across capital markets rather than concentrated solely within the insurance sector, catastrophe bonds can enhance financial resilience and support recovery following natural disasters. BNY supports the functioning of the catastrophe bond market through roles such as trustee, collateral manager, custodian and paying agent, helping these structures operate with transparency, operational integrity and efficient fund flows.

Green, Social and Sustainability Bonds

With an 11% global market share by deal count origination in 2025, BNY served as a leading trustee for green bonds by deal volume.[10] In 2025, we continued to support the demand for green, social and sustainability loans and bonds, administering 121 new sustainability-linked issuances totaling $46 billion.[10] For sustainability-linked products, repayment terms are tied to the issuers' achievement of specified sustainability targets, such as reductions in greenhouse gas emissions.

Massachusetts Clean Water Trust

BNY helped support the Massachusetts Clean Water Trust's 2025 bond issuance, contributing to a financing that advances cleaner water, stronger infrastructure, and more resilient communities across Massachusetts.

As part of the underwriting syndicate, BNY supported a transaction that included Green Bonds and Sustainability Bonds designed to fund critical wastewater and drinking water projects, as well as refund outstanding obligations.

The financing is intended to help address some of the state's most pressing water-related challenges, including aging infrastructure, water quality protection, PFAS remediation, lead-related improvements, and stormwater management.

It also includes a strong social component, with Sustainability Bond proceeds directed toward projects in disadvantaged communities, helping expand access to essential infrastructure investment where it is needed most.

This transaction reflects how BNY helps clients use the capital markets to support environmental progress and community impact. By supporting financing for essential water infrastructure, BNY contributed to a transaction designed to protect public health, strengthen local resilience, and promote more sustainable outcomes over the long term.

New York State Housing Finance Agency

BNY supported the New York State Housing Finance Agency's $504 million 2025 Sustainability Bonds issuance by serving as co-managing underwriter, trustee and tender agent.



The bond proceeds are expected to finance eight mortgage loans for the construction or rehabilitation of eight multifamily developments located across Albany, Bronx, Erie, Kings, Monroe, Niagara and Onondaga Counties. Together, these projects are expected to create or preserve 1,731 housing units, the majority of which are intended to serve households at specified levels of area median income.

The developments are also expected to incorporate energy-efficiency standards and features, supporting both housing affordability and environmental performance.

Through this role, BNY helped support capital deployment toward projects designed to advance access to affordable housing and contribute to more sustainable communities.

10 Green, social and sustainability bond data reflect FY25 issuances for which BNY served as a trustee and/or agent. The reported volume and count represent client issuances administered by BNY. Data and methodology from Dealogic and Refinitiv.

SUSTAINABLE SOLUTIONS CONTINUED

SPOTLIGHT

Supporting Renewable Energy Financing in Egypt

BNY supported the financial close of the 1.1 GW Suez wind project in Egypt — one of the region's largest renewable energy developments — helping mobilize approximately $700 million in senior debt from a consortium of development finance institutions and commercial lenders.

Delivering a project of this scale required alignment across stakeholders, a bankable financing structure and disciplined governance across a multi-phase construction timeline.

BNY served as Account Bank, Security Agent, and Intercreditor Agent, implementing a coordinated operating framework to support transparent cash management, administer the secured structure, and facilitate alignment across lenders.

In these roles, BNY provided operational reliability and governance oversight, supporting consistent execution from financial close through construction.

The project is expected to deliver 1.1 GW of renewable generating capacity, supporting Egypt's energy transition and contributing to emissions reductions of approximately 1.1 million tons of CO_2 annually.

By acting as an independent intermediary across a complex, multi-lender financing structure, BNY helped advance a landmark renewable energy investment while supporting disciplined capital deployment and stakeholder coordination.

Responsible Investment and Client Choice

BNY Investments supports clients' investment goals through distinct strategies and tailored services. This includes offering a wide range of traditional and responsible investment options, according to each client's individual objectives and preferences, through our asset class specialists. In making investment decisions, we incorporate and analyze the financial implications of environmental, social and governance factors where those factors are deemed financially material and within the investment mandate set by our clients.

For clients with additional sustainability preferences, BNY Investments offers products across asset classes, including equities and fixed income, that seek financial opportunities alongside specified sustainability outcomes.

The breadth of our offering is shaped by clients' evolving preferences, global regulatory frameworks and investing practices that are consistent with our fiduciary responsibilities. Our focus remains on advancing clients' long-term financial interests.

Our investment affiliates include Insight Investment, a fixed income franchise; BNY Investments Newton, an equity and multi-asset manager; Walter Scott, a specialized equity manager, and BNY Investments Dreyfus, a liquidity solutions provider.

Each highly experienced investment team has its own proprietary investment process and approach. The following section provides examples of how each responsible investment team integrates sustainability research and tools into their investment approach to meet clients' needs.

Liquidity Solutions Supporting Client Philanthropy

BNY and BNY Investments Dreyfus (Dreyfus)[11] provide a unique opportunity for our clients to help fulfill their philanthropic objectives alongside their core liquidity needs. In June 2026, Dreyfus launched SPARK℠ Future shares, expanding the opportunity to retail investors purchasing through a financial intermediary to donate 10% of net revenue[12] annually to an eligible nonprofit of the investor's choosing, based on each client's average balance.

SPARK℠, SPARK℠ Future, BOLD® and BOLD® Future shares are offered exclusively through the flagship fund, BNY Dreyfus Government Cash Management.[12] The fund's investment adviser is BNY Mellon Investments Adviser, Inc (BNYIA). BNYIA has engaged its affiliate Dreyfus to serve as the fund's sub-adviser.

11 Dreyfus is a division of Mellon Investments Corporation

12 Legal Notice BNY Investment SPARK℠, SPARK℠ Future, BOLD® and BOLD® Future Disclaimer

SUSTAINABLE SOLUTIONS CONTINUED

Dreyfus provides liquidity solutions and offers strategies spanning major asset classes, including Treasury, U.S. government, prime, short duration fixed income and digital assets, through a variety of pooled vehicles in addition to customized portfolio solutions.

In support of clients' philanthropic goals, SPARK℠ and SPARK℠ Future shares enable eligible clients to direct a donation to an eligible nonprofit organization of their choice while managing liquidity needs.[13] BOLD and BOLD Future shares enable clients to support Howard University's Graduation, Retention and Access to Continued Excellence (GRACE) Grant. The BNY BOLD non-financial program also supports mentorships and educational opportunities for Howard University students.

BNY and Dreyfus have donated nearly $3 million to 25 organizations from these share classes through BNY corporate giving as of June 30, 2026.

Please See Legal Notice BNY Investment SPARK℠, SPARK℠ Future, BOLD® and BOLD® Future Disclaimer for important disclosures

AI Governance and Investment Analysis

In 2026, Insight Investment (Insight) published a white paper[14] on the role of AI governance in how entities manage and respond to AI-related risks. The paper highlights that AI can function as an economic variable rather than an externality and may directly influence company valuation where companies do not have adequate safeguards and processes in place to address the responsible and sustainable development and use of AI tools. The use of AI requires careful review and thoughtful design of enterprise arrangements, infrastructure systems, data provenance, model validation and integration in overall risk management. Clear governance is essential to help these components work effectively while managing risk.

To assess an entity's approach to AI governance, Insight's framework focuses on four dimensions: exposure; readiness; commercial strategy and execution; and monitoring and assurance. Given the pace of development in AI, the framework is expected to require ongoing review. For capital allocators, understanding these components can help identify risks and opportunities.

Insight has also collaborated with industry organizations to advance understanding of AI governance and adoption. This includes work with the UK Investment Association (IA) to better understand common use cases and examine enablers and barriers to long-term AI adoption and integration, particularly when paired with distributed ledger technology. Insight also contributed to guidance published by the Society of Pension Professionals, SPP, providing a practical framework to support responsible AI leadership among pension scheme trustees, advisers and administrators.[15]

In 2026-27, Insight will continue to engage both independently (with companies and sectors) and with the IA, their stewardship committee, SPP, and other collaborative initiatives on the topic. This engagement will support the development of industry guidance and the application of Insight's framework to investment analysis and company engagement.

SPOTLIGHT

Understanding Carbon Footprinting for Green Bonds

Insight Investment first published research on carbon footprinting for green bonds in October 2023, prompting discussion across the investment management industry. The research examined how different approaches to estimating the carbon footprint of green bonds have led to different results, with implications not just for green bond holdings but also for the carbon footprint of conventional bond and equity portfolios, given the need to adjust companies' overall metrics to reflect any green bonds they issue. In 2025, Insight participated in the Partnership for Carbon Accounting Financials (PCAF) public consultation on new methods and guidance that reflected many of Insight's recommendations.[16] Insight is translating the latest guidance into portfolio reporting enhancements and modeling to support clients with an interest in the carbon footprint of their portfolios.

13 The organization(s) selected by the shareholder for the Donation must be tax-exempt pursuant to section 510©(3) under the Internal Revenue Code of 1986, as amended, and determined by BNY to be eligible (Eligible Organizations).
14 https://www.insightinvestment.com/globalassets/documents/recent-thinking/global-corporate/glo---ai-governance_final.pdf
15 https://the-spp.co.uk/document/spp-guide-governance-in-the-age-of-ai-a-practical-framework-for-responsible-leadership/
16 https://www.insightinvestment.com/globalassets/documents/recent-thinking/uk-update-on-carbon-footprinting-and-pcaf-consultation-dec-2024.pdf

SUSTAINABLE SOLUTIONS CONTINUED

Nature-related Research and Client Insights

BNY Investments seeks to deepen understanding of emerging nature-related risks and potential financial impacts to support clients' investment decision-making. Our asset class specialists conduct research and publish insights to help clients consider a range of investor needs and issues across investment decisions.

BNY Investments Newton (Newton) is building a framework to help analyze the financially material implications of nature for businesses. To determine materiality, Newton uses revenue data, enabling a more granular focus than sector or industry mappings. This provides, investor-useful information on water scarcity, water quality and deforestation — areas where a deeper understanding can provide investment insight. Newton's advanced analytics capability enables the team to interpret unstructured and inconsistently disclosed data in a way that informs research and supports investment decision-making. Newton expects this approach to evolve as nature-related data becomes more readily available.

For clients with an interest in nature-related topics, Insight Investment has published research, including a deep dive into the financial materiality of water risks in corporate bond portfolios.

Where consistent with their business models, client objectives, products and legal requirements, our investment teams participate in industry groups focused on sustainability and nature-related challenges facing the financial industry, and participate in policy consultations.

Mapping Exposure to Deforestation-linked Commodities

As the potential economic consequences of nature loss become better understood, investors are increasingly seeking to understand financially material biodiversity-related risks faced by the companies in which they invest. Reflecting this, Walter Scott undertook a biodiversity-related risk-mapping exercise across its portfolios in 2025.

The research was guided by the Taskforce on Nature-related Financial Disclosures (TNFD), which provides guidance for companies and investors on how best to consider nature and biodiversity-related risks and impacts.

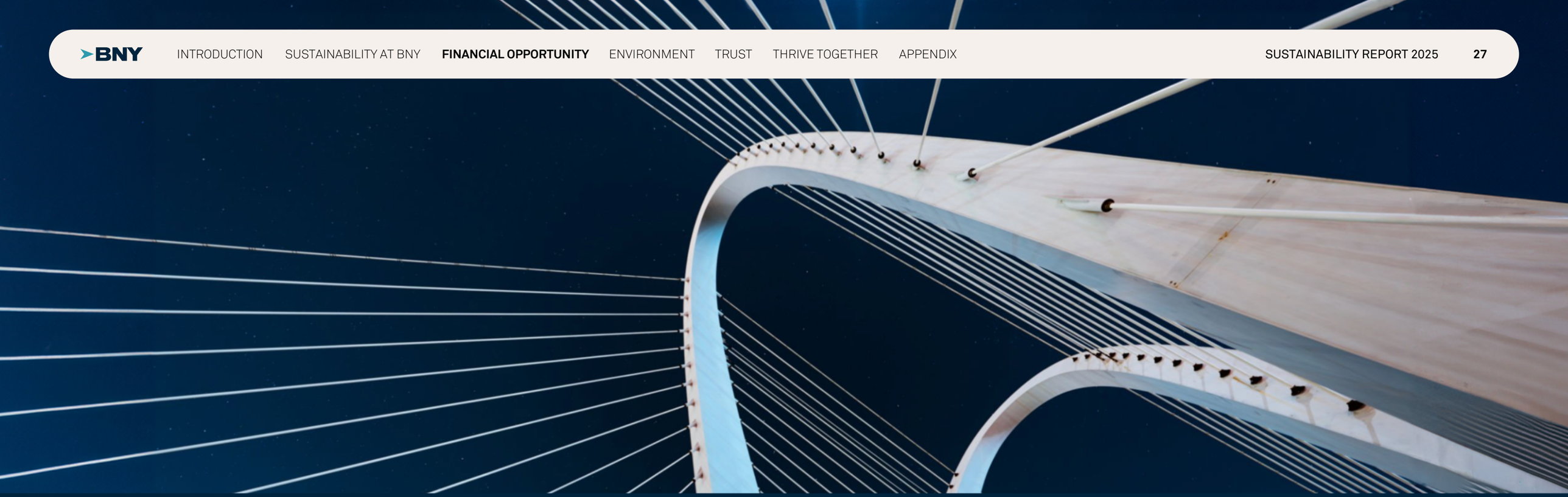
Based on a review of this guidance and the sector weightings in Walter Scott portfolios, the initial assessment focused on deforestation.



The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services has identified four commodities as key drivers of deforestation: beef, palm oil, soya and timber.[17] Despite limited data availability on biodiversity loss, data specific to these four commodities is more readily available. Walter Scott considered this data when assessing its investee companies exposure to deforestation-related risks.

The mapping exercise found that a relatively small number of companies in Walter Scott portfolios had exposure to one or more of the four commodities. Walter Scott estimated the number with direct exposure is even smaller.

17 IPBES Report: https://files.ipbes.net/ipbes-web-prod-public-files/inline/files/ipbes_global_assessment_report_summary_for_policymakers.pdf



FINANCIAL OPPORTUNITY

IN THIS SECTION

FINANCIAL ACCESS
See page 28 →

COMMUNITY EMPOWERED
See page 29 →

FINANCIAL ACCESS

BNY supports financial access by creating more economic benefits for our customers and communities.

Supporting Community Financial Institutions

BNY has continued to support Community Development Financial Institutions (CDFIs) and Minority Depository Institutions (MDIs) through our founding and participation in the Advancing Communities Together (ACT) Deposit Program. In 2025, the program reached a milestone of $100 million in low-cost funding for mission-driven banks across the United States — with BNY directing $24 million in funding to the program.[18] These funds will support community banks as they create economic opportunity in the communities they serve.

Community Financial Education

In 2025, BNY announced anew multi-year initiative designed to strengthen financial education across the interconnected communities that fuel a strong economy — from U.S. community banks to nonprofit organizations.[19]

This multifaceted initiative builds on the company's ongoing efforts to strengthen financial access and resilience and increase participation in the financial system. It encompasses delivering tailored training for 1,000 U.S. community banking leaders, providing dedicated funding and support to nonprofit organizations working to advance financial literacy.

BNY will contribute $10 million to U.S.-based nonprofit organizations that promote financial wellbeing in our communities. This philanthropic commitment aims to improve financial outcomes for individuals and families through education and access.

> "Strong community banks are foundational to a resilient financial system. Providing tools and expertise to support them is an important part of how BNY supports communities."
>
> Sandy Fernandez
>
> Global Head of Philanthropy
> BNY

Voice of Community Banks

In 2024, to increase understanding of the priorities and challenges of the sector BNY launched the Voice of Community Banks initiative with an inaugural survey and white paper. The 2025 survey found that 55% of community banks said small business clients, ranging from brick-and-mortar retailers to professional service providers, were their #1 customer segment.

While about 31% of surveyed small businesses currently do business with community banks, 55% said they plan to begin or expand a relationship with a community bank. Many small businesses were satisfied with the current service that their community banks provide, while also identifying opportunities for additional services, particularly risk management controls and expanded credit card offerings

Cybersecurity threats and data management persisted as major challenges for community banks in 2025, while regulatory compliance and digital transformation rose as top challenges. Technology modernization and data analytics were noted as major opportunities, with geographic expansion coming into focus as an opportunity for the next five years.

Results from the survey helped shape BNY's tailored training for community banks, covering topics like AI, instant payments, and digital assets.

SPOTLIGHT

Community Banking Summit



In 2025, BNY hosted the inaugural Community Banking Summit, bringing together nearly 30 community banking leaders for focused discussion on the opportunities and challenges facing the sector.

The event reflected BNY's focus on supporting community banks through practical insight and direct engagement with senior leaders. Discussions explored ways to strengthen the community banking ecosystem and support long-term economic resilience.

By sharing insights and facilitating collaboration, BNY supported organizations exploring ways to deliver for their customers and communities while advancing financial performance.

18 Act Deposit Program Annual Impact Report Summer 2025
19 BNY Expands Commitment to Financial Education for Community Banks, Nonprofits, and Employees

COMMUNITY EMPOWERED

BNY supports communities through philanthropy, investments, lending, and employee volunteering and working with nonprofit organizations to address local needs and contribute to long-term resilience.

Community Support and Philanthropy

In 2025, BNY's philanthropic activities focused on promoting social mobility, strengthening financially underserved communities and building a more resilient future.

$49M
Total Global Community Support[20]

$13M
Company matching donations in 2025

Employee Giving and Volunteering

BNY supports employees in giving back to the communities where they live and work. Through our year-round Giving at BNY program, employees can take part in volunteer activities and support eligible nonprofit organizations. Eligible employees can take time off to volunteer at nonprofit organizations they are passionate about and want to support. Employees can also maximize their contributions through the annual company match, up to a total of $10,000.

In 2025, BNY hosted global, enterprise-wide volunteer and donation campaigns aligned to key moments, including Community Month, Founders Week and Giving Tuesday Community Week. These events were planned in partnership with Executive Committee Sponsors, senior leaders, local site executives/leads, E/BRG leaders and more in order to help drive employee engagement in our Giving at BNY program.

During our second annual Community Month in April 2025, BNY hosted volunteer events across our regions, globally, with nonprofit partners, employees and our executives serving as sponsors. Our Giving Tuesday campaign expanded from one day to a full week of employee giving and volunteering, sponsored by Executive Committee members Hani Kablawi, Head of International and Emily Portney, Global Head of Asset Servicing.






167k
Total hours of employee volunteering in 2025

8,000
nonprofits organizations supported globally in 2025

$4M
raised through employee giving in 2025

27k
employees across

31
countries

20 This includes employee giving, corporate matching gifts, the value of pro bono volunteerism, foundations giving, and corporate grants and sponsorships.

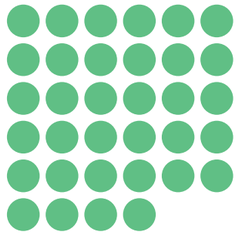
COMMUNITY EMPOWERED CONTINUED

Skills-based Volunteerism

BNY's skills-based volunteer programs connect employee expertise with community organizations seeking practical support. Volunteers from across BNY, including those in Legal, Engineering, Finance, the People Team and Communications, contribute time and skills to projects identified by community partners as important to their mission and growth. Through this work, employees provide critical support to low-income individuals and under-resourced organizations while also delivering expertise, applying skills, and strengthening the places where we live and work.

2,272HRS

of pro bono work contributed globally by BNY employees[21]



34

organizations partnered with throughout pro bono initiatives

Corporate Pro Bono Support

BNY's skills based volunteer programs give employees opportunities to work with community organizations, NGOs and small businesses, while engaging in a one-of-a-kind, cross-sector stretch assignment.

People Team experts partnered with DreamSpring, a nonprofit Community Development Financial Institution (CDFI) supporting underserved entrepreneurs, to help address staff retention challenges by reimagining performance management, training, and compensation. Applying the same expertise and strategies guiding our own organization, the team helped unlock measurable impact.

Following launching a new enterprise-wide strategic plan, the U.K. learning disability services organization, Mencap, needed a rigorous way to track progress and ensure lasting impact. Drawing on agile practices and BNY's platform operating model, the team helped Mencap design an evaluation and monitoring framework with supporting tools and training.

The framework is helping Mencap track progress and support delivery of its ambitions for people living with disabilities.

Legal Pro Bono Support

BNY's Legal Department supports local communities by contributing legal expertise and professional experience. For example, in New York, attorneys provide ongoing consultations through Volunteer Lawyers for the Arts and Family Legal Care. In APAC, BNY attorneys, in collaboration with Clifford Chance, have provided governance advice to non-governmental organizations. Attorneys across multiple jurisdictions have also participated in Justice in Action Sprints, initiatives designed to strengthen justice systems, advance children's rights, and address other important community needs.

Through partnerships with more than twenty legal services organizations worldwide, the Legal Department helps support under-resourced communities, including low-income artists in New York, NGOs in APAC, and survivors of domestic violence. Non-attorneys within the department also contribute their language capabilities and professional expertise to assist clients of legal service organizations. In addition, members of the Legal Department have worked with organizations to help finalize adoptions from foster care, promote homeowner stability, and assist survivors of human trafficking in repairing their credit under the Federal Debt Bondage Repair Act.

Corporate Social Responsibility in BNY India

Since 2014, BNY's India legal entities have complied with India's Corporate Social Responsibility (CSR) requirements, which require qualifying companies to contribute at least 2% of their average net profits from the previous three financial years to eligible social impact initiatives. Guided by its philanthropic focus on empowering communities and supporting resilient futures, BNY India directs these investments toward programs that advance social mobility, entrepreneurship, capacity building, environmental sustainability, human rights, disaster relief, arts and culture, and community services. Through a structured due diligence and monitoring process, projects are prioritized based on community needs, funding gaps, opportunities for long-term support, and potential for lasting impact.

21 Data includes Signature and Legal Pro Bono Programs for 2025.

COMMUNITY EMPOWERED CONTINUED

Supporting Affordable Housing

BNY leverages both traditional and innovative financing solutions to support developers in addressing the shortage of quality rental housing for low- and moderate-income (LMI) families and seniors. Our offerings include construction loans, letters of credit and equity investments in Low-Income Housing Tax Credits (LIHTC) — helping our clients to build and preserve affordable housing in the communities we serve.

LIHTC INVESTMENTS:

In total, BNY has made 3 new investments at a value of approximately

$88M

451

units of affordable housing produced from these investments

Community Reinvestment Act (CRA)

In the U.S., BNY Mellon, N.A. and The Bank of New York Mellon are evaluated under the Community Reinvestment Act (CRA) of 1977, a federal law that encourages banks to help meet the credit needs of their local communities, particularly in LMI areas. Our banking subsidiaries meet these obligations through targeted investments, lending and community service. In their most recent CRA performance evaluations, BNY Mellon, N.A. received a rating of "Outstanding" and The Bank of New York Mellon as "Satisfactory".

Small Business Investment Company (SBIC) Fund Program

BNY's investments in SBIC funds help extend capital to small and middle-market businesses that often have limited access to traditional financing sources. These investments are intended to support business growth while also seeking attractive risk-adjusted returns. Through this approach, BNY combines investment discipline support for businesses seeking to expand, create jobs and strengthen local communities.

SBIC FUNDING COMMITMENT:

$134M
(funded)

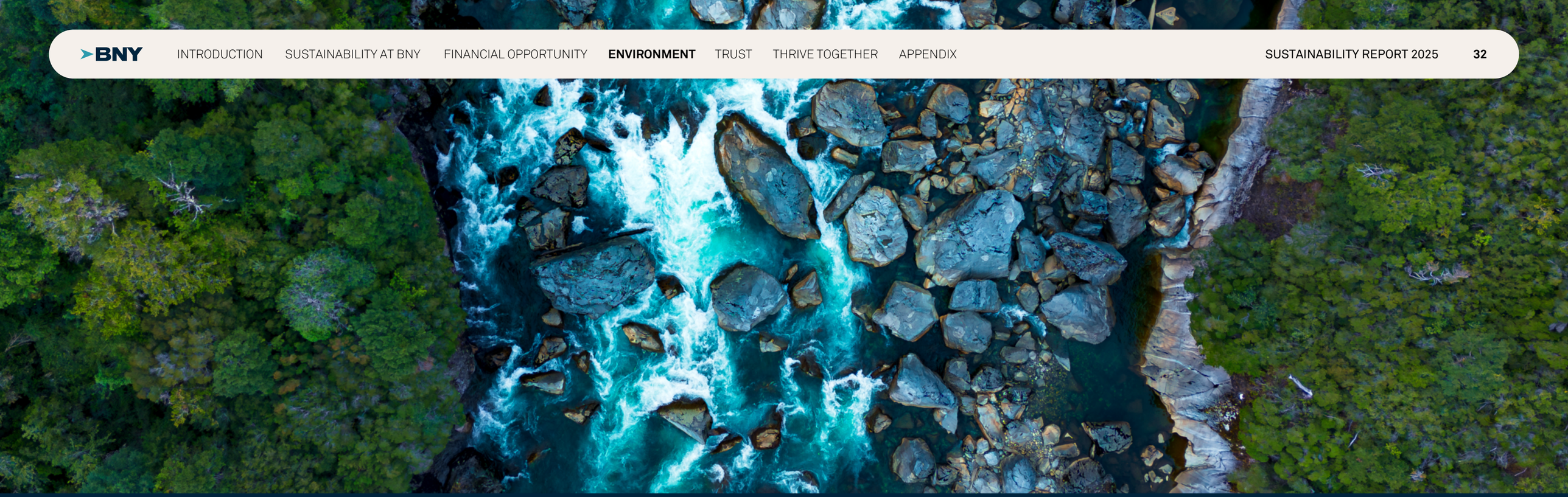
$66M
(unfunded)

25 SBIC
investments in the BNY portfolio as of year-end

SPOTLIGHT

Columbus Crossing

In 2025, BNY closed on $64 million of construction loan and equity financing to support the development of 120 affordable housing units for LMI family households in Bergen County, NJ. When complete, the new units will be leased to qualifying family households at affordable rents based on income (50% and 60% of area median income). The development will also include 30 units set-aside for adults with developmental disabilities and will feature an array of 24/7 services provided by several nonprofits to help these residents manage the responsibilities of independent living. This vibrant and inclusive community will include a welcoming lobby, community room with kitchenette, mailroom and on-site office space for social service providers and property management. The location is ideal for the intended tenants — Paramus, NJ is a strong suburban community with good schools, abundant retail amenities, employment opportunities and good transportation access.



ENVIRONMENT

IN THIS SECTION

ENVIRONMENTAL SUSTAINABILITY
See page 33 →

SUSTAINABLE OPERATIONS
See page 35 →

ENVIRONMENTAL SUSTAINABILITY AMBASSADORS IN ACTION
See page 36 →

ENVIRONMENTAL SUSTAINABILITY

BNY regularly evaluates its environmental goals and actions to improve operational efficiency while supporting client needs and broader business objectives.

We have achieved our 2025 environmental sustainability goals and have thoughtfully extended goals for 2030, focusing on areas most meaningful for our business and strategy.

Our Approach

As a global systemically important bank with $63.4 trillion[22] in assets under custody and/or administration (AUC/A), BNY manages its operations with a focus on resilience and efficiency. We consider the potential impact of climate-related events on our business and operations, including potential effects on clients and financial markets. This helps inform how we manage risk and plan for operational continuity. BNY is taking actions to reduce our impact on the environment and effectively manage our natural resource use.

2025 Goals and Progress

BNY's 2025 environmental sustainability goals focused on office waste management, printing and paper use, water conservation and maintaining carbon neutrality.[23] These goals supported efficiency improvements and environmental performance across our operations. In 2025, we achieved our environmental sustainability goals and continued to make progress against our 2030 operational emissions reduction goal, which is aligned to a 1.5°C pathway.

2025 Environmental Goals

AREA	2025 GOAL	ACHIEVED
Carbon Neutrality	Maintain carbon neutrality [23, 24]	✓
Waste	Divert 80% waste from landfill	✓
	Achieve zero technology waste to landfill	✓
Paper	Maintain paper neutrality in the U.S. and India through 2025	✓
Water	Achieve water use reduction	✓

Financed Emissions

BNY's Scope 3, Category 15 financed emissions continue to represent the largest share of our Scope 3 emissions footprint.[25] We set 2030 reduction targets in line with 1.5°C pathways for the Oil & Gas and Power sectors. In 2025, we continued our work to achieve reductions in our financed emissions from select lending, investment and capital markets activities in these sectors.

Operational Emissions

BNY aims to reduce our Scope 1 and Scope 2 emissions by 50% by 2030, relative to a 2018 base year and in line with a 1.5°C reduction pathway. In 2025, we continued to make progress — achieving a cumulative reduction of 33% relative to our base year. Our Scope 1 and Scope 2 emissions levels are primarily impacted by changes in energy efficiency, our real estate footprint and electricity grid emissions intensity.

Read More information regarding our financed emissions, operational emissions, including GHG inventory measurement and reduction approach, can be found in our TCFD Report

SPOTLIGHT

2030 Environmental Sustainability Goals

In evaluating further opportunities to improve efficiency while supporting our business objectives, BNY developed 2030 environmental sustainability goals, which complement our existing 2030 operational emissions reduction goal.

AREA	2030 GOAL
Carbon Neutrality[23]	Maintain for Scope 1, 2, and 3 (business travel) emissions
Waste	Divert 85% of office waste from landfill
Water	Reduce absolute water withdrawal by 45%, relative to 2018 baseline
Green Buildings	70% of real estate footprint to be LEED or equivalent certified
Operational Emissions	**Reduce Scope 1 and Scope 2 (location-based) emissions by 50% by 2030, relative to a 2018 base year.**

22 Data as of Sept. 30, 2026.

23 For additional information about BNY's approach to carbon neutrality, including purchases of carbon offsets and renewable energy instruments, please see our California Voluntary Carbon Markets (VCMDA) disclosure.

24 BNY's approach to carbon neutrality includes the purchase of carbon offsets and renewable energy certificates (RECs). RECs are widely accepted, market-based legal instruments conveying the environmental benefits of renewable energy.

25 All references to "financed emissions" in this report collectively refer to the greenhouse gas (GHG) emissions associated with BNY's on-balance sheet lending and investment activities, as well as BNY's off-balance sheet capital markets activities (also referred to as "facilitated emissions"). The Scope 3, Category 15 emissions associated with the assets under management undertaken by BNY's investment management business (BNY Investments) are excluded from the financed emissions analysis and sector targets described in this section.

ENVIRONMENTAL SUSTAINABILITY CONTINUED

Carbon Neutrality[26]

As part of our carbon neutrality program,[26] we procure 100% renewable electricity through the purchase of RECs or similar sources and carbon offsets to compensate for any residual emissions that could not be mitigated through other efforts. In 2015, BNY became carbon neutral across its operations. In 2019, we recommitted to our goal of maintaining carbon neutrality annually through 2025 for Scope 1 and Scope 2 emissions, including our data centers, as well as reported Scope 3, Category 6 (business travel) emissions. We met our goal to maintain carbon neutrality in 2025 through real reductions in energy consumption and emissions, as well as through the use of RECs and carbon offsets. Looking ahead, we aim to maintain carbon neutrality annually through 2030.

Read More regarding our carbon neutrality approach in our TCFD Report

Waste Management

In 2025, more than 253 tons of corporate technology equipment was recycled or properly disposed of, representing 100% of electronic waste collected by BNY's corporate technology recycling vendor. BNY also achieved a landfill diversion rate of 85%, exceeding its 2025 goal of diverting 80% of waste from landfill.

BNY continued to advance our waste management strategy by centralizing waste receptacles and enhancing waste signage across our global real estate footprint. Annual waste audits at key U.S. locations help monitor performance and identify opportunities for improvement. At BNY's Pittsburgh office, findings from prior-year waste audits highlighted the volume of organic waste generated on-site, leading to the introduction of a composting program in the cafeteria kitchen.

2025 WASTE DISPOSAL (POUNDS)[27, 28]



WASTE DIVERTED FROM DISPOSAL	
Via Recycling	5,323,760
Via Composting	1,061,500
Waste Directed to Disposal	
Via Incineration (mass burn)	1,558,880
Via Landfill	1,363,880
Total Weight of Waste Generated	**9,308,020**

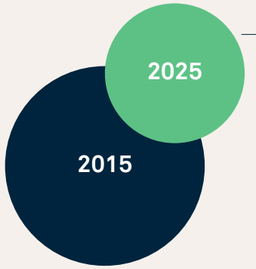
Printing and Paper Use

To reduce paper use, printing capabilities are now granted on an exception-only basis. We remain paper neutral in our global operations by offsetting all paper use across the entire enterprise through a certified reforestation program. Through engagement with third-party vendors, approximately 114,858 trees have been planted to date on behalf of BNY.

2025 WATER WITHDRAWAL (MEGALITERS)[27, 28]



WATER WITHDRAWAL	
U.S. Water Withdrawal	137
International Water Withdrawal	158
Total Water Withdrawal	**295**



We have achieved a 30% reduction in water withdrawal compared with a 2015 adjusted baseline.

Water Use

BNY continues to monitor water consumption and identify opportunities to further reduce usage and improve efficiency. Where appropriate, we use efficient irrigation systems, install high-efficiency fixtures in new spaces and monitor water-intensive mechanical equipment. For example, high-efficiency fixtures and water reuse systems in recent LEED-certified building renovations have contributed to significant water savings. In 2025, BNY also installed real-time water meters at five U.S. locations, including a data center, to deepen visibility into water consumption. This enhanced monitoring supports more accurate water-use data and helps us measure and manage our environmental footprint.

26 For additional information about BNY's approach to carbon neutrality, including purchases of carbon offsets and renewable energy instruments, please see our California Voluntary Carbon Markets (VCMDA) disclosure.

27 Reported waste disposal and water withdrawal metrics reflect BNY office sites representing a majority of our occupied square footage in 2025. Waste and water data includes actual consumption or disposal data where available, as well as landlord-provided data and estimates for certain leased sites. For waste, data may be based on directly contracted hauler reports or information provided by property management and may be allocated proportionally to BNY based on share of space in a building, or based on frequency, quantity and disposal fate of pickups. Waste metrics have been rounded to the nearest ten pounds.

28 BNY withdraws all of its water from municipal sources. All water withdrawals are freshwater.

SUSTAINABLE OPERATIONS

BNY works to improve the efficiency of its real estate footprint by applying environmental considerations across its global locations.

Green Building & Location Strategy
As part of BNY's efforts to improve operational efficiency, we continue to invest in Strategic Global Locations and other key sites. These investments are intended to support a more consistent experience for employees and clients while helping BNY manage its real estate footprint more efficiently.

Our People

We look to create office experiences within vibrant work environments, aiming to amplify collaboration and expand career development paths.

Our Clients

Our commercial focus and investments in centralized locations aims to create a more consistent environment and adds value through improved experience.

Our Communities

Investing in local infrastructure will help to build regional pipelines of talent. Increased presence will help foster deeper relationships with local universities, public officials and clients.

Our Footprint

Efficient building systems require planning and long-term investment. By focusing on infrastructure that BNY owns or controls, we can better manage resource efficiency across our real estate footprint. Sustainability certifications achieved or anticipated across our locations reflect these ongoing investments.

BNY also uses sustainable design and construction guidelines for new buildings and major renovations, including consideration of third-party green building certifications such as LEED.

SPOTLIGHT

Sustainable Operations in Action

In addition to targeted investments in energy efficiency, BNY considers green building certifications that assess broader aspects of design and environmental performance. In recent years we have made significant progress in major site moves and renovations in several locations.

More Efficient Buildings

Across our global operational footprint, BNY continues to make building updates to improve efficiency. Of our real estate footprint, 57% of the square footage is LEED certified or holds other certifications or standards such as U.S. EPA's ENERGY STAR®, ISO 14001 or BREEAM.

Dublin Office Achieves LEED Platinum Certification

BNY's office in Dublin, Ireland, achieved LEED Platinum certification for interior spaces under the Interior Design and Construction (ID+C) rating system.

Community Engagement

In 2025, at our Pittsburgh Location, BNY continued its partnership with The Education Partnership, a local nonprofit organization, to donate surplus office supplies identified during floor clean-outs associated with the Pittsburgh site consolidation. This initiative helped divert materials from landfill while supporting community reuse efforts.

The Education Partnership redistributes these supplies to teachers and students in under-resourced schools across Southwestern Pennsylvania. As part of this partnership, BNY donated a total of approximately 13,325 pounds of office supplies in 2025.

At our New York headquarters, BNY partnered with Materials for the Arts (MFTA), a creative reuse center within the New York City Department of Cultural Affairs, to donate 423 pounds of audiovisual equipment removed from operational use. MFTA redistributes donated materials, free of charge, to New York public schools, city agencies and nonprofit organizations with arts programming across the five boroughs.

Employee Electronic Recycling

In 2025, BNY expanded its employee personal electronic waste collection program to offices in Lake Mary, London and Manchester, building on existing programs in New York and Pittsburgh. The program gives employees a convenient way to bring personal electronic items from home to the office for responsible disposal and recycling. During the year, 96 pounds of electronics were collected and recycled through the program. BNY continues to explore opportunities to extend this initiative to additional office locations.

ENVIRONMENTAL SUSTAINABILITY AMBASSADORS IN ACTION

Across BNY, Environmental Sustainability Ambassadors are employee volunteers who support environmental priorities through local programming and volunteer events. In 2025, ESA chapters helped colleagues take part in practical environmental action and sustainability education in communities around the world.

Key initiatives include:

1 **ESA Brazil:** To mark Earth Day, ESA Brazil chapters in São Paulo and Rio de Janeiro hosted breakfast sessions focused on sustainability education. The chapters shared guidance on the proper disposal of packaging materials and curated a "Reading Corner" featuring children's books on sustainability authored by a BNY employee and ESA member.

2 **ESA Brussels:** Volunteers from the ESA Brussels chapter gathered in the Sonian Forest (protected under the UNESCO World Heritage List) to help remove invasive, non-native trees. The activity supported habitat protection and forest management in an area recognized for its ecological value.

3 **ESA Japan:** To mark World Environment Day on June 5, the ESA chapter in Tokyo organized a clean-up event. Volunteers removed litter from sidewalks and green spaces and cleaned braille blocks in collaboration with the East Japan Guide Dog Association.

4 **ESA Korea:** The Seoul-based ESA chapter hosted a "plogging" event that brought colleagues together to support environmental protection while encouraging health and well-being. The activity gave employees an opportunity to connect while taking part in local environmental action.

5 **ESA Wroclaw:** Employees took part in a two-day "Clean Up the World" volunteer event organized with Fundacja Polska Górom, followed by time to relax and connect around a bonfire. The experience concluded with an evening lecture and stargazing session with an astronomer, timed to coincide with the peak of the Perseid meteor shower.

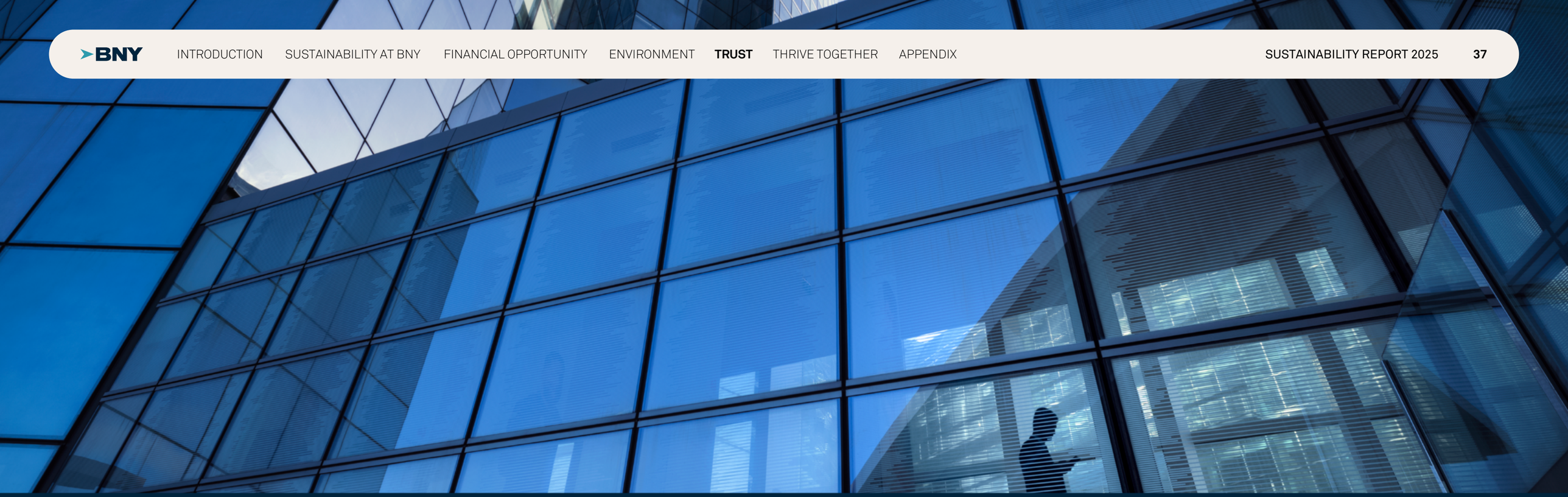












TRUST

IN THIS SECTION

RISK MANAGEMENT
See page 38 →

RESPONSIBLE USE OF DATA & ARTIFICIAL INTELLIGENCE
See page 39 →

RESPONSIBLE BUSINESS
See page 40 →

HUMAN RIGHTS
See page 41 →

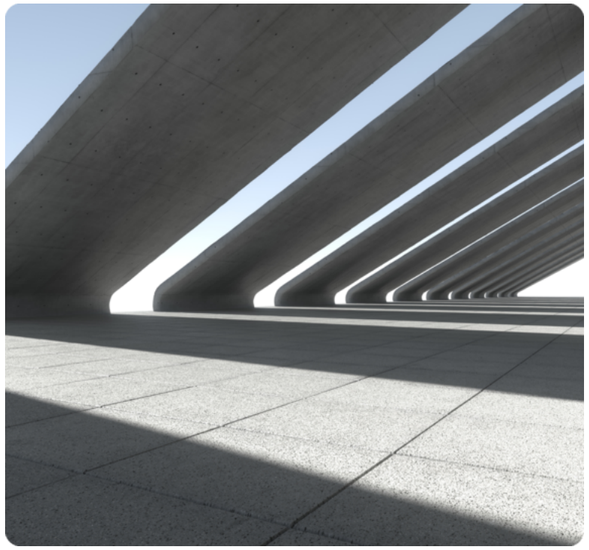
RISK MANAGEMENT

BNY's risk management approach supports responsible growth and is grounded in established policies, limits, monitoring and internal controls.

BNY maintains an Enterprise Risk Management Framework that supports informed, risk-based decision-making. The framework helps BNY identify, assess and manage material risks across the organization. Sustainability-related risks are considered within this framework where relevant, supporting BNY's ability to manage risk while pursuing long-term business objectives.

Managing Sustainability-related Risk

Understanding risk drivers and vulnerabilities is important as BNY addresses potential sources of risk within its risk framework. BNY considers sustainability-related risks, including climate-related risks, as potential drivers of financial risks (such as Credit, Market and Liquidity Risks), and non-financial risks (such as Operational and Strategic Risks).



The way these risk drivers may affect BNY are influenced by factors including our business model, commercial offerings, geographic footprint, client base, sectors, supply chain and other key areas. BNY's approach to managing sustainability-related risks is integrated into core components of our risk framework and is applied where relevant across the organization.

Read More on BNY's approach to Risk Management, please refer to the Risk Management section of BNY's 2025 Annual Report and our 2025 TCFD Disclosure for climate-related risk management

Three Lines of Defense

BNY's three lines of defense model is an important component of our risk framework, helping clarify roles and responsibilities across the organization, including with respect to sustainability matters.

FIRST LINE OF DEFENSE

BNY's **first line of defense** includes senior management, business and corporate staff, excluding employees in Risk Management, Compliance and Internal Audit.

SECOND LINE OF DEFENSE

Risk and Compliance serve as the independent **second line of defense**, providing independent review and challenge. This function reports directly to both the company's CEO and the Risk Committee of the Board.

THIRD LINE OF DEFENSE

Internal Audit is BNY's **third line of defense** and serves as an independent, objective assurance function that reports directly to the Audit Committee of the company's Board of Directors.

RESPONSIBLE USE OF DATA & ARTIFICIAL INTELLIGENCE (AI)

As BNY scales its use of AI, we seek to protect data, respect privacy, maintain resilient systems, and embed risk governance, controls and human oversight.

Advancing AI Across BNY

BNY continues to integrate AI into its core operations, empowering our people and innovating for our clients.

Our enterprise AI platform, Eliza, is built on the premise of foundational, reusable capabilities and is designed to enhance client service, company operations and drive cultural transformation through the power of AI.

Named after Eliza Hamilton, philanthropist and wife of BNY's founder Alexander Hamilton, the platform gives employees a marketplace of AI solutions, access to approved datasets and a community for sharing insights on intelligent tools and platforms.

The AI Hub, established in 2023, coordinates and oversees BNY's application of AI across the firm. Over the past year, we continued to build and refine capabilities to both generate AI-enabled solutions for employees and our clients, while helping employees use AI thoughtfully and responsibly.

AI Governance

Across BNY's development and use of AI-enabled solutions, our goal is to promote compliant and responsible use of AI. BNY's Commitment to the Responsible, Ethical Use of Data and AI sits within our enterprise AI Governance framework and is aligned to leading external AI standards.

Cyber Resilience

As BNY accelerates our transformation, maintaining cyber resilience remains critical to protecting our business and delivering value to clients. BNY's cybersecurity program incorporates layered controls aligned with internationally recognized standards, including ISO 27001:2022 and the National Institute of Standards and Technology Cybersecurity Framework (NIST CSF). We monitor evolving regulatory requirements, guidance, intelligence and technology development across the jurisdictions where we operate to align our global program with leading industry and business practices.

Learn More about our Information Security and Protection practices in our 2025 Annual Report

Data Privacy

BNY's data privacy program is led by the Global Privacy Office, which oversees the development and implementation of the BNY Privacy Framework, supported by policies, procedures and controls. The framework is aligned with leading international privacy standards and structured around the financial services industry's Three Lines of Defense model. This approach defines roles and responsibilities across Lines of Business, Corporate Functions and Platforms, providing a coordinated and accountable approach to data privacy.

BNY aims to handle personal information in a lawful, fair and transparent manner for clients, employees and other stakeholders.

Learn More about BNY's Data Privacy in BNY Trust Center

Managing Innovation Responsibly

BNY manages innovation with a focus on resilience, including how we balance business growth with environmental considerations.

As AI and data center activity expand, BNY continues to consider ways to manage energy use across our operations. This includes energy-efficiency investments, electrification and renewable energy systems, as well as tracking AI-related resource consumption through Eliza, our enterprise AI platform.

SPOTLIGHT

AI Research and Development

BNY collaborated with Carnegie Mellon University to advance the responsible development and application of artificial intelligence through a multi-year research collaboration known as the BNY AI Lab. The collaboration brings together BNY experts with Carnegie Mellon University's leading faculty, students and researchers to develop AI technologies and frameworks with a focus on strong governance, trust and accountability for financial services applications. In addition to theoretical and applied AI research, the collaboration supports cross-disciplinary education, talent development and knowledge exchange. The work is intended to support innovation that delivers long-term value for clients and the financial system.

RESPONSIBLE BUSINESS

Ethical decision-making, transparency and accountability underpin responsible business practices, informing our public policy engagement, tax approach, ethics and compliance practices, and supplier relationships.

Public Policy

As a global financial institution, BNY brings perspective to policy and regulatory discussions that affect our business, the markets in which we operate and the interests of our clients, employees, shareholders and communities. Laws and regulations play an important role in shaping the financial services industry. BNY engages constructively with policymakers and market participants, in compliance with applicable legal and regulatory requirements.

In 2025 BNY spent $1,900,000 on federal lobbying.

Additional Information, including our Political Engagement Statement, lobbying reports and information on our employee-funded political action committees is available here

U.S. Federal Political Action Committee Contributions in 2025 (in USD)[29, 30]

	REPUBLICAN	DEMOCRATIC	TOTAL
U.S. House	122,500	81,000	203,500
U.S. Senate	46,500	43,000	89,500
Total	**169,000**	**124,000**	**293,000**

Tax Transparency

BNY's tax mission is to comply with applicable laws and regulations in every jurisdiction where we operate, while maintaining open and transparent dialogue with tax authorities throughout authorized inquiries and audits. We aim to support transactions that produce tax outcomes aligned with their underlying economic substance and consistent with the intent and letter of the law.

More Information is available in BNY's 2025 Annual Report and Global Tax Strategy

Compliance & Ethics

BNY's Code of Conduct applies to all employees and serves as a foundational guide for ethical behavior across BNY. The code plays a central role in shaping our conduct and risk culture. It outlines key guidelines and shared expectations in areas such as respecting others, avoiding conflicts of interest, conducting business responsibly, engaging with governments, protecting BNY assets and supporting our communities. All BNY employees are expected to complete the mandatory Ethics and Code of Conduct training course, which covers topics such as ethical behavior and reporting and escalation.

Responsible Sourcing and Supplier Standards

At BNY, we strive to build a resilient supplier network that upholds strong ethical standards, demonstrates responsible social and environmental practices, and safeguards human rights. This approach fosters trust and strengthens our ability to identify and manage supplier risk effectively.

Our Supplier Code of Conduct sets expectations for suppliers across areas including worker health and safety, labor and human rights, environmental sustainability, ethical conduct, community engagement, conflicts of interest and other responsible business practices. We hold ourselves to high standards in these areas and expect our suppliers to meet comparable expectations.

As part of BNY's risk-based vendor due diligence process, vendors are assessed, as applicable, across relevant domains including modern slavery, carbon emissions, operational resilience, cybersecurity, and model and AI governance. Relevant control gaps identified through these assessments are communicated to the vendor and tracked for remediation where required. Where a vendor does not adequately address a material gap, the issue is escalated for further review and decision-making regarding the vendor relationship.

29 Data as of December, 31 2025

30 Additional contributions include $11,500 made to Pennsylvania candidates and $5,000 made to trade association PACs, resulting in $309,500 in total PAC disbursements.

HUMAN RIGHTS

BNY's Human Rights Statement guides how we consider human rights across our operations, supply chain and business relationships. It applies to the way we engage with employees, suppliers, communities, and other stakeholders.

Our Human Rights Approach

BNY is committed to respecting human rights in line with internationally recognized standards, including the United Nations Universal Declaration of Human Rights, International Labour Organization (ILO) Core Conventions, and United Nations Guiding Principles on Business and Human Rights and by our participation as a signatory to the United Nations Global Compact.

With this report, we reaffirm our support of the 10 Principles of the United Nations Global Compact (UNGC).[31]

UNITED DECLARATION OF HUMAN RIGHTS ARTICLE 26

SPOTLIGHT

Supporting Education Infrastructure in India

Education plays a critical role in building long-term resilience and opportunity in communities facing structural and socio-economic challenges. In remote regions of India such as Jammu & Kashmir, access to safe, functional and well-resourced school infrastructure is essential for supporting learning outcomes, student well-being, and community development.

Uri was selected for the School Infrastructure Improvement Initiative because of the difficult terrain and persistent security concerns in the region.

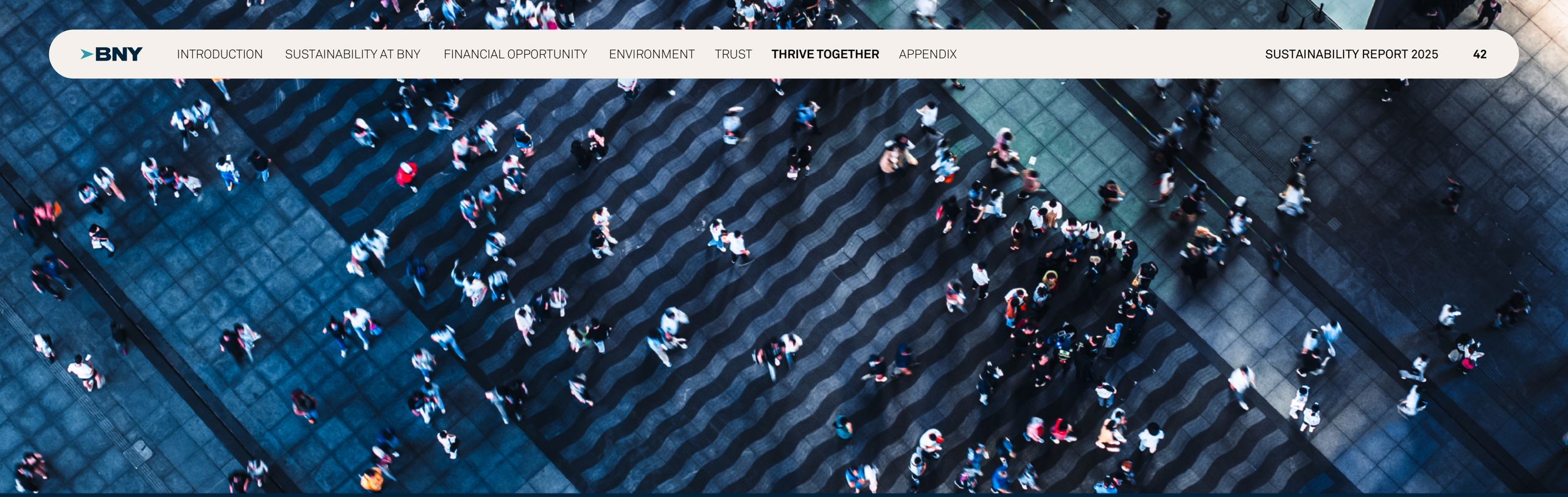
Since 2022, BNY invested ₹17,511,941 across three funding tranches to strengthen education infrastructure in six government schools in Uri Tehsil, Baramulla District.

The initiative focused on upgrading classrooms, sanitation facilities, laboratories, libraries and mid-day meal infrastructure, helping create safer and more effective learning environments for students and educators.

Together, these improvements now support 1,384 students annually, across the six schools. Student enrollment improved by 47% and attendance, engagement and access to quality education increased, particularly for girls and students from underserved backgrounds. Designed as durable, school-owned infrastructure aligned with India's National Education Policy, the program emphasizes long-term sustainability, local ownership and lasting educational impact beyond the funding period.



31 https://unglobalcompact.org/what-is-gc/mission/principles



THRIVE TOGETHER

IN THIS SECTION

CAREER JOURNEY
See page 43 →

CAREER JOURNEY

Our culture is a vital part of BNY's success. Having an environment where all people can fully contribute, be themselves and share different perspectives drives better business outcomes.

It's the most effective way to think through issues, bring different viewpoints together and quickly solve problems. That's why our Thrive Together principle applies to everyone at BNY.

At BNY, we take a global but tailored approach to retention, reflecting the needs of our workforce in each region.

We have implemented initiatives to support career mobility, including stronger internal and external candidate sourcing and enhanced recruitment practices.

To support retention and career progression, BNY encourages senior leaders to actively advocate for and sponsor high-potential employees. Development plans are designed with promotion-readiness in mind and may incorporate sponsorship, coaching or tailored support to help employees advance their careers.

BNY also offers flexible work options that promote work-life balance. In addition, our comprehensive employee benefits include family-friendly policies, further supporting wellbeing and long-term career success.

We monitor retention rates globally and regionally to inform our approach. Our focus is on developing internal talent pipelines, supporting career mobility and helping employees build long-term careers at BNY.

RETENTION AND INTERNAL MOBILITY[32]

21%
Open positions filled internally

90%
Company-wide Retention Rate

Employee/Business Resource Groups (E/BRGs)

As of December 2025, there were approximately 14,500 unique members across our six E/BRGs. These groups are open to all employees to join and participate, and play a vital role in employee engagement and workplace culture.

Examples of 2025 activities include:

GENEDGE hosted Day in the Life Of (DILO), a global program that helped participants explore platforms, learn agile practices, boost digital skills, and connect with senior leaders. Sessions covered topics including Agile, AI, and Digital Tools.

VETNET partnered with BlackRock and a leading technology company to hold a Veteran hackathon focused on solutions for veterans in the financial sector.

HEART supports awareness and understanding of disabilities and health-related experiences. These include visible and invisible disabilities, physical and mental health challenges, chronic conditions, caregiving responsibilities and neurodivergent experiences.

In 2025, HEART partnered with Wellbeing to maintain a global network of Mental Health Champions, providing empathetic peer support and direct employees to appropriate resources.

In 2025, BNY ran its second global cross-E/BRG mentoring program, offering mentoring opportunities for employees at all levels across BNY. Additional information in the Location Highlights section.

SPOTLIGHT

Awards & Recognition

Campus Forward Award
Ripplematch, 2025

Early Talent Award
Handshake, 2025

Top 100 Graduate Employers
Times, 2025

Most Trusted Recruiter Award
IIT Guwahati, 2025

Legacy Recruiter Award
Symbiosis School of Banking and Finance, 2025

32 Interns are excluded from the reported data.

CAREER JOURNEY CONTINUED

Recruiting and Talent Development

Attracting and retaining exceptional talent supports BNY's long-term growth and culture. We offer early-career programs and experienced-hire pathways that help employees build skills and grow their careers while contributing to business priorities.

Early Career Programs

In 2025, BNY's Intern and Analyst Programs continued to support the development of future talent and strengthen the pipeline for long-term growth. Designed as immersive early-career experiences, these programs provided participants with meaningful, goal-oriented work aligned to real business priorities, while building professional, technical and leadership capabilities.

The 10-week global internship program combines hands-on project work with structured development, including mentorship. Interns were embedded within teams across regions and functions, contributing to clearly defined deliverables that support business outcomes. This program is the primary pipeline for BNY's analyst program.

The analyst program is a two-year rotational experience exposing participants to multiple areas of BNY. Through rotations, formal learning and coaching, analysts develop the skills and perspective needed to support BNY's long-term growth.

~3,000

analysts and interns joined BNY in 2025

Development and Learning

At BNY, we support lifelong learning, giving employees access to tools and programs that help them build skills aligned with business needs and career goals.

A core part of this approach is Learn at BNY, our intelligence-driven learning experience platform. It provides a single point of access to high-quality content curated from both internal resources and top external providers. Accessible on- and off-network, including mobile, Learn at BNY helps employees build personalized learning journeys.

In 2025, we advanced our learning strategy with dedicated AI learning pathways available to all employees, designed to build practical capabilities across roles and levels.

SPOTLIGHT

Business for Good Case Competition

BNY's 4th annual Business for Good Case Competition, hosted by Philanthropy & Community Impact, challenged summer interns to develop proposals addressing BNY and community needs. In this unique business school-style case competition, 415 interns conducted research and participated in nonprofit-led masterclasses to develop proposals related to one of three distinct areas: economy, equality, and environment. A panel of judges awarded first prize to a proposal for an AI-powered job assistant designed to identify relevant roles, refine resumes, and provide interview coaching. The winning team then worked with BNY engineers over the course of their senior year to help bring the solution to life.

The program connects early-career development and BNY's philanthropy and sustainability work.



Winners of the 2025 Business For Good Competition

CAREER JOURNEY CONTINUED

These pathways help colleagues build and practice, human-centered AI capabilities and use new technologies responsibly. We continue Leadership and Management development offerings to strengthen people leader capability and support high-performing teams. This includes preparing our leaders as BNY transitioned to the Platform Operating Model by conducting Leadership Summits. In addition, we respond to our culture feedback tools and offer in-person and virtual opportunities globally, covering topics such as leading change, courageous conversations, performance, and more. Together, these programs support BNY by building skills for today and preparing for future work.

Employee engagement with Learn at BNY remained strong in 2025, with 99% year-to-date active usage and 1,071,160 elective learning hours completed. This engagement reflects employees' continued focus on building skills and supporting their career growth.

Mentorship and Career Growth

Mentorship is an important part of BNY's "Thrive Together" culture — helping colleagues build skills and navigate career opportunities. BNY offers structured mentorship programs that foster learning and provide guidance and professional development. Together, we strengthen our talent pipeline and community, creating lasting impact for our people, clients, and the broader industry.

BNY also offers employees the opportunity to self-nominate for internal and external programs, conferences and other enriching leadership experiences that align with their personal and professional goals. Some examples include:

LEARNING HOURS IN 2025[33]

1,071,160

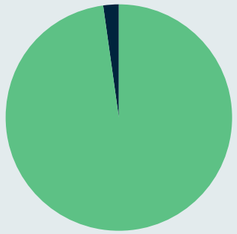
Total elective learning hours (excludes mandatory courses)

33,519

Distinct count of elective courses completed

~22

Average hours per year of elective learning



~98%

of year-end active employee population that completed nonmandatory training

Global E/BRG Mentoring Program: A five-month program designed by our E/BRG leaders to foster community, connections and career development opportunities for all BNY employees.

Reverse Mentoring Program: A six-month program that pairs emerging leaders (mentors) with senior leaders (mentees) to combine cross-generational perspectives and drive collaboration across BNY.

Performance Management

BNY's annual performance management process is designed to align employee goals with our corporate strategy and support a high-performance culture. The process combines ongoing feedback and coaching with two formal performance reviews each year. Regular conversations between managers and employees create a continuous feedback loop that help clarify expectations, assess results and support professional growth. BNY also uses anonymous, multi-rater (360°) feedback to provide broader, confidential perspectives that support employee development.

Employees are assessed against clearly defined, results-based individual goals, as well as enterprise-wide risk and Principles goals that reflect how we operate as one BNY. Individual performance ratings inform compensation decisions, helping align rewards with contribution and results.

Employee Feedback

In 2025, BNY continued to collect and analyze employee feedback to better understand workforce experience and identify opportunities to strengthen our culture. Insights from our enterprise-wide survey highlighted strong alignment between individual work and team objectives and high-quality manager relationships, supported by clear communication.

We also saw continued strength in peer collaboration, with employees expressing confidence in their colleagues and a shared focus on high-quality work.

These insights help inform where we focus our efforts. Looking ahead, BNY will continue translating feedback into action, investing in learning at all levels and simplifying how work gets done.

Employee Representation

In several European jurisdictions where BNY operates, employees are formally represented through internal works councils or staff delegations, as required by local legislation. These elected employee representatives meet regularly with management to be informed and consulted on key business developments, supporting open dialogue and collaboration on matters that impact the workforce.

33 Interns and contractors are excluded from the reported data.

CAREER JOURNEY CONTINUED

Compensation

Performance-linked compensation provides a clear incentive for employee contribution and supports BNY's high-performance culture.

BNY maintains compensation practices designed to be competitive and aligned with employee performance.

Fair Pay

Effective March 1, 2025, BNY increased its minimum hourly wage for U.S.-based employees from $22.50 to $25 per hour — more than three times the federal minimum and representing an increase up more than 50% since 2021.

Pay Equity

BNY is committed to providing equal pay for equal work. To support this, we periodically review our pay practices and processes.

Employee Recognition

Employee recognition supports engagement and helps reinforce BNY's culture of performance. Our recognition program gives managers and employees a way to acknowledge achievements, collaboration and contributions across BNY.

Recognition can also mark important personal and professional milestones, including new-hire welcomes, birthdays and service anniversaries.

Health and Wellbeing

BNY offers benefits designed to support employee wellbeing and respond to the needs of employees and their families. These benefits include healthcare coverage, mental health resources, financial protection, tuition reimbursement and paid time off.

Program enhancements are informed by employee feedback and regional market insights. We also recognize the importance of time away from work to care for oneself and others, offering global leave options such as Caregiver, Bereavement and New Parent Leave to support employees through life's key moments.

- **16 weeks** (minimum) for New Parent Leave
- **10 days** of Caregiver Leave
- **13 days** (minimum) of Sick Leave[34]
- **8 Work From Anywhere days** each year for eligible employees
- **12 no-cost therapy sessions** and **12 no-cost coaching sessions** offered annually for employees and their household family members

Employee Financial Wellbeing

BNY continues to support employee financial wellbeing and broaden access to savings and wealth-building opportunities through a range of compensation, benefits and retirement-focused initiatives, including:

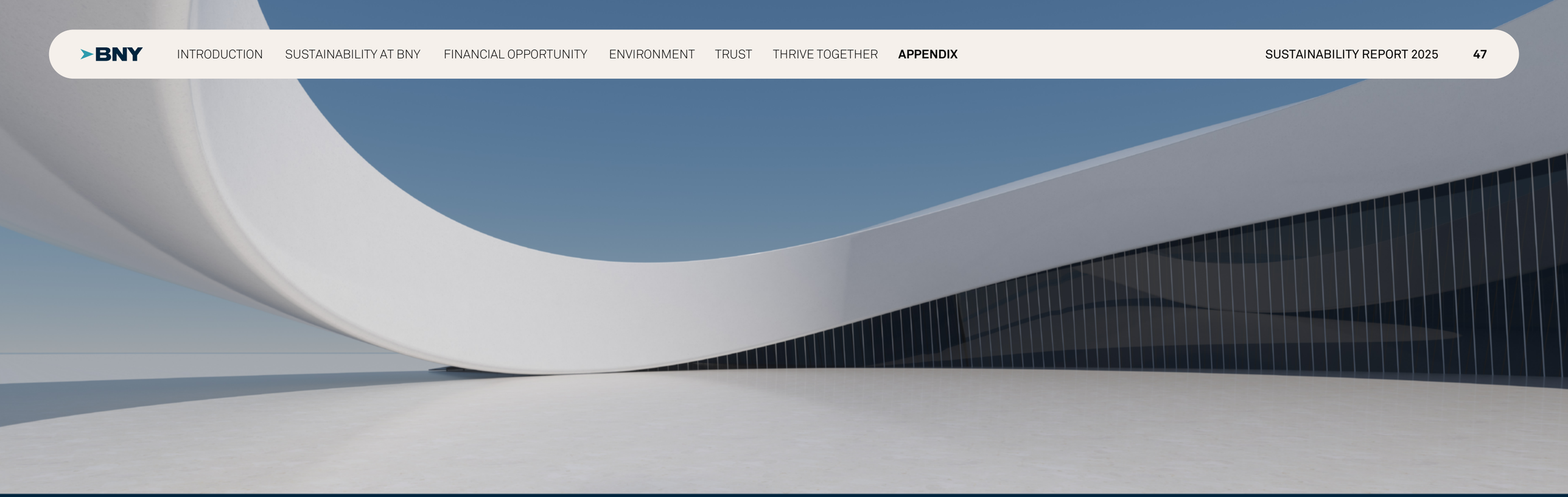
- **Recognition:** Eligible non-exempt (overtime-eligible) employees received an annual VIP recognition award of $1,000 in December 2025; the award was evenly split between BNY stock and VIP points.
- **Incentive Compensation Deferral:** Employees in the U.S. and U.K. can contribute a portion of their incentive compensation to their retirement accounts, enabling long-term financial planning.
- **Student Loan Match Program (US 401k):** Employees may receive employer-matching contributions to their US 401(k) based on qualified student loan repayments.
- **Enhanced Basic Employer Contribution (US 401k):** The baseline employer contribution has increased from $750 to $1,000 for employees earning $100,000 or less.

SPOTLIGHT

Financial Access for Families

BNY is expanding financial access for its employees and their families through targeted initiatives designed to support long-term financial security. One example is Trump Accounts, the U.S. government's investment savings initiative for children, for which BNY serves as financial agent. For eligible newborns of eligible U.S. employees, BNY will match the federal $1,000 contribution to these accounts, effectively doubling the initial investment in each child's future savings. Together, these efforts help BNY families begin building assets from day one and reflect BNY's broader commitment to strengthening employees' financial wellbeing and creating pathways to greater financial opportunity.

34 The 13 days of Paid Sick and Safe Time is a U.S.-specific offering. Sick time provided outside of the U.S. is determined by applicable local statutory law and is reflected in firm policies by location.



APPENDIX

IN THIS SECTION

GRI INDEX
See page 48 →

SUSTAINABLE ACCOUNTING STANDARDS BOARD INDEX
See page 55 →

LEGAL NOTICE
See page 57 →

GRI INDEX

The following is supplemental information to BNY's 2025 Sustainability Report. BNY has reported with reference to the Global Standards (revised Universal Standards and the Topic Standards currently deemed relevant to BNY) for the period January 1 to December 31, 2025. All data is reported as of December 31, 2025, unless otherwise noted. This index provides responses for individual GRI indicators in the following ways: (1) section and page references to our 2025 Sustainability Report; (2) direct responses within the index; (3) references to other company reports (e.g., Annual Report or Proxy Statement); or (4) materials located on our website.

BNY is using the indicator language provided by GRI to facilitate reference and has provided corresponding information that BNY deems to be currently relevant for each indicator. Neither the reference to any terms (including "material") in the indicator, nor the inclusion of any corresponding information in this table, should be deemed to have the meaning associated with any such term under any law, regulation or standard (including the GRI), including whether any such information is material under any law, regulation or standard.

DISCLOSURE		
GRI 1: FOUNDATION 2021 USED		
STANDARDS: GRI 2: General Disclosures 2021		
2-1	Organizational details	Annual Report 2025: • General, pg. 3 • Corporate Information, pg. 207 • International Operations, pg. 19
2-2	Entities included in the organization's sustainability reporting	Form 10-K 2025, Item 1 — Business, Description of Business, pg. 5 Sustainability Report 2025, Introduction, About This Report, pg. 5
2-3	Reporting period, frequency and contact point	Sustainability Report 2025, Introduction, About This Report, pg. 5 The BNY 2025 Sustainability Report was published in October 2026
2-4	Restatements of information	Not applicable for this reporting period
2-5	External assurance	TCFD Report 2025, Independent Accountants' Review Report, pg. 15

DISCLOSURE		
2-6	Activities, value chain and other business relationships	Sustainability Report 2025: • BNY Overview, pg. 4 • Trust, Responsible Business, Responsible Sourcing and Supplier Standards pg. 40 Annual Report 2025: • Review of Business Segments, pg. 10 • International Operations, pg. 19 Political Activities and Policy Engagement Form 10-K 2025, Item 1 — Business, Description of Business, pg. 5 https://www.bny.com/corporate/global/en.html
2-7	Employees	Annual Report 2025, International Operations, pg. 19
2-8	Workers who are not employees	Not applicable as BNY does not rely significantly on workers who are not employees to perform its work, in comparison to employees.
2-9	Governance structure and composition	2026 Proxy Statement: • Item 1 — Election of Directors, Our Corporate Governance Practices, pg. 18 • Item 1 — Election of Directors, Director Qualifications, pg. 16 Sustainability Report 2025, Sustainability At BNY, A Foundation of Strong Governance, pg. 20
2-10	Nomination and selection of the highest governance body	2026 Proxy Statement, Item 1 — Election of Directors, Director Nomination Process, pg. 22
2-11	Chair of the highest governance body	2026 Proxy Statement, Item 1 — Election of Directors, pg. 9 onwards
2-12	Role of the highest governance body in overseeing the management of impacts	2026 Proxy Statement: • Item 1 — Election of Directors, Our Approach to Sustainability, pg. 34 • Item 1 — Election of Directors, Committees and Committee Charters, pg. 37 (see CGNSR Committee Charter) Sustainability Report 2025, Sustainability At BNY, A Foundation of Strong Governance, pg. 20 TCFD Report 2025, Governance, pg. 2

GRI INDEX CONTINUED

DISCLOSURE		
2-13	Delegation of responsibility for managing impacts	Sustainability Report 2025, Sustainability At BNY, A Foundation of Strong Governance, pg. 20 TCFD Report 2025, Governance, pg. 2
2-14	Role of the highest governance body in sustainability reporting	2026 Proxy Statement, Item 1 — Election of Directors, Committees and Committee Charters, pg. 37 (see CGNSR Committee Charter) Sustainability Report 2025, Sustainability At BNY, A Foundation of Strong Governance, pg. 20
2-15	Conflicts of interest	2026 Proxy Statement, Item 1 — Election of Directors, Corporate Governance and Board Information, Director Nomination Process, pg. 22 The Bank of New York Mellon Corporation Directors' Code of Conduct
2-16	Communication of critical concerns	2026 Proxy Statement, Item 1 — Election of Directors, Our Corporate Governance Practices, pg. 18 The Bank of New York Mellon Corporation Corporate Governance Guidelines Data is not currently made publicly available regarding the number and the nature of critical concerns that were communicated to the highest governance body during the reporting period. Sustainability Report 2025, Sustainability At BNY, A Foundation of Strong Governance, pg. 20
2-17	Collective knowledge of the highest governance body	2026 Proxy Statement, Item 1 — Election of Directors, Director Qualifications, pg. 16 (see also Committee and Committee Charters, pg. 37)
2-18	Evaluation of the performance of the highest governance body	2026 Proxy Statement, Item 1 — Election of Directors, Evaluation of Board and Committee Effectiveness, pg. 24
2-19	Remuneration policies	2026 Proxy Statement: • Compensation Philosophy and Governance Practices, pg. 7 • Item 1 — Election of Directors, Director Compensation, pg. 42 • Item 2 — Advisory Vote on Compensation, Introduction, pg. 49 • Other Potential Payments upon Termination or Change in Control, pg. 85 • Additional Information, Equity Compensation Plans, pg. 98 Form 10-K 2025, Item 11 — Executive Compensation, pg. 12

DISCLOSURE		
2-20	Process to determine remuneration	2026 Proxy Statement: • Compensation Philosophy and Governance Practices, pg. 7 • Item 1 — Election of Directors, Director Compensation, pg. 42 • Item 2 — Advisory Vote on Compensation, Introduction, pg. 49 • Item 2 — Advisory Vote on Compensation, Stakeholder Engagement, Support and Feedback, pg. 71 • Additional Information, Equity Compensation Plans, pg. 98
2-21	Annual total compensation	2026 Proxy Statement: • Item 2 — Advisory Vote on Compensation, Pay Ratio, pg. 88 • Item 2 — Advisory Vote on Compensation, Introduction, pg. 49
2-22	Statement on sustainable development strategy	Sustainability Report 2025, Introduction, Message from our Leadership, pg. 3 Sustainability at BNY
2-23	Policy commitments	Sustainability Report 2025, Introduction, About This Report, pg. 5
2-24	Embedding policy commitments	Sustainability Report 2025: • Introduction, About This Report, pg. 5 • Sustainability Report 2025, Sustainability At BNY, A Foundation of Strong Governance, pg. 20 • Trust, Responsible Business, pg. 40 • Trust, Responsible Business, Human Rights, pg. 41 2026 Proxy Statement: • Our Approach to Sustainability, pg. 34 • Corporate Governance and Board Information, Our Corporate Governance Practices, pg. 18
2-25	Processes to remediate negative impacts	Sustainability Report 2025, Trust, Responsible Business, Human Rights, pg. 41 2026 Proxy Statement, Helpful Resources, pg. 107 (see also Human Rights Statement and the Employee Code of Conduct)
2-26	Mechanisms for seeking advice and raising concerns	Employee Code of Conduct The Bank of New York Mellon Corporation Directors' Code of Conduct

GRI INDEX CONTINUED

DISCLOSURE		
2-27	Compliance with laws and regulations	Annual Report 2025, Legal Proceedings, pg. 182
2-28	Membership associations	Sustainability Report 2025, Financial Opportunity, Financial Access, pg. 28 Political Activities and Policy Engagement
2-29	Approach to stakeholder engagement	Sustainability Report 2025, Sustainability At BNY, A Foundation of Strong Governance, Integrating Stakeholder Perspectives, p. 21
2-30	Collective bargaining agreements	Employee Code of Conduct
MATERIAL TOPICS		
STANDARDS: GRI 3:Material Topics 2021		
3-1	Process to determine material topics	Sustainability Report 2025, Sustainability at BNY, Our approach, pg. 18
3-2	List of material topics	Sustainability Report 2025, Sustainability at BNY, Our approach, pg. 18
3-3	Management of material topics	The management of material topics is included in the topic disclosures within this GRI Index (GRI 3-3).
ECONOMIC PERFORMANCE		
STANDARDS: GRI 201: Economic Performance 2016		
GRI 3-3	Management of material topics	Sustainability Report 2025, Sustainability At BNY, A Foundation of Strong Governance, pg. 20 Annual Report 2025, Letter, pg. I
201-1	Direct economic value generated and distributed	Annual Report 2025: • Noninterest Expense, pg. 10 • Financial Summary, pg. 1 Sustainability Report 2025, Financial Opportunity, Community Empowered, pg. 29
201-2	Financial implications and other risks and opportunities due to climate change	TCFD Report 2025, Climate-related Risk Management pg. 5

DISCLOSURE		
201-3	Defined benefit plan obligations and other retirement plans	Annual Report 2025, Note 17 — Employee Benefit Plans, pg. 166
201-4	Financial assistance received from government	Annual Report 2025, Note 11 — Income Taxes, pg. 158 (see also BNY Global Tax Strategy) 2026 Proxy Statement, Additional Information, Information on Stock Ownership, pg. 99
INDIRECT ECONOMIC IMPACTS		
STANDARDS: GRI 203: Indirect Economic Impacts 2016		
GRI 3-3	Management of material topics	Sustainability Report 2025: • Sustainability At BNY, A Foundation of Strong Governance, pg. 20 • Financial Opportunity, Community Empowered, pg. 29
203-1	Infrastructure investments and services supported	Sustainability Report 2025, Financial Opportunity, Community Empowered, pg. 29
203-2	Significant indirect economic impacts	Sustainability Report 2025, Financial Opportunity, Community Empowered, pg. 29
PROCUREMENT PRACTICES		
STANDARDS: GRI 204: Procurement Practices 2016		
GRI 3-3	Management of material topics	Sustainability Report 2025: • Sustainability At BNY, A Foundation of Strong Governance, pg. 20 • Trust, Responsible Business, Responsible Sourcing and Supplier Standards, pg. 40 • Trust, Responsible Business, Human Rights, pg. 41 Supplier Code of Conduct Employee Code of Conduct
204-1	Proportion of spending on local suppliers	Sustainability Report 2025: Trust, Responsible Business, Responsible Sourcing and Supplier Standards, pg. 40 The percentage of procurement budget spent on local suppliers is not available as it is not a material focus for BNY currently.

GRI INDEX CONTINUED

DISCLOSURE		
ANTI-CORRUPTION		
STANDARDS: GRI 205: Anti-corruption 2016		
GRI 3-3	Management of material topics	Sustainability Report 2025: • Sustainability At BNY, A Foundation of Strong Governance, pg. 20 • Trust, Responsible Business, pg. 40 • Trust, Risk Management, pg. 38 Employee Code of Conduct Supplier Code of Conduct The Bank of New York Mellon Corporation Directors' Code of Conduct
205-1	Operations assessed for risk to corruption	Sustainability Report 2025, Trust, Responsible Business, pg. 40
205-2	Communication and training about anti-corruption policies and procedures	Sustainability Report 2025, Trust, Responsible Business, pg. 40 Employee Code of Conduct, Anti-Corruption and Improper Payments pg. 24
205-3	Confirmed incidents of corruption and actions taken	Annual Report 2025, Legal Proceedings, pg. 182
ANTICOMPETITIVE BEHAVIOR		
STANDARDS: GRI 206: Anticompetitive Behavior 2016		
GRI 3-3	Management of material topics	Sustainability Report 2025: • Sustainability At BNY, A Foundation of Strong Governance, pg. 20 • Trust, Responsible Business, pg. 40 Employee Code of Conduct Supplier Code of Conduct, Fair Competition and Antitrust, pg. 9 The Bank of New York Mellon Corporation Directors' Code of Conduct
206-1	Legal actions for anticompetitive behavior, anti-trust, and monopoly practices	Annual Report 2025, Legal Proceedings, pg. 182

DISCLOSURE		
ENERGY		
STANDARDS: GRI 302: Energy 2016		
GRI 3-3	Management of material topics	Sustainability Report 2025: • Sustainability At BNY, A Foundation of Strong Governance, pg. 20 • Environment, Environmental Sustainability, pg. 33 • Sustainable Operations, pg. 35 TCFD Report 2025, Metrics and Targets, pg. 12 Environmental Sustainability Policy Statement
302-1	Energy consumption within the organization	a. TCFD Report 2025, Metrics and Targets, pg. 12 b. While BNY does not purchase fuel from renewable sources directly; we do purchase carbon offsets and renewable electricity products to offset all of our emissions generated from Scope 1, Scope 2 and Scope 3 business travel. c. TCFD Report 2025, Metrics and Targets, pg. 12 d. BNY does not sell any electricity, heating, cooling or steam. e. TCFD Report 2025, Metrics and Targets, pg. 12 f. TCFD Report 2025, Metrics and Targets, pg. 12 g. BNY applies standard energy conversion factors and ultimately converts energy consumption from gigajoules to MWh (0.277778 MWh per GJ)
302-2	Energy consumption outside the organization	BNY considers energy consumed outside the organization as purchased goods and services, capital goods, fuel-and-energy-related activities, upstream transportation and distribution, business travel, employee commuting, upstream leased assets, downstream leased assets, and investments relevant to our operations.
302-3	Energy intensity	a. TCFD Report 2025, Metrics and Targets, pg. 12 b. TCFD Report 2025, Metrics and Targets, pg. 12 c. TCFD Report 2025, Metrics and Targets, pg. 12 d. The ratio uses energy consumed within the organization as reported TCFD Report 2025, Metrics and Targets, pg. 12

GRI INDEX CONTINUED

DISCLOSURE		
302-4	Reduction of energy consumption	TCFD Report 2025, Metrics and Targets, pg. 12
302-5	Reductions in energy requirements of products and services	Not applicable to BNY's business.
WATER AND EFFLUENTS		
STANDARDS: GRI 303: Water and Effluents 2018		
GRI 3-3	Management of material topics	Sustainability Report 2025: • Sustainability At BNY, A Foundation of Strong Governance, pg. 20 • Environment, Environmental Sustainability, pg. 33 Environmental Sustainability Policy Statement
303-1	Interactions with water as a shared resource	Sustainability Report 2025, Environment, Environmental Sustainability, pg. 33
303-2	Management of water discharge-related impacts	Not applicable due to the nature of BNY's operations which use municipal water only. All wastewater is discharged through municipal sewerage systems.
303-3	Water withdrawal	Sustainability Report 2025, Environment, Environmental Sustainability, pg. 33
303-4	Water discharged	BNY does not actively track water discharged volumes, category or area. All wastewater is discharged through municipal sewerage systems.
303-5	Water consumption	BNY does not actively track water consumption volumes, category or area. All wastewater is discharged through municipal sewerage systems.
EMISSIONS		
STANDARDS: GRI 305: Emissions 2016		
GRI 3-3	Management of material topics	Sustainability Report 2025, Sustainability At BNY, A Foundation of Strong Governance, pg. 20 TCFD Report 2025, Governance, pg. 2 Environmental Sustainability Policy Statement
305-1	Direct (Scope 1) GHG emissions	TCFD Report 2025, Metrics and Targets, pg. 12

DISCLOSURE		
305-2	Energy indirect (Scope 2) GHG emissions	TCFD Report 2025, Metrics and Targets, pg. 12
305-3	Other indirect (Scope 3) GHG emissions	TCFD Report 2025, Metrics and Targets, pg. 12
305-4	GHG emissions intensity	TCFD Report 2025, Metrics and Targets, pg. 12
305-5	Reduction of GHG emissions	TCFD Report 2025, Metrics and Targets, pg. 12
305-6	Emissions of ozone-depleting substances (ODS)	Not applicable to BNY's business.
305-7	Nitrogen oxides (NOx), sulphur oxides (SOx), and other significant air emissions	Not applicable to BNY's business.
WASTE		
STANDARDS: GRI 306: Waste 2020		
GRI 3-3	Management of material topics	Sustainability Report 2025: • Sustainability At BNY, A Foundation of Strong Governance, pg. 20 • Environment, Environmental Sustainability, pg. 33 Environmental Sustainability Policy Statement
306-1	Waste generation and significant waste-related impacts	Sustainability Report 2025, Environment, Environmental Sustainability, pg. 33
306-2	Management of significant waste-related impacts	Sustainability Report 2025, Environment, Environmental Sustainability, pg. 33
306-3	Waste generated	Sustainability Report 2025, Environment, Environmental Sustainability, pg. 33
306-4	Waste diverted from disposal	Sustainability Report 2025, Environment, Environmental Sustainability, pg. 33
306-5	Waste directed to disposal	Sustainability Report 2025, Environment, Environmental Sustainability, pg. 33

GRI INDEX CONTINUED

DISCLOSURE		
SUPPLIER ENVIRONMENTAL ASSESSMENT		
STANDARDS: GRI 308: Supplier Environmental Assessment 2016		
GRI 3-3	Management of material topics	Sustainability Report 2025: • Sustainability At BNY, A Foundation of Strong Governance, pg. 20 • Trust, Responsible Business, Responsible Sourcing and Supplier Standards pg. 40 Supplier Code of Conduct, pg. 14 Environmental Sustainability
308-1	New suppliers screened using environmental criteria	Supplier Code of Conduct The percentage of new suppliers that were screened is not available.
308-2	Negative environmental impacts in the supply chain and actions taken	Supplier Code of Conduct The percentage of new suppliers that were screened is not available.
EMPLOYMENT		
STANDARDS: GRI 401: Employment 2016		
GRI 3-3	Management of material topics	Sustainability Report 2025: • Sustainability At BNY, A Foundation of Strong Governance, pg. 20 • Thrive Together, Career Journey, pg. 43
401-1	New employee hires and employee turnover	Sustainability Report 2025, Thrive Together, Retention and Internal Mobility , pg. 43 Employee retention is reported by region in place of employee turnover.
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Sustainability Report 2025: • Thrive Together, Health and Wellbeing, pg. 46 • Thrive Together, Employee Financial Wellbeing, pg. 46 Annual Report 2025, Our People and Culture pg. XIII
401-3	Parental leave	No data available

DISCLOSURE		
TRAINING AND EDUCATION		
STANDARDS: GRI 404: Training and Education 2016		
GRI 3-3	Management of material topics	Sustainability Report 2025: • Sustainability At BNY, A Foundation of Strong Governance, pg. 20 • Thrive Together, Career Journey, Development and Learning pg. 44
404-1	Average hours of training per year per employee	Sustainability Report 2025, Thrive Together, Career Journey, Learning Hours in 2025, pg. 45 The breakdown of average hours of training by gender and employee category is not currently available.
404-2	Programs for upgrading employee skills and transition assistance programs	Sustainability Report 2025, Thrive Together, Career Journey, pg. 43-45 2025 Annual Report, AI at the Forefront, pg. XI
404-3	Percentage of employees receiving regular performance and career development reviews	Sustainability Report 2025, Thrive Together, Performance Management, pg. 45
DIVERSITY AND EQUAL OPPORTUNITY		
STANDARDS: GRI 405: Diversity and Equal Opportunity 2016		
GRI 3-3	Management of material topics	Sustainability Report 2025: • Sustainability At BNY, A Foundation of Strong Governance, pg. 20 • Thrive Together, Career Journey, pg. 43 Gender Pay Gap Report (UK)
405-1	Diversity of governance bodies and employees	2026 Proxy Statement, Item 1 — Election of Directors, Director Qualifications, pg. 16 Sustainability Report 2025: • Sustainability At BNY, A Foundation of Strong Governance, pg. 20
405-2	Ratio of basic salary and remuneration of women to men	Sustainability Report 2025, Thrive Together, Compensation, pg. 46 Gender Pay Gap Report (UK) The ratio for each employee category is not currently available.

GRI INDEX CONTINUED

DISCLOSURE		
LOCAL COMMUNITIES		
STANDARDS: GRI 413: Local Communities 2016		
GRI 3-3	Management of material topics	Sustainability Report 2025: • Sustainability At BNY, A Foundation of Strong Governance, pg. 20 • Financial Opportunity, Community Empowered, pg. 29 Employee Code of Conduct, Supporting Our Communities, pg. 35 Supplier Code of Conduct, Community Commitment, pg. 14
413-1	Operations with local community engagement, impact assessment and development programs	Sustainability Report 2025: Financial Opportunity, Community Empowered, pg. 29 The percentage of operations with implemented local community engagement programs is not available.
413-2	Operations with significant actual and potential negative impacts on local communities	Sustainability Report 2025: Financial Opportunity, Community Empowered, pg. 29
SUPPLIER SOCIAL ASSESSMENT		
STANDARDS: GRI 414: Supplier Social Assessment 2016		
GRI 3-3	Management of material topics	Sustainability Report 2025: • Sustainability At BNY, A Foundation of Strong Governance, pg. 20 • Trust, Responsible Business, Responsible Sourcing and Supplier Standards pg. 40 Supplier Code of Conduct Modern Slavery Statement Human Rights Statement
414-1	New suppliers that were screened using social criteria	Supplier Code of Conduct Modern Slavery Statement Human Rights Statement The percentage of new suppliers that were screened is not available.
414-2	Negative social impacts in the supply chain and actions taken	Supplier Code of Conduct Modern Slavery Statement Human Rights Statement The number and percentage of suppliers assessed is not available.

DISCLOSURE		
PUBLIC POLICY		
STANDARDS: GRI 415: Public Policy 2016		
GRI 3-3	Management of material topics	Sustainability Report 2025: • Sustainability At BNY, A Foundation of Strong Governance, pg. 20 • Trust, Responsible Business, Public Policy, pg. 40 Political Activities and Policy Engagement Employee Code of Conduct, Political Activities, pg. 35
415-1	Political contributions	Sustainability Report 2025, Trust, Responsible Business, Public Policy, pg. 40
CUSTOMER PRIVACY		
STANDARDS: GRI 418: Customer Privacy 2016		
GRI 3-3	Management of material topics	Sustainability Report 2025: • Sustainability At BNY, A Foundation of Strong Governance, pg. 20 • Trust, Responsible Use of Data & Artificial Intelligence (AI), pg. 39 Employee Code of Conduct: • Use of Artificial Intelligence-Based Technologies. pg. 31 • Use of Computers, Systems, and Corporate Information, p. 31 Privacy Statements and Privacy Notices
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Sustainability Report 2025, Trust, Responsible Use of Data & Artificial Intelligence (AI), pg. 39 Number of substantiated complaints is not publicly available.

SUSTAINABLE ACCOUNTING STANDARDS BOARD INDEX

SASB Asset Management & Custody Activities Sustainability Accounting Standard (2024 version)

BNY is using the disclosure topics and accounting metrics as provided by SASB to facilitate reference and has provided corresponding information that BNY deems to be relevant for each item. Neither the reference to any terms in the referenced SASB topic or metric, nor the inclusion of any corresponding information in this table, should be deemed to have the meaning associated with any such term under any law, regulation or standard (including SASB)

DISCLOSURE TOPICS	ACCOUNTING METRICS	CODE	
Transparent Information & Fair Advice for Customers	(1) Number and (2) percentage of licensed employees and identified decision-makers with a record of investment-related investigations, consumer-initiated complaints, private civil litigations, or other regulatory proceedings	FN-AC-270a.1	BNY does not report this information.
	Total amount of monetary losses as a result of legal proceedings associated with marketing and communication of financial product-related information to new and returning customers	FN-AC-270a.2	Annual Report 2025, Legal Proceedings, pg. 182
	Description of approach to informing customers about products and services	FN-AC-270a.3	BNY provides general and targeted product and service information to our clients through a multi-channel marketing approach. The approach may vary based on the type of client, product and service, as well as the applicability of laws of regulations.
Employee Diversity & Inclusion	Percentage of (1) gender and (2) diversity group representation for (a) executive management, (b) non-executive management, (c) professionals, and (d) all other employees	FN-AC-330a.1	BNY does not currently report this information.
Incorporation of Environmental, Social, and Governance Factors in Investment Management & Advisory	Amount of assets under management, by asset class, that employ (1) integration of environmental, social and governance (ESG) issues, (2) sustainability-themed investing and (3) screening	FN-AC-410a.1	BNY does not currently report this information.
	Description of approach to incorporation of environmental, social and governance (ESG) factors in investment or wealth management processes and strategies	FN-AC-410a.2	Sustainability Report 2025: Sustainability at BNY, Sustainable Solutions, Responsible Investment and Client Choice, pg. 24
	Description of proxy voting and investee engagement policies and procedures	FN-AC-410a.3	BNY Investments firms' proxy voting information can be found: • Newton Sustainability and Stewardship 2025 annual report • Insight Investment Stewardship Policy • Mellon Proxy Guidelines Summary • Walter Scott Stewardship • BNY Investments Responsible Investing

SUSTAINABLE ACCOUNTING STANDARDS BOARD INDEX CONTINUED

DISCLOSURE TOPICS	ACCOUNTING METRICS	CODE	
Financed Emissions	Absolute gross financed emissions, disaggregated by (1) Scope 1, (2) Scope 2 and (3) Scope 3	FN-AC-410b.1	BNY does not report this information.
	Total amount of assets under management (AUM) included in the financed emissions disclosure	FN-AC-410b.2	BNY does not report this information.
	Percentage of total assets under management (AUM) included in the financed emissions calculations	FN-AC-410b.3	BNY does not report this information.
	Description of the methodology used to calculate financed emissions	FN-AC-410b.4	TCFD Report 2025, Metrics and Targets, Financed Emissions, pg. 13
Business Ethics	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, antitrust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations	FN-AC-510a.1	Annual Report 2025, Legal Proceedings, pg. 182
	Description of whistleblower policies and procedures	FN-AC-510a.2	Employee Code of Conduct
Activity Metrics			
Total assets under management (AUM)		FN-AC-000.A	Annual Report 2025, Financial Summary, pg. 2
Total assets under custody and supervision		FN-AC-000.B	Annual Report 2025, Financial Summary, pg. 2

LEGAL NOTICE

Forward-looking Statements

We have included in this report statements that may constitute "forward-looking statements." Forward-looking statements are not historical facts or statements of current conditions, but instead represent only our beliefs regarding future events, many of which, by their nature, are inherently uncertain and outside our control. These statements are not guarantees of future results or performance and involve certain known and unknown risks, uncertainties and assumptions that are difficult to predict and are often beyond our control. These statements relate to, among other things, our goals, targets, aspirations, strategy, plans, intentions and objectives, and actual outcomes and results may differ materially from those expressed in, or implied by, any of these forward-looking statements. Factors that could cause our outcomes and results to differ from the forward-looking statements include global socio-demographic and economic trends, energy prices, technological innovations, climate-related conditions and weather events, our ability to gather and verify data regarding environmental impacts, changes in the methodologies, assumptions and estimates underlying our climate-related strategy and analysis, our ability to successfully implement various initiatives throughout the company under expected timeframes, the compliance of various third parties with our policies and procedures, legislative and regulatory changes, and other unforeseen events or conditions. In addition, important factors that generally affect our business and operations can be found under "Risk Factors" in Part I, Item 1A of our Annual Report on Form 10-K for the year ended December 31, 2024, and in subsequent reports filed with the Securities and Exchange Commission (SEC).

All forward-looking statements speak only as of the date on which such statements are made.

Approach to Disclosure

Our approach to the disclosures included in this report differs from our approach to the disclosures we include in our mandatory regulatory reports, including our filings with the SEC. While certain matters discussed in this report may be significant, any significance should not be read as necessarily rising to the level of materiality used for the purposes of complying with the U.S. federal securities laws and regulations, even if we use the word "material" or "materiality" in this report. This report is intended to provide information from a different perspective and in more detail than that required to be included in other regulatory reports, including our filings with the SEC. Unless specifically stated, none of the terms used in this report are intended to have the meanings prescribed under any laws or regulations. References to terms such as 'material', 'significant', 'sustainable', 'net-zero' or similar are not intended to carry the same meaning as under any statute, regulation, sustainability framework or industry guidance, and do not signify the adoption of any legal standard or third-party definition.

All data in the report is for the year ended December 31, 2025 and includes all affiliated entities listed in BNY's Form 10-K 2025, unless otherwise noted.

This document has been prepared using data and methodologies which are subject to certain limitations, including ongoing developments in: (a) applicable laws and regulations; (b) techniques and standards for measuring and analyzing relevant data; (c) judgments, estimations and assumptions; (d) availability of relevant data; and (e) quality and completeness of third party data, including data from our customers relating to their emissions and commitments. While we strive to use reliable, comprehensive information, certain information in this report, including our financed emissions calculations, are estimates within a range of error that depend on actual or estimate data, third party-data, assumptions, standards, methodologies, scenarios, and metrics that will continue to evolve over time.

The sustainability metrics and other information in this report have not been independently audited or assured (unless otherwise stated), and should not be relied upon as the basis for any action or investment decision.

Except as required by law, BNY undertakes no obligation to update any statement (including forward-looking statements and statements regarding historical periods) in this report or future disclosures.

We reference our and third-party websites throughout this report, but neither the websites nor the information contained therein are incorporated by reference.

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Any references to dollars are to US dollars unless specified otherwise.

BNY Dreyfus Government Cash Management ("Fund"): Investors should consider the investment objectives, risks, charges, and expenses of a money market fund carefully before investing. To obtain a prospectus, or summary prospectus, if available, that contains this and other information about the Fund visit www.dreyfus.com. Investors should read the prospectus carefully before investing.

Although the Fund's board has no current intention to impose a fee upon the sale of shares, the board reserves the ability to do so after providing at least 60 days prior written notice to shareholders.

The Fund's investment adviser is BNY Mellon Investment Adviser, Inc. (BNYIA). BNYIA has engaged its affiliate, Dreyfus, a division of Mellon Investments Corporation (MIC), a registered investment adviser, to serve as the Fund's sub-adviser. BNY Mellon Securities Corporation (BNYSC), a registered broker dealer, is the distributor. All are affiliates of The Bank of New York Mellon Corporation.

Securities instruments and services other than money market mutual funds and off-shore liquidity funds are offered by BNY Mellon Capital Markets, LLC.

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BNY Investment SPARK℠, SPARK℠ Future, BOLD® and BOLD® Future Disclaimer

The Fund's investment adviser is BNY Mellon Investment Adviser, Inc (BNYIA). BNYIA has engaged its affiliate, Dreyfus to serve as the Fund's sub-adviser. SPARK shares: BNYIA will make an annual donation to eligible charitable and other not-for-profit organizations that are selected by holders of SPARK shares (Donation). The Donation will be based on 10% of BNYIA's net revenue attributable to the Fund's SPARK shares. "Net revenue" represents the management fee paid by the Fund to BNYIA, after any fee waivers and/or expense reimbursements by BNYIA, with respect to SPARK shares, and will be paid from BNYIA's own past profits. Offered exclusively through BNY, including LiquidityDirect. BOLD and BOLD Future: BNYIA will make an annual donation, out of its legitimate profits, to select HBCUs of an amount representing 10% of its net revenue attributable to the Fund's BOLD and BOLD Future shares. "Net revenue" represents the management fee paid by the Fund to BNYIA after any fee waivers and/or expense reimbursements by BNYIA and less any revenue sharing payments made by BNYIA or its affiliates, with respect to the Fund's BOLD and BOLD Future shares. BOLD and BOLD Future shares are offered exclusively through BNY Dreyfus Government Cash Management fund.

Government/Treasury Money Market Funds: You could lose money by investing in the Fund. Although the Fund seeks to preserve the value of your investment at $1.00 per share, it cannot guarantee it will do so. An investment in the Fund is not a bank account and is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other government agency. The Fund's sponsor is not required to reimburse the Fund for losses, and you should not expect that the sponsor will provide financial support to the Fund at any time, including during periods of market stress.

BNY Mellon Investment Adviser, Inc. (BNYIA) will make an annual donation to charitable and other not-for-profit organizations that are selected by holders of SPARK shares and SPARK Future shares (Donation). The organization(s) selected by the shareholder for the Donation must be tax-exempt pursuant to section 501(c)(3) under the Internal Revenue Code of 1986, as amended, and determined by BNY to be eligible (Eligible Organizations).

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THANK YOU FOR READING OUR 2025 SUSTAINABILITY REPORT

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