CALIFORNIA VOLUNTARY CARBON MARKETS DISCLOSURE ACT (VCMDA) INFORMATION

August 13, 2026

This document is intended to be responsive to Division 26, Part 10 of the California Health and Safety Code, which is added by California's Voluntary Carbon Markets Disclosure Act (VCMDA).

Information on Claims Related to Greenhouse Gas Emissions

Periodically, The Bank of New York Mellon Corporation (BNY, together with its subsidiaries) makes enterprise-wide statements about carbon neutrality and reductions in our greenhouse gas (GHG) emissions. This includes our goals to achieve GHG emissions reductions in relevant areas of our Scope 1 and Scope 2 (location-based) operational emissions and Scope 3 financed emissions by 2030[1], consistent with 1.5°C pathways. Information on GHG emissions, including our progress against our GHG reduction targets and the independent third-party verification of our Scope 1, Scope 2, and Scope 3, Category 6 (business travel) GHG emissions metrics can be found on pages 9-12 of our 2025 TCFD Disclosure. BNY's definition and approach to carbon neutrality can be found on page 9 of the 2025 TCFD Disclosure.

BNY's Carbon Offset Purchases for Calendar Year (CY) 2025		
Name of Offset Seller	**Project Registry/ Applicable Standard**	**Identification Number in Registry**
Climate Impact Partners	ACR[2]	ACR729
Climate Impact Partners	VCS[3]	VCS1495
Climate Impact Partners	VCS[3]	VCS959
Climate Impact Partners	VCS[3]	VCS2478
Climate Impact Partners	ACR[2]	ACR973

[1] BNY's Scope 3, Category 15 "financed emissions" refer to the GHG emissions associated with BNY's on-balance sheet lending and investment activities, as well as BNY's off-balance sheet capital markets facilitation activities (also referred to as "facilitated emissions"). The Scope 3, Category 15 GHG emissions associated with the managed investments of BNY Investments and its affiliated boutique firms are excluded.
[2] American Carbon Registry (ACR) Standard
[3] Verified Carbon Standard (VCS)

For 2025, BNY purchased its Energy Attribute Certificates (EACs)[4] from Climate Impact Partners (CIP). Relevant information about these instruments has been provided to us by CIP, as further discussed below:

BNY's Renewable Energy Purchases for CY 2025			
Name of Offset Seller	**Certificate Type**	**Project Location**	**Vintage Year (VY)/ Reporting Year (RY)[5]**
Climate Impact Partners	Green-e® REC	United States	RY25
Climate Impact Partners	Australian REC - LGC	Australia	VY25
Climate Impact Partners	Guarantee of Origin (GO)	Europe	VY25
Climate Impact Partners	I-REC	India	VY25
Climate Impact Partners	I-REC	Vietnam	VY25
Climate Impact Partners	I-REC	UAE	VY25
Climate Impact Partners	GEC	China	VY25
Climate Impact Partners	I-REC	Brazil	VY25
Climate Impact Partners	I-REC	Israel	VY25
Climate Impact Partners	I-REC	Malaysia	VY25
Climate Impact Partners	I-REC	Thailand	VY25
Climate Impact Partners	I-REC	Turkey	VY25
Climate Impact Partners	Japan NFC	Japan	VY25
Climate Impact Partners	Renewable Energy Guarantee of Origin (REGO)	United Kingdom	VY25

Information included, or specifically referenced, in BNY's latest TCFD Disclosure on the matters covered by the VCMDA supersede and update any prior statements on such matters, including any statement contained herein.

[4] An EAC is a contractual instrument that indicates the generation of a particular quantity of energy, or product associated with the generation of a specified quantity of energy from a renewable energy project. An EAC is distinct from the actual energy produced and may be separately transferred or conveyed.

[5] The Green-e® Energy certified United States Wind and Solar RECs procured from Climate Impact Partners use "Reporting Year 2025 (RY25)," which reflects renewable production spanning July 1, 2024 to March 31, 2026. EACs procured from Climate Impact Partners, including Australian RECs, GOs, I-RECs, Japan NFCs, China GECs and REGOs, use "Vintage Year 2025 (VY25)". Within the context of Carbon Credits, "Vintage Year" reflects the calendar year (January 1, 2025 to December 31, 2025) in which the emissions were removed, limited, reduced, destroyed, avoided, sequestered or mitigated by the emissions reduction project. Within the context of EACs, "Vintage Year" refers to the calendar year (January 1, 2025 to December 31, 2025) in which the renewable energy was generated by the renewable energy project.

Legal Notice

This document contains forward-looking statements within the meaning of the safe harbor provisions of the U.S. Private Securities Litigation Reform Act of 1995. 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 sociodemographic 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.

In addition, the methodologies, assumptions, and estimates underlying our climate-related strategy, targets, analysis and data have evolved over time and are likely to continue to change in future periods, including as a result of regulatory, industry, scientific and other developments. Certain information in this document incorporates or otherwise relies upon data from third parties, which may have been prepared in ways that are not consistent with our methodologies or practices. Except as required by law, we do not independently verify such third-party information. As a result of these and other factors, the information we present in this document could differ from that included in our prior disclosures, and information in future disclosures (including any future regulatory filing on similar topics) may differ from information contained in this document. The information provided in this document reflects the company’s interpretation of TCFD and approach to climate as of the date(s) referenced in these disclosures and is subject to change without notice. None of the content of this document shall be deemed to be incorporated by reference in any documents we have filed or will file with the SEC or any other regulator.

Additionally, these disclosures may contain statements based on hypothetical scenarios and assumptions. These statements should not necessarily be considered as being indicative of current or actual risk or forecasts of expected risk. Except as required by law, BNY undertakes no obligation to update any statement (including both forward-looking statements and statements regarding historical periods) in this document or future disclosures.

Although this document may reference certain laws and regulations, words used in this document (including any references to “significance,” "carbon neutrality", "net zero", “relevance,” “priority,” “impact” or similar terms) should not be read to have the meanings ascribed to them under any laws, regulations or third-party standards. Furthermore, neither any importance attributed to the topics included in this document, nor the inclusion of such information herein, should be read to mean that any information necessarily rise to the level of materiality used for the purposes of complying with applicable securities laws and regulations or other reporting framework, even where we use the word “material” or “materiality” in these disclosures, or even where the TCFD framework calls for a discussion of “material” risks, opportunities or other impacts. While this report includes disclosures that are contemplated by the TCFD framework, it includes additional, illustrative information that goes beyond the framework. Therefore, in future regulatory and voluntary documents we publish that may reference the TCFD framework, we may take a different approach or include a different set of information than we have in this report.

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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