

# Truist 2023 Climate Lobbying Summary

## Introduction

Truist is committed to inspiring and building better lives and communities. This commitment extends to our public policy initiatives and partnerships. Truist is a member of and participates in several national civic, trade, and advocacy organizations. Through these partnerships, Truist works to address a broad range of business, financial services, and industry issues, including the risks climate change presents to our clients, company, and communities.

Our 2023 Climate Lobbying Summary provides an overview of how we engage with our major trade associations on climate and sustainability topics. The summary also outlines our assessment of each trade association's alignment with our perspective on climate measures and related legislation based on activity from 2023. Our goals and views on any number of issues, including climate and sustainability matters, may not entirely or consistently align with those of our trade association partners; however, we strive to ensure broad alignment on our—and their—most important objectives. Truist's objectives include managing climate-related risks, our Net Zero by 2050 goal, and our aspiration to be part of an inclusive energy transition that considers the broad spectrum of geographies, communities, industries, and clients we serve. Our latest [Task Force on Climate-Related Financial Disclosures \(TCFD\) Report](#) includes further details on Truist's climate goals, key performance indicators, and progress.

Truist takes a balanced and inclusive approach to working with stakeholders on climate and sustainability issues. This includes our approach to working with trade association partners.

## Working with trade association partners

Truist is a member of several national and state trade associations that represent business and financial services companies. Some of these associations engage in lobbying to promote sound and effective public policy and positions that meet the interests of their membership base and the broader business community. Truist engages with our trade associations on climate-related issues in a variety of ways, including regular dialogue. In instances where Truist's policy positions are not aligned with those of other member organizations, or the positions of the association, we share our concerns in a constructive manner and work with the organization to achieve greater alignment.

## Monitoring

Truist's Government Affairs, Corporate Communications, and Corporate Responsibility teams collectively monitor major trade associations' public statements and activities related to the issues that are important to Truist, including climate and sustainability matters. With these reviews, we aim to understand whether trade association positions and activities align with important climate measures, including the Paris Agreement, and whether trade association partners support our Net Zero and related climate goals. When we developed our monitoring framework, we drew from outlines provided by the Interfaith Center on Corporate Responsibility (ICCR) and the Ceres Company Network and incorporated our current reporting under the TCFD framework.

Truist monitors trade associations throughout the year to understand point-in-time alignment. We review readily and publicly available activity from each of the trade associations, including any engagement through calls and other meetings. This summary is the result of a full-year analysis developed during the 2023 calendar year and terminating on December 31, 2023. We analyzed:

- Relevant legislation and regulations that our trade associations have commented on within letters or other public communications.
- Lobbying filings and disclosures made by the trade associations on climate-related issues.
- Top-tier national, banking trade, and environmental trade media coverage for relevant articles and mentions of the trade associations and their spokespeople in relation to climate change policy.
- Feedback from our engagement on climate-related issues with trade associations in regular and ad hoc meetings.
- Content on the trade associations' websites and social media channels.
- Where applicable, meetings we held with our major trade associations to discuss their climate goals and ensure our clear understanding of their climate activity in 2023, as part of our preparation of this report.
- Where applicable, responses to a survey Truist sent to our major trade associations as part of our preparation of this report.

Truist has closely followed the statements and actions of our major trade associations on iterations of the SEC's climate disclosure rule, which was ultimately finalized in March 2024. Several associations released comment letters on the original proposed rule in 2022, and several have since commented on the final rule in 2024. Because these comments are outside of the date range for the 2023 Climate Lobbying Summary, they are not included here, but Truist continues to monitor developments on this topic.

We are committed to complying with all applicable laws regarding political activity, including MSRB Rule G-37, SEC Rule 206(4)-5, CFTC Rule 23.451, and applicable state and local regulations. Our established policies and procedures are consistent with this commitment. Truist's compliance processes guide our activities in accordance with those policies, our Code of Ethics, and with all relevant laws governing political contributions and lobbying activities.

Truist's 2023 Climate Lobbying Report analyzes climate-related activities of our trade associations during the 2023 calendar year, terminating on December 31, 2023. As always, Truist continues to closely monitor our trade associations' actions and statements on climate-related topics, but any activity that has taken place after December 31, 2023 has not been included in our analysis for the 2023 Climate Lobbying Report.

## Public policy engagement and oversight

We engage in the public policy process and share our views on policy matters with elected officials and regulatory organizations. Truist employs in-house and outside registered lobbyists as part of our Government Affairs team. The Government Affairs team either engages directly with public officials or works with trade associations and informal organizations to engage in the policymaking process. For further detail on our engagement with elected officials, please read [Truist's Statement of Political Engagement](#).

The Government Affairs team reports directly to Truist's chief legal officer. Truist's senior leaders annually review Truist's Statement of Political Engagement and receive reports that provide information on our trade association memberships, disbursements from Truist-sponsored PACs, contributions to any ballot measure committee, and lobbying activity. As part of its annual review, senior leadership provides oversight of large trade association memberships as well as political contributions and lobbying activities.

The Nominating and Governance Committee of Truist's Board of Directors oversees our policies and practices relating to political contributions and lobbying. As part of this oversight, the committee receives an annual review of the funding, governance, advocacy initiatives, and political contribution activities of Truist-sponsored political action committees and our major trade associations.

## Methodology

For this summary, we included any trade association or 501(c)(4) organization focused on federal advocacy and to which Truist pays annual membership fees or donations in excess of \$50,000. The associations are:

- American Bankers Association
- Bank Policy Institute
- Business Roundtable
- Consumer Bankers Association
- Mortgage Bankers Association
- Risk Management Association
- Securities Industry and Financial Markets Association
- U.S. Chamber of Commerce

In 2023, Truist left the American Financial Services Association as part of a broader reassessment of the company's trade association memberships, unrelated to our climate-related goals.

## In-scope topics

For this assessment, we developed a specific scope, which included critical climate topics:

- Position on climate change and climate change-related risks;
- Position on the goals of the Paris Agreement and the recently finalized SEC climate-related disclosure rule;
- Position on climate provisions in recent legislation;
- Commitment to emissions reduction targets and investing in low-carbon technologies.

## Assessment of alignment

According to publicly available materials, survey responses, and discussions with our contact points, *aligned associations* have:

- Similar positions to Truist on the Paris Agreement, emissions reductions, and investments in low-carbon technologies and no significant misalignments in other areas, including positions on climate change policy.

*Partially aligned associations* have at least one of the following:

- Share aspects of Truist's position on climate change but advocate for a slightly different approach;
- Share aspects of Truist's position on the Paris Agreement but advocate for a slightly different approach;
- Share aspects of Truist's position on emissions reductions and investments in low-carbon technologies but advocate for a slightly different approach;
- Have no external position on climate change or the Paris Agreement, but their actions and priorities indicate alignment with Truist's objectives.

Associations determined to be *not applicable* do not lobby on climate change-related issues and do not have public positions on our evaluation topics. *Not aligned* indicates that an association has stated opposition to one or multiple Truist climate goals and that its other climate positions do not align with Truist's purpose.

For all four levels of alignment, we have determined the subsequent action items.

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

## 2023 climate lobbying summary

Our trade association partners were receptive to outreach and participated in a productive, mutual dialogue on their climate policy engagement. We also developed a survey for those that were unable to speak with us. Both in our conversations and through the survey, Truist encouraged each association to share its opinion on climate-related topics, including: recent climate legislation; the Paris Agreement; renewable energy and fossil fuel financing; and other climate initiatives the association may be engaged in. The results of our conversations and the survey were instrumental in shaping our assessment of these organizations and their alignment with Truist's climate objectives. Details of this assessment follow.

### Our findings

Through our 2023 annual assessment, we concluded that the majority of our trade associations are aligned or partially aligned with Truist's climate goals. None of the associations we reviewed were determined to be not aligned. We designated one association as not applicable because it does not lobby on climate change-related issues, nor does it have public positions on climate change. All other associations have maintained the same level of alignment determined in our 2022 assessment.

### American Bankers Association (ABA)

#### Summary

The American Bankers Association describes itself as the voice of the nation's \$23.4 trillion banking industry, composed of small, regional, and large banks that together employ more than 2.1 million people.<sup>1</sup> ABA identifies 25 policy priorities, including the issue of climate change as it relates to banking, specifically risk management, and disclosure requirements.<sup>2</sup>

#### Alignment: *Partially aligned*

Our assessment of ABA's alignment remains unchanged from our 2022 assessment. Since Truist's last report, ABA has demonstrated consistency across its public comments, lobbying activities, and other public statements as it pertains to climate change and climate-related disclosures. ABA continues to advocate for "common-sense, market-based solutions," which it believes offer the best opportunity in addressing climate change.<sup>3</sup>

ABA is generally aligned with Truist in its support for consistent global disclosure frameworks that require disclosure of material, company-specific climate risks. In the past year, ABA submitted several comment letters to federal agencies, including the International Sustainability Standards Board and the Federal Reserve, advocating for a flexible approach to climate-related disclosures. ABA supports a "robust and transparent process when developing climate-related financial risk guidance and rulemakings"<sup>4</sup> and requests a reporting taxonomy that both "addresses users of sustainability-related financial information and can be prepared without undue cost."<sup>5</sup>

ABA encourages its members to engage in and make commitments to various environmental initiatives, though the association itself has not taken a definitive stance on measures such as the Paris Climate Accord. While ABA generally abstains from lobbying on these issues, it becomes involved where it feels the regulatory process is inhibiting the success of its members. The association opposes governmental imposition on its members' broader business decision-making processes, both including and outside of regulation related to climate.

Truist will continue to monitor ABA's public commentary on measuring and disclosing carbon emissions and other climate-related risks while continuing to engage on areas of potential and partial alignment.

## Bank Policy Institute (BPI)

### *Summary*

The Bank Policy Institute describes itself as a nonpartisan public policy, research, and advocacy group representing the nation's leading banks and their customers. Its members include universal banks, regional banks, and the major foreign banks doing business in the United States. Collectively, its members employ almost 2 million Americans and make nearly half of the nation's small business loans.<sup>6</sup>

### *Alignment: Aligned*

Our assessment of BPI remains unchanged from last year, as the association continues to align with Truist's stance on climate risk and the need for consistent global disclosure frameworks. While BPI did not engage in robust lobbying efforts on climate matters in 2023, the association continues to acknowledge the risks and necessity of addressing climate change, and its research team produces educational materials on sustainability and climate change for member banks, including blogs, primers, and working papers. The association supports the development of principles-based guidance for climate-related financial risk management, and, in April, advocated for such guidance provided by the New York State Department of Financial Services.<sup>7</sup> BPI also commented early last year that strategic planning should be required for companies and government agencies to take into account the potential impact of climate-related financial risks that are considered material from an institutional, enterprise-wide perspective.<sup>8</sup> BPI's members are "devoting substantial resources to developing risk management capabilities to identify, measure, and mitigate these risks."<sup>9</sup>

BPI tends not to take official positions on specific climate goals, allowing its members to take their own stances on these issues. However, BPI did meet with the U.S. Treasury prior to the September 2023 publication of the Treasury's Principles for Net-Zero Financing & Investment to encourage the agency to promote coordination and consistency across geographies with the goal of avoiding widely disparate standards across these categories.

Truist will continue to monitor BPI's comments on climate-related financial risk and disclosure rules while continuing to engage on areas of alignment.

## Business Roundtable (BRT)

### *Summary*

Business Roundtable describes itself as an association of America's leading companies' CEOs working to promote a thriving U.S. economy and expanded opportunity for all Americans through sound public policy.<sup>10</sup> BRT provides policy perspectives on a variety of climate-related issues, including American energy in the 21st century, energy infrastructure, sustainability, and climate change. To address climate change, BRT supports policies that build on America's strengths in technology and energy diversity, encourage investment and innovation in the U.S. energy sector, and preserve environmental quality for the 21st century and beyond.<sup>11</sup>

### *Alignment: Partially aligned*

Our assessment of BRT's alignment remains unchanged from last year. BRT believes in a national market-based emissions reduction policy and is generally aligned with Truist in its support for consistent global disclosure frameworks that require disclosure of material, company-specific climate risks. According to its website, BRT highlights the importance of limiting global temperature rise this century to well below two degrees Celsius above preindustrial levels, consistent with the Paris Agreement.<sup>12</sup>

Still, BRT remains only partially aligned due to its concerns about implementing climate related rules—such as its opposition to requiring Scope 3 emissions disclosures in financial filings.<sup>13</sup> BRT has argued that a market-based approach to reducing emissions would be more effective and overall better for the economy than a strictly regulatory approach, as too many mandatory disclosures could deter companies from setting more ambitious climate goals.

Since Truist's last report, BRT has advocated on a variety of issues. While most issues are unrelated to climate change and sustainability, BRT focused part of its advocacy last year on addressing supply chain vulnerabilities affecting investments into clean energy. In November, BRT released a report which examined opportunities to advance U.S. leadership in global clean energy supply chains, and the association hosted panels during COP28 with BRT CEOs and other member company leaders to discuss climate related topics, including the importance of reliable clean energy and opportunities to enable the energy transition. BRT has focused on the importance of establishing "secure, resilient and efficient clean energy supply chains" to account for the accelerating demand and investment in clean energy.<sup>14</sup> The report highlighted specific vulnerabilities for solar, nuclear, grid modernization, and hydrogen clean energy supply chains, advocating for the reforming of the permitting process.<sup>15</sup>

Truist will continue to monitor BRT's public commentary on measuring and disclosing carbon emissions and other climate-related risks while engaging with BRT on areas of partial alignment.

## Consumer Bankers Association (CBA)

### Summary

The Consumer Bankers Association describes itself as the only member-driven trade association focused exclusively on retail banking. Its members include the nation's largest retail banks, 85% of which hold over \$10 billion in assets. CBA partners with leading retail banks to "promote sound policy, prepare the next generation of diverse bankers to lead the industry, and finance the dreams of consumers and small businesses."<sup>16</sup>

### Alignment: Not applicable

CBA remains quiet on climate change-related issues, taking no position on its website or in comment letters. With no statements or lobbying in 2023 regarding climate-related risks or disclosure, we are unable to apply our alignment criteria to this association. During discussions between Truist and CBA, a representative for the association explained that CBA does not engage in policy issues unrelated to consumer issues and does not view climate policy as within its scope.

Truist will continue to monitor CBA for any public statements on climate-related risks and will engage directly on issues if appropriate.

## Mortgage Bankers Association (MBA)

### Summary

The Mortgage Bankers Association describes itself as the leading advocate for the real estate finance industry, representing and serving its members through a comprehensive array of capabilities and tools that enable members to deliver fair, sustainable, and responsible real estate financing within ever-changing business environments.<sup>17</sup> According to its website, MBA advocates for members on climate-related issues through three channels: policy, research, and practice. MBA educates its members on federal climate policies and engages in extensive research related to the intersection between real estate finance and climate change.<sup>18</sup>

### Alignment: Partially aligned

We continue to view MBA as partially aligned, as the organization advocates for reasonable policy approaches to address the management and disclosure of climate-related financial risk as it affects real estate finance. In its approach to disclosure, MBA considers both the operational burden and the utility of the disclosed information, and supports policies that recognize an evolving understanding of climate risk and ESG investing. This year, MBA published comment letters supporting the advancement of low-carbon and clean energy technology. While MBA recognizes climate-related financial risk and associated financial loss, it does not provide a clear position on fossil fuel financing, carbon intensive projects, or the risks to the planet associated with climate change. We therefore view MBA as partially aligned with our objectives.

Truist will continue to monitor MBA's position on climate related disclosures and their support of low-carbon and clean energy while continuing to engage on areas of potential and partial alignment.

## Risk Management Association (RMA)

### Summary

The Risk Management Association describes itself as a member-driven professional association focused on advancing the use of sound risk management principles in the financial services industry.<sup>19</sup> RMA does not engage in lobbying, nor does it take positions on climate-related policies. However, the association publishes reports and educational blog posts, and hosts webinars and workshops about climate-related risk management and analytics.<sup>20</sup> RMA brings banks together to collaborate on climate-related issues and opportunities while enabling members to take their own stances on climate-related issues.

RMA also runs the Climate Risk Consortia, which includes 31 large financial institutions (including Truist) and 11 regional banks. The Consortia aims "to foster the integration of climate risk management throughout banking operations in a manner that is proportionate to the underlying risk and to help the industry prepare actively to navigate the economy's transition to a low-carbon future." Additionally, the Consortia develops frameworks and recommendations for climate risk strategy, management, and disclosures.<sup>21</sup>

### Alignment: Aligned

Consistent with our findings from 2022, RMA aligns with Truist's climate goals. RMA continues to recognize the need to take action to address climate change and acknowledges the importance of managing the risks climate change poses for financial institutions.<sup>22</sup> RMA's Climate Risk Consortia provides important resources to member banks, including Truist, that help create guidelines for embedding climate matters into risk management practices.<sup>23</sup>

Truist will continue to monitor RMA's practices while continuing to engage on areas of alignment.

## Securities Industry and Financial Markets Association (SIFMA)

### Summary

The Securities Industry and Financial Markets Association describes itself as the leading trade association for broker-dealers, investment banks, and asset managers operating in the U.S. and global capital markets.<sup>24</sup> Providing forums for its members to discuss industry policy, SIFMA advocates on legislation, regulation, and business policy affecting retail and institutional investors as well as equity and fixed income markets. SIFMA serves as an industry coordinating body to promote fair and orderly markets, informed regulatory compliance, and efficient market operations and resiliency.<sup>25</sup>

### Alignment: Aligned

Truist's assessment of SIFMA remains unchanged from last year. Since our last report, SIFMA continues to acknowledge climate risk as a significant financial issue.<sup>26</sup> Recognizing the "intensifying" pace of climate change, SIFMA is aligned with Truist on the importance of a continuous dialogue with regulators as it relates to climate-related financial risk. However, the organization opposes quantifying climate-related financial risks into banks' exposure, as it believes the availability of climate data is only just emerging.<sup>27</sup> SIFMA, however, has expressed its overall support for material climate-related disclosures.<sup>28</sup> Over the past year, SIFMA has not lobbied for or against any climate or renewable energy-related provisions in legislation and does not extend its climate advocacy efforts to the state level.

Truist will continue to monitor SIFMA's practices, public commentary on measuring and disclosing carbon emissions, and other climate-related risks while actively engaging on areas of alignment.

## U.S. Chamber of Commerce (USCC)

### Summary

The U.S. Chamber of Commerce describes itself as the world's largest business organization. Its members include small businesses and chambers of commerce across the country, leading industry associations, and global corporations that are innovating and solving for the world's challenges.<sup>29</sup> The USCC regularly comments on climate-related topics and legislation, lobbies on relevant issues, and makes PAC donations to elected officials that have strong stances on climate change legislation.

### Alignment: Partially aligned

We continue to view the U.S. Chamber of Commerce as partially aligned, as it still advocates for a collaborative effort between citizens, governments, and businesses to address climate change. In 2023, the USCC made several public comments on the impact of new emissions rules on businesses and published a comment letter about the Environmental Protection Agency's carbon pollution standards for coal and natural gas plants. In that letter, the USCC expressed support for a low carbon transition and implored the EPA to consider the impact of the new regulations on businesses.<sup>30</sup>

The USCC has been increasing its presence at COP conferences since COP26 in Glasgow, most recently leading the largest business delegation in the conference's history to COP28 in Dubai.<sup>31</sup>

The USCC continues to be a vocal advocate for permitting reform and is lobbying for legislation that aims to modernize energy infrastructure. However, the media frequently frames the organization as an obstacle to progress in the fight against climate change, as reports state that the organization continues to oppose legislation that would meaningfully address climate change. For example, the Chamber supported the clean energy and climate provisions of the Inflation Reduction Act, though the association did not support the bill due to various other factors. As a result, we view the USCC as partially aligned with Truist's climate objectives.

Truist will continue to monitor the USCC's practices and public comments on climate-related issues while engaging on areas of partial alignment.

## End notes

- 1 ABA Press Release. [www.aba.com/about-us/press-room/press-releases/aba-nasdaq-community-bank-index-december-2023](https://www.aba.com/about-us/press-room/press-releases/aba-nasdaq-community-bank-index-december-2023)
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- 3 [www.aba.com/advocacy/our-issues/climate-change-and-banking](https://www.aba.com/advocacy/our-issues/climate-change-and-banking)
- 4 Response to Principles for Climate-Related Financial Risk Management for Large Banks. <https://www.aba.com/advocacy/policy-analysis/clclimateocc20220214>
- 5 Response to IFRS Sustainability Disclosure Taxonomy: Proposed Taxonomy. <https://www.aba.com/advocacy/policy-analysis/aba-urges-issb-to-integrate-digital-taxonomy>
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