



Priority Recommendations  
of the Wells Fargo Human  
Rights Impact Assessment  
and Actions in Response

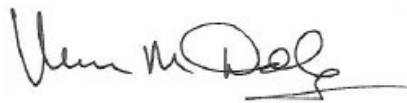
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February 2022

## A Message from Bill Daley

At Wells Fargo, we are transforming the way we run our company and redefining parts of our culture to be more effective. Doing what is right for customers must be at the center of everything we do, and we have been taking meaningful steps to embed this mindset into all of our decisions.

We undertook a Human Rights Impact Assessment (HRIA) to help us gain better insights into where our stakeholders perceive we have positive and negative human rights impacts. It also included a specific focus on diversity, equity, and inclusion initiatives and impacts. We value stakeholder feedback and appreciate their perspectives on how we are managing human rights and where we have opportunities to strengthen our approach. We know that management of human rights is an ongoing effort and intend to build on the learnings from the HRIA with a goal of improving both our understanding of, and management approach for, addressing these critical issues.



**Bill Daley**

Vice Chairman of Public Affairs  
Wells Fargo & Company

# Introduction

Wells Fargo undertook a Human Rights Impact Assessment (HRIA) to help us gain better insights into where our stakeholders perceive we have positive and negative human rights impacts. The HRIA also included a specific focus on diversity, equity, and inclusion (DE&I) initiatives and impacts. We recognize that management of human rights is an ongoing effort and intend to build on the priority recommendations of this HRIA. This document contains the HRIA priority recommendations and actions we have or we plan to take in response.

## **HRIA background**

We engaged a third party law firm in the fourth quarter of 2020 to conduct an HRIA. Our Board's Corporate Responsibility Committee oversaw the work.

The HRIA was premised on the diligence standards set by the United Nations Guiding Principles on Business and Human Rights (UNGPs). The UNGPs establish the responsibilities of companies to respect human rights and provide guidance on how companies can identify and mitigate human

rights harms that may be associated with their operations and activities. The UNGPs state that the due diligence:

*“...should cover adverse human rights impacts that the business enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships<sup>1</sup>.”*

This document, prepared by Wells Fargo, contains the priority recommendations of the HRIA and actions we have taken or plan to take in response. The HRIA was not intended to arrive at, and the stakeholder perceptions and observations gathered as part of the HRIA are not, factual determinations or conclusions regarding Wells Fargo's policies and procedures or compliance with any applicable laws or regulations. We recognize our responsibility to respect human rights in our operations, products, and services. We acknowledge the importance of active and ongoing engagement with our stakeholders and look forward to continuing our work in this area.

1. United Nations Office of the High Commissioner for Human Rights, Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework, Principle 17.(a) (2001).

### **HRIA methodology**

The HRIA entailed a detailed review of Wells Fargo's core human-rights related policies and discussions with management, employees, and external stakeholders.

#### **Interviews**

The third party who conducted the HRIA conducted interviews with internal and external stakeholders, including Wells Fargo

management and employees, members of our external Stakeholder Advisory Council (SAC), and individuals identified by the SAC who raised allegations of harm by Wells Fargo (known as rights holders under the UNGPs). To encourage candid

We recognize that management of human rights is an ongoing effort and intend to build on the priority recommendations of this HRIA.

feedback, the discussions were anonymized, aggregated, and summarized by the third party.

#### **Employee surveys**

To complement the information provided directly by stakeholders, the third party also reviewed anonymized results from a 2021 survey of Wells Fargo employees who are key members of the company's Employee Resource Networks.

In addition, Wells Fargo provided the third party with the results of a 2020 survey administered by Wells Fargo that asked respondents about the company's new expectations for DE&I.

#### **Internal policy review**

The third party also conducted a review of Wells Fargo's core human rights-related policies.

#### **Media landscape**

The third party considered and incorporated various external media materials and civil society organization reports.

# Recommendations

The priority recommendations identified by the third party in the HRIA are:

## *Human Rights Risk Management & Policy*

- Wells Fargo should consider prioritizing the issuance of a comprehensive human rights policy and providing training to the bank's leadership and senior management regarding the UNGPs.
- Wells Fargo should consider reviewing its policies to identify potential opportunities to strengthen its human rights due diligence and risk assessment process in a way that prevents commercial relationships with entities causing serious adverse human rights impacts – especially those affecting vulnerable communities.

## *Public Policy & ESG Integration/ESRM Teams*

- Wells Fargo should consider making human rights implementation and the work of the ESG Integration Team and the Environmental and Social Risk Management (“ESRM”) Team major components in its transformation strategy by: (1) expanding the size of the Teams and ensuring that they are appropriately resourced; (2) providing additional weight to the stature of the Teams and their recommendations; and (3) better aligning the ESRM Team with, among other functions, Independent Risk Management.

- Wells Fargo should consider incorporating clear human rights goals and criteria into the Public Policy Team's government engagement strategy and appointing government affairs personnel who are focused exclusively on ESG and DE&I goals.

## *Customer Remediation*

- Wells Fargo should consider evaluating its customer remediation process and compensation formula to ensure compensation is proportional to the harm and costs incurred by the claimant and takes into account less quantifiable harms such as emotional suffering.
- As part of this evaluation, Wells Fargo should consider and leverage stakeholder input to determine fair compensation standards, potentially including direct collaboration with rights holders and consumer advocacy groups.

## *Workforce & Workplace*

- Wells Fargo should ensure its commitments to a safe workplace free from retaliation and discrimination are being implemented, with particular focus on offices, facilities, and operations below the senior management level.

- Wells Fargo should regularly review and revise its employee grievance mechanisms to ensure that employees are able to raise work-related issues and concerns regarding unethical behavior to senior management without retaliation, and such complaints are fully investigated.

We recognize our responsibility to respect human rights in our operations, products, and services.

#### *Advisory Council*

- Wells Fargo should evaluate the role and structure of the Advisory Council to explore opportunities for enhanced stakeholder engagement regarding Wells Fargo's goals. Such an evaluation should consider opportunities to: (1) align the Advisory Council's mission with the bank's transformation goal of better connecting with communities; (2) empower the Advisory Council to play a more active advisory role; (3) meet more frequently; and (4) increase attendance by key Wells Fargo personnel.

#### *Due Diligence*

- Wells Fargo should carry out human rights due diligence on a regular basis and focus forthcoming due diligence initiatives on more closely evaluating topics identified in this HRIA, including: (1) DE&I implementation and racial equity; (2) human rights in the workplace and workforce, with a special focus on low-wage, vulnerable workers and employees of color; (3) operations and facilities in India and the Philippines; and (4) implementation of Wells Fargo's modern slavery prevention practices.

#### *Diversity, Equity, and Inclusion*

- Wells Fargo should consider updating its current DE&I strategy in a manner that sets the bank on a path to be a leader among peer banks on DE&I implementation, and engage in dialogue with Advisory Council members and relevant civil society organizations to identify specific DE&I initiatives for prioritization and/or greater investment.
- When prioritizing, Wells Fargo should focus on the most vulnerable and historically underserved communities, as well the demographic composition of its employees and the communities it serves.

## Focus areas

The focus areas of the HRIA's priority recommendations align with key priorities for Wells Fargo as we work to transform the company and rebuild trust. We have summarized our actions in response to these recommendations to generally align with the following categories of the priority recommendations:

- Human Rights Risk Management & Policy
- Customer Remediation
- Workforce & Workplace
- Advisory Council
- Diversity, Equity, and Inclusion

We have implemented or expect to implement actions within these focus areas, reflecting our own ongoing continuous improvement efforts and, in some cases, further actions in response to the HRIA. We value the insights provided by stakeholders and plan to continue our ongoing engagement with our stakeholders to hear and learn from them.

Management of human rights, DE&I, and other important ESG matters is an ongoing effort with a goal of continually improving both our understanding of, and management approach for, addressing these critical issues over time. Following is a summary of the actions we have already taken, are currently undertaking, or that require ongoing evaluation and attention.

## Human rights risk management and policy

Our commitment to protect human rights includes consistent treatment among people, employee well-being, and environmental stewardship. Many of the actions we've taken to rebuild trust, strengthen our culture, and reduce operational and conduct risk are critical components of a robust human rights risk management approach. Wells Fargo's [Human Rights Statement](#) articulates our approach and was approved at the senior-most management levels of our company and overseen by the Corporate Responsibility Committee of the Board.

A key component of our risk management framework and internal policy framework is our [Code of Ethics and Business Conduct](#) (Code of Ethics). The Code of Ethics provides clarity and focus on the ethical behavior Wells Fargo employees expect of one another and is supported by company policies, and we support understanding and adoption through regular training of all employees. The Code of Ethics includes a specific focus on human rights. Our Conduct Risk function, which is part of our Compliance organization, and our Conduct Management function, which is part of the Chief Operating Office, establishes conduct-related policies and requirements, including the Code of Ethics, and provides risk management oversight of the company's adherence to those requirements.

Another key aspect of our internal policy framework is our ESRM process. Our ESRM framework and associated policy includes due diligence and analysis of third-party environmental, social, and governance research across identified sensitive industries. We are a signatory to the Equator Principles and have adopted an [Indigenous Peoples Statement](#), which we developed in consultation with tribal leaders, Indigenous stakeholders, and their representatives. We created this document to better communicate our commitment to Indigenous Peoples in general and to provide insights into our decision-making on projects in which Wells Fargo financing may potentially impact Native American, Alaska Native, or other Indigenous communities. Our continued progress on human rights is also communicated to stakeholders through our annual [ESG Report](#) and our annual [UK Modern Slavery Act Statement](#).

Below is an overview of some of the key initiatives we plan to undertake within our human rights risk management and policy focus area:

- Wells Fargo expects to publish an updated Human Rights Statement in 2022, which we expect to include updated information on our human rights focus and initiatives relating to our employees, customers, suppliers, and communities.
- We plan to continue to evolve our ESRM framework and related policy that helps identify, evaluate, and manage the

environmental and social risks, including human rights risks, associated with our lending and investments. As our understanding of complex ESRM issues evolves, we will continue to review our ESRM process, including relevant controls, to manage environmental and social risk, including human rights and diversity, equity, and inclusion topics.

- Wells Fargo's [Supplier Code of Conduct](#) (Supplier Code) outlines our expectation that suppliers not only comply with applicable requirements, but also aspire to the highest standards of ethical business practices, environmental stewardship, and community investment. In 2021, we proactively engaged another third party with human rights and ESG expertise to conduct an assessment of our current Supplier Code relative to leading practices. As a next step, we are assessing recommendations from the third party to determine what enhancements to the Supplier Code may be appropriate.
- To drive greater awareness and understanding of human rights principles and issues, we plan to incorporate a new, voluntary human rights training on our employee learning and development platform. We also aim to further educate employees on Wells Fargo's internal human rights initiatives and engagement opportunities.



## Customer remediation

Doing what is right for customers must be at the center of everything we do, and unfortunately, we too often fell short of this in the past. We have been taking dramatic steps to embed this mindset into all of our decisions, which feeds into all the ways in which we touch customers. This extends from product design and pricing to our coverage and service models and how we approach complaints and remediations. And we know it's all about our actions, not our words.

We established Wells Fargo's Customer Remediation Center of Excellence within the Chief Operating Office. Its mission is to care for our customers and support their financial success by providing consistent, timely, and effective remediation when they have been impacted by Wells Fargo.

Our approach is focused on improved processes and dedicating additional resources to remedy mistakes in a timely fashion. Our work has included centralizing remediation activities from the lines of business into the Customer Remediation Center of Excellence, focusing on consistent application of customer-centric standards in remediation. We also invested heavily in resources and improving our processes with the goal of providing remediation closer in time to the event that led to the impact. We also monitor customer complaints throughout the remediation process to identify customer concerns.

Wells Fargo established the Office of Consumer Practices in 2021 as a company-wide, consumer-focused advisory group also within the Chief Operating Office. It is designed to help ensure our products, services, and business practices are fair and transparent, and is reinforcing a customer-centric culture across Wells Fargo. Its work complements efforts already underway to improve Wells Fargo's business practices and its overall customer experience. The group's activities include:

- Assessing and advising on consumer-related products, services, and business practices to help ensure the consumer's perspective is embedded in decision-making.
- Engaging throughout elements of the customer-product life cycle, including advising on product development considerations, like terms, conditions, and pricing.
- Reviewing complaint metrics and other data to help identify and advise on potential consumer-related trends and outcomes.
- Providing advice on policies, procedures, and training that impact how Wells Fargo interacts with consumers, including older adults and people with disabilities.

## Workforce and workplace

Under our Code of Ethics, all employees have the responsibility to protect the reputation and integrity of Wells Fargo, and we expect

## Understanding the perspectives of a wide range of stakeholders is critical to identifying and managing our ESG and human rights priorities.

our employees to speak up when they have a concern. Our employees have several resources available to them to ensure they understand these expectations. Our Code of Ethics, together with our Employee Handbook, and company policies including our Speak Up and Non Retaliation Policy,

guides our employees in doing the right thing the right way. If employees observe suspected, inappropriate, unethical or illegal activities and/or policy violations, Wells Fargo offers several reporting channels:

- The EthicsLine is available 24 hours, 7 days a week
- Discuss the matter with any manager in the organization
- Contact Employee Relations
- Contact the Ethics Office directly

As stated in our Code of Ethics, Wells Fargo does not tolerate retaliation of any kind against anyone for providing information in good faith about suspected unethical or illegal conduct. Managers are also expected to guard against retaliatory conduct by proactively watching for signs of retaliation and reporting any observed conduct that could be a sign of retaliation. Employee grievances are taken seriously, reviewed, and investigated if warranted.

Over the last few years, in order to strengthen the management of Conduct and Ethics Risk, Wells Fargo built a Conduct Management team within the Chief Operating Office. This function is designed to ensure unethical conduct, including retaliation is effectively identified and addressed.

### **Advisory Council**

Understanding the perspectives of a wide range of stakeholders is critical to identifying and managing our ESG and human rights priorities. We engage with relevant stakeholders, including customers, employees, community members, suppliers, shareholders, regulators, media, analysts, and others. Engagement occurs through various channels.

We created the SAC in 2017 to provide stakeholder insight and feedback to the Board and senior management on current and emerging ESG issues. The council is composed of external experts and thought leaders who represent groups focused on human rights, consumer rights, fair lending, the environment, civil rights, and governance. It represents a diverse range of perspectives and experiences and is focused on deepening our understanding of current and emerging ESG issues that are relevant to our stakeholders. Key issues include serving the financial needs of underserved communities, diversity and social inclusion, and environmental sustainability. This group helps us understand and consider a broad range

of perspectives – not only in our ESG plans and activities, but also in our day-to-day business operations and decisions.

Since we formed the SAC in 2017, we have also established other formal approaches to engaging stakeholders to gain feedback, insights, and support for important priorities including our Banking Inclusion Initiative - National Unbanked Advisory Task Force and Minority Depository Institutions Advisory Committee.

### **Diversity, equity, and inclusion**

We're developing and implementing a comprehensive DE&I agenda that focuses on sustainable progress and lasting impact. In November 2020 our CEO created the Diverse Segments, Representation, and Inclusion (DSRI) Department. The Head of DSRI reports directly to our CEO and serves on the company's Operating Committee (OC).

We have made significant progress on our DE&I goals, and we recognize that we have more work to do to communicate this progress and continue our work on DE&I. We disclose information about our efforts in our ESG Report and in our additional ESG disclosures and regularly consider enhancements to improve communication about our progress. Following are some of the highlights of our recent progress:

#### **DE&I integration**

We have worked to integrate DE&I throughout the business. We held our inaugural DE&I Awareness Month with

over 36,500 employee participants, which included hosting a live DE&I summit and 15 DE&I chats and events at the enterprise level covering topics such as unconscious bias, racial justice, and inclusion. In 2021, we also installed dedicated Diverse Segment Leaders in each customer-facing line of business. In addition to our longstanding Employee Resource Networks (which are each sponsored by an OC member reporting directly to our CEO), we created new executive forums consisting of top leaders from several diverse segments who met regularly with OC members and participated in a year-end strategy session with our CEO and DSRI Leaders.

#### **Training**

Our new, immersive diversity training is a result of the company's commitment to require that all managers receive interactive training to increase inclusion skills and behaviors that will support creating and maintaining an inclusive work environment. OC members have completed four multi-hour immersion sessions and initial sessions have been held with other executives and senior managers and their Human Resources partners. In addition, immersive inclusive leadership sessions were conducted with managers and key internal business partners during the last two quarters of 2021, which included anti-racism principles.

### **Diverse talent leadership programming**

We have increased our focus on diverse talent within our talent management processes. In 2021, we launched two sponsorship programs specifically targeted at diverse talent mobility. The first being an executive sponsorship program, which pairs OC members with other executives and senior managers. Through this program, sponsors get to know the diverse leaders, understand their professional aspirations, and provide support for their careers. Second, we launched the Building Organizational Leadership Diversity (BOLD) program. Lines of business and functional groups have implemented the program in their organizations to sponsor other senior employees. In addition to sponsorship, the program is designed to develop and increase visibility and mobility of high-potential talent. These programs served over 340 diverse leaders across the business in 2021.

### **Accountability**

Increasing executive accountability by linking DE&I outcomes to compensation is a critical part of our DE&I commitment. In 2021, we added a new DE&I executive performance objective for senior leaders that is directly connected to increasing gender and racial/ethnic representation in our executive ranks. This is now part of year-end performance evaluations and consideration of individual performance

for our CEO and each OC member. In addition, as part of our culture expectations at work, in 2020 we rolled out a DE&I performance objective for all managers and employees. This objective champions DE&I with a specific focus on creating a safe and inclusive environment where differences are respected, and encourages diverse ideas that challenge our thinking, where we build relationships with colleagues and customers who are different than us, and where we help each other succeed. In 2021, we added a focus within our DE&I training programs to help employees better understand unconscious bias.

### **Sourcing of diverse talent**

In 2021, we increased our partnerships with colleges, universities, and other organizations spotlighting diverse talent recruitment. For example, by expanding our engagement we increased our hiring of candidates from Historically Black Colleges and Universities and Hispanic-Serving Institutions. We also instituted diverse candidate slates and interview teams on most jobs of over \$100,000 in total compensation. We are in the process of eliminating education requirements in certain job categories to increase equity in hiring. Programs such as Glide-Relaunch (an in-house returnship program) and our Career Development Cohort program (an in-house diversity focused program that supports our partnership with the OneTen Coalition) further support our DE&I recruiting efforts.

### **Supplier diversity**

Our Supply Chain Management group works closely with all our lines of business, as well as internal and external stakeholders, to help grow relationships with certified minority, women, LGBTQ, veteran, disability-owned, and small businesses. In 2021, Wells Fargo is projecting to have spent \$1.3 billion or 13% of total controllable spend with certified

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diverse suppliers. This marked the eighth consecutive year of spending over \$1 billion with certified diverse suppliers.

### **Supporting diverse customers**

In addition to looking at DE&I from an internal perspective, we are also actively working to better support our customers through a DE&I lens. Following are highlights from several of our recent diverse customer-focused initiatives.

- Wells Fargo announced its Banking Inclusion Initiative, a 10-year commitment designed to help unbanked individuals gain access to affordable, mainstream, digitally-enabled transactional accounts – a meaningful entry point to fully participating in the economy and achieving financial stability. The initiative will focus on reaching unbanked communities and, in particular, helping remove barriers to financial inclusion for Black and African American, Hispanic, and Native American/Alaska Native families, which account for more than half of America's 7 million unbanked households. It is also designed to assist those who are underbanked or underserved – individuals who may have a bank account yet continue to use high cost, non-bank services and have similar needs. Wells Fargo expects to bring together multiple national and community stakeholders to roll out the broad-based initiative that is designed to increase access to affordable products, digital banking, and financial guidance within unbanked communities. Through this initiative, Wells Fargo also plans to collaborate with partners to explore solutions to the credit challenges facing unbanked individuals. The commitment is organized around three pillars: access to affordable products and digital solutions, financial education and advice, and launching a National Advisory Task Force.

- As of May 2021, Wells Fargo made investments in a total of 13 Minority Depository Institutions (MDIs) and fulfilled our commitment, announced in March 2020, to invest \$50 million in Black-owned banks in communities across the country. As part of this equity capital investment, we also offer access to a dedicated relationship team that can work with each MDI on financial, technological, and product development strategies to help strengthen each institution and support their growth. MDIs are a viable and very important sector of the banking industry that can directly support the financial health of communities where typically there are gaps in banking services. By working together with MDIs, Wells Fargo can address some of the issues facing the communities where these banks are located and help reach the unbanked. These investments are designed to complement our community development efforts while positively impacting people in many communities we serve.
- In 2021, Wells Fargo also launched its “Dream. Plan. Home.” mortgage program, designed for customers with income at or below 80% of the area median income in certain areas. Highlights of the program include up to \$5,000 for one-time closing costs, such as appraisal and processing fees for purchasing a primary residence.
- In 2022, Wells Fargo announced new efforts to limit overdraft-related fees and give customers more flexible options to meet their personal financial needs. These offerings, which include earlier access to direct deposits, a 24-hour grace period before incurring any overdraft fees, the elimination of several fees, and a new, short-term loan, build on actions the company has taken over the past several years to improve customer experience.
- Through our NeighborhoodLIFT program we support sustainable homeownership. The NeighborhoodLIFT down payment assistance program provides a forgivable, zero-interest down payment loan with no required payments. Eligible homebuyers may use the money from this loan for the down payment and/or closing costs of a home mortgage loan. Managed by NeighborWorks America with support from the Wells Fargo Foundation, this program offers down payment assistance and requires homebuyer education. Unlike many other similar programs, a customer doesn’t have to be a first-time homebuyer to qualify. Since inception of the program in 2012, more than 25,000 homebuyers received down payment assistance grants via NeighborhoodLIFT.
- In 2021, Wells Fargo announced the issuance of an Inclusive Communities and Climate Bond, our first Sustainability

Bond, which is designed to fund projects and programs that support housing affordability, socioeconomic opportunity, and renewable energy. The transaction builds on Wells Fargo's expertise in and history of underwriting green, social, and sustainability bonds, and advances the company's commitment to accelerate a more inclusive and sustainable economy. Wells Fargo's first Sustainability Bond is intentionally designed to support job creation and human and health services in minority communities, housing affordability for low-to-moderate income individuals and families, and the development of renewable energy resource. Diverse underwriting firms received the bulk of fees from the \$1 billion Sustainability Bond.

- We are proud to be the No. 1 funder of home purchase loans for Hispanics and Asian Americans and the No. 2 funder of home purchase loans for African Americans as of 2020, according to Home Mortgage Disclosure Act data. We continue to work toward fulfilling our 2017 10-year, \$60 billion commitment to increase African American homeownership, and so far, we've helped 81,000 African Americans become homeowners. This is in addition to the 10-year, \$125 billion commitment Wells Fargo made in 2015 to Hispanic homeownership financing.
- In 2021, the Black Economic Alliance and Wells Fargo committed to launching the Black Economic Alliance Entrepreneurs Fund (BEA Fund), to accelerate the growth of Black entrepreneurs and business owners. The \$50 million BEA Fund will provide seed, startup, and early-stage capital funding to businesses founded or led by Black entrepreneurs. Wells Fargo will help support the effort with a five-year, \$20 million commitment to help boost the program's operations and investments. The BEA Fund plans to recycle 100% of returns to support ongoing operations and investments in Black businesses and entrepreneurs.
- Over the past year, Wells Fargo announced a new wave of support for entrepreneurs including an initiative focused on mentoring women-owned businesses called "Connect to More." The pandemic made it clear that capital is only part of the answer to an inclusive long-term recovery for the small business community. Connect to More is one example of how we are supporting the success and sustainability of women-owned businesses through access to expertise and specialized online resources. As part of the program, Wells Fargo partnered with the Nasdaq Entrepreneurial Center where women entrepreneurs can gain complimentary support through its signature Milestone

Mapping Coaching Circles. Connect to More is offering Milestone Mapping Coaching Circles into 2022 with the goal of helping 500 women-owned businesses.

- In addition, a racial equity lens is being applied to many of our philanthropic investments. For example, we created the Open for Business Fund<sup>2</sup> in 2020 to support Community Development Financial Institutions (CDFIs) and other nonprofit organizations that serve diverse small businesses. In 2021, we fulfilled our \$420 million commitment, which included grants to 235 CDFIs and nonprofits, which in turn is estimated to help more than 152,000 small business owners and maintain more than 255,000 jobs. Roughly 85% of small

businesses served by Open for Business Fund grantees are projected to be those hardest hit by the pandemic, including Black, African American, Hispanic, Native American, Asian American, and other traditionally underserved small businesses most disproportionately impacted by the pandemic. This funding was additional to the \$280 million in charitable grants made through Wells Fargo and the Wells Fargo Foundation. We are proud of these accomplishments but recognize that we have an opportunity to better communicate the impact of our charitable funding. Moving forward, we aim to enhance the measurement and reporting of our philanthropic efforts that support our diversity, equity, and inclusion priorities.

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2. The Open for Business Fund is comprised of gross processing fees received in 2020 from funding Paycheck Protection Program loans.



## Conclusion

We are proud of the work we have completed thus far with respect to human rights and DE&I, while we also acknowledge that this is a journey, and we have more work to do. We value active and ongoing engagement with our stakeholders and will continue to update stakeholders on our human rights approach and progress via our annual [ESG report](#) and [additional ESG disclosures](#).

### **Cautionary Statement about Forward-Looking Statements**

This document contains forward-looking statements about our future financial performance and business. Because forward-looking statements are based on our current expectations and assumptions regarding the future, they are subject to inherent risks and uncertainties. Do not unduly rely on forward-looking statements as actual results could differ materially from expectations. Forward-looking statements speak only as of the date made, and we do not undertake to update them to reflect changes or events that occur after that date. For information about factors that could cause actual results to differ materially

from our expectations, refer to our reports filed with the Securities and Exchange Commission, including the discussion under “Risk Factors” in our Annual Report on Form 10-K for the year ended December 31, 2021, as filed with the Securities and Exchange Commission and available on its website at [www.sec.gov](http://www.sec.gov).<sup>3</sup>

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