



Principles

Our CSR principles provide guidance for our corporate responsibility efforts.



Corporate Social Responsibility Annual Reports

[View 2024 Sustainability Report](#)

[View 2024 GRI and SASB Index](#)

[View 2024 TCFD Index](#)

[VIEW ARCHIVED CSR REPORTS](#)



State of Illinois Community Reinvestment Act

The Department of Financial and Professional Regulation (Department) evaluates our performance in meeting the financial services needs of this community, including the needs of low-income to moderate-income households. The Department takes this evaluation into account when deciding on certain applications submitted by us for approval by the Department. Your involvement is encouraged. You may obtain a copy of our evaluation once the Department completes our first evaluation. You may also submit signed, written comments about our performance in meeting community financial services needs to the Department. We will update this notice when our first evaluation has been issued.

Ethics and Employee Relations Hotline

Northern Trust maintains an overriding commitment to the highest standards of integrity, ethics and honesty. Our Code of Business Conduct and Ethics provides the foundation of that commitment and defines our relationships with our clients, with each other and with all the people that contribute to Northern Trust's success.

Concerns about Northern Trust or the conduct of its people should be referred to our Business Abuse and Employee Relations Hotline, which is run by NAVEX Global, an independent third party, by any of the following methods:

By secure website:

<http://www.ntrs.ethicspoint.com>

Toll-free Business Abuse and Employee Relations Hotline numbers:

- Australia: 1800038629
- Canada: 1-844-983-0441
- China: 4001205063
- Hong Kong: 800 938 046
- India: 022 5097 2967

- Ireland: 1800849272
- Japan: 0066-3386-8002
- Luxembourg: 80025178
- Malaysia: 0154-600 0532
- Netherlands: 0800 3297746
- Norway: 80062663
- Philippines: 02 8540 0370
- Singapore: 8004922723
- Sweden: 020 79 82 49
- Switzerland: 0800 121 169
- United Arab Emirates: 8000120272
- United Kingdom: 0808 196 5638
- United States: 1-888-372-8798

Australian Whistleblowing Policy

The objective of the Policy is to ensure that The Northern Trust Company, Melbourne Branch and any related bodies corporate that is either domiciled in Australia or registered as a foreign company in Australia complies with its obligations under the *Corporations Act 2001* (Cth), which provides whistleblower protections, in relation to 'Eligible Disclosures', as defined in the Policy.

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Statement Regarding Government Relations and Political Contributions

Northern Trust Corporation supports public policy positions that enhance the safety of client assets and promote the safety and soundness of the financial system and a strong global economy.

Northern Trust concentrates its public policy positions in areas most relevant to its businesses. Our public policy and lobbying focus includes, among other things, United States federal, state and European Union financial regulatory reform efforts. We work with certain trade associations of which we are a member and we also meet directly with members of Congress, state legislators, regulators and other government officials globally to discuss our positions and make recommendations for improved policy and regulation.

At the United States federal level, we focus on proposed regulatory and policy changes that will impact our businesses and support those changes that will enhance the safety of client assets and promote the safety and soundness of the financial system and a strong global economy. At the state level, we regularly meet with elected and appointed officials to discuss public policy positions that will impact the businesses of The Northern Trust Company, our principal subsidiary and the largest bank chartered in Illinois. In appropriate circumstances, we file comment letters to proposed federal regulations, copies of which are publicly available from regulatory agencies.

Northern Trust's Director of Public Affairs and Government Relations oversees the political, lobbying and other public advocacy activities of the Corporation, including with respect to significant trade association memberships, and has final authority with respect to the organization's political spending decisions. The Corporate Governance Committee of the Board of Directors provides Board-level oversight of these activities. Northern Trust's Public Affairs and Government Relations group analyzes Northern Trust's corporate and PAC political contributions regularly to ensure contributions made during the year are consistent with this Statement.

Political Contributions by Employees

Northern Trust expects employees to seek guidance and pre-clear certain individual political contributions. More detailed Northern Trust policies and procedures that apply to all employees or certain groups of employees are set forth in pre-clearance procedures and other documents, including a summary of state and local jurisdictions with "pay-to-play" restrictions on political contributions.

Corporate and PAC Political Contributions

Northern Trust engages in the political process in order to advance and protect its long-term interests and does so at all times without regard for the private political preferences of its executives.

Northern Trust does not: (i) contribute directly to political parties, committees, or candidates for public office; (ii) make contributions to 527 groups, such as governors' associations and super PACs, or other tax-exempt organizations, such as 501(c)(4)s; or (iii) make contributions specifically intended to influence the outcomes of ballot measures.

Northern Trust sponsors both a federal-only political action committee and a multi-candidate political action committee ("Northern PACs"). Both are allowed to solicit a restricted class of Northern Trust's U.S. employees for contributions, which then can be used to support candidates who support effective legislation important to Northern Trust. All contributions to Northern PACs are voluntary; employees are neither favored nor disadvantaged on the basis of their participation. Decisions about potential contributions are reviewed and approved by the respective leadership of the Northern PACs, based on the public policy interests of Northern Trust.

Trade Organizations

Northern Trust is a member of various industry trade organizations relating to its public policy objectives. Participation in these organizations is important to gain industry insight, foster relationships and professional opportunities within the industry, and facilitate and collaborate on public policy topics of mutual interest. Our principal trade organization memberships, defined as organizations to which we pay \$25,000 or more annually in dues, include:

- American Bankers Association
- Bank Policy Institute
- Florida Bankers Association
- Illinois Bankers Association
- Investment Company Institute
- Security Industry and Financial Markets Association

Our membership in specific trade organizations does not mean we endorse or support every position, priority, or issue that those organizations or their members support, but we recognize the importance and overall benefit of our participation in groups that advocate and help to shape public policy. We periodically assess an organization's scope and purpose to identify where their positions may materially diverge from Northern Trust's and evaluate the benefit of continued

membership. Additionally, because Northern Trust does not contribute to the PACs of trade organizations, it does not track the payment amounts or recipients of payments made by those trade associations.

Federal lobbying reports may be found at: http://www.senate.gov/legislative/Public_Disclosure/LDA_reports.htm and our financial contributions can be found at: http://www.fec.gov/finance/disclosure/candcmte_info.shtml

(Effective November 18, 2025)

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Corporate Contribution Reports

- [Year-End 2019 Report](#)
- [Mid-Year 2020 Report](#)
- [Year-End 2020 Report](#)
- [Mid-Year 2021 Report](#)
- [Year-End 2021 Report](#)
- [Mid-Year 2022 Report](#)
- [Year-End 2022 Report](#)
- [Mid-Year 2023 Report](#)
- [Year-End 2023 Report](#)
- [Mid-Year 2024 Report](#)
- [Year-End 2024 Report](#)
- [Mid-Year 2025 Report](#)
- [Year-End 2025 Report](#)

Political Action Committee Contribution Report

- [Year-End 2019 Report](#)
- [Mid-Year 2020 Report](#)
- [Year-End 2020 Report](#)
- [Mid-Year 2021 Report](#)
- [Year-End 2021 Report](#)
- [Mid-Year 2022 Report](#)
- [Year-End 2022 Report](#)
- [Mid-Year 2023 Report](#)
- [Year-End 2023 Report](#)
- [Mid-Year 2024 Report](#)
- [Year-End 2024 Report](#)
- [Mid-Year 2025 Report](#)
- [Year-End 2025 Report](#)

Statement of Greenhouse Gas Emissions

[Download a PDF](#) of our current statement of greenhouse gas emissions or view our historic disclosures at www.cdp.net.

Australia Workplace Gender Equality Report

As part of our continued focus on diversity & inclusion and achieving gender balance in our workforce, Northern Trust actively complies with any government legislation requiring the disclosure of our gender diversity information and policies.

It is in this light that Northern Trust has lodged its report to the Australian Workplace Gender Equality Agency (WGEA), which requires all organizations with 100 or more employees in Australia to complete an annual questionnaire addressing gender equality in the workplace. In addition to fulfilling the legislative requirement, this exercise helps us assess and further strengthen our own gender equality agenda.

UK Gender Pay Gap Statement

Fostering and supporting a globally diverse and inclusive workforce is a strength of Northern Trust and is what will help us to succeed. We are an equal opportunity employer and aim for excellence in our efforts to recruit and develop our workforce.

As required by government legislation, Northern Trust and all companies in Great Britain with more than 250 employees, must disclose their gender pay gap. We support the widespread publishing of gender pay gaps and are continually looking to make improvements to close our own gender pay gap.

For more information, download and read the Northern Trust Gender Pay Gap Report:

- [Northern Trust Gender Pay Gap Report UK - 2024](#)
- [Northern Trust Gender Pay Gap Report UK - 2023](#)
- [Northern Trust Gender Pay Gap Report UK - 2022](#)
- [Northern Trust Gender Pay Gap Report UK - 2021](#)

Ireland Gender Pay Gap Statement

Effective 2022, government legislation requires Northern Trust and all companies in Ireland with 150 or more employees to disclose their gender pay gap annually.

For more information, download and read the Northern Trust Gender Pay Gap Report:

- [Northern Trust Gender Pay Gap Report Ireland – 2025](#)
- [Northern Trust Gender Pay Gap Report Ireland – 2024](#)
- [Northern Trust Gender Pay Gap Report Ireland – 2023](#)

Human Rights Statement

Northern Trust recognizes our responsibility to respect internationally recognized human rights, as outlined in the UN Guiding Principles of Business and Human Rights. For more information, download and read the Statement:

- [Human Rights Statement](#)

Modern Slavery Statements

Northern Trust firmly believes that all work should be done voluntarily and without slavery, servitude, forced or compulsory labor or the involvement of human trafficking (Modern Slavery). We take the risk of Modern Slavery occurring within our business and in our supply chain seriously and view relationships with vendors as an opportunity to encourage behavior and practices that are consistent with our own ethical practices.

- [Read the Combined Australian, Canadian and UK Modern Slavery Statement - 2024](#)
- [Read the Combined Australian, Canadian and UK Modern Slavery Statement - 2023](#)
- [Read the Combined Australian, Canadian and UK Modern Slavery Statement - 2022](#)
- [Read the UK Modern Slavery Statement - 2021](#)
- [Read the Australian Modern Slavery Statement - 2021](#)
- [Read the Combined Australian, Canadian and UK Modern Slavery Statement - 2020](#)

- [Read the UK Modern Slavery Statement - 2019](#)
- [Read the UK Modern Slavery Statement - 2018](#)
- [Read the UK Modern Slavery Statement - 2017](#)
- [Read the UK Modern Slavery Statement - 2016](#)

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