

INSPIRED BY PEOPLE. DRIVEN BY PURPOSE. TOGETHER WE WILL.

2022

**ESG &  
SUSTAINABILITY**

M&T Bank



WILMINGTON  
TRUST



INSPIRED BY PEOPLE. DRIVEN BY PURPOSE.

together  
we will

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Disclosures

The report covers the period of January 1–December 31, 2022, and is as of December 31, 2022, unless otherwise noted. M&T closed its acquisition of People's United Financial, Inc. ("People's United Bank" or "PUB") on April 1, 2022; unless otherwise noted, the report does not include People's United data prior to the acquisition.



# welcome

## FROM OUR CHAIRMAN AND CEO

At M&T Bank, our commitment to the communities we serve isn't just something we say or put on marketing brochures. It's a defining aspect of our culture that is brought to life every day by teams in all parts of our company. No matter where we operate, our goal is to be regarded as the hometown bank, willing and able to rally around a cause when the community needs us.

And as I reflect on the past year, it's clear to me that our communities needed us perhaps like never before. Our hometown of Buffalo experienced multiple tragedies, including the racist murders of innocent shoppers at a local supermarket and a once-in-a-lifetime blizzard. Unusual circumstances to be sure, but our employees reacted in their usual way. They responded instinctively—not because we told them to or even granted permission, but because they know no other way. A group organized and joined vigils to signal our collective rejection of hatred. Another team converted a branch into a food distribution center that helped while the impacted grocery store was shuttered. Of course, we did, financially, what a good corporate citizen should do and donated more than half a million dollars to support organizations focused on the impacted community, but it's our people who make the greatest impact.

These efforts are not unique to our hometown. Each time we enter a new community, our employees quickly make it seem as though we've been there forever. This is the standard level of dedication we expect to be held to across our new communities in Connecticut, Maine, Massachusetts, New Hampshire, and Vermont, and all the places our merger with People's United Bank in 2022 has now introduced us.

Take, for instance, our AMPLIFY Fund, which we deployed last year to support low- and moderate-income communities and underrepresented populations across these regions. The Fund is not your average \$25 million corporate philanthropic investment. We have teams in each community actively working to understand their specific needs and issues, bringing our collective resources together to make the most meaningful impact possible.

Another example of how we live our community values is our multicultural branch initiative. I recently had the privilege of ringing the New York Stock Exchange bell in honor of the team's effort to provide distinct branch experiences shaped by the preferences and perspectives of our culturally diverse communities. It reflects more than our commitment to social sustainability. It's about our constant desire—and that of our colleagues—to identify needs that transcend banking and help address them.

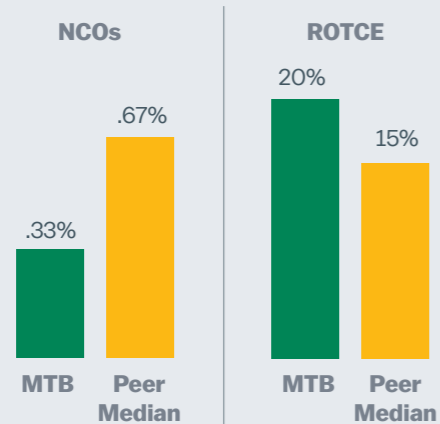
I invite you to learn more about these initiatives and others in the pages that follow. Our ESG agenda is not a separate initiative that sits in our headquarters. It's embedded into what we do each and every day so much so that it is, in fact, the core business of our enterprise. It is what we do. While our efforts will continue to evolve to reflect our communities and new challenges, our commitment to transparency and accountability will remain constant. We will continue to share our progress and push ourselves to use our capabilities to solve the pressing issues affecting our customers and communities.

**René F. Jones**  
Chairman and CEO

## M&T BANK: A COMPANY BUILT ON MAKING A DIFFERENCE

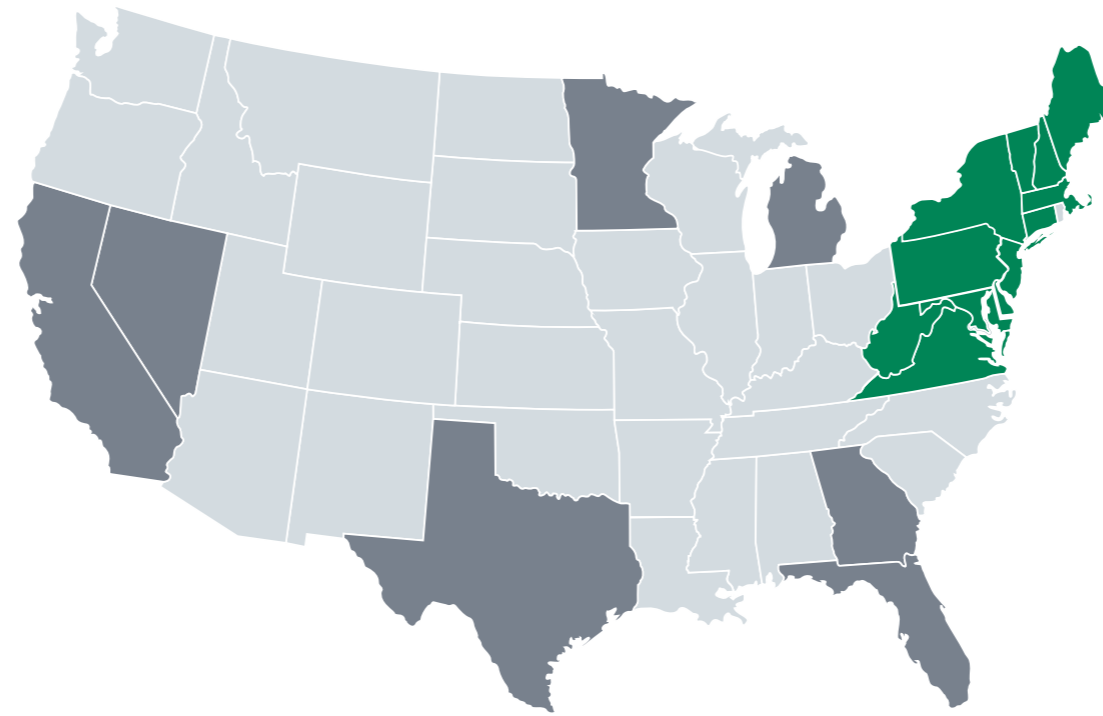
### A History of Strong Performance

We have been profitable for 186 consecutive quarters: more than 46 straight years. We were one of two commercial banks in the S&P 500 at the start of the 2008 financial crisis to maintain a dividend throughout. These accomplishments are driven in part by our strong credit culture. This is characterized by fewer than 50 percent of the industry average net charge-offs (NCOs) and strong returns, with 20 percent return on tangible common equity (ROTCE), compared to the median 15 percent of our peers throughout the past 20 years.



Since our founding in 1856, our enduring purpose has been to make a difference in people's lives. Whether that's a colleague, a customer, a local business—we are and always have been driven to help, encourage, and promote growth for all whom we serve. Our leadership has exemplified this culture for 167 years, and it is ingrained in our talented and unified team of over 22,000 colleagues.

As a top 15 U.S.-owned, commercial bank holding company,\* we serve 5.1 million customers and provide banking products and services in 12 states across the eastern U.S. from Maine to Virginia, and Washington, D.C., and have \$201 billion in total assets as of 12/31/22. We deliver industry-leading capabilities with the care and empathy of a local bank. We offer advice, guidance, and solutions across the financial spectrum, combining M&T's traditional banking services with the wealth management and institutional expertise of our affiliate, Wilmington Trust.



■ M&T Bank and Wilmington Trust offices  
 ■ Wilmington Trust offices

\* S&P Global Market Intelligence as of December 31, 2022. Methodology excludes subsidiaries of foreign bank parents, investment banks, credit card companies, insurance company subsidiaries, brokers, and asset managers.

## OUR VALUES AND PRINCIPLES

### Our community-centric mission

We live and work alongside our customers, developing deep, lasting relationships and supporting local businesses, schools, universities, sports, arts and social organizations, and government institutions. We are committed to projects that drive economic growth and champion causes that will create long-term sustainability.

As we grow, we welcome each new community to the M&T family, offering opportunities for local talent, nurturing new relationships, and seeking ways to overcome challenges.

### A committed and talented team

Deeply embedded in our communities, our colleagues strive to make a difference every day for our customers by remaining focused on delivering exceptional service. Concentrated across the Northeast and Mid-Atlantic regions, with a national and international presence, they are the heartbeat of our organization and the basis of our success.

### Values that sustain

Our values guide our colleagues to create and reinforce a culture of which we are proud and that will sustain us for the long term. Guided by our set of core values, we demonstrate an intense passion for our organization and responsibility for the work we do together to deliver value and transparency to our stakeholders.



## Our ESG Guiding Principles

### Serving the whole of our communities

Our approach is not exclusionary. When we identify ESG risks, we partner with our customers and vendors to manage them.

### Recognizing the interconnected nature of ESG issues

We look at ESG issues holistically and view the intersections as points of leverage.

### Focusing where we can have the greatest impact

We find unique niches to add value to our stakeholders and collaborate with and support others in areas where we do not have expertise.

### Realizing business value through ESG

While identifying and managing ESG risks, we seize opportunities to create value.

### Integrating ESG into what we do

Understanding and serving the needs of all our stakeholders is how we've built M&T and how we continue to operate.

### Creating transparency and accountability

We focus on continuous improvement in how we measure our impact (positive, negative, and across each ESG pillar) and how we share the lessons we learn from our risks and opportunities.

### integrity

- We treat others with respect
- We do the right thing, even when nobody is watching
- We trust each other to do what's best

VALUE IN ACTION

### ownership

- We understand what's important to our customers and communities
- We follow through on commitments
- We execute with urgency
- We act responsibly to preserve our future

VALUE IN ACTION

### curiosity

- We never stop learning
- We encourage creativity
- We embrace and adapt to change
- We are empathetic and listen actively

VALUE IN ACTION

### collaboration

- We work together as one team
- We are transparent and share what we know
- We are inclusive and value diverse perspectives
- We celebrate our successes

VALUE IN ACTION

### candor

- We are open and honest
- We seek and share feedback
- We question behavior that doesn't align with our values

VALUE IN ACTION

## ESG PRIORITIES

### Engaging stakeholders and assessing ESG materiality

This past year, we updated our ESG Materiality Assessment to reflect our expanded footprint and extrinsic changes to the industry. The ESG Materiality Assessment helped M&T understand the perspectives of our internal and external stakeholders and focus on its most impactful and significant ESG topics.

Our update included in-depth interviews, focus groups, surveys, and desktop research across internal and external stakeholders, including customers, employees, executive leaders, Board of Directors, potential employees, investors, vendors, community organizations, and government organizations. We used a dual materiality approach, focusing on our “outward” impacts (i.e., those the company has on people, the economy, and the environment as associated with environmental, social, and governance topics) and “inward” impacts to the organization (i.e., those that environmental, social, and governance topics have on the company). We used materiality definitions from the Sustainability Accounting Standards Board and the Global Reporting Initiative. Note, ESG materiality does not equate to materiality of M&T Bank’s financial results/impact to financial reporting or materiality under Federal securities laws.

Through our analysis, we prioritized our key ESG topics based on impact to our stakeholders and impact to business success. This prioritization guides our reporting, measurement, investment, and work.

### Impact on society, environment & economy

Impact on society, environment & economy	Significant			<ul style="list-style-type: none"> <li>Ethical behavior, business conduct, and culture</li> <li>Corporate governance</li> </ul>	
	High			<ul style="list-style-type: none"> <li>Accessible and equitable banking</li> <li>Sustainable finance</li> <li>Employee and leadership diversity</li> <li>Community investment</li> </ul>	
	Moderate	<ul style="list-style-type: none"> <li>Supply-chain management</li> <li>Advocacy and public policy</li> </ul>	<ul style="list-style-type: none"> <li>Environmental impact reduction and responsible resource management</li> <li>Transparent and consistent reporting</li> </ul>	<ul style="list-style-type: none"> <li>ESG and climate risk management and integration</li> <li>Customer financial protection</li> </ul>	
	Low		<ul style="list-style-type: none"> <li>Technology and innovation</li> </ul>	<ul style="list-style-type: none"> <li>Board diversity and independence</li> </ul>	
		Low	Moderate	High	Significant

### Impact on business

## ESG STRATEGY AND SUSTAINABLE DEVELOPMENT GOALS (SDGs) ALIGNMENT

Focusing our efforts on where we can have the most significant impact is essential to our progress. To that end, we have seven sustainability priorities, which cross the enterprise and allow us to leverage our capabilities and align our enterprise strategy.

Across these priorities, corporate governance structures create a culture of accountability, ethical behavior, risk management, and transparency, so that we act responsibly to serve our stakeholders. With the appropriate governance structures in place, we are better positioned to advance our sustainability priorities.

STRATEGY	SDGs ALIGNMENT	STRATEGY	SDGs ALIGNMENT
 <p><b>Finance an Equitable Economy</b></p> <p>For the communities we serve to have thriving, inclusive, sustainable, and equitable economies supported by our products, services, investment, and purchasing power</p>	     	 <p><b>Grow Climate Finance</b></p> <p>Provide guidance, insights, and capital for our customers to prepare for and take advantage of the physical and economic implications from the changing climate</p>	  
 <p><b>Attract, Develop &amp; Retain Talent</b></p> <p>Be the best place our colleagues have ever worked and be the employer of choice for people who want to make a difference in our communities</p>	 	 <p><b>Reduce Our Carbon Footprint</b></p> <p>Reduce our impact on the climate and demonstrate our commitment</p>	   
 <p><b>Colleague, Leadership &amp; Customer Diversity</b></p> <p>Colleagues, leadership, and customers to be fully representative of the communities we serve</p>	   	 <p><b>Support Climate Resilient Communities</b></p> <p>Play a key role in preparing our communities for—and helping them through—physical impacts of climate change and the economic transition to a low-carbon economy</p>	       
 <p><b>Integrate Climate Risk</b></p> <p>Fully understand the risks to internal and external stakeholders of physical climate changes and focus on transitioning to a low-carbon economy</p>			

TOGETHER WE WILL

# govern

## STEWARDING OUR PRINCIPLES OF GOVERNANCE

We are all expected to act ethically, responsibly, and in the best interest of all our stakeholders, driven by our values and deep engagement in the communities we serve.

### Assuring the Integrity of Our Board

M&T Bank Corporation's Board of Directors promotes our long-term performance, encourages discipline when taking risk, and helps deliver sustainable value to shareholders—all while supporting a culture of openness and debate.

M&T strives to foster an inclusive and diverse workplace that respects and values differences—an ambition that extends to the Board. We prioritize a range of backgrounds, professions, skills, experiences, and geographic representation and community involvement among our directors, because a variety of viewpoints, skills, and experiences allows for effective discussion and oversight.

### Board composition review, candidate identification, and succession planning

We regularly review the composition of our Board. The Nomination and Governance (N&G) Committee of the Board evaluates candidates based on identified skills, experiences, and attributes M&T believes would be beneficial to have represented. Since 2019, we have engaged a third-party consultant to assist the Board of Directors and executive management with Board succession planning and candidate identification, evaluation, and recruitment.

Based on continuing feedback from Board members, executive management, and the third-party consultant, we maintain a succession framework for future director retirements and director candidate recruitment that maps the qualifications we feel future Board members should possess. This director candidate process considers the current needs of the Board; candidate diversity, age, skills, and experiences; director succession planning needs; and our business strategy.



**The following terms are used throughout the Stewarding Our Principles of Governance section:**

**Employee**

Any individual who is employed as an executive, officer, manager, exempt, non-exempt (full- or part-time), or temporary employee of M&T.

**Contingent worker**

Any individual who is engaged by M&T to address particular needs but is not permanently or temporarily hired by M&T as an employee. Contingent workers are engaged by M&T on an individual contractual basis, through a temporary employment agency or outsourcing providers.

**Personnel**

Any individual who is either an employee or contingent worker, following the above definitions.



**Board composition and diversity**

Our efforts around Board succession planning, candidate identification, evaluation, and recruitment have emphasized the importance of diversity in consideration of director candidates. As of December 31, 2022, four diverse directors had joined the Board since 2020, including three women and one person of color.

The Board had 17 directors as of December 31, 2022. The People's United acquisition resulted in four directors—three men and one woman—joining the Board in 2022. For more information on Board demographics, tenure, and independence, see the table on page [10](#); for more information on Board skills and experience, see the table on page [11](#).

**Board committees**

Members of our Board's committees are appointed annually. In 2022, the Nomination, Compensation, and Governance Committee was dissolved and reorganized to form two new committees: the Nomination and Governance (N&G) Committee and the Compensation and Human Capital (C&HC) Committee. This change shifted the corporate governance responsibilities of the Nomination, Compensation, and Governance Committee to the N&G Committee and the compensation functions to the C&HC Committee. The formation of these two committees created additional oversight and support around ESG and human capital matters, including diversity, equity, and inclusion.

- The N&G Committee is responsible for corporate governance oversight, including overseeing the evaluation of the Board and recommending Board composition, candidate nominees and committee appointees, and corporate governance standards.

This Committee also maintains oversight of M&T's ESG management and strategy and serves as a resource to the Board on ESG matters.

- The C&HC Committee oversees M&T's executive compensation and benefits programs and reviews M&T's human capital and talent management strategy, including diversity, equity, and inclusion, and employee well-being, engagement, recruitment, development, and retention initiatives.

The Audit Committee, the N&G Committee, the C&HC Committee, and the Risk Committee are entirely composed of independent directors.

The Board provides robust oversight of executive management and, through the C&HC Committee, conducts an annual evaluation of CEO performance and compensation. The Board and its committees review their own performance through annual self-evaluations. For more information on Board committee membership, see the table on page [10](#).

**ESG governance: The Board's role in ESG oversight**

We strive to be a sustainable organization that creates outsized value and impact for all our internal and external stakeholders. Given the importance of ESG to our organization and stakeholders, we have established formal roles and responsibilities for M&T's ESG risks, opportunities, practices, performance, and disclosure.

The Board of Directors is committed to overseeing the bank's corporate sustainability and ESG strategies and matters. To this end, the Board maintains oversight of ESG-related topics through its committee structure. To support its role, in 2022,

the Board discussed M&T's environmental and social sustainability strategies, including goals and targets; M&T's climate risk activities and risk management; and Board and management oversight, effectiveness, and governance of ESG matters. In addition, the Board received education on the current regulatory environment, including climate risk.

- The N&G Committee is responsible for oversight of ESG strategy and policies. As needed, the Committee reports and escalates to the Board, as well as to the Risk Committee and the C&HC Committee.

— In 2022, the N&G Committee discussed M&T's ESG governance and oversight, M&T's sustainability strategy, M&T's operational sustainability goals, and external ESG trends

- The Risk Committee is responsible for oversight of M&T's enterprise risk framework, including the integration of climate risk.

— In 2022, the Risk Committee discussed the bank's steps to mitigate ESG-related risks and the integration of climate risk into the bank's Risk Appetite Statement

- The C&HC Committee has oversight of human capital and talent management strategies, including those related to employee diversity, equity, and inclusion; employee well-being and engagement; and employee recruitment, development, and retention.

— In 2022, the C&HC Committee discussed annual employee engagement survey results; diversity, equity, and inclusion initiatives; an updated pay equity review; employee salary structure; and executive compensation

## BOARD DEMOGRAPHICS, TENURE, AND INDEPENDENCE

	Barnes	Brady	Butler	Chwick	Cruger	Cunningham	Geisel	Godridge	Jones	Ledgett	Rich	Sadler	Salamone	Scannell	Seseri	Walters	Washington		
<b>Age*</b>	67	82	53	60	64	80	74	66	58	64	65	77	69	59	45	67	72	<b>66</b> average age of directors	
<b>Female</b>				●				●			●				●			<b>24%</b> of directors were women	
<b>Male</b>	●	●	●		●	●	●		●	●		●	●	●		●	●		
<b>African American/ Black</b>			●						●								●	<b>18%</b> of directors were people of color	
<b>White/ Caucasian</b>	●	●		●	●	●	●	●		●	●	●	●	●	●	●			
<b>Tenure in years*</b>	0	28	2	0	0	21	13	2	5	5	13	23	7	5	2	0	26	<b>59%</b> of directors had tenure of five years or less	
<b>Independent</b>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes		
<b>BOARD COMMITTEE MEMBERSHIP</b>																			
<b>Committee Membership*</b>	Risk	N&G (C), Executive	N&G	Risk	Audit	Audit	C&HC (C), Executive	Risk	Executive	Risk	C&HC, Executive	Executive (C), Risk (C)	Audit (C)	N&G				Audit, C&HC	<b>94%</b> of directors met the criteria for independence required by the New York Stock Exchange® as well as our Corporate Governance Standards (available on our <a href="#">website</a> )

\*As of 12/31/2022.

Note, based on director responses to the annual directors and officers questionnaire, we have no directors who identify as LGBTQ+.

(C) indicates director is the committee chair.

Please visit the [2023 Proxy Statement](#) for more information on our Board.

## BOARD SKILLS AND EXPERIENCE

	Barnes	Brady	Chwick	Cruger	Cunningham	Geisel	Godridge	Jones	Ledgett	Rich	Sadler	Salamone	Scannell	Seseri	Walters	Washington	TOTAL
<b>CEO Experience</b>	●	●			●	●		●		●	●	●	●	●	●	●	12
<b>Commercial Banking</b>	●			●	●	●	●	●			●				●		8
<b>Wealth / Investment Management</b>				●	●		●	●				●		●	●		7
<b>Customer Experience / Retail</b>	●					●	●			●	●	●			●	●	8
<b>Technology / Digital Innovation</b>		●	●	●					●				●	●			6
<b>Cybersecurity</b>			●						●					●			3
<b>Risk Management</b>	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	16
<b>Corporate Governance</b>		●	●	●	●	●			●	●	●	●	●	●	●		12
<b>Bank Regulatory</b>	●		●	●	●	●	●	●			●	●			●		10
<b>Finance / Accounting</b>	●	●		●	●	●	●	●			●	●	●	●	●	●	13
<b>Human Capital Management</b>	●	●	●	●		●	●	●	●	●	●	●	●	●	●	●	15

Skills for all directors are as reported in our most recent Proxy Statement filed in March 2023. This chart does not include Calvin Butler, Jr., who was no longer a director as of the 2023 Proxy Statement. Please see the [2023 Proxy Statement](#) for more information on our directors' skills and experience.

- As of January 2023, the Audit Committee is responsible for reviewing and discussing with management ESG data disclosures included in public and regulatory reports.

### Management governance of ESG

Board oversight of ESG is supported by a management governance structure, which includes an executive-level ESG Committee and executive-level Management Risk Committee, as well as senior management-level and employee-level groups focused on ESG and climate risk matters, respectively. In 2022, we updated our ESG management governance structure to respond to the evolving regulatory landscape around climate risk management and climate-related disclosure, as well as to better manage our strategic ESG priorities.

- The ESG Committee is composed of executive leadership responsible for business lines, Finance, Community Banking, and Human Resources. This team is responsible for approval and oversight of ESG-related strategy, goals, targets, partnerships, disclosure, roles, and responsibilities; oversight on progress and disclosure; and escalation to the Board and/or the executive leadership team as needed. The ESG Committee also receives ongoing education around ESG-related topics.
- The ESG Working Group includes senior leaders from across the enterprise who are responsible for key ESG topics. This team is responsible for the development, oversight, and advancement of our ESG management framework.

- The Climate Steering Committee is composed of senior leaders and is responsible for oversight of the enterprise-wide Climate Program (see more detail in Our Climate-Focused Operating Model and Governance Structure on page 31), which includes ensuring enterprise alignment, oversight on progress, and engagement in reporting and execution.
- The Management Risk Committee is composed of executive leadership and is responsible for implementation and oversight of our Enterprise Risk Framework, including incorporating climate risk into the framework, with oversight from the Risk Committee of the Board.
- The Climate Risk Working Group was established by the bank's senior-level Operational Risk Committee in 2022 to aid in the governance and review of the bank's oversight of climate risk. The group is composed of employees across the company who monitor for climate risks.

### Informing, educating, and engaging with our colleagues on ESG

ESG is a company-wide imperative, and thus management's responsibility is shared across the organization. We continue to educate and communicate with our colleagues on ESG-related topics. Efforts include launching a climate education pilot program; hosting educational sessions on ESG with the Board, senior leadership, and employees across business lines and departments; distributing ESG-related content on our internal communications platform; and launching an ESG page on our internal website.

In addition, ESG and climate risk content is included within the Risk Management course required under the Enterprise Mandatory Assigned Training Program for all personnel when hired and annually thereafter.

### Compensating Our Executive Officers

M&T maintains executive compensation programs designed to attract and retain executives who can help maximize performance for the benefit of the company and our shareholders. We endeavor to deliver compensation and other rewards that are competitive and that are strongly aligned with performance while discouraging excessive risk taking. Our executive compensation programs are overseen by the C&HC Committee.

An independent compensation consultant advises the C&HC Committee on current market trends in compensation practices and appropriate pay ranges based on competitive pay data and in light of company and individual performance.

We have a robust program for incentive compensation risk oversight. As part of this program, key control functions including the Risk Management Division, Compliance, Finance, Human Resources, and Legal are actively involved in the oversight of our incentive programs. We conduct an annual risk assessment of our incentive compensation plans to be sure they are appropriately balanced from a risk/reward perspective. In addition to an annual financial review by our Chief Financial Officer, our Chief Risk Officer meets with the C&HC Committee to review the state of risk management and adherence to our risk

appetite on at least an annual basis. These factors are taken into consideration when establishing incentive pool funding levels and individual executive compensation determinations.

Our executive compensation programs provide for a market-competitive mix of base salary, short-term cash incentives, and long-term equity-based incentives that vest over time, to align executives' interests with the long-term interests of the bank and our shareholders. When considering company performance for purposes of incentive compensation matters, we take a holistic view that considers how we have performed with respect to all of our constituencies: employees, shareholders, regulators, customers, and communities. As such, in addition to key financial performance metrics, we consider factors such as employee engagement; diversity, equity, and inclusion initiatives; customer satisfaction; and our standing with prudential regulators in assessing our performance for a given year. Individual executives are also evaluated against such metrics for purposes of their individual performance assessments.

To further support the alignment of compensation and company performance, shareholder outreach is conducted each year, and M&T has garnered significant support for our executive compensation program. Over the past five years, shareholder support for our executive compensation program—for compensation paid to our named executive officers in 2018-2022 as disclosed in our proxy statement—ranged between 93 percent and 97 percent, with an average of 95 percent of shareholder support over these years.

M&T also maintains stock ownership and retention guidelines for our executives that serve to further align the executives' interests with those of our shareholders. We expect that within five years of becoming subject to the guidelines, executive officers achieve and maintain a level of stock ownership commensurate with their position. For non-executive directors, the stock ownership requirement is two times their annual retainer amount.

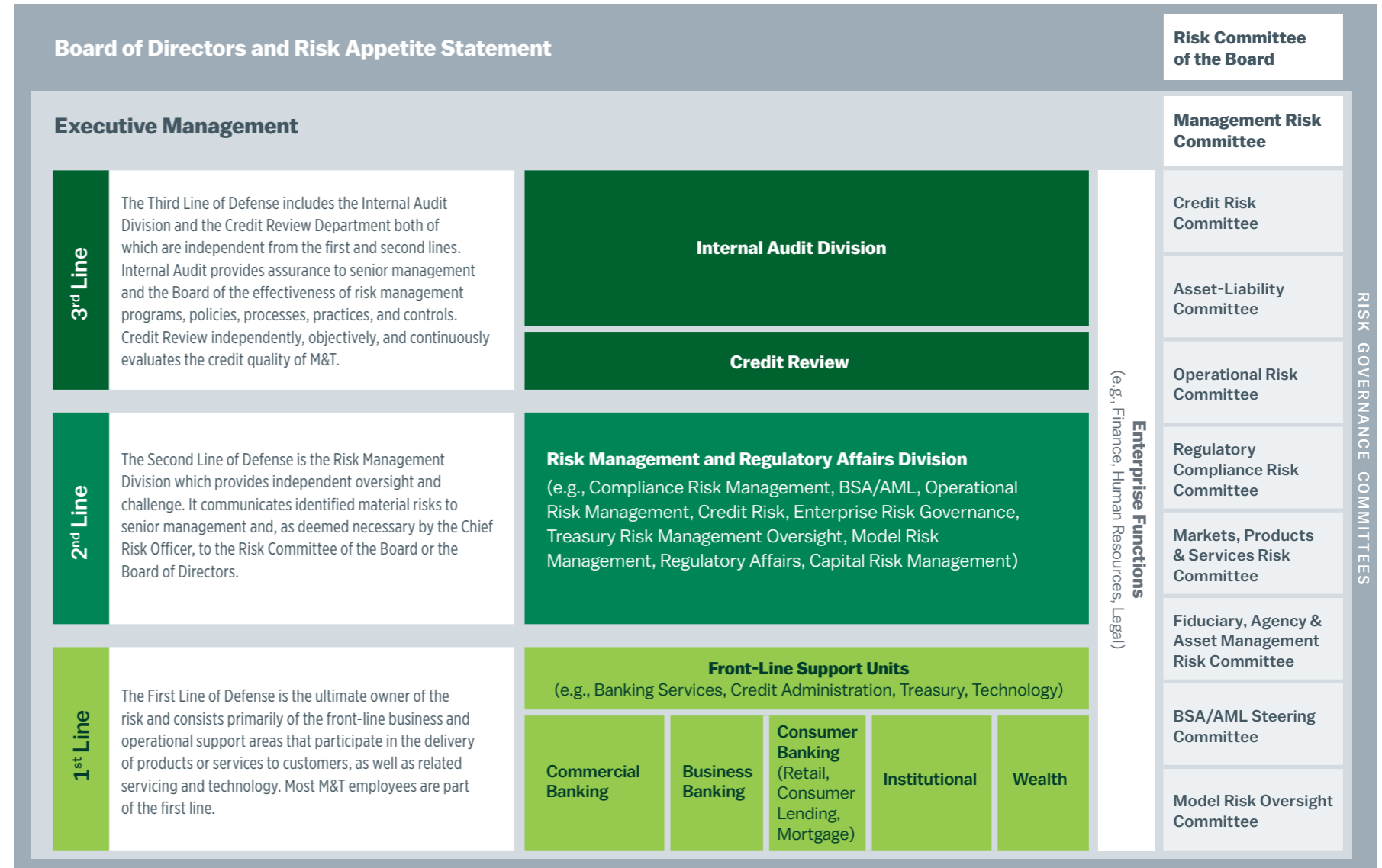
Further details of our executive compensation programs appear in our [2023 Proxy Statement](#).

## Managing Risk

All employees play a vital role in managing risk. The Risk Committee of the Board, entirely composed of independent directors, assists the Board in its oversight of risk management, provides independent challenge, and reviews and approves key policies and practices.

Our Enterprise Risk Framework is reviewed and approved by the Risk Committee of the Board at least annually. It incorporates three lines of defense, covering our approach to risk taking, our oversight, and our risk assurance practices. The Framework also clearly defines roles, responsibilities, and risk management policies and procedures, including our Risk Appetite Statement and oversight by the eight Risk Governance committees and the Management Risk Committee. The table on the right contains additional information on the Enterprise Risk Framework and three lines of defense, including the second-line Risk Management Division.

### Enterprise Risk Framework: Three Lines of Defense Organizational Model



Our multi-tiered governance proactively identifies risks, develops an aggregated view of them, and provides consistent governance across M&T. Risk Governance committees are predominantly chaired by Risk Management Division senior managers. The Risk Governance committees report to the Management Risk Committee, which is chaired by the Chief Risk Officer (CRO). The Management Risk Committee serves as the executive-level committee responsible for the implementation and oversight of the Framework.

Under the Enterprise Mandatory Assigned Training Program, all personnel are required to take Risk Management training when hired and annually thereafter. In addition, job-specific training is delivered as deemed necessary by management within each department, business line, and/or division. For example, employees whose roles require compliance with specific regulations, laws, or regulatory guidance may be subject to additional training requirements. The Risk Management Division also performs an annual analysis of the experience and capabilities of its resources to determine if specific additional training is needed.

Employee alignment to our Enterprise Risk Framework is an integral component of ongoing performance management. Every employee has an annual performance objective to ensure their performance and behavior align with the Enterprise Risk Framework and their respective roles and responsibilities for keeping the bank safe. Furthermore, M&T's compensation plans are intended to reinforce positive behaviors that support the Enterprise Risk Framework.

### Defining our appetite for risk

Our Risk Appetite Statement articulates, in written form, the types of risk we are willing to accept and those we seek to avoid in pursuit of our business objectives. It guides our decision-making process and serves as the link between our corporate values, business operations, and risk culture by helping to ensure the Board and our employees share a consistent understanding of our appetite for risk. Managers at all levels reinforce its principles, and the statement and its supporting metrics are reviewed at least annually by the CRO, the Risk Committee of the Board, and the Board. It is intended to be a dynamic document that is reviewed regularly to evolve with the business.

In formulating our risk principles, we consider business integrity and reputation, our long-standing culture, our colleagues, and our communities.

We have identified metrics deemed critical measures of the organization's adherence to its risk appetite by risk type including regulatory and compliance, credit, operational, interest rate and market, and model risk. Risk triggers and limits for each of these metrics consider performance under stress conditions and are set by the Risk Management Division and approved by the CRO and Risk Committee of the Board.

In addition to the ongoing monitoring of metrics, management regularly assesses and monitors its adherence to its desired Risk Appetite, and results of this analysis are shared with the Management Risk Committee and the Risk Committee of the Board quarterly.

### Independent and risk-based assurance

Internal Audit's mission is to enhance and protect organizational and shareholder value by providing risk-based and objective assurance, advice, and insight. As the Third Line of Defense independent from the First and Second Lines, Internal Audit provides assurance to senior management and the Board of the effectiveness of risk management programs, policies, processes, practices, and controls. The division is led by our Chief Auditor, who reports directly to the Audit Committee of the Board.

Internal Audit's Audit Plan is based on a comprehensive risk assessment and presented annually to the Audit Committee for approval. Internal Audit maintains a continuous auditing program to support an overall risk assessment strategy that is dynamic and reflects changes in the control environment and infrastructure, as well as changes to businesses, products, services, or regulations.

### Embracing Our Commitment to Human Rights

At M&T, we firmly believe that people are our greatest strength—and we support upholding and protecting human rights throughout our organization, with our employees, our suppliers, our customers, and the communities we serve. Throughout our internal and external operations, we are consistent with human rights principles, including those established by the International Bill of Human Rights and the Universal Declaration of Human Rights; the UN Guiding Principles on Business and Human Rights; and the ILO Declaration on Fundamental Principles and Rights at Work. Our

policies and procedures are designed to comply with all applicable laws and regulations relating to human rights, including those intended to eliminate modern slavery and human trafficking and those regarding child labor, wages, working hours, health and safety, and discrimination in hiring and employment practices.

Identifying, monitoring, and addressing potential human rights risks is important to M&T. More information on how we mitigate such risks is discussed in “Ensuring Ethical Behavior” on page 15; “Supplier Code of Conduct” on page 16; “Bank Secrecy Act/Anti-Money Laundering and Sanctions compliance” on page 18; “Protecting Our Company's and Customers' Information: Information Security, Cybersecurity, and Data Privacy” on page 20; and “Committed to Fair and Responsible Banking” on page 24. In addition, we view ensuring equal and equitable access to financial products and services as an essential right of our customers. More information on our efforts to foster financial inclusion is discussed in “Fostering Prosperity” on page 67.

### Respecting labor rights

As a U.S.-based company, we follow the National Labor Relations Act (NLRA), which guarantees the right of employees to organize and bargain collectively with their employers, and to engage in other protected concerted activity or to refrain from engaging in any of the above activities. There are no M&T employees covered under collective bargaining agreements.

Employees can access information on their rights under the NLRA through Employee Rights posters available at all M&T work locations.

We are committed to providing fair compensation and benefits commensurate with prevailing industry conditions. At a minimum, our compensation meets or exceeds all applicable wage laws, including those relating to minimum wages, overtime hours, and benefits. Moreover, working hours must not exceed limitations established by applicable law. Further discussion of our compensation and benefits is included in “Supporting Our Valued Team Members” on page 56 and “Developing Our People” on page 58.

We are also committed to providing a safe and healthy work environment for all employees and to following all applicable occupational health and safety laws and regulations. We have several internal policies and supporting procedures focused on minimizing health and safety risks and supporting accident prevention. These include, but are not limited to, our Workplace Violence Prevention Policy, Physical Security Policy, and our Code of Business Conduct and Ethics.

## Ensuring Ethical Behavior

Our Code of Business Conduct and Ethics (the “Code”) applies to all M&T personnel whom we expect to act with integrity and honesty. The Code covers a wide range of ethics issues and business practices such as conflicts of interest, gifts and entertainment, money laundering, confidentiality of information, insider trading, discrimination, and harassment. The Code is available on our [website](#).

The Code also requires compliance with all applicable antitrust laws (known as competition laws), which are rules developed by the U.S. government to protect consumers from predatory business practices. These laws were created to ensure that fair competition exists in the marketplace. More information on our Antitrust Policy can be found in “Antitrust Policy” on page 17.

In addition, the Code requires compliance with all applicable anti-bribery and corruption laws in the markets and jurisdictions in which we operate, including the UK Bribery Act and the Foreign Corrupt Practices Act. The Code prohibits personnel from engaging in bribery or corruption of any kind, including gifts and entertainment, for the purpose of influencing. More information on our specific Anti-bribery and Anti-corruption Policy can be found in “Anti-bribery and Anti-corruption Policy” on page 17.

Those who violate the standards in the Code are subject to corrective action, up to and including termination of employment (or other status, as applicable).

The C&HC Committee of the Board holds oversight responsibility for the Code, including annually reviewing and reassessing the adequacy of the Code and recommending proposed changes to the Board for approval. Further, the Risk Committee of the Board is responsible for oversight of conduct risk being incorporated into our risk framework.

Several internal programs ensure compliance with the Code and identification and mitigation of conduct-related risk. These include reviews of departments and business lines for conduct risk.

Our Enterprise Mandatory Assigned Training Program requires that all personnel complete and pass training on the Code when hired and annually thereafter. All personnel must also annually acknowledge the Code and the internal Employee Handbook, which includes employment-related information, expectations, and policies.

An additional Code of Ethics for CEO and Senior Financial Officers is designed to ensure that fair, accurate, timely, and clear disclosures are filed with the Securities and Exchange Commission. It also obliges our CEO and senior financial officers to report violations of the Code and covers actions to be taken should a violation occur. The Code of Ethics for CEO and Senior Financial Officers is available on our [website](#).

Personnel in areas such as brokerage and investments are subject to additional conduct-related obligations. In addition, due to M&T’s international business operations, personnel may also be further subject to the laws of overseas countries.

### Raising concerns without fear: Reporting illegal or unethical behavior

Our complaint procedures help employees navigate potentially difficult situations and enable them to submit any concerns, complaints, and information anonymously. Our “See Something, Suspect Something, Say Something” Program prohibits retaliation against employees who report violations of our Code of Business Conduct and Ethics or other wrongdoing or concerns. The Code of Business Conduct and Ethics also protects whistleblowers, including for the reporting of fraud or other illegal or unethical conduct. In addition, employees are protected from retaliation for employment-related complaints, including harassment and other concerns, which can also be submitted anonymously.

Complaints can be made anonymously, 24 hours a day, seven days a week, to the M&T Employee Complaint Hotline (by phone or through our dedicated online portal), to managers, or to Human Resources.

Collecting, tracking, and addressing employee complaints includes the following actions:

- Employees may utilize a centralized complaint system (the M&T Employee Complaint Hotline) to report complaints; this system also enables tracking of employee complaints

- A cross-functional team triages all complaints at intake to assess risk and need for escalation
- A dedicated investigations team is charged with investigating and resolving employee complaints
- M&T personnel are required to cooperate in internal investigations of misconduct; depending on the nature of the violation, subsequent actions can include employee coaching and enhanced performance management, and corrective action up to and including termination of employment

In addition, we regularly monitor, analyze, and report on complaints through the following initiatives:

- Ongoing statistical analysis of complaints, outcomes, demographics, and emerging trends to improve outcomes and engagement
- Regular reports to and meetings with a “response team” of senior corporate leaders charged with oversight of the complaint process
- Semi-annual reporting to the Board of Directors on complaint data, analysis, and trends

### Supplier Code of Conduct

In 2022, M&T set out to further reinforce our supplier engagement process. The result of these efforts was the adoption of M&T’s Supplier Code of Conduct in early 2023. The Supplier Code of Conduct centralizes the tenets that M&T values within our supplier network. Namely, we review potential suppliers carefully, looking for those that adhere to ethical business practices and

respect the human rights of all individuals. Further, the Supplier Code of Conduct underscores our commitment to seeking out suppliers that value diversity, equity, and inclusion and respect the progress we’ve made, and the work ahead, regarding the deeply interconnected ESG issues facing our communities daily.

Accordingly, it is expected that all suppliers adhere to M&T’s Supplier Code of Conduct; any written agreement between M&T and the supplier (Supplier Agreement); and all laws, rules, and regulations applicable to the supplier’s business. It is the responsibility of every supplier to ensure its employees, representatives, and next-level suppliers (including supplier subcontracts) thoroughly understand M&T’s expectations as set forth in the Supplier Code of Conduct.

During the course of the supplier life cycle, suppliers may be asked to provide a written attestation that they have read, understand, and will abide by the Supplier Code of Conduct. M&T reserves the right to conduct reasonable inquiries of our suppliers to ensure compliance with this Code. Further, our suppliers are expected to self-monitor their compliance with this Code and to inform M&T in a timely manner of any non-compliance. The Supplier Code of Conduct is subject to an annual review, as well as periodic updates and revisions as required. M&T’s Supplier Code of Conduct can be read in full on our [website](#).





## Complying with the Law

### Antitrust, anti-bribery, and anti-corruption

Our Code of Business Conduct and Ethics and internal Employee Handbook outline expected employee conduct and the laws and regulations applicable to M&T. These include our Antitrust Policy and Anti-bribery and Anti-corruption (ABAC) Policy.

### Antitrust Policy

We believe that fair competition and customer choice are important to M&T, our employees, shareholders, and to the people and communities we serve. Attempting to maximize growth by taking advantage of a dominant position, engaging in collusion or abusive practices, or seeking and using our competitors' inside information, deprives M&T and our competition, as well as the customers and local economies that we serve, of the ability to coexist in a fair and open market.

Our Antitrust Policy promotes fair and vigorous competition and provides fair treatment and freedom of choice to customers and employees through a commitment to comply with federal and applicable state and international antitrust or competition laws and regulations. The Antitrust Policy applies to all M&T activities, entities, employees, and directors. Through use of a contractual term, we require contingent workers and contractors, vendors, and other third parties that are conducting business activities on M&T's behalf to comply with antitrust and competition laws and regulations.

Conduct Risk Oversight, within the Risk Management Division, is responsible for the Antitrust Policy's implementation, annual approval, and the independent evaluation of the First Line's adherence to the Antitrust Policy. This includes:

- Performing periodic risk assessments of the bank's adherence to antitrust requirements and assisting the First Line in identifying antitrust risk in various situations
- Ensuring procedures have been established in support of the Antitrust Policy for the review and escalation of potential violations
- Maintaining an inventory of all potential and actual violations of the Antitrust Policy and their disposition
- Ensuring training on the Antitrust Policy is included for all personnel when hired and annually thereafter within the Code of Business Conduct and Ethics trainings as part of the Enterprise Mandatory Assigned Training Program

The Operational Risk Committee is responsible for primary Risk Governance Committee oversight of the Antitrust Policy, including its annual review and approval. Executive- and Board-level oversight is provided by the Management Risk Committee and Risk Committee of the Board, respectively.

As part of our "See Something, Suspect Something, Say Something" Program that encourages employees to report concerns about improper conduct, M&T employees are required to report a violation or potential violation of the Antitrust Policy to their manager, Human Resources, or to the M&T Employee Complaint Hotline (by phone or through our dedicated online portal). For more information, see "Raising concerns without fear: Reporting

illegal or unethical behavior" on page 15. M&T employees who fail to report conduct prohibited by the Antitrust Policy may be subject to disciplinary action, including termination of employment.

Potential violations of the Antitrust Policy are reviewed by a team that includes Human Resources, Conduct Risk Oversight, First Line, and Legal to ensure that appropriate corrective action, remediation, reporting, and/or escalation occurs. M&T representatives who engage in suspected antitrust violations or any conduct prohibited by the Antitrust Policy may be subject to disciplinary action, up to and including termination of employment.

### Anti-bribery and Anti-corruption Policy

M&T holds itself to high ethical standards, which are critical to the success of the company, customers, stakeholders, and the general well-being of employees. With these standards in mind, M&T has established an Anti-bribery and Anti-corruption Policy (ABAC Policy), which requires adherence to the applicable state, federal, and international anti-bribery and anti-corruption laws and affirms that M&T does not tolerate improper payments or favors to achieve successful results. In addition to violating laws, such actions harm society, undermine the trustworthiness of M&T, and are unfair business practices.



### The ABAC Policy specifically prohibits:

- Offering or giving anything of value as an incentive to a government official in order to obtain an advantage, decision, or action, no matter how immaterial or routine
- Requesting or accepting anything of value from a customer, vendor, or other third party, or another M&T employee, to influence or reward you in connection with any M&T business or transaction
- Offering or giving anything of value to a customer, vendor, or other third party, or another M&T employee, to influence or reward something involving any M&T business or transaction
- Making or causing any improper or inaccurate recording of payments, gifts, or transactions
- Violating any internal accounting controls or engaging in any conduct that results in financial statements not accurately and fairly reflecting M&T's operations

The ABAC Policy applies to all M&T activities, entities, employees, directors, and contingent

workers that are conducting business activities on M&T's behalf. M&T expects all its vendors, suppliers, and agents to comply with the ABAC Policy. M&T reserves the right to terminate immediately any business relationship with a customer, vendor, agent, or other third party that has engaged in bribery or corruption or if M&T believes that their conduct is contrary to the highest ethical standards promoted by this Policy.

In addition, our ABAC Policy takes into consideration the standards set forth by the Wolfsberg Group. We regularly share our Wolfsberg Group Due Diligence Questionnaire with other financial institutions and parties seeking to better understand our protocols. The questionnaire is also available on our [website](#).

Conduct Risk Oversight, within the Risk Management Division, is responsible for the ABAC Policy's implementation, annual approval, and the independent evaluation of the First Line's adherence to the ABAC Policy. This includes:

- Performing periodic risk assessments of the bank's adherence to the ABAC Policy and assisting the First Line in identifying bribery and corruption risk
- Ensuring procedures have been established in support of the ABAC Policy for the review and escalation of potential violations
- Maintaining an inventory of all potential and actual violations of the ABAC Policy and their disposition
- Ensuring training on the ABAC Policy is included for all personnel when hired and annually thereafter within the Code of Business Conduct and Ethics trainings as part of the Enterprise Mandatory Assigned Training Program

The Operational Risk Committee is responsible for primary Risk Governance Committee oversight of the ABAC Policy, including its annual review and approval. Executive- and Board-level oversight is provided by the Management Risk Committee and Risk Committee of the Board, respectively.

As part of our "See Something, Suspect Something, Say Something" Program that encourages all employees to report concerns about improper conduct, all M&T employees should report a violation or potential violation of this Policy to their manager, Human Resources, or to the M&T Employee Complaint Hotline (by phone or through our dedicated online portal). For more information, see "Raising concerns without fear: Reporting illegal or unethical behavior" on page 15. M&T personnel who fail to report conduct prohibited by this Policy may be subject to disciplinary action, including termination.

Potential violations of the ABAC Policy are reviewed by a team that includes Human Resources, Conduct Risk Oversight, First Line, and Legal to ensure that appropriate corrective action, remediation, reporting, and/or escalation occurs. Any M&T personnel who engage in bribery or corruption, or any other conduct prohibited by the ABAC Policy, are subject to termination or other disciplinary action.

M&T maintains additional policies that supplement the ABAC Policy's intent to require ethical employee conduct. This includes the Gifts, Bequests and Entertainment Policy. In addition, the Political Activities Policy addresses the applicable state, federal, and international laws that ban bribes, improper payments, and illegal campaign contributions to government officials (see "Defining Our Political Activities" on page 26).

### Bank Secrecy Act/Anti-Money Laundering and Sanctions compliance

Our BSA/AML/OFAC Program is designed to comply with all applicable anti-money laundering (AML) laws and regulations including the Bank Secrecy Act (BSA) and USA PATRIOT Act and with all applicable sanctions programs such as those administered by the Office of Foreign Assets Control (OFAC). Our BSA/AML/OFAC Program takes into consideration the standards set forth by our primary regulator as well as the Wolfsberg Group, an international association that aims to develop frameworks and guidance for the management of financial crimes risks. The Program also takes into consideration the National Anti-Money Laundering and Countering of Terrorism Financing Priorities as set forth by the Financial Crimes Enforcement Network (FinCEN). As previously noted, we regularly share our Wolfsberg Group Due Diligence Questionnaire with other financial institutions and parties seeking to better understand our program. The questionnaire is also available on our [website](#).

The BSA/AML/OFAC Group within the bank's Risk Management Division is responsible for enterprise-wide BSA/AML policy and sanctions compliance, including all required government reporting. We maintain a BSA/AML/OFAC Program and Policy, as well as corresponding procedures, which affirm our commitment to fighting money laundering and terrorist financing and outline our strategy for managing risk and complying with laws and regulations. The BSA/AML/OFAC Program and Policy are reviewed and approved annually by the Risk Committee of the Board to ensure ongoing compliance and effective program execution.

Our BSA/AML and sanctions risk governance is accomplished through formal oversight by the Board and its Risk Committee. The Committee receives reports and updates from the BSA/AML/OFAC Group at least twice per year. The Chief BSA/AML Officer also chairs the BSA/AML Compliance Steering Committee, which assists in the execution of the Risk Committee's responsibilities. The BSA/AML Compliance Steering Committee meets monthly and consists of business unit and compliance senior management. The BSA/AML Compliance Steering Committee is responsible for executing the responsibility of senior management to communicate and reinforce the "tone from the top" established by the Board and to ensure a positive culture of BSA compliance. The Risk Committee of the Board, Management Risk Committee, and the BSA/AML Compliance Steering Committee are all intended to oversee and monitor the effectiveness of the controls and processes in place to identify, measure, mitigate, monitor, and report on the bank's BSA/AML, OFAC, and other sanctions risks.



**SPOTLIGHT****Putting Policy into Action**

**In addition to reviewing suspicious banking transactions, our BSA/AML/OFAC Group has executed many notable initiatives related to ESG risks.**

**Project Umbra**

We proudly participate in The Knoble Network's Project Umbra, a collaborative effort between banks, regulators, charities, and law enforcement to identify and eliminate child sexual exploitation. This cross-industry consortium has allowed the bank to benefit from a financial industry-wide analysis and development of an inventory of red flags and other indicators of child sexual exploitation, resulting in early identification of suspicious activity and eventual prosecution.

**Russia Sanctions**

The bank has enhanced its KYC and sanctions-related controls to ensure full compliance with the new economic sanctions levied against Russia due to the war in Ukraine.

**FinCEN Director's Law Enforcement Awards**

For the third year in a row (2020, 2021, and 2022), M&T was recognized in the FinCEN Director's Law Enforcement Awards Program. FinCEN initiated the awards program to recognize significant criminal investigations that resulted from information shared through Bank Secrecy Act reporting and that were successfully prosecuted. All federal, state, local, and tribal law enforcement agencies are eligible to submit nominations for the awards program. Nominations included significant cases that relied on BSA reporting to investigate and successfully prosecute a spectrum of serious and significant criminal activity.

**We regularly execute other analytical projects based on emerging issues and trends.**

Our BSA/AML/OFAC Program is subject to federal and state regulatory examinations. In addition, our Compliance Testing Group undertakes ongoing testing across the entire organization to evaluate the company's compliance with applicable laws, rules, and regulations. We also periodically retain third-party consultants to assess the structure and effectiveness of the overall BSA/AML/OFAC Program.

All employees are trained on their BSA/AML/OFAC responsibilities when hired and annually thereafter as part of the Enterprise Mandatory Assigned Training Program. The Board also undertakes annual BSA, AML, and OFAC training conducted by the designated Chief BSA/AML Officer. We provide targeted, supplemental training for other personnel in certain positions and track participation in mandatory training. As part of our proactive approach to risk identification and escalation, we encourage and expect all staff to "See Something, Suspect Something, Say Something," and have several reporting mechanisms available, including a Fraud and BSA Unusual Activity Referral form and the confidential and anonymous M&T Employee Complaint Hotline by phone or through our dedicated online portal.



### Keeping vigilant against fraud and financial crimes

As fraud techniques become more sophisticated, our technology, staff, and vendors adapt to keep our customers safe. The M&T Bank Financial Crimes Management department is responsible for mitigating the financial, reputational, and regulatory risk of fraud on the bank, our customers, and employees.

The Corporate Fraud Management Policy applies to M&T and our domestic and foreign subsidiaries and affiliates and provides guidance to all business units and employees of the organization on the recognition of, response to, and reporting of both internal and external fraudulent events. The Policy supports M&T's objective to aggressively manage, deter, detect, investigate, prevent, and mitigate losses to the bank and our customers, which may result from fraudulent activities perpetrated by insiders, customers, or third parties. The Policy serves to ensure the organization develops and implements controls and procedures that comply with internal expectations and external regulations. Review of the policy occurs annually.

In addition, the Policy:

- Includes Identity Theft Red Flags monitoring and reporting requirements associated with Identity Theft detection and prevention
- Identifies the responsibility of all employees to recognize the potential signs of financial exploitation of an At-Risk Adult and report all known or suspected cases to Financial Crimes Management within appropriate time frames

Fraud monitoring includes the identification of suspicious activities or alerts to help prevent and detect fraudulent transactions or other fraudulent activity. M&T's Enterprise Fraud Management Strategy includes further development of case management and alert management technology to maximize effectiveness of fraud monitoring and to facilitate further centralization of fraud monitoring where necessary to maximize effectiveness. We have multiple layers of protection and monitoring for payment methods and channels, including behavioral monitoring tools, authentication methods, biometrics, and always-on monitoring.

To assist with the prevention, detection, and resolution of fraud events, all personnel are required to take training on Recognizing and Reporting Fraud when hired and annually thereafter as part of the Enterprise Mandatory Assigned Training Program. Depending on job function, additional training may be required. Relevant employees also hold third-party certifications, including Certified Fraud Examiner (CFE). In addition, as part of our proactive approach to risk identification and escalation, we encourage and expect all staff to "See Something, Suspect Something, Say Something," and have several reporting mechanisms available.

### Protecting Our Company's and Customers' Information: Information Security, Cybersecurity, and Data Privacy

#### Cybersecurity

M&T recognizes the value of our customers' personal and financial information and takes the protection of that information very seriously. Our Board-approved Information Security and Business Continuity Program enables us to meet our commitment to the confidentiality, integrity, and availability of information and services, while pursuing business opportunities.

The Risk Committee of the Board is the primary committee that oversees cybersecurity, and the Chief Information Security Officer (CISO) regularly reports to it. The CISO is responsible for the design and execution of the Information Security and Business Continuity Program, which complies with applicable legal and regulatory standards, and is supported by the governance structure defined within the Enterprise Risk Framework. The CISO reports to senior management and the Board on information security issues and the effectiveness of our information security program. Cybersecurity risk is continually assessed and monitored as part of M&T's Enterprise Risk Framework.

Aligned with leading industry standards—including the U.S. Department of Commerce's National Institute of Standards and Technology (NIST) Cybersecurity Framework—our program is built upon a strong foundation of policies, standards, and procedures that leverage the NIST standards to help safeguard our customers' information and reduce

the risk of incidents and breaches. The program features layered controls of network intrusion detection and prevention, enterprise malware protection, threat monitoring, and a Security Operations Center that provides 24/7 support and additional operational measures to monitor and respond to data breaches and cyberattacks.

In accordance with the Gramm-Leach-Bliley Act, we undertake periodic assessments to identify and assess risks to customer information and evaluate the effectiveness of our security controls. Ongoing audits—including vulnerability and penetration testing of our computing infrastructure—are performed by independent third parties and by our internal cybersecurity personnel.

M&T expects third-party service providers (including suppliers and business partners) granted access to customer and/or corporate information to protect the confidentiality, integrity, and availability of its information assets by implementing layered security controls that are reasonable and appropriate for the level of risk and classification of data as defined by M&T. Such providers are required to have security policies, standards, and procedures that meet or exceed the information security guidelines as specified in the Information Security and Business Continuity Program. Roles, responsibilities, and expectations for service providers and third parties are communicated through contract vehicles (and other associated agreements) and monitored through oversight as part of the Third-Party Risk Management Program.



Core security principles are incorporated across the enterprise, such as the Principle of Least Privilege, whereby information is disclosed on a “need to know” basis, and Segregation of Duties, which is designed to prevent fraud and errors by sharing the tasks and benefits of a specific business process among multiple users.

To protect data, M&T has documented formalized standards and policies that are reviewed and approved annually to provide comprehensive technical, administrative, and physical security, including access controls, for our systems that contain corporate, customer, and employee data. Every employee is responsible and accountable for properly safeguarding company information to which they are permitted access.

Our Information Security Awareness Program—an important component of the overall Information Security and Business Continuity Program—ensures that employees and contingent workers are aware of cyber-related policies, principles, standards, and practices, as well as new and current regulatory requirements that are required to safeguard

customer and corporate information assets. The program includes web-based training courses that all personnel are required to take when hired and annually thereafter as part of the Enterprise Mandatory Assigned Training Program.

Information security awareness initiatives and resources are provided to employees throughout the year, including:

- Targeted information security training for our managers and privileged users
- Resources and references on the cybersecurity intranet site
- Internal communications regarding threat trends and high-risk activities
- Phishing awareness testing and training
- National Cybersecurity Awareness Month
- Security content on the bank’s customer-facing website
- External customer cybersecurity awareness webinars
- Cybersecurity briefings

M&T has established standardized, repeatable, and documented data loss prevention and incident response policies and procedures to respond to potential or actual privacy breaches.

To further support our information security practices, we maintain insurance policies that cover potential financial losses associated with cybersecurity events and have agreements in place with an industry-leading computer forensics firm.

## Privacy

M&T’s Enterprise Privacy Policy and Program cover all our operations and reflect our obligations for complying with all domestic and international privacy-related laws, regulations, and other requirements (e.g., EU GDPR supervisory authorities issue guidance that are not strictly regulations) in the jurisdictions in which we and our subsidiaries and affiliates conduct business. The Privacy Policy and Program also reflect our commitment to the fair and responsible handling of consumer, employee, and other personal data in accordance with widely accepted data privacy principles. M&T adheres to the following standards to fulfill that commitment:

- Personal data processing must be conducted in a lawful, fair, and transparent manner
- Privacy considerations are taken into account early in the development of any new product, service, or system where personal data is processed and appropriate measures are taken to mitigate any potential privacy risks
- Personal information is collected for specified, explicit, and legitimate purposes and its use is limited to what is necessary for the stated purpose

The Privacy Officer oversees, implements, and maintains this program enterprise-wide and ensures it is reasonably designed to identify, assess, monitor, and mitigate privacy risk throughout the organization. Our Privacy Policy and Program are reviewed annually by the Privacy Officer and approved by M&T’s Regulatory Compliance Risk Committee. The Program is a coordinated effort within the M&T organization. As new technologies

emerge, and as data privacy and protection continue to be growing priorities for consumers, the program seeks to align M&T with rapidly changing privacy regulation.

M&T is committed to the protection of the personal, financial, and health information of our customers, employees, and other individuals in compliance with legal, regulatory, and other requirements. To achieve this, M&T maintains procedures and controls that are designed to ensure sensitive personal information, financial information, and protected health information of our current, former, and prospective customers, employees, and other individuals is collected, maintained, used, and disclosed appropriately by all M&T entities and third-party service providers. Customer preferences with respect to affiliate and non-affiliate information sharing are recorded and honored.

M&T does not sell our customers’ personal information to third parties for advertising or marketing purposes. Where the law permits, and in accordance with customer opt-out choices, we disclose Nonpublic Personal Information with our affiliates and non-affiliated third parties for marketing and everyday purposes such as to process transactions, maintain accounts, report to credit-reporting agencies, and comply with legal requests. M&T requires that any third-party service provider we do business with commits to limiting its use of customer information to the stated purpose for which M&T disclosed the information. M&T also requires third parties to protect the security and confidentiality of customer, employee, and corporate information, and act in accordance with the letter and spirit of laws, regulations, and M&T policies related to privacy matters.

Information about the Nonpublic Personal Information we collect, what information is shared with affiliates and non-affiliates, and when and how customers may limit that sharing, can be found in our Privacy Notice. This notice is provided to all retail customers when they establish a relationship with M&T and can be found on our [website](#). In addition, M&T notifies customers of material privacy notice changes, including those involving the use of customers' personal data, prior to implementation of the changes.

Our Privacy Policy also addresses the following consumer protections:

- Protecting individuals' health information
- Protecting personal information from, or about, children under 13 on the internet
- Protecting personal financial records from government scrutiny (the program includes our commitment to follow due process when legally mandated requests for information are received from government agencies)
- A consumer's rights to limit marketing, such as telemarketing and commercial emails

All employees are responsible for protecting the privacy and confidentiality of customer information. Personnel who have access to M&T customer or employee nonpublic personal information are required to take Privacy of Consumer Information compliance training when hired and annually thereafter as part of the Enterprise Mandatory Assigned Training Program. Personnel are instructed to follow their departmental procedures for

reporting privacy incidents to the Privacy Office. M&T's Privacy Office intakes and investigates reported privacy incidents. If issues are identified, the Privacy Office oversees escalation and timely resolution in accordance with risk management procedures. This process includes notifying customers and regulators if data breaches or other data incidents involving customer information occur.

Business lines, including all entities, divisions, and departments within M&T and all subsidiaries and affiliates, develop internal controls, policies, and procedures to comply with applicable privacy laws, regulations, and requirements. This is done with guidance and oversight from the Privacy Office, established within the Compliance Risk Management Program, and in alignment with our Privacy Policy. Monitoring and testing of those controls are undertaken regularly to ensure compliance with data privacy requirements and our own policies and standards.

## Providing Continuity During Times of Crisis: Business Continuity Management

Business can be interrupted by natural and human events, ranging from small to catastrophic. Business continuity is the process of ensuring we can continue to perform the activities required to keep an organization running during a period of disruption. Therefore, we have a Business Continuity Management Program that is reviewed and approved annually by the Risk Committee of the Board. The Program and related policies, standards, and procedures seek to align with industry standards/guidance such as National Institute of Standards and Technology® (NIST), National Fire Protection Association® (NFPA), and the Federal Financial Institutions Examination Council (FFIEC). It is centrally administered by a dedicated team of continuity and crisis management professionals.

The Program is supported by the governance structure defined within the Enterprise Risk Framework to provide effective oversight and communication with constituents at all levels of the organization. All personnel are required to complete Disaster Recovery/Business Continuity training when hired and annually thereafter as part of the Enterprise Mandatory Assigned Training Program.

The Business Continuity Management Program has four complementary missions:

- **Crisis & Significant Event Management** establishes governance and a response framework to address significant events resulting from natural, technological, and human-caused hazards. It also ensures the safety of stakeholders within our facilities; sustainment of critical operations; and the bank's reputation and market share.
- **Continuity and Recovery Planning** establishes business and technology recovery priorities and dependencies, creating and exercising plans for business functions and supporting technologies. Business unit plans are maintained in any location where M&T Bank and its subsidiaries and affiliates conduct business and technology recovery plans are required for applications. Both plan types must be reviewed and validated by a tabletop or simulation exercise annually.
- **Third-Party Due Diligence** evaluates the adequacy of continuity objectives and capabilities for third-party product and service providers.
- **Operational Resilience** establishes assessment, testing, and reporting capabilities designed to ensure vulnerabilities are identified, disruption impacts are understood, and significant market and customer harm is mitigated.

Requirements for the Crisis & Significant Event Management program were developed in general alignment with the National Fire Protection Association 1600 Standard on Continuity, Emergency, and Crisis Management and are outlined in the Crisis & Significant Event Management Policy.

M&T participates in several external programs and organizations tied to business resiliency and crisis management:

- We participate in the Corporate Emergency Access System (CEAS), a third-party public response system that equips essential staff with a centrally issued “CEAS credential” or ID card. Upon law enforcement activation, the credential allows access to restricted but safe areas during times of crisis, including emergencies and disasters.
- M&T is a member of the Financial Services Information Sharing and Analysis Center® (FS-ISAC), which is an organization comprised of financial institutions committed to sharing cyber intelligence to anticipate, mitigate, and respond to cyber threats.
- M&T is a member of the Association of Continuity Professionals (ACP), a national nonprofit supporting multi-industry collaboration and education in the disciplines that holistically make up Business Continuity Management.
- M&T is a member of the Local Emergency Planning Committee formed under the Emergency Planning and Community Right-to-Know Act (EPCRA).

**While the work carried out under the Business Continuity Management Program is constant and continues to evolve as new risks emerge, there were several major community, regional, and global events in 2022 that required the program’s response.**

Event	Impact on the bank	Community	Regional	Global
<b>May 14 Mass Shooting in Buffalo</b>	A hate crime with 10 lives lost, affecting our community, customers, and colleagues	●		
<b>Hurricane Ian</b>	Affected an office in Florida		●	
<b>Tropical Storm Nicole</b>	Affected an office in Florida		●	
<b>November Winter Storm</b>	Lake effect storm with over 6 feet of snow in areas of Western New York		●	
<b>December Winter Storm Elliott</b>	Deadly blizzard in Western New York		●	
<b>Ukraine-Russia War</b>	Required plausible scenario development and exercise within the Business Continuity Management Program			●

## Committed to Fair and Responsible Banking

### Fair and Responsible Banking Policy and Program

We foster an enterprise-wide culture of fair and responsible banking. This requires treating customers consistently and equitably, in compliance with consumer protection laws and regulations, and without regard to any specific characteristic or basis as prohibited by law. All employees are expected to deliver products and services in a fair and transparent manner that meets the customer's needs.

Our Fair and Responsible Banking Policy identifies, measures, monitors, and manages our responsible banking and fair lending risks, and prohibits unfair (including discriminatory), deceptive, or abusive acts and practices (UDAAP). The Fair and Responsible Banking Program executes the Fair and Responsible Banking Policy and ensures compliance with all applicable responsible banking laws and regulations, reflects best practices, and establishes a common framework to manage responsible banking risks. The Fair and Responsible Banking Program further outlines and defines applicable responsible banking-related laws, regulations, and standards as well as industry and regulator guidance. The Fair and Responsible Banking Policy and Program cover M&T Bank and all its subsidiaries and affiliates and apply to all business units and to third parties acting on our behalf who provide services in connection with M&T products and services.

We seek to comply with the letter and spirit of all applicable fair and responsible banking laws and regulations, including best practices, industry guidance, and other laws and regulations that are not specifically focused on fair lending or UDAAP but are extensions of the responsible banking concept. M&T is cognizant of our responsibility to comply with laws at each level of government, whether it is federal, state, or local, for areas where our business activities are conducted.

The Fair and Responsible Banking Policy and Program cover all products and services offered by M&T. Fair and Responsible Banking applies throughout a product or service life cycle, including product development, marketing, advertising, sales, pricing, application processing, underwriting and origination, operations, servicing, escrow, collections, loss mitigation, and foreclosure activities, among others.

Fair and responsible banking compliance is an essential part of M&T's business strategy, and we work to ensure equal access to banking and provide safeguards against financial abuse. All personnel are required to complete training when hired and annually thereafter on fair lending, UDAAP, and fair treatment of customers as part of our Enterprise Mandatory Assigned Training Program. In addition to training, we conduct various oversight and monitoring activities to ensure compliance with fair and responsible banking-related risks.

The Board provides oversight of the Fair and Responsible Banking Policy and Program through the Risk Committee of the Board, the Management Risk Committee, and the Regulatory Compliance Risk Committee. The Board also receives annual fair lending and UDAAP training.

### The Fair and Responsible Banking Policy and Program incorporate federal, state, and local fair and responsible banking-related laws and regulations, including but not limited to:

- Section Five of the Federal Trade Commission Act (FTC Act)
  - Includes Unfair or Deceptive Acts or Practices (UDAP)
- Sections 1002, 1031-1036 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act)
  - Includes Unfair, Deceptive, or Abusive Acts and Practices (UDAAPs)
- Fair Housing Act (Sections 804, 805, and 818)
- Regulation B (Equal Credit Opportunity Act, ECOA, Sections 1002.4-1002.7)
- Regulation C (Home Mortgage Disclosure Act, HMDA)
- Servicemembers Civil Relief Act (SCRA)
- The Americans with Disabilities Act (ADA)
- State laws, including New York State Executive Law 296-a (Unlawful Discriminatory Practices in Relation to Credit) and Section 349 of New York's General Business Law (Deceptive acts and practices unlawful)
- Other federal, state, and local responsible banking-related laws and regulations

### M&T requires all employees and third-party service providers to act in accordance with both the letter and the spirit of all applicable federal and state fair lending statutes and regulations by performing aspects of a customer's journey without regard to discrimination on a prohibited basis, including:

- Race
- Color
- Sex
- Religion
- Creed
- National origin
- Age (provided the applicant has the capacity to enter into a binding contract)
- Disability (including the use of a guide or support animal)
- Familial status (including family responsibilities and child-bearing potential)
- Receipt of public assistance/unemployment
- Good faith exercise of any rights under the Consumer Credit Protection Act
- Military status or exercise of any rights under the Servicemembers Civil Relief Act
- Sexual orientation, gender identity, or gender expression
- Marital, civil union, or domestic partnership status
- Genetic or medical information not related to credit decisioning
- Political activities
- Citizenship or immigration status
- Any other federal, state, or city/town-specific prohibited basis



### Product and service reviews

We conduct various oversight and monitoring activities to ensure compliance with fair and responsible banking-related risks, including reviewing and monitoring new and existing products and services for such risks. These include, but are not limited to, risk reviews of new products and services and annual risk assessments for fair and responsible banking-related regulations.

The Markets, Products, and Services (MPS) team ensures the risk review process operates in a manner reasonably consistent with regulatory requirements and industry expectations. The MPS team oversees the review process for all new and modified products, services, and expansions, and works with Business Unit Management, First Line Risk Officers, and Risk Subject Matter Experts to ensure adherence to the established process. The executive-level Markets, Products, and Services Risk Committee (MPSRC) is responsible for evaluating the impact and risks associated with new and existing products and services to M&T. Board oversight of product and service reviews occurs within the Risk Committee, which receives reporting from the MPSRC.

### Fair marketing and advertising

M&T advocates equal access and treatment to financial products and services within the marketing and advertising of these products and services. The Compliance Risk Management (CRM) Program contains guidelines around required review and approval by CRM for marketing or advertising campaigns and collateral prior to use or implementation. These guidelines were designed to ensure compliance with laws, rules, and regulations related to marketing and advertising, including fair lending, UDAAP, and other consumer protection considerations, where applicable.

### Promoting Ethical Sales Practices and Incentives

As stated in M&T's Enterprise Risk Framework, every employee is expected to conduct business in a legal and ethical manner, and to foster an environment that promotes integrity across the organization and fair outcomes for customers. In support of that Framework, the Sales Practices and Incentive Policy establishes the standards to which all business lines must adhere in the development and implementation of incentive plans to ensure that such systems and associated sales practices promote desired behaviors and adherence to M&T's Risk Appetite. This Policy is enterprise-wide and applies to M&T Bank and affiliates. Sales practices and incentive compensation compliance are also considered within M&T's Fair and Responsible Banking Program.

The senior executive vice president (SEVP) of each affected business unit is responsible for ensuring this policy is implemented within the business and supported by appropriate procedures and governance. Further, the SEVP must directly participate in the development and approval of sales performance expectations and associated sales practices and incentive plans, and ensure that appropriate controls and monitoring procedures are in place to maintain the integrity of the process. Incentive plans or sales expectations (e.g., goals, if applicable to a given business) should include:

- Expected sales objectives and behaviors
- Performance structures used to incent appropriate employee behavior to achieve business line objectives, while maintaining focus on meeting customer needs and fostering effective risk management

The Incentive Plan Risk Committee (IPRC) is responsible for ensuring compliance with rules and regulatory guidance relating to incentive compensation plans, including the Interagency Guidance on Sound Incentive Compensation Policies. The IPRC provides oversight of the development, administration, management, and payment of divisional incentive programs. The IPRC is accountable to the C&HC Committee of the Board and is composed of senior and executive management from business lines, Risk Management, Risk Compliance, Legal, and Human Resources. Divisional incentive plans require IPRC approval annually prior to implementation.

The Risk Management Division (also known as the Second Line of Defense within the bank's Enterprise Risk Framework) reviews incentive plans, identifies and/or challenges risks within them, and evaluates whether appropriate controls are in place to monitor sales performance relative to incentive plan payouts. Additionally, in partnership with the business lines, the Risk Management Division annually reviews and approves incentive compensation plans.

Business lines are responsible for ongoing monitoring of incentive compensation plans to continually track and monitor sales performance relative to incentive compensation payout expectations, and to evaluate for inappropriate sales practice behaviors. Each business line is responsible for developing and documenting internal controls within the bank's centralized risk and compliance platform, and designated groups within the business lines monitor and test controls related to sales practices and incentives.

## Upholding Debt Collection Policies

Our debt collection policies and procedures follow the relevant federal and state laws, which may vary based on product. Within the Enterprise Risk Framework, the Second Line of Defense—the Risk Management Division—has oversight for regulatory compliance.

Within the mortgage servicing business, the federal Fair Debt Collection Practices Act (FDCPA), under Regulation F, and state laws govern our collections policies and procedures. Policies and procedures are in place for business units responsible for debt collection to comply with each component of the FDCPA and with relevant state laws. Personnel whose roles involve collections receive annual training on FDCPA requirements under the Divisional Mandatory Assigned Training (DMAT) Program (see “Fulfilling our Regulatory and Risk Annual Training Requirement” on page 28).

Other deposit and lending products of the bank are also subject to state laws related to collections. Policies and procedures are in place within relevant business units to comply with these state laws. Annual training under the DMAT Program is required for personnel whose roles involve collections, and additional business line training is conducted as relevant.

## Addressing Customer Complaints

M&T values customer feedback and takes all complaints seriously. We have policies and procedures across the organization that capture the process for intake, proper handling, and response to complaints. Our Customer Complaint Management Program is owned and implemented by the Customer Advocacy team. The Voice of the Customer (VOC) team provides reporting, insights, and analytics support of complaints data. The Customer Advocacy team and VOC team sit within the Customer Experience Division, whose responsibilities include supporting the business lines in creating value for our customers.

Compliance Risk Management (CRM) is responsible for the oversight and monitoring of complaint data to identify risks relating to compliance with applicable laws, rules, regulations, and government guidance. CRM collaborates with the VOC team to create effective risk-related complaint reporting to ensure management can proactively manage regulatory risks. CRM also compiles quarterly reporting on complaint trending for verbal and written complaints. Additionally, the Fair Lending Office within CRM is responsible for monitoring all complaints that allege discrimination.

To ensure effective and sustainable Compliance oversight of complaints data, CRM has an underpinning framework and established escalation protocols in place. Our Compliance Risk Management Complaint Procedure outlines the oversight, management, reporting, and handling structure for the compliance risk review of customer complaints. Further, CRM is responsible

for escalating issues indicating risks from all complaint reviews to various risk committees, including the Regulatory Compliance Risk Committee, the Management Risk Committee, and the Risk Committee of the Board.

CRM helps to ensure that complaints are captured, escalated, analyzed, and reported in accordance with applicable laws, regulations, and industry practices. The review and resolution process includes:

- Reviewing complaints pre- and post-response in accordance with the Compliance Risk Management Complaint Procedure
- Working directly with the business units to ensure any identified deficiencies and risks are addressed
- Providing feedback to the Customer Advocacy team for incorporation into training and communications distributed to the business units

M&T does not publicly disclose our internal complaint data. However, data on complaints made to the Consumer Financial Protection Bureau® (CFPB) are available on its [website](#). In 2022, customers made 736 complaints about M&T to the CFPB. M&T responded to 735 (99.9 percent) in a timely manner following the CFPB’s definition. In addition, 46 complaints were made to the CFPB about People’s United Bank and 46 (100 percent) were addressed in a timely manner.



## Defining Our Political Activities

We educate elected officials about how their decisions impact our ability to serve customers, the strength of our financial system, the quality of lives in our communities, and our employees.

- We advocate and engage in the political process on behalf of all stakeholders—our customers, employees, communities, and shareholders
- We engage in the political process in a transparent way, with full reporting, accountability, and oversight
- We disclose all expenditures of corporate funds used for lobbying at the federal and state level, and our program is designed to comply with all applicable federal, state, and local laws regarding political activities

### Political Activities Program and Policy

M&T's Political Activities Policy upholds M&T's Political Activities Program. The Political Activities Policy contains the governance principles and requirements for managing risks and obligations for laws and regulations, including those governing political activities. This Policy applies to all political activities of M&T, the M&T Bank and Wilmington Trust PAC (M&T PAC), all employees and directors (including Employee Resource Groups), and all M&T lobbyists retained by M&T. The Policy is maintained by the Risk Management Division and reviewed by the bank's Legal department for adherence to the law. The Policy is reviewed and updated annually by the Risk Management Division and approved by the Chief Risk Officer. Political activities training is conducted for all personnel when hired and annually thereafter as part of the Enterprise Mandatory Assigned Training Program.

### Political contributions

Our Political Activities Policy defines a political contribution as anything of monetary or "in kind" value provided for the benefit of a candidate, campaign, political party, political committee, PAC, or any other political organization, organized under Section 527 of the Internal Revenue Code, or a ballot measure committee. Adhering to the Political Activities Policy's prohibition of corporate funds for political contributions, M&T does not contribute corporate funds to political campaigns, parties, and committees, or to federal, state, or local initiatives advancing election campaign and ballot issues.

No gift, political contribution, or anything else of value may be offered to a public official with the intent of influencing a government decision or when such a gift, contribution, or thing of value is linked with a government decision or otherwise in violation of law. Investment advisors are subject to laws that restrict or ban their ability to make personal political contributions. Employees who transact business with government officials or entities—as well as employees with the title of senior vice president and above, and all members of the Board of Directors—must also obtain pre-clearance for personal political contributions. The Risk Management Division assists employees, including pre-clearing contributions, to ensure compliance with applicable laws. Post-review of contributions and gifts and entertainment is conducted to further ensure compliance with applicable laws and regulations.

### Our advocacy

M&T directors, officers, and employees are not authorized to lobby on behalf of the organization without authorization from the Government Relations Department. On the state and local level, we lobby in our headquarters state of New York and file timely disclosure reports as required by the New York State Commission on Ethics and Lobbying in Government. With the addition of People's United Bank, we increased our lobbying activity within our footprint, including advocacy activity in Connecticut. We filed timely disclosures as required by the Connecticut State Office of State Ethics.

At the federal level, we file quarterly disclosures about issues for which we have lobbied and total related expenditures, which include trade association dues allocatable to lobbying, outside lobbying firms, employee compensation, travel, and expenses. In 2022, we reported lobbying expenditures of \$330,000 related to lobbying regarding electronic payments, economic development, the CHIPS and Science Act of 2022, the Secure and Fair Enforcement (SAFE) Banking Act of 2022, the United States Innovation and Competition Act of 2021 (USICA), and retirement savings. People's United Bank did not have federal lobbying.

Our quarterly disclosures are publicly available via the Office of the Clerk of the U.S. House of Representatives or the Secretary of the U.S. Senate. The search name is "M&T Bank Corporation."

### Political action committees

We participate in the political process through bipartisan contributions from the M&T Bank and Wilmington Trust Political Action Committee (M&T PAC). With the acquisition of People's United Bank, the \$21,795 balance remaining in the People's Bank Federal Political Action Committee was transferred into the M&T PAC, and the People's Bank Federal Political Action Committee was terminated as of April 1, 2022.

The M&T PAC allows employees to pool their resources to support candidates for public office. We do not contribute corporate funds to the M&T PAC, and all funds are provided on a voluntary basis by eligible employees. No retaliatory action may be taken against employees who choose not to contribute.

A committee of M&T executives approves contributions by the M&T PAC to local, state, and federal political candidates and committees who represent the communities we serve, who serve in relevant positions, or who otherwise support initiatives aligned with our businesses, shareholders, core values, customers, and communities. M&T PAC contributions are made without regard for the personal political views or interests of senior management. The M&T PAC does not contribute to candidates running for the office of president of the United States.

2022 M&T PAC Contribution Recipients	Contribution Amount
Federal Candidates	\$13,000
Federal PACs	\$8,500
Local Candidates	\$10,250
Local Party Committees	\$1,800
State Candidates	\$8,350
State PACs	\$10,000
<b>TOTAL</b>	<b>\$51,900</b>

The M&T PAC makes required filings to the Federal Election Commission and relevant state and local commissions and works with Risk Management and our Legal Department to ensure that all contributions are made in accordance with applicable laws and M&T policies. In 2022, the M&T PAC contributed \$51,900 to local candidates and party committees, state candidates and PACs, and federal candidates and PACs.

Prior to the acquisition by M&T Bank, People's United Bank maintained the People's United Bank Political Action Committee in its headquarters state of Connecticut. Following the acquisition by M&T Bank, the PAC was re-registered in Connecticut as the M&T Bank and Wilmington Trust PAC. The Connecticut PAC made \$250 in contributions in 2022 to a local party committee. The Connecticut PAC is in the process of being dissolved and is no longer accepting employee contributions. The Connecticut PAC makes required filings to the state of Connecticut State Elections Enforcement Commission.

## Fulfilling Our Regulatory and Risk Annual Training Requirement

M&T directly, or through our subsidiaries, is subject to a variety of federal, state, and international laws, regulations, and regulatory guidance. Therefore, we recognize that providing appropriate training is a necessary component to ensure the bank effectively manages risks and that our Enterprise Risk Framework functions as designed.

Our Bankwide Mandatory Assigned Training Policy sets forth the guiding principles and requirements for ensuring that the employees and contingent workers of M&T Bank Corporation and all subsidiaries complete training that contains mandatory regulatory and risk content.

The regulatory and risk training content is broken into two cycles to ensure that general and specific information is delivered appropriately:

- Enterprise Mandatory Assigned Training (EMAT) are courses that, with few exceptions, are applicable for all employees and contingent workers
- Divisional Mandatory Assigned Training (DMAT) are courses that pertain to more specific responsibilities and are therefore assigned to employees and contingent workers based on their specific roles

The information conveyed in these trainings:

- Promotes awareness of regulations
- Communicates our policies to comply with those regulations

- Defines mandatory procedures
- Provides knowledge to identify and report risks and issues
- Must be completed at the time of hire and annually, as assigned

The Board is responsible for promoting a culture that encourages ethical conduct and compliance with applicable rules and standards and for ensuring M&T has a sound and effective firm-wide Compliance Risk Management Program. Executive and senior management are responsible for overseeing the implementation of the EMAT and DMAT programs and are required to complete training courses as assigned. The Chief Compliance Officer, Head of Operational and Enterprise Risk, Chief Human Resources Officer, and Enterprise Security Officer are the senior leaders responsible for approval of updates and amendments to the Bankwide Mandatory Assigned Training Policy and are ultimately responsible for the EMAT and DMAT courses for their respective areas. It is the responsibility of M&T Learning to oversee the development of the EMAT and DMAT courses, execute upon the assignment of the courses, and develop the reporting mechanism to track completion of the assigned courses.

A comprehensive series of steps are taken to ensure that employees and contingent workers have the training they need to complete their responsibilities effectively and in compliance with applicable laws, regulations, regulatory guidance, and policies.

We seek to ensure the training content is comprehensive, risk-based, updated regularly, and delivered in a timely manner. In addition, DMAT content is reviewed to ensure it is tailored to the responsibilities of the personnel receiving it.

# 225,117

hours of EMAT and DMAT courses completed in 2022

## The Bankwide Mandatory Assigned Training Policy Covers the Following Annual Enterprise Mandatory Assigned Trainings:

### Enterprise Governance Risk

- Political Activities
- Risk Management

### Enterprise Security Risk

- Cybersecurity
- Disaster Recovery/Business Continuity
- Recognizing and Reporting Fraud
- Physical Security

### Human Resources Risk

- U.S. Code of Business Conduct and Ethics
- European Union (EU) and Canadian (CA) Code of Conduct
- Workplace Harassment: California Employees
- Workplace Harassment: California & Connecticut Managers
- Workplace Harassment: Connecticut Employees
- Workplace Harassment: Employees
- Workplace Harassment: Managers
- Workplace Harassment: The Laws Where You Work

### Regulatory/Compliance Risk

- AML/BSA/OFAC: Overview
- AML/BSA/OFAC: Advanced
- AML/CTF for the European Offices
- AML/ATF for Canada
- Community Reinvestment Act
- Fair Lending
- Fair Treatment of Customers
- Privacy of Consumer Information



Additionally, M&T may provide supplementary regulatory training to a targeted audience on an ad hoc frequency to reinforce content and knowledge that was previously received. Ad hoc training may be provided to respond to the changes in the regulatory environment or M&T's operations. Events that could necessitate this type of ad hoc training include:

- Changes to federal, state, and international laws, regulations, and regulatory guidance
- Changes to M&T's product and service offerings
- Results from audits, regulatory exams, and testing activities
- Consumer complaints

Throughout the training cycle, M&T Learning creates reports with course completion data and provides them to training coordinators, business line management, and designated representatives and content owners. Managers are expected to use these reports to ensure their employees and contingent workers complete the assigned courses. In addition, managers are required to account for employees' timely completion of training as part of their annual performance check-ins. Training coordinators also use the reports to provide periodic updates to their senior managers. The consequences for failing to complete the assigned training may include appearing on reports that are sent to senior management, negative impacts on annual performance check-ins, and/or corrective action. In 2022, personnel completed 225,117 hours of EMAT and DMAT trainings.

## Being Transparent on Tax

We disclose all current and deferred U.S. federal and state taxes in our reports to the U.S. Securities and Exchange Commission. We also participate in the Internal Revenue Service's (IRS\*) Compliance Assurance Process, a program that helps large corporate taxpayers improve federal tax compliance. This program allows taxpayers and the IRS to resolve issues before filing tax returns and comply with federal tax laws; ensure accurate tax returns, thereby shortening the IRS audit process; and use real-time issue resolution tools and techniques to process the audit.\* M&T had been accepted into the Compliance Assurance Process Program by the IRS for tax years through 2022 and in 2023, was accepted into the program for the tax year ending December 31, 2023.

M&T pays foreign taxes related to our foreign activities. Our foreign activities represent less than one percent of the company's consolidated assets and revenues. As required under United Kingdom (UK) rules, M&T has publicly disclosed our UK tax strategy since December 31, 2018. These disclosures are available on our [website](#). M&T is also continuing to monitor Pillar Two initiatives across various foreign jurisdictions (for more information on Pillar Two, visit [www.oecd.org](http://www.oecd.org)). We do not expect implementation of Pillar Two to have a material impact on our foreign taxes.

\*Source: <https://www.irs.gov/businesses/corporations/compliance-assurance-process>

TOGETHER WE WILL

pre  
serve

## PRESERVING OUR PLANET BY FINANCING A SUSTAINABLE FUTURE

Our environmental sustainability strategy is rooted in a single purpose: Making a difference in people's lives.

The importance of our collective role in climate mitigation and adaptation efforts becomes more evident each year. In 2022, the global mean temperature was about 1.15°C (1.9°F) above the pre-industrial level<sup>1</sup> and the accompanying impacts of climate change are sizeable. There were many reminders during 2022 of the increasingly severe consequences—from record-breaking heat waves in the U.S. and Europe, to severe droughts in Africa, and catastrophic floods in Pakistan and China. The economic realities are significant as well, as climate-related damages in the U.S. alone have grown to about \$133 billion per year.<sup>2</sup>

However, 2022 also delivered important progress in combating climate change. Energy transition investment grew 28 percent to over \$1 trillion.<sup>3</sup> Generation from renewable sources (i.e., wind, solar, hydro, biomass, and geothermal) surpassed coal-fired generation in the United States' electric power sector for the first time. The combined wind and solar share of total generation increased from 12 percent in 2021 to 14 percent in 2022.<sup>4</sup>

The Inflation Reduction Act (IRA) that was passed is expected to provide \$369 billion of public spending and tax credits into our economy to boost clean energy, clean infrastructure, and climate resilience over the next decade.<sup>5</sup> Declining capital costs for solar panels (on a relative basis to other generating asset classes), wind turbines, and battery storage, as well as government subsidies such as those included in the IRA, result in renewables becoming increasingly cost effective relative to other alternatives for building new power capacity. The IRA altered the policy landscape the Energy Information Administration (EIA) uses to develop their projections, and the EIA now projects that U.S. energy-related CO<sub>2</sub> emissions will drop up to 38 percent below 2005 levels by 2030.<sup>6</sup>

Financial institutions have an important role to play in financing the transition to a low-carbon economy and the efforts to adapt to the physical impacts of climate change. We are supporting climate action by focusing on the priorities below.

### Our Sustainability Priorities



**Growing  
Climate Finance**



**Integrating  
Climate Risk**



**Reducing our  
Carbon Footprint**



**Supporting Climate  
Resilient Communities**



### Key 2022 Planet Metrics\*

# \$231.6

million invested in the  
renewable energy sector

# 13%

reduced electricity  
consumption since 2019

# 46%

reduced Scope 1  
emissions since 2019

# 14%

reduced Scope 2  
emissions since 2019

\*Numbers above reflect legacy  
M&T and do not include  
People's United Bank (PUB).

### Our Climate-Focused Operating Model and Governance Structure

To effectively focus on our four key priorities, we wanted to approach the work cohesively and holistically across the enterprise, ensuring that what we learn and build can be leveraged across all workstreams and teams at the bank. To this end, we created an enterprise-wide Climate Program, pulling together business lines, corporate functions, and key partners from across the organization into a collaborative, common approach to climate work.

Parallel workstreams comprise the program focusing on external reporting, emissions measurement, climate risk, sustainable finance, operational sustainability, climate resilient communities, and change management. One of the activities initiated by our Climate Program during 2022 was an education pilot offering. We offered our program participants learning modules on emissions, risks, and opportunities; organized reflective cohort discussions; and arranged virtual "Lunch & Learns" during the summer months.



## ESG Governance



### Ensuring effective engagement and alignment across our organization

To support the climate work underway, we matured our governance structure.<sup>7</sup> The Climate Steering Committee governs our Climate Program and is comprised of senior leadership spanning the organization who provide feedback on strategy, goals, targets, partnerships, and disclosure, as well as alignment across the enterprise and engagement in reporting and execution.

The Climate Steering Committee reports into the ESG Committee, a team of executive leaders who are responsible for approval of ESG-related strategy, goals, targets, partnerships, disclosures, roles/responsibilities, oversight on progress and disclosure, and escalation to the Board and/or the executive leadership team as needed.

The Nomination and Governance Committee (N&G) of the Board is responsible for oversight of ESG strategy, goals, targets, progress, and disclosures. Board oversight and management committees for Climate Risk is described in the Integrating Climate Risk section.

### Growing Climate Finance

Supporting our customers and communities through the transition to a low-carbon economy and adaptation for climate resiliency is core to our environmental impact and role as a bank for communities.

#### Defining and measuring sustainable finance

Creating sustainable products and services is one of the largest impacts we can have as a bank, and during 2022, we developed a sustainable finance taxonomy to guide our work. Our taxonomy outlines our definition of sustainable lending and investment activities, across categories such as clean transportation, energy efficiency, and green buildings. It defines eligible activities across the environmental and social pillars and is accompanied by a decision tree to create consistency and transparency for the types of companies, investments, and projects that can be classified as sustainable finance. This foundational work allowed us to begin baselining measurement of our Sustainable Finance activities, setting the stage to monitor and expand the capital we deploy to this essential work.

### Building new capabilities

Our work has also focused on understanding climate-focused growth opportunities and the capabilities we need to effectively serve our customers and communities. Partnering across the enterprise, we've identified key lending opportunities and are working to bring new products to market in 2023.

#### Leveraging the power of tax equity

Tax equity enables us to repurpose our federal income tax dollars into attractive renewable energy investments. We focus on high-quality, durable infrastructure that has a substantial and positive environmental impact.

We are making progress on our aspiration to increase investment within our footprint. In 2022, we invested \$208.7 million in renewable energy on a tax equity basis. Our 2022 capital deployments included utility scale solar in our footprint (i.e., New York State and a component of the state's Clean Energy Standard) and community solar in Maine—both firsts for M&T. We increased investment in the residential solar and battery energy storage sectors, which included systems in Massachusetts, Maryland, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont, and other states.

In 2023, we aspire to increase investment in renewable energy as well as broaden and diversify our investments to include utility scale wind, along with solutions that directly address equitable access to renewable energy for low- and moderate-income communities.

**“DESRI deeply appreciates the steadfast support of M&T in financing our renewable energy projects, in spite of a challenging operating environment in 2022. We are thrilled to start the new year by signing a commitment for tax equity financing for Gravel Pit Solar, which we expect to be the largest solar project built in Connecticut.”**

Adria Schulman-Eyink, Director, D.E. Shaw Renewable Investments (DESRI)



### Providing renewable energy financing solutions

M&T Bank has provided capital to support renewable energy deployment into the communities we serve since 2015. Our specialty finance group has a team of dedicated renewable energy specialists who work in close collaboration with our relationship management teams across the regions to serve our customers' climate-focused needs. In 2022, this team's total fundings for renewables reached \$22.9 million, in the form of loans and leases. The primary focus is on customer investment in renewable energy-generating assets, such as the installation of a solar panel system on the roof of a manufacturing facility, building, or office complex, which itself is often also financed by M&T. Additionally, our specialty teams support programs that were created specifically for solar developers or contractors active in our communities who work with municipalities, school districts, hospitals, medical centers, and colleges to help reduce their energy-related operating costs.

#### SPOTLIGHT

### \$1 Billion To Be Invested Over Five Years

We are committed to investing \$1 billion in renewable energy projects during 2022-2027 with a particular focus on initiatives in our expanded geographical footprint. Despite industry headwinds from global supply-chain issues (particularly with respect to solar modules), which resulted in substantial delays for many projects, we were able to deploy \$231.6 million in 2022. We are on track to achieve and hopefully exceed our five-year commitment. Our primary investment vehicle in 2022 was tax equity, although we provided lease and debt solutions as well, as described in the sections above, "Leveraging the power of tax equity" (\$208.7 million) and "Providing renewable energy financing solutions" (\$22.9 million).

### Enhancing corporate banking

With the acquisition of People's United Bank in 2022, M&T Bank's Corporate Banking group merged with the Corporate Banking team from People's United.

In 2022, M&T participated in loans to construct battery energy storage systems and became a lender to the largest generator of electricity from wind and solar power in the world. During the year, we also provided credit to many of our existing customers who are expanding their operations into clean energy solutions such as renewable natural gas development and carbon capture and sequestration.

#### SPOTLIGHT

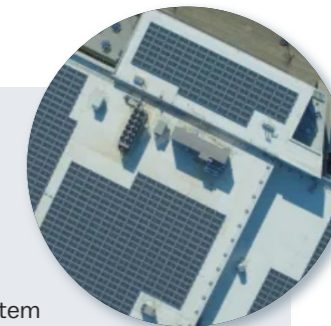
### Solar

M&T provided \$2.8 million in financing for solar installation at ResinTech's manufacturing facility building campus in Camden, New Jersey (NJ). The arrays consisted of both a roof mount and canopy systems. This 978 kilowatt (kW) system is projected to generate 1,222,500 kilowatt hours (kWh) of clean power during its first full year of operation. ResinTech's solar installation is part of an ongoing effort to reduce operating costs while also reducing dependence on electricity generated from fossil fuel. Our financing was structured to incorporate local NJ Transitional Renewable Energy Certificates. The combined benefits of these certificates and the solar power generated produce substantial operating savings for the customer. In total, ResinTech operates nearly four megawatts of solar arrays to power its facilities.

**"For what is now my 11th business solar project, M&T did an excellent job in not only ultimately financing the project, but over several months working with my team to determine the correct vehicle and structure that was best for my company. Developing clean and dependable power generation for ResinTech has reduced our operational expenses, shown our community we are a responsible company, and allows us to better compete as a U.S. manufacturer. To know that we can be both self-reliant and play a part in the transition to a low-carbon economy gives us the peace of mind needed to continue to operate and be successful for generations to come. M&T provided us the step-by-step assurance in all phases of the project that ensures it will not be our last."**

Jeffrey Gottlieb, CEO, ResinTech

M&T partnered with another bank to provide a \$54 million sale leaseback financing program involving 12 solar projects in New Jersey (NJ) and the District of Columbia (DC), developed by HESP Solar, a regional leader in renewable energy development. Our financing involved the integration of systems providing clean power to various schools and education districts in New Jersey, commercial entities, and DC community solar. The first \$8.92 million phase of this program involved three New Jersey school districts (Bridgeton Board of Education, Watchung Hills High School, and Belleville Board of Education) and was funded by M&T in December 2022. It is expected to produce 6,258,000 kWh of clean low-cost energy to these parties during the first year. Our financing took into account local NJ Transitional Renewable Energy Certificates, DC Solar Renewable Energy Credits, as well as low-cost power purchase agreements (PPAs) provided by HESP.



## SPOTLIGHT

### Hydro

Some facilities we have been involved with in the Albany region track their roots as far back as 1918, with Henry Ford's Hydroelectric Dream developed with Thomas Edison. The Green Island Hydro facility, upgraded earlier this year, dates back to 1923. M&T is part of an ongoing expansion and upgrade of hydro facilities in Newport, Vermont (VT) (4 megawatt) and West Charleston, VT (675 kW). The \$5.5 million conditional sales contract was funded in December 2022. Newport was forecasted to produce 15,295 megawatt hours (MWh) and West Charleston was forecasted to produce 2,258 MWh in 2022. Many view such hydro facilities as the first class of renewable energy assets.



Across our entire energy platform, we have focused on developing relationships with companies that have established their position with regards to the energy transition by publishing their own ESG reports or by publicly stating goals for reducing their greenhouse gas emissions, and in many instances have already made major investments in clean energy technologies. In addition, we have a number of customers who are leveraging their expertise in reducing greenhouse gas emissions and bringing these solutions to their clients. This includes the offering of renewable energy in place of conventional energy, support in retro-fitting equipment, and providing consultation in developing renewable energy and storage solutions.

Key to the growth of this effort is the continued financial support of energy companies actively engaged in energy transition and building capacity for renewable energy. It is important to us that we continue to work with companies who are taking part in the energy transition that is underway in our communities and across the country.

#### Leveraging project finance for renewable energy

Wilmington Trust's Project Finance Agency Services team focuses on providing trust and agency services to a wide range of sectors, including renewable power generation and storage. They have developed a strong knowledge base for renewable energy, and have closed more than 260 such transactions since 2017. The team administers a portfolio of nearly 400 projects for developers, lenders, and investors in the Project Finance sector.

The projects encompass a variety of technologies, including solar, wind, hydro, geothermal, and renewable natural gas. Recently, the team has been supporting significant lending activity in the area of battery storage, some co-located with clean power generation and some stand-alone. Their supporting services roles in these transactions include Administrative Agent, Collateral Agent, Depositary Agent, and Escrow Agent.

#### Supporting renewable asset-backed securitizations in structured finance

In addition, Wilmington Trust, N.A.'s Structured Finance team focuses on providing trustee and other services to a wide range of sectors, including solar securitizations. The team provides the roles of Indentured Trustee, Owner Trustee, Paying Agent, Calculation Agent, and Back-Up Servicer, as well as providing Trust Tax Return Preparation and Independent Director services through its wholly owned subsidiary Wilmington Trust SP Services. In 2022, the team onboarded 22 new asset-backed securities (ABS) transactions, which securitized loans in connection with the installation of residential solar panels. These transactions support industry partners as they go to market, which in turn provides investors with options to invest in renewable energy-related assets.

We recently partnered with Sunstone Credit, Inc. to fund affordable and easy-to-understand solar loans made to small- and medium-sized businesses in the U.S. Sunstone was founded with the mission of helping more businesses choose solar. Co-founder and CEO of Sunstone, Josh Goldberg, said:

**"We are thrilled to partner with M&T Bank to reduce the friction small and medium business customers encounter in obtaining affordable solar loans. Together we are committed to building a platform that will drive commercial sales growth for our solar developer providers and enable cost savings for borrowers while providing a cleaner future environment."**

#### Green affordable housing programs

M&T made loans totaling \$562 million in 2022, in conjunction with green programs by Fannie Mae®, Freddie Mac®, and the Federal Housing Authority® (FHA). Fannie Mae offers green building certification and a rewards program for building energy improvements, which applies to multi-family properties within the U.S. The rewards program includes qualifications such as energy and water use must be reduced by >30 percent, improvements completed within 12 months, and a portion of the proceeds must finance energy-saving upgrades. Freddie Mac's Multifamily Green Advantage® program consists of several programs (Green Up®, Green Up Plus®, Green Retrofits, Green Certified, Green Rebate, and C-PACE). Borrowers must be able to reduce whole property energy consumption by at least 15 percent and reduce either energy and/or water whole property consumption by an additional 15 percent for a total of 30 percent reduction in whole property energy and water

## Wilmington Trust's ESG-Related Services to Clients

M&T Bank's wealth and investment management subsidiary, Wilmington Trust, offers products and services to clients who choose to incorporate sustainable investing and ESG principles into their investment portfolios. In addition to financially material environmental considerations, Wilmington Trust also incorporates financially material social and governance factors into its investment process for its ESG offerings to clients.

### Investing in sustainability

**Wilmington Trust's sustainable investing philosophy for ESG is based on the belief that ESG issues can be financially material for companies, resulting in risks or opportunities that can substantially impact the economic value of a company.**

### Presenting Wilmington Trust's sustainable investing solutions

Wilmington Trust has a long history of incorporating client preferences—which range from religious beliefs to social and environmental priorities—into their portfolios. Over the past several years, they have expanded their services to offer full sustainable investment advisory solutions utilizing their sophisticated expertise and resources.

To meet the needs of clients, the sustainable investing platform includes both proprietary and third-party ESG solutions and vehicles. Proprietary ESG investment strategies integrate ESG analysis throughout the investment process while seeking to achieve their investment objectives. For the proprietary ESG strategies, Wilmington Trust believes that engagement between shareholders and management is crucial to a better understanding of a company's financial risks related to its ESG practices. Their approach to engagement reflects timely themes that inform their interactions with multiple companies simultaneously. Key engagement themes typically shift year-to-year based on the evolving investment landscape.

Alongside their proprietary ESG strategies are externally managed strategies, identified by the Wilmington Trust Manager Research Group, which seeks to assemble competitive investment solutions for clients. Covering several asset classes, these third-party strategies include both actively managed and passive products and solutions, as well as traditional quantitative and qualitative approaches, for investors who wish to reflect ESG concerns or other values in their investment portfolios.

*Please see important disclosures in [Section 4](#) of the Appendices.*

consumption. The FHA's Energy Efficient Mortgage program for single-family homes allows qualified borrowers to finance "100 percent of the expense of a cost-effective 'energy package' for approved upgrades, additions, and/or improvements that make your new home (or refinanced one) more energy efficient." Lastly, we are actively evaluating the market for financing energy efficiency and renewable energy improvements at commercial properties.

## Building Climate-Resilient Communities

M&T has long believed that strong communities and a strong bank are deeply intertwined. Understanding our communities' climate risks and partnering to mitigate these in a way that improves equity and economic development is the focus of our Climate-Resilient Communities work.

Throughout 2022, we undertook efforts to increase our understanding of what physical risks from climate change are most significant for underserved communities within our company's footprint. A heat mapping exercise was completed to determine exposure on a community level, allowing us to prioritize a selection of pilot communities. Our next steps are to explore specific climate impacts, and relevant adaptation needs, in partnership with key local stakeholders.

## Supporting grassroots efforts to advance environmental justice

The need to address environmental concerns is urgent, not just because of climate change, but because of mounting evidence of the cascading effects of environmental hazards on human development, health, prosperity, and longevity. These effects can be found in the links between asthma and air pollution, between unsafe housing and lead poisoning, and between lack of access to healthy foods and diet-related health issues, among other harmful outcomes. And the disproportionate impact of environmental degradation falls on the poor, and especially on communities of color.

Through The M&T Charitable Foundation, we launched the AMPLIFY Fund's Equity & Environment Initiative in 2022, a new, two-year funding effort to advance environmental justice through community-based organizations in the states of New York, Connecticut, Massachusetts, Vermont, Maine, and New Hampshire. Priority was given to organizations seeking to affect environmental improvement in communities facing one or more environmental justice concerns, such as hazardous waste exposure, insufficient green and open space, poor ambient and indoor air quality, energy insecurity, transit access, poor water quality, inadequate access to healthy foods, and/or the need for new or revised policies to advance important environmental objectives at the local, regional, or state level.

## SPOTLIGHT

## Climate Solutions Accelerator, Rochester

The Climate Solutions Accelerator is working to create a healthier, more equitable, and environmentally sustainable community by catalyzing local efforts to eliminate greenhouse gas emissions and address the effects of climate change. With M&T's contribution of \$25,000 in startup funding, the Accelerator is now providing structure, support, and education for organizational leaders in the Genesee-Finger Lakes region to guide and expedite their transition to clean energy and adoption of building decarbonization measures and sustainable business practices, with a focus on equity and organizations that serve, or are located in, Disadvantaged Communities, as defined by New York State.

The AMPED initiative is a partnership of 20+ local organizations dedicated to electrifying the area's buildings and vehicles. The Accelerator was one of the founding partners, and in 2022, the AMPED campaign highlighted the work of local organizations making significant progress toward full electrification and hosted an ongoing webinar series that makes broad and deep knowledge on electric technologies, policy, incentives, and practical



learning accessible to show how we all win when we Go All Electric. Additionally, in 2023, the Accelerator launched Color Your Organization Green, a yearlong course that helps organizations develop an understanding of the problems and opportunities that climate change poses for our region, identify how they currently contribute, and create a Climate Action Plan to guide their organization in addressing the climate crisis. Participating organizations form an internal "green team," and a cohort of green teams from different organizations, move through the course together, attending in-person gatherings and virtual workshops.

## SPOTLIGHT

## Youth Ministries for Peace & Justice, Inc. (YMPJ)

Youth Ministries for Peace & Justice, Inc. (YMPJ) was founded to bring South Bronx residents together, build community power, and address environmental hazards and socio-economic inequities. YMPJ operates in the frontline environmental justice communities of Bronx River and Soundview/Bruckner in the South Bronx. YMPJ received AMPLIFY funding for their Space Activation Program for reorganizing and coordinating their space activation work under one directorate. Work will include designing, implementing, and analyzing community needs assessments and visioning sessions, all contributing to a strategic vision of Bronx space activation. Project examples include community development of the Soundview Economic Hub, Southern Boulevard Revitalization, and the Morrison Public Plaza, where redevelopment improved storm water drainage and connected the Plaza to a renovated park. Currently, each activation effort has different local partners, consultants, and funding streams at each stage of implementation. With the contributions from M&T's AMPLIFY Fund (see page 78 for more information on the AMPLIFY Fund), YMPJ will develop an overarching strategy, timeline, and workplan for multiple space activations in the Bronx.



**"The AMPLIFY Fund will help us reorganize and coordinate our space activation work under one directorate. By combining similar but separate workstreams, YMPJ will be positioned to develop an overarching strategy, timeline, and workplan for multiple space activations in the Bronx. YMPJ's environmental justice-focused space activation work is benefiting from a high degree of financial and political momentum. With past support from M&T and a continued partnership through this funding opportunity, we are able to deepen community engagement activities so that community voices remain central to planning and decision-making in these spaces. We are grateful to M&T for supporting our work with the space activations projects that will also focus on improving economic opportunities in the South Bronx, and improving the South Bronx food system."**

David Shuffler, Executive Director of YMPJ

## SPOTLIGHT

## Groundwork Bridgeport

Groundwork Bridgeport, a 501(c)3 organization in Bridgeport, Connecticut, has a mission to bring about the sustained regeneration, improvement, and management of the physical environment, by empowering people, businesses, and organizations to promote environmental, economic, and social well-being. Groundwork Bridgeport, an AMPLIFY Fund recipient, was awarded contributions for a program called Growing an Equitable Urban Forest. Groundwork Bridgeport highlights the importance of trees in the urban environment, as they:

- Reduce the concentration of heat in dense urban environments—a phenomenon known as the urban heat island effect—by providing shade onto paved surfaces and releasing water into the air

- Filter the air of pollutants, improving air quality and reducing the risks that air pollution poses to vulnerable people, particularly young children, older adults, and people with respiratory and cardiovascular conditions
- Reduce the threat of flooding by allowing storm water to penetrate the ground, as a form of “green infrastructure”
- Aid in the reduction of stress, increase focus, and promote recreation among those who live near them

The urban tree canopy in Bridgeport is sparse—among the lowest in the state according to the CT Department of Energy and Environmental Protection (CT DEEP)—and unevenly distributed, with lower-income neighborhoods having fewer trees. Groundwork Bridgeport will work with volunteers to plant and care for more trees in the neighborhoods that need them most.

**“We are working to expand our efforts to plant more trees on the streets of our urban neighborhoods in Bridgeport, which will contribute to the environmental restoration of our community and the improved quality of life of our residents. M&T’s support will be used to purchase the trees and other necessary materials, allowing us to plant trees in front of people’s homes at no cost to them. The grant funds will also support stipends for our 20 Tree Corps Leaders to continue leading volunteers and stewarding our urban forest.”**

Christina Smith, President & CEO, Groundwork Bridgeport



## SPOTLIGHT

## Net Zero Sustainable Workforce Training Center update

M&T is a long-time supporter of People United for Sustainable Housing (PUSH). Our Charitable Foundation has approved a \$250,000 grant over three years for PUSH’s Net Zero Sustainable Workforce Training Center (as described in our 2021 ESG Report). The Net Zero Sustainable Workforce Training Center (SWTC) will serve as an example of a sustainable building with passive house construction, zero net energy with on-site photovoltaics, and smart energy monitoring systems. The building will also be providing a physical home for PUSH’s workforce development programs.

The building project is currently out to bid, and PUSH will start breaking ground soon after a general contractor has been selected. SWTC will provide a mix of flexible classroom, office, and meeting space for workers. It will generate as much energy as it uses through an on-site PV solar system and a geothermal heating/cooling system, which will also serve as a learning laboratory for renewable energy training. Most of the training will be hands-on and require the use of demonstration modules (e.g., an air source heat pump on a rolling platform that can be plugged in and worked on and then stored away) and space for project-based building demonstrations (i.e., building a full-sized panelized passive construction wall).



### Our Operational Sustainability Targets and Goals

# 20%

reduction in waste to landfill by 2025 (2019 baseline)

# 20%

reduction in water consumption by 2025 (2019 baseline)

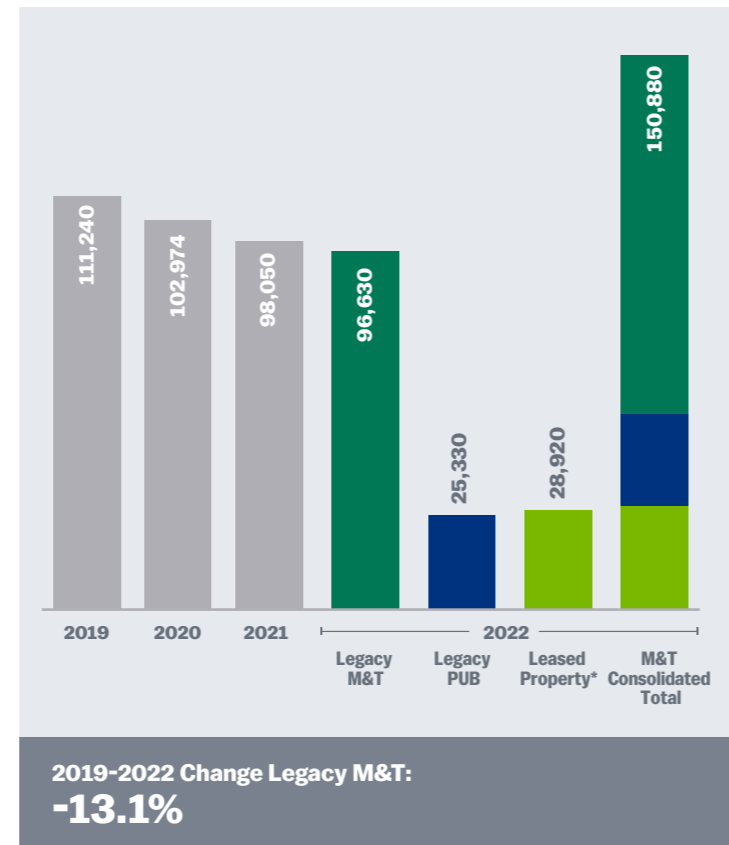
# 100%

renewable energy by 2030

# carbon neutral

by 2035 (scope 1 and 2)

### M&T Electricity Consumption Total (in MWh)



\*Not calculated 2019-2021.

### Reducing Our Carbon Footprint

Decreasing our impact on the environment, both direct and indirect impact, is important to all our stakeholders and foundational to our broader goals. Last year, we set goals to reduce our water and waste, move to 100 percent renewable energy, and become carbon neutral to demonstrate our commitment and hold ourselves accountable. We're proud of the work our colleagues have done to date, but we have much more in front of us.

#### Embracing energy efficiency and renewable power

Emissions from our electricity usage are a significant proportion of our total operational carbon emissions. Over the years, we have reduced our electricity consumption by investing in energy efficiency and changing behaviors at our offices and branches. Throughout 2022, Property Management completed nearly 80 different electric energy savings projects, including interior and external

LED lighting modernizations and electric heat pump installations. Combined, we expect these projects to reduce our electrical consumption by over 800,000 kWh per year. This is equivalent to the electricity needed to power 75 American homes on an annual basis.<sup>8</sup> Approximately a quarter of those savings can be attributed to a People's United Bank Signage Rebranding project, where we converted 597 illuminated LED signs at 341 locations throughout Connecticut, Maine, Massachusetts, New Hampshire, New York, and Vermont.

We are committed to purchasing 100 percent renewable energy by 2030. In 2022, we conducted a renewable energy opportunity assessment and created a roadmap to reach 100 percent. We have milestones in place for on-site solar installations and for evaluating contractual agreements for larger off-site renewable projects, and have begun an assessment for a rooftop solar project at one of our corporate offices in Western New York. As a part of our efforts we joined the Clean Energy Buyers Association (CEBA).



### People's United Bank Signage Rebranding Project



Before



After

### 2019-2022 M&T Diversion\* (Pounds)



2019-2022 Legacy M&T Non-Diverted  
Waste change:  
**-14.9%**

\*Waste data will continue to be refined as a part of the merger between M&T and PUB.

Our goal of carbon neutrality by 2035 is based on our scope 1 and 2 emissions. The goal can be achieved through continued energy savings and fuel replacements. Residual emissions will be offset using credible and effective carbon offsets and/or carbon removals-only credits.

### Expanding our recycling to drive continuous improvements

During 2022, we began collecting and analyzing more granular waste data from our branches and offices. This effort allows us to make educated decisions to support sustainable waste management, as reflected in the pilot initiatives described below. Lessons learned will be applied to our overall footprint to help us achieve our 2025 target of reducing waste to landfill by 20 percent. This year, we are reporting for both M&T's legacy and our extended waste footprint due to the PUB acquisition, with a plan to re-baseline and re-establish our waste-to-landfill reduction target in the near future to reflect the recent acquisition.

### Recent recycling initiatives

The Think Green Resource Group (TG) conducted two different projects in 2022 to reduce waste across our branch footprint. The first initiative included an audit of 38 branches with existing recycling services across the Delaware region to illustrate maximum opportunities for diverting waste and minimum contamination of recycling streams. TG distributed signage and educational materials and held recycling contests across branches over a three-week period. Branches who submitted a photo of contaminant-free recycling bins were entered into a drawing to win

pizza for their branch. TG members also sent educational materials to the janitorial vendors servicing the Delaware branches to help ensure recyclable materials are disposed of properly and avoid common causes of contamination, such as disposing of recyclables in garbage bags.

In the second initiative, we added recycling services to 20 branches and offices throughout our footprint, which included branches in Maryland, New Jersey, New York, Pennsylvania, Virginia, and Washington, D.C. TG worked with waste management and property managers to determine if chosen branches and offices had sufficient space to add outdoor recycling totes/dumpsters, and proper indoor recycling bins. This was followed by educational outreach, similar to the process described above for the Delaware recycle project.

Branch employees were enthusiastic and supportive of the changes. While certain branches and offices continue to face challenges such as illegal dumping, tenant access of dumpsters, and employee turnover within the janitorial companies and branches, the TG initiatives found several opportunities to reduce non-diverted waste services after implementing recycling. The best practices identified will help branches implement waste reductions going forward. We anticipate completing an additional 20 branches in the first quarter of 2023, building on lessons learned from the 2022 initiatives.

In addition, for our People's United Bank Signage Rebranding Project, we recycled just under 100,000 pounds of primary materials (steel, aluminum, and plastics) in an effort to avoid sending materials to landfills.



### SPOTLIGHT

### Think Green

Our employee-led resource group, Think Green, promotes environmental sustainability at both the employee and organizational level. In 2022, Think Green had 842 members and organized 18 volunteer events. Since 2019, it has:

- Sponsored events to educate and encourage discussion on sustainable living, earth and animal preservation, climate change, diversity and inclusion, and green choices in the workplace
- Participated in cleanups, concerts, and community and neighborhood activities
- Worked with bank departments on green initiatives such as electronic document signing, digital conversion from paper initiatives, and recycling efforts
- Provided a network for employees to exchange ideas, news of local activities and events, suggestions, and clips on green issues from legislation to sustainable gift giving
- Played an active role in the Western New York Sustainable Business Roundtable to increase access to educational webinars, community networking opportunities, and workshops

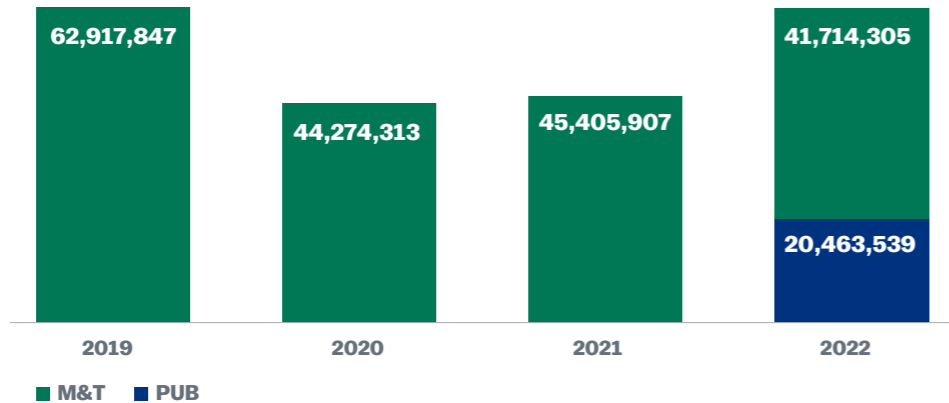
### Conserving and protecting water

Most of our footprint is between the Great Lakes and Chesapeake Bay, creating high awareness among our stakeholders of how our actions impact waterways.

We established our water reduction target (20 percent by 2025, from base year 2019) a year ago, and announced how we wanted to leverage our water usage data to identify further opportunities for capital investments. Around the same time, we started a pre-assurance review of our utility data, which was completed by mid-2022. This process

revealed challenges with units of measure for water consumption and conversion errors.<sup>9</sup> We have continued with regular spot-checks and made adjustments to correct units of measure. We are working closely with our utility data aggregator to establish controls and a robust data management process, in order to minimize future water reporting data errors. This year, we are reporting for both M&T's legacy and our extended water footprint due to the PUB acquisition, with a plan to re-baseline and reestablish our water target in the near future to reflect the updated water consumption data and the changes due to the recent acquisition.

### Water Consumption (Gallons)



2019-2022 Change Legacy M&T:  
**-33.7%**

### Clean transportation

To engage and empower our staff, we offer programs and benefits to help employees reduce their carbon footprints. For example:

- We work with formal carpool programs in the District of Columbia, Delaware, Maryland, Southern Pennsylvania, Virginia, and Western New York to encourage fewer vehicles being driven
- The Niagara Frontier Transportation Authority transit pass program offers generous discounts for M&T employees, incentivizing their use of public transport; during 2022, 509 employees took advantage of the discount, with greater engagement anticipated as pandemic restrictions and concerns ease
- We have partnerships in place with two bike commuter programs in our footprint: Reddy Bikeshare and NYC Citi Bike Bikeshare
- We offer 10 electric vehicle chargers at our Amherst Center (NY) free of charge for our employees and neighbors; during 2022, we worked on expanding electric vehicle charging options, and a project is underway to add an additional 24 electric vehicle charging ports at three more branches and offices in Western New York

### Measuring our impact

Consistent, transparent measurement of our environmental impact is essential to our accountability and action. We continue to focus on advancing our climate reporting, seeking better data, more transparency, and expanding what we are able to measure.





### Operational emissions

We began disclosing our direct (scope 1) and indirect (scope 2) greenhouse gas (GHG) emissions in 2020, reporting emissions from 2017 onward. In 2021, we refined our calculations, included new sources under scope 1 and 3 in our GHG inventory, and started to apply sub-region emission factors from the Emissions & Generation Resource Integrated Database (eGRID). In 2022, we continued to refine our GHG inventory and reviewed new sources to add, allowing us to consider the GHG Protocol's Corporate Standard.

In 2022, we saw two impacts to our emissions: increased activity at our branches and offices compared to 2020/2021 and the acquisition of People's United Bank (PUB), which significantly increased our operational footprint with new branches and offices in New England.

With the acquisition of PUB, we automatically triggered the recalculation of our emissions baseline per the guidance incorporated into our newly established M&T Greenhouse Gas Inventory Management Plan (GHG IMP). Our plan requires the examination of the baseline whenever there is a change that alters any material data point by 5 percent or more. To show the progress on our first set of goals and targets, we will include PUB metrics as a separate line for 2022. We will continue to report on the consolidated entity going forward with the establishment of a new baseline and any necessary updates to our water and waste targets.

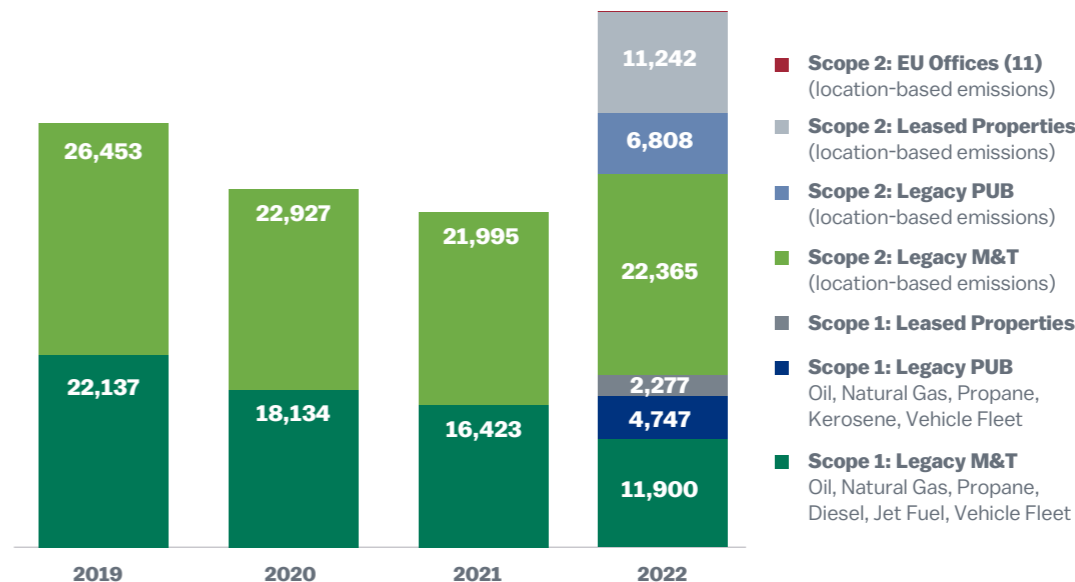
We conducted a pre-assurance review in mid-2022 to identify gaps related to our processes for the identification, collection, measurement and reporting of our GHG emissions. Additionally, we worked with our third-party data providers to establish a more robust data management process, including documenting the estimation methodology and unit conversions used. In order to track our process, our GHG IMP ensures that we are aligned on key facets of our inventory development, such as organizational and operational boundaries. We engaged a third-party to perform a limited assurance engagement over certain GHG emissions and electricity consumption metrics within our inventory for the 2022 reporting year. Our management assertion and the external report can be found [here](#).

### Value-chain emissions

Our greatest impacts—both positive and negative—on the climate are and will be through our loans and investments. We want to play a constructive role in charting a low-carbon future in collaboration with our customers and measuring and disclosing our financed emissions will inform this work.

In March 2022, we joined the Partnership for Carbon Accounting Financials (PCAF), an industry-led initiative that is developing and implementing consistent and transparent standards around the calculation and reporting of financed emissions (Scope 3: Category 15-Investments). We are working toward the disclosure of our financed emissions, and during 2022, we began the process by identifying data sources and conducting initial analysis on three asset classes.

### Scope 1 and Scope 2 CO<sub>2</sub>e Emissions, 2019-2022 (Metric tons)



Legacy & PUB breakouts are available on page [83](#) in the Appendices.

### 2019-2022 Change Legacy M&T:

**-29.6%**

### Preparing for non-voluntary reporting

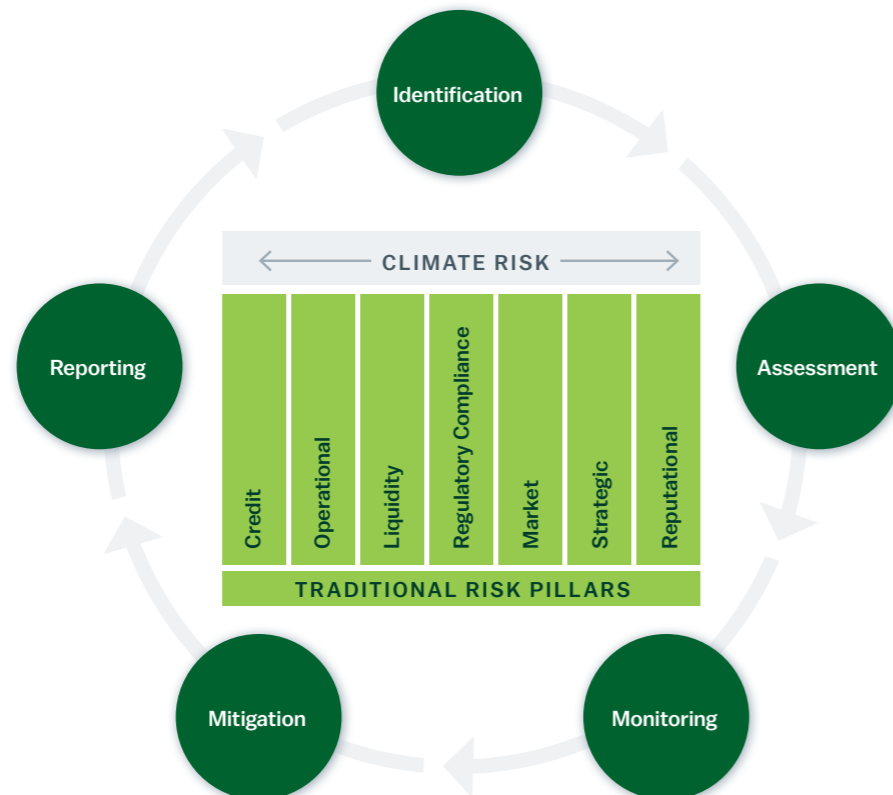
Following the release of the Securities and Exchange Commission's (SEC) Climate Disclosure Proposal, we brought together a cross-functional team to conduct an in-depth readiness assessment. This effort led to the creation of a plan to prioritize work, mitigate gaps, and ensure increased readiness to comply. Within this work, we conducted an assessment of scope 1 and 2 processes and an assessment of scope 3 emissions to determine which sources could be material for disclosure under the proposed guidance.

To align with recently updated best practices, we shifted our organizational boundary, switching our carbon accounting methodology from operational control to financial control method, as defined in [The Greenhouse Gas Protocol—A Corporate Accounting and Reporting Standard, Chapter 3 Setting Organizational Boundaries](#). As a result of the shift in methodology, we have not restated years prior to 2022, which remain aligned to the operational control method. We are assessing our fugitive emissions to determine whether they meet our threshold for inclusion into our GHG Inventory.

## Integrating Climate Risk into Our Risk Framework

M&T Bank has continued our commitment to enhancing our capabilities to identify, measure, monitor, and mitigate climate-related risks to ensure our safety and soundness and to better inform us of the impact climate risk may have on our customers. Such risks include both acute (immediate) and chronic (long-term) physical risks, as well as risks that may manifest from efforts to transition to a low-carbon economy.

As we continue to actively formalize our climate risk infrastructure, we are identifying and assessing the various climate risks posed to the organization. We believe that climate risk is transverse and impacts numerous pre-existing risk disciplines (see diagram below). We are leveraging our learnings in our pursuit to improve data, assess risk, develop metrics, and perform scenario analysis, all of which serve as key tools that will be necessary to properly manage climate risk.



### Governance

M&T's multi-tiered risk governance committee structure plays an essential role in the oversight and governance of climate risk. This includes proactive risk identification, developing an aggregated view of risks, and providing consistent climate governance across M&T.

### Board oversight

The Risk Committee of the Board of Directors established the risk management infrastructure to ensure adherence to the company's Enterprise Risk Framework, which identifies climate risk as a key risk category for the bank. The Risk Committee of the Board (Risk Committee) is comprised of a select group of Board members established by the Board to assist in its oversight of all risk management activities, including the oversight of the Climate Risk Framework. The Management Risk Committee (MRC) is responsible for managing risks across the enterprise by establishing or guiding significant strategies, policies, procedures, and processes to identify, assess, measure, manage, monitor, and report the major risks facing the organization, including climate risk. The MRC is chaired by the Chief Risk Officer and serves as the executive level committee responsible for the implementation and oversight of the Enterprise Risk Framework. The committee is comprised of executive leadership across the three lines of defense, and MRC is responsible for ensuring all risks, including climate risk, are appropriately incorporated into our risk framework. The MRC periodically receives updates on climate risk from the bank's Climate Risk Officer.

### Board Oversight



### Operational Risk Committee

The Operational Risk Committee was established by the MRC for the purpose of overseeing the company's Risk Framework, governance, and oversight of operational risk practices across the enterprise and serves as the primary committee to evaluate and review the effectiveness of the bank's Climate Risk Framework through updates provided by the Climate Risk Officer or Head of Enterprise Risk Management.

### Climate Risk Working Group

The Climate Risk Working Group was established by the bank's Operational Risk Committee during 2022 to aid in the governance and review of the bank's oversight of climate risk and is comprised of team members across various areas in the company who monitor for climate risks. Led by the bank's Climate Risk Officer and Climate Risk Senior Advisor, the Working Group serves as a central communication forum to disseminate information as needed throughout the organization and assist in the development of enhancements and improvements to the climate risk infrastructure.

### Strategy

In 2017, the Task Force on Climate-related Financial Disclosures (TCFD) released its recommended guidance for a consistent framework for disclosures regarding the impacts of climate change. In December 2021, we signed on as a TCFD supporter, and as of December 2022, there were 4,000 supporters in over 100 jurisdictions around the world. The core TCFD recommendations are disclosures around Governance, Strategy, Risk Management, and Metrics & Targets. Practices

the bank has employed to address Governance, Strategy, and Risk Management are covered in this section. Metrics & Targets is the subject of the Reducing our Carbon Footprint section, as well as the Planet section of the ESG index in [Section 1](#) of the Appendices.

In 2022, M&T appointed a Climate Risk Officer to oversee the newly formed Climate Risk Management Team (CRMT). The team is responsible for overseeing the integration of climate considerations into the Enterprise Risk Management Framework and for providing guidance to business lines on the way in which climate risks and strategies are assessed and developed. CRMT includes a Senior Climate Risk Advisor and individuals who provide critical data analysis support.

As recognized by many other financial institutions, we acknowledge the inherent industry-wide challenges in areas such as data and the lack of consistent assessment and measurement methodologies. Despite these challenges, we believe it is critical that we continue to improve our competency, knowledge, and tools necessary to identify, measure, monitor, and mitigate climate risk and integrate the necessary risk management practices into our risk framework. To that end, we believe that active engagement with other financial institutions and the regulatory community is vital to monitoring best market practices and understanding regulatory expectations and in supporting our customers and communities through the challenges that may manifest from climate change. We are active members of the Risk Management Association (RMA) Climate Risk Consortium, the Bank Policy Institute (BPI) Climate Risk Working Group, and the American Bankers Association (ABA) Climate Risk Working Group.

## Priorities

### 2022 Achievements

- Increased staffing resources and improved annual training on climate risk
- Established our initial climate risk inventory and completed an internal Climate Risk Identification and Assessment Report
- Engaged in a vendor selection process to pursue enhanced analysis of physical and transition risk
- Considered/reviewed enhancements to CCAR Idiosyncratic Event Scenario library specific to near-term climate events
- Established the Climate Risk Working Group within our Risk Governance Framework
- Incorporated climate risk into Management Risk Committee and Risk Committee of the Board charters
- Updated the Board of Directors on all climate risk activities

### 2023 Areas of Focus

- Complete an updated Climate Risk Identification and Assessment Report inclusive of the post PUB conversion footprint
- Initiate scenario analysis activities with initial focus on exploring transition risk impacts to commercial borrowers when considering the Network for Greening the Financial System (NGFS) scenarios
- Complete vendor trial(s) related to the enhancement of physical risk data
- Formalize our climate risk framework (e.g., ensure procedures are documented; data feeds and pertinent controls become business as usual)
- Continue to closely monitor regulatory developments from federal and state agencies, including the Federal Reserve Board (FRB) and the SEC
- Conduct a Capabilities Assessment of the methods employed in the FRB Pilot Climate Scenario Analysis Exercise
- Continue collaboration with peer community (RMA Climate Risk Consortium, BPI Climate Risk Working Group) and ESG partners
- Explore building partnerships with universities and colleges within our footprint to further the study of the impacts of physical and transition risks



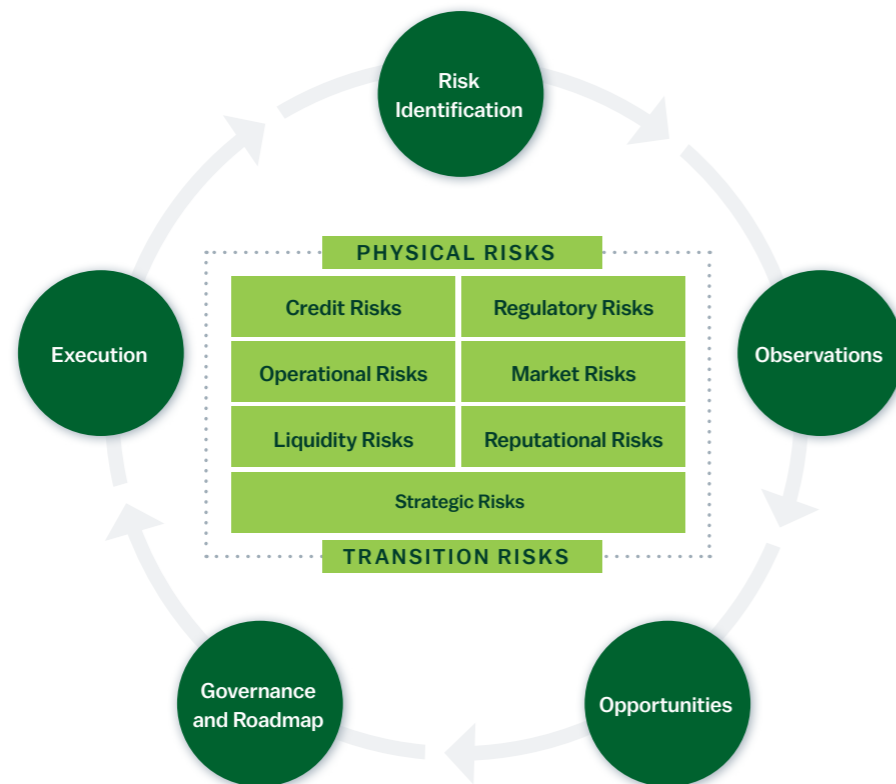
## Risk management

### Identification of climate-related risks

The financial impacts that result from the economic effects of climate change and the transition to a lower carbon economy pose an emerging risk to the safety and soundness of financial institutions. These risks include both the physical risks and transition risks associated with climate change.

The CRMT maintains an inventory of climate-related risks and continuously assesses how the various

business lines and the bank's customers will be impacted (see table on risk inventory examples on page 46). A key component of this work is the team's annual Climate Risk Identification and Assessment Report, which documents the identification, assessment, and prioritization of climate risks based upon currently available tools and data. The risk inventory for the report was created through engagement with stakeholders within Credit Risk Management, Consumer Lending & Mortgage, and Commercial Banking.



### Assessment of transition risk

Transition risks refer to stresses to institutions or sectors arising from the shifts in policy, consumer, and business sentiment, or technologies associated with the changes that would be part of a transition to a lower carbon economy. The Network of Central Banks and Supervisors for Greening the Financial System (NGFS) has developed scenarios that represent transition pathways. Such pathways are intended to highlight the potential outcomes of the pace and organization associated with the transition to a low-carbon economy. In accordance with these concepts, a slower transition to a low-carbon economy may limit the financial impact to higher GHG emitting sectors in the near term. However, such a transition may increase physical risks resulting from increased GHG emissions and the disorderly nature of an attempt to quickly transition during the next decade.

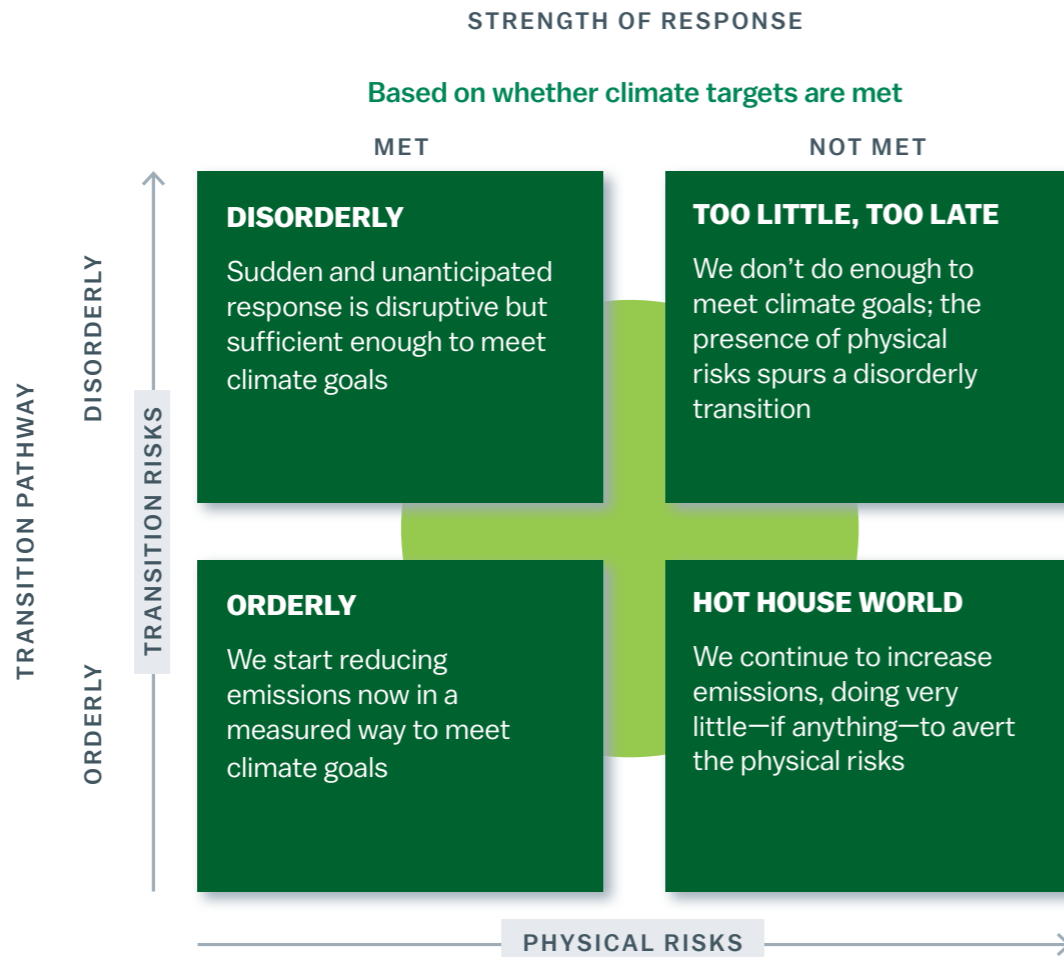
We analyzed our Commercial and Industrial Portfolio from the lens of transition risk and identified a few key considerations:

- The bank does not maintain a significant percentage of higher transition risk customers in its Commercial and Industrial (C&I) portfolio
- Underlying transition risks could create challenges for the bank in the future, such as supply-chain impacts and transfer of risk within the financial services industry
- Our customers are exposed to a varying degree of transition risk manifesting from a transition to electric vehicles (e.g., impact to the traditional manufacturer/dealer model, auto part suppliers, gas and convenience stores, etc.), remaining a key long-term area of focus

### Transition Risk Key Categories and Examples

Category	Example
<b>Policy and Regulation</b>	<ul style="list-style-type: none"> <li>• Tax credit incentives to change consumer behavior</li> <li>• Carbon Tax on Greenhouse Gas Emissions</li> <li>• Regulations that require changes to building standards and requirements</li> </ul>
<b>Technological Advancement</b>	<ul style="list-style-type: none"> <li>• Increased reliability and decreased costs associated with solar and wind power</li> <li>• Improved performance of battery technology</li> </ul>
<b>Consumer Preference</b>	<ul style="list-style-type: none"> <li>• Preference to pay for goods produced through sustainable methods</li> <li>• Personal efforts to reduce carbon footprint (e.g., electric vehicle purchase)</li> </ul>

## The Network for Greening the Financial System Forward



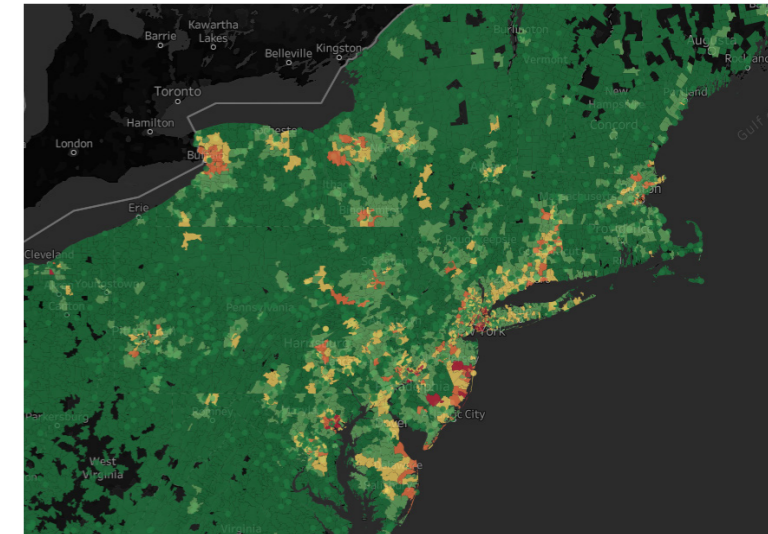
CRMT has partnered with an industry expert to evaluate how a transition to a greener economy will impact the various industries and customers that the bank serves. Developing an understanding of which industries are likely to be constrained (or grow) with the shift to cleaner technologies is critical to assisting our customers with the transition.

The next phase of transition analysis will include researching new ways to improve our assessment and measurement of the potential financial impact of transition on our customers, and begin efforts to determine how best the bank may assist them with their varying needs in an effort to mitigate potential loss.

### Physical risk

Physical risks refer to harm to people and property arising from acute, climate-related events, such as hurricanes, wildfires, floods, and heatwaves, and chronic shifts in climate, including higher average temperatures, changes in precipitation patterns, and sea level rise. Adverse effects could include potentially disproportionate impacts on the financially vulnerable, including low- and moderate-income (LMI) and other disadvantaged households and communities.

We continue to improve our abilities to identify, measure, and monitor physical risk to our clients, including early efforts to consider the likelihood of 18 natural hazards in order to identify regions and areas with increased risk. Some of the physical risks considered are coastal flooding, riverine flooding, hurricanes, heatwaves, and wildfires. A snapshot of the results for the Northeastern United States is depicted above.



Physical Risk Heatmap for Northeastern United States.

This initial mapping exercise has highlighted for us more concentrated risks in metropolitan areas, along coastlines, and in areas of more dense lending concentrations. We were also able to conclude that flood risk is likely the most significant physical risk that impacts our communities and customers. The next phase of analysis will include exploring improved geographic specificity of physical risks.

### Operational risk considerations

In 2022, we established a Crisis Management Office to create action plans in the event of extreme risk to the bank caused by weather events, technological events, or man-made threats. The CRMT is working closely with the Crisis Management Office to identify acute climate risks that may require a rapid response plan. These plans are critical to

## Risk Inventory Examples

Risk types	Definitions	Physical risk examples	Transition risk examples	Time horizons*
<b>Credit</b>	The risk to current or anticipated earnings or capital arising from an obligor's failure to meet the terms of any contract with M&T or otherwise perform as agreed	Borrower experiences loss of income or assets due to acute climate events or chronic climate changes, resulting in a reduced ability to pay	Borrower's industry experiences financial loss due to a global shift toward a greener economy, resulting in diminished ability to pay	Short Medium Long
<b>Interest Rate</b>	The risk to current or anticipated earnings (net interest income) or capital arising from movements in interest rates	Adverse weather events impact the time horizon of principal and interest cash flows	The shift to a low-carbon economy changes demand for banking products, resulting in changes to M&T's balance sheet and lending portfolio	Medium Long
<b>Operational</b>	The risk of failure to meet professional obligations involving clients, products, and business practices; damage to physical assets; business disruption and systems failures; data management failures and failures in execution, delivery, and process management	Adverse weather events damage facilities, thereby disrupting regular operations, potentially over extended time horizons	Higher costs to build low-carbon-emitting and climate-resilient facilities	Short Medium Long
<b>Compliance</b>	The risk of legal or regulatory sanctions, financial loss, or damage to reputation resulting from failure to comply with laws, rules, regulations, and other regulatory requirements and standards of self-regulatory organizations applicable to a banking organization	Acute weather events cause operational disruptions that adversely impact ability to meet regulatory timelines and requirements	Implementing new regulations on climate-related disclosures poses difficulty due to the need to overhaul internal processes to collect and store data necessary for reporting	Short Medium
<b>Strategic</b>	The risk to current or anticipated earnings, capital, or franchise or enterprise value arising from adverse business decisions, poor implementation of business decisions, or lack of responsiveness to changes in the banking industry and operating environment	Poor decision-making and strategy execution in areas with greater exposure to acute and chronic climate risks	Implementation of adjustments to M&T's strategy that are not in line with changing regulations and market shifts toward a low-carbon economy	Medium
<b>Reputational</b>	The risk to current or anticipated earnings, capital, franchise, or enterprise value arising from negative public opinion	Inadequate response to acute climate events that impact customers and employees invites stakeholder scrutiny	Failure to support communities through a transition may result in negative publicity	Short Medium Long
<b>Market</b>	Reflects the change in earnings or capital from fluctuations in market factors such as variations in interest rates, market prices, credit spreads, macroeconomic conditions, monetary policy, and fiscal policy	Acute weather events disrupt energy supply, increasing the volatility in pricing of downstream commodities	Transition to a greener economy triggers inflation and results in changing interest rates	Medium Long
<b>Liquidity</b>	The risk to meet M&T's financial obligations when they are due, undertake new transactions, and the ability to access funding sources or manage fluctuations in funding level requirements	Acute weather events divert funds to support recovery efforts	Inaccurate pricing of assets due to various transition risk factors	Short Medium Long

\*Short: 0-5 years; Medium: 5-15 years; Long: 15+ years.



**“The December Winter Storm Elliott was ‘the big one.’ It was a once-in-a-generation storm for which no one could be completely ready, and it was clear early on that anyone who could pitch in, should. Given our size, we have some pretty special capabilities. So, once we determined that among the needs of the city was figuring out how to feed first responders, it was pretty much a no-brainer to do just that. And while it was a service that was needed and was clearly appreciated by the first responders, I have to say that those delivering the service also appreciated the ability to help in their own way. We couldn’t drive snowplows or man police and fire teams, but we could help out those who could, hopefully making the first responders more effective than they might have been without our help. In any event, we sent them a message that we appreciate their service to our community.”**

Keith Belanger, Head of Corporate Services

our operations and to providing those services necessary for our customers and communities.

To effectively manage such risks, we have made a large capital investment in backup generators and upgraded our communication and information infrastructure at critical facilities in Western New York and locations across the Mid-Atlantic. A robust work-from-home capability for the majority of our non-branch employees further mitigates risk. Our current focus and future priorities are assessing M&T offices and branches in relation to physical risk data, maintaining and hardening our physical infrastructure to withstand severe weather, enhancing our technology to provide even better tools for remote work, and creating office hoteling spaces for our employees to further enable flexible working.

### Looking forward

We are constantly continuing to evaluate and execute on the different ways we, as a community-focused bank, can play our part in tackling climate change. While climate is our current environmental sustainability focus, we do recognize how biological diversity is an emerging focal area among the interconnected areas that correspond to preserving the planet. Biodiversity is also by itself a vital part of the climate equation. In an effort to address our environmental impacts in a more holistic way, we will closely monitor and assess the work already being conducted by organizations such as the Taskforce for Nature-related Financial Disclosures (TNFD) and Science Based Targets Network (SBTN) to deepen our understanding of potential risks and opportunities across our footprint.

### PLANET ENDNOTES

- <sup>1</sup> World Meteorological Organization, Press Release Number: 12012023
- <sup>2</sup> OFR’s Annual Report, page 9: <https://www.financialresearch.gov/annual-reports/files/OFR-Annual-Report-2022.pdf>
- <sup>3</sup> Bloomberg NEF article, <https://www.bloomberg.com/news/articles/2023-01-26/clean-energy-fossil-fuel-investment-tied-for-first-time-in-2022>, 01/26/23
- <sup>4</sup> U.S. Energy Information Administration—EIA - Independent Statistics and Analysis: <https://www.eia.gov/todayinenergy/detail.php?id=55960>, 03/27/23
- <sup>5</sup> Pub. L. 117-169, Aug. 16, 2022, 136 Stat. 1818
- <sup>6</sup> Annual Energy Outlook 2023, [https://www.eia.gov/outlooks/aeo/pdf/AEO2023\\_Narrative.pdf](https://www.eia.gov/outlooks/aeo/pdf/AEO2023_Narrative.pdf), March 2023
- <sup>7</sup> See the Governance section for a detailed description of our overall enterprise risk framework as well as ESG-specific governance
- <sup>8</sup> In 2021, the average annual electricity consumption for a U.S. residential utility customer was 10,632 kilowatthours (KWh), EIA: <https://eia.gov/tools/faqs/faq.php?id=97&t=3>
- <sup>9</sup> We revised 2019-2021 water data, please see the planet index

TOGETHER WE WILL

# connect

## NURTURING OUR PEOPLE

We strive to create a highly engaging work experience that drives employee satisfaction and empowers our team members to unlock their true potential and achieve their personal and professional goals.

At M&T, our people are our greatest asset. As talented and purpose-oriented individuals, they are key difference makers in helping us deliver on our purpose: making a difference in people's lives. In turn, our focus on the Sustainability Priorities highlighted on the next page ensure we create an environment that effectively supports their efforts and makes M&T a fulfilling place to work.

As a community-focused bank, the foundation of the value we provide to the communities we serve is built upon deep and positive relationships—with our customers, community members, and colleagues. In order to build and nurture those relationships, our colleagues must feel supported by the organization. Our vision is to help make our employees' lives better, so they can provide

the best possible experience to our customers and communities. Our employee experience is inextricably tied to our customer and community experience and is the cornerstone of our community-focused bank model.

Our holistic human capital management delivery model combines the expertise of various Centers of Excellence including Total Rewards; HR Shared Services and Employee Relations; Talent Acquisition; HR Business Support; Learning and Development; and Diversity, Equity, and Inclusion. Together, these services provide a support framework to enable our employees to bring their best selves to work, provide the best customer experience for our customers, and engage in the highest service to our communities.



**“Our mission at M&T is to be the bank of choice for diverse customers in every community we serve, be a workplace where our colleagues truly feel like they belong and can be their authentic selves, and create diverse leadership pipelines at all levels to reflect our broader employee base and our communities. Everything we do to invest in our colleagues is in service to this mission. The interconnectedness of our employee well-being and success in our communities underscores our role as a community-focused bank.”**

Tracy Woodrow, Chief Administrative Officer



## Our Sustainability Priorities



### Attract, Develop & Retain Talent



### Colleague, Leadership & Customer Diversity



## Key 2022 People Statistics

# 30,074\*

personnel trained through  
M&T programs

# 284

colleagues in a leadership  
development program

# 43

employees joined the  
organization through  
apprenticeship programs  
since 2020

# 9.5

years of average  
employee tenure

\*Number includes any personnel (employees and contingent workers) who completed a training in 2022 regardless of employment status at 12/31/22.

## Welcoming Our New M&T Colleagues from People's United Bank

Just over a year after announcing the planned acquisition of People's United Bank (PUB), M&T completed the deal on April 1, 2022, welcoming almost 4,500 new colleagues to the M&T family. As M&T entered new markets through the acquisition, we built upon the strengths of those communities and their workforce to complement them with our own existing team. M&T, like People's United Bank was, is a bank built for communities. Our relationships with businesses and borrowers are founded on local knowledge and the strength of our talent.

### Integrating into M&T culture while preserving the PUB spirit

Leading up to, during, and after the conversion, we sought to build trust with our new PUB colleagues, establish awareness and understanding of the M&T culture for former PUB employees, and understand PUB's cultural elements that would further strengthen our own. To do this, we used change management best practices, deployed

frequent communications, leveraged managers and key influencers, and recognized individuals for their successful adoption of the M&T culture.

Our "One Culture" team, made up of senior leaders, HR Centers of Excellence, and employee champions, came together to support the transition from two organizations to one. Some of the support they provided included:

- Hosting a targeted Senior Leader Onboarding Event in April 2022 for 80 PUB senior executives
- Holding town hall meetings to explain benefits and conversion activities to PUB employees
- Focusing on the legacy PUB employee experience through the conversion process by conducting pulse surveys, identifying opportunities for continued alignment, and action planning
- Providing spot awards to new colleagues demonstrating M&T values and going above and beyond to assist customers throughout conversion



M&T employees at the Bridgeport Center job fair in Bridgeport, CT.



Throughout 2022, special consideration was given to hiring efforts within the PUB footprint and support for non-retained PUB employees, including:

- Holding town-hall-style meetings to advise of severance eligibility and criteria to receive, outplacement/career transition services eligibility and timing to commence programs, preferred consideration for available M&T positions, and employee benefit impacts
- Maintaining preferred consideration for open roles at M&T for all PUB non-retained employees
- Providing outplacement and career transition assistance including one-on-one consultative services focused on developing résumés, building personal brand, interviewing techniques, and networking opportunities
- Holding sponsored employer webinars to highlight opportunities that exist within M&T and externally
- Making available one-on-one conversations with M&T recruiters regarding career interests and available openings
- Hosting virtual and in-person career fairs open to the general public with early admission hours for PUB non-retained employees

## Attracting and Recruiting Talent Throughout Our Footprint

Recruiting top-tier talent to M&T is vital to our success. We use various channels to effectively identify and recruit high-caliber talent throughout our footprint and beyond and focus on providing a positive recruiting experience. In addition, we leverage candidate experience surveys to continually improve the applicant experience. Talent attraction is the first step in creating a valuable relationship with our employees as they consider M&T for their next role.

### Attracting talent

M&T strives to create and maintain diverse representation at all levels and in all areas of the organization to promote a sense of belonging among employees and maintain a workforce that reflects the communities that we serve. Our recruiting efforts focus on achieving diversity among a variety of factors, including but not limited to race, gender, educational background, perspective, life experience, culture, and others.

One way that we do that is through our Talent Acquisition Ambassadors (TAA) program. This program was implemented in 2020 and leverages a diverse group of employees from across the bank to help us recruit diverse talent. There are 48 employees throughout different business lines who have dedicated over 800 hours combined toward promoting awareness of M&T career opportunities within our communities. This includes representing M&T at career fairs and events, building relationships with candidates, and using personal connections in the community to drive awareness of new opportunities at M&T.



In partnership with Employee Resource Groups, our Employee Referral Program generated more than 12,500 job applications in 2022 and resulted in 23 percent of all new hires. This staff-led program helps drive diversity in recruiting, and we continue to look for targeted ways to extend our reach and help those in search of a new career with M&T.

Demographic reporting for our hiring is included on page 91 in the Appendices. For more on Employee Resource Groups, see page 64.

#### Partnering to attain diverse talent

We continually seek opportunities to expand our collegiate partnerships with universities and colleges with strong ties to our communities and a focus on supporting underrepresented populations.

In 2022, we partnered with Historically Black Colleges and Universities (HBCUs) including Bowie State University, Lincoln University, Howard University, Delaware State University, the University of DC, and University of Maryland Eastern Shore to recruit top talent. We also worked with nonprofit organizations such as the Thurgood Marshall College Fund and attended events including Wilmington, Delaware's 5<sup>th</sup> Annual HBCU Week.

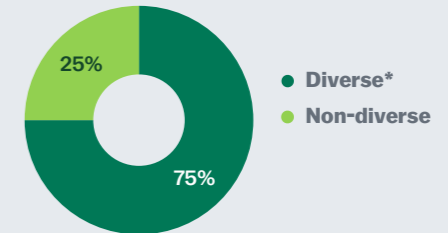
We seek talent by engaging with organizations to promote job opportunities at M&T, including:

- The Consortium<sup>®</sup>
- National Black MBA Association<sup>®</sup>
- Reaching Out MBA
- MBA Veterans<sup>®</sup>
- Prospanica
- National Society of Black Engineers
- Society of Hispanic Professional Engineers<sup>®</sup>
- Out in Science, Technology, Engineering and Mathematics (oSTEM)<sup>®</sup>
- Grace Hopper Celebration<sup>®</sup>
- Technica Corporation<sup>®</sup>
- Forte
- Department of Defense SkillBridge
- Hiring Our Heroes<sup>®</sup>

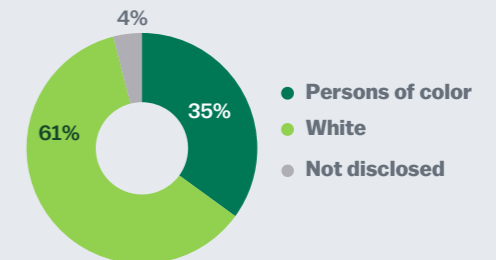
Through these partnerships, we attended more than 70 individual recruiting events, including hackathons and informational and networking sessions. The diverse audiences across these organizations and events included Black, Latino and Hispanic, and LGBTQ+ people; Veterans; individuals with disabilities; and women.

#### Referral Program Applicant Diversity Composition

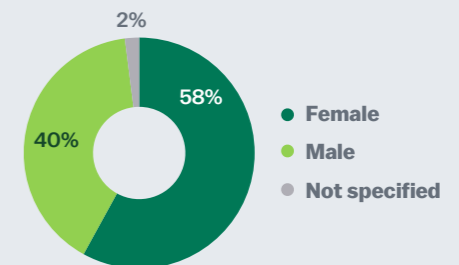
##### OVERALL DIVERSITY



##### RACE/ETHNICITY DIVERSITY



##### GENDER DIVERSITY



\*Diverse indicates women or persons of color.

### Cultivating a pipeline of talent

Using multiple outreach tactics and deep relationships with educational and institutional partners, we work throughout the year to supplement our talent pipeline with bright and talented students and recent graduates. Hiring early career talent helps us bring in new ways of thinking and diverse perspectives. We have several successful campus hiring and development programs that remain a popular entry point to M&T for new-to-career colleagues. In addition to being an entry point to the organization, these leadership development programs have a formal training curriculum and designated development days throughout the program, and they provide immediate access to peer support groups and senior management, with work on highly visible projects that add immense value to the organization.



## Talent Development Programs

### Management Development Program

Since 1983, this program has helped more than 1,500 talented and motivated students make a seamless transition from college to career with us. Participants join the bank in a range of roles and divisions, allowing them to immediately provide value and develop in-depth knowledge about particular business lines.

### Executive Associate Program

MBA graduates get a wide breadth of experience in an accelerated leadership development program. Since 1984, it has enabled hundreds of students to learn more about the financial services industry in general as well as how M&T is structured.

### Summer Internship

This 10-week paid program includes department-specific projects that provide exposure to bank leadership, training, networking opportunities, and early access to full-time roles.

*While our Management Development Program, Executive Associate Program, and Summer Internships place trainees in various roles across the organization, we also offer specialized campus and external hiring programs to develop talent in key areas of the business for specific roles and strategic skill areas. Those programs are detailed below.*

### Relationship Manager Sales Program

This program is designed to elevate the Business Banking acumen of new hire relationship managers with little to no Business Banking knowledge. It utilizes a combination of lectures, activities, and subject matter experts to enhance skills around prospecting, networking, financial analysis, and systems. Upon completion, the goal is for each associate relationship manager to have the ability to identify what is important to customers and understand the appropriate solutions in order to help them grow their business.

### Operations Development Program

Servicing two of our largest operations divisions, Banking Services and Customer Asset Management, this program welcomes recent college graduates and a small number of early-in-career colleagues. The curriculum is focused on leadership and operations skills that foster individual career growth and contribute to the organization's talent pool.

### Community Branch Management Program

Preparing early career talent for the dynamic role and multifaceted responsibility of being a branch manager, this program curriculum is designed to develop a steady pipeline of talent for the retail branch model, with training in talent management, business tenets, customer service, leadership, change management, and community advocacy.

### Technology Development Program

Focusing on recruiting undergraduates with software engineering experience, its aim is to expand our diverse pipeline of tech talent. A two-year rotational program, it is self-directed, allowing participants to build essential soft skills in concert with their job roles. 2022 welcomed our third Technology Development Program class. 51 percent of the class were people of color and 17 percent were women.

### Technology Internship Program

An immersive 10-week program that provides hands-on experience and channels students' passion for coding and learning into real-life impacts. On completion, interns are pre-qualified for our Technology Development Program.

## Nurturing New Talent Pipelines

### Supporting Veterans

This year, we continued our Corporate Fellowship Program, in partnership with the Department of Defense (DoD) SkillBridge and Hiring Our Heroes® (HOH) programs, for active service members who are within their last 180 days with the military.

DoD SkillBridge helps active service members discover opportunities for work experience and industry training before exiting the military. They can review positions available immediately or apply for development programs through third parties such as HOH.

The 12-week HOH Corporate Fellowship Program delivers the same valuable work experience and industry training, with additional career development opportunities and mentorship provided by HOH and the host company.

We are proud to offer these opportunities to service members and are piloting our program with direct hire positions on the DoD SkillBridge site and as a 2022 HOH Fellowship host company and look forward to continuing this partnership in 2023. To date, M&T has hired nine participants from the DoD SkillBridge and HOH programs following the completion of their fellowships.

In 2022, we dedicated internal resources to focusing on the Veteran job-seeking experience and creating new ways to reach out to Veterans, knowing that this population has a unique and valuable perspective to offer us as an employer.

### Investing in apprenticeship

Another way that we strive to make career opportunities at M&T more accessible to diverse talent is through our intentional investment in apprenticeship. Apprenticeships provide a model for talent development that incorporates on-the-job training and allows apprentices to “earn while they learn.” This model doesn’t require candidates to have an advanced education degree and gives untapped talent a shorter and more accessible path to starting or switching careers and earning a competitive salary.

This year, we welcomed our third class of apprentices to our Z Development Program (ZDP), an apprenticeship focused on training the next generation of mainframe technologists. The ZDP, a partnership with Franklin Apprenticeship and IBM®, aims to grow the talent pool for enterprise computing through IBM Z Mainframe System Administrator and Mainframe Application Developer Apprenticeship pathways. The role is ideal for people looking to switch careers and intended to bring new talent into the technology field. Apprentices complete many hours of pre-apprenticeship training, then receive ongoing learning opportunities as well as support from a system of managers, buddies, and mentors.

We also participated in the launch of a new and innovative youth apprenticeship program targeted to high schoolers in Buffalo, NY. Through a program called CareerWise Greater Buffalo, a partnership with CareerWise USA, Say Yes Buffalo, and the Buffalo Public School system, M&T committed to a three-year apprenticeship for nine graduating high school seniors interested in starting their careers while also earning college credit. The nine apprentices work part-time in various roles across the organization, including in technology, banking services, and customer experience, while attending Western New York-based schools for credit toward their apprenticeship. M&T has already signed on to participate in next year’s CareerWise Greater Buffalo apprenticeship program with plans to hire another cohort of apprentices in 2023.

### Seeking out local talent

Another way we are approaching building sustainable talent pipelines in a highly competitive market is through investment in local partnerships. These partnerships rely on nonprofits, trainers, and workforce development organizations within our footprint who work collaboratively with M&T to source, build relationships, and reskill the wealth of untapped talent in our own backyard.

For the past eight years, M&T Bank has been a key partner to Zip Code Wilmington, a not-for-profit that transforms motivated individuals from diverse backgrounds into skilled, professional software engineering roles through intensive 12-week bootcamps. Their programs for Software Developers and Data Engineers boasts a 95 percent graduation rate, an 85 percent job placement rate within six months of graduation, and a salary that is two to three times more than what the graduate was earning. Over the course of the partnership, almost 30 Zip Code alumni have joined M&T Tech as employees.

**“Since our founding in 2015, M&T has fully understood and embraced the transformative power that Zip Code’s programs provide. The bank continues to invest in our graduates as volunteers, collaborators, philanthropists, and most importantly, as employees.**

**M&T is a corporate partner that shares our values and commitment to the Wilmington community.”**

Lossie Freeman, Director of Corporate Partnerships, Zip Code Wilmington

# ~500

## Youth engaged through tech education initiatives

### Investing in the next generation of talent

When it comes to cultivating a pipeline of tech talent, we are taking a proactive and holistic approach, combining community outreach and tech skills education to reach top talent before they graduate high school. By fostering partnerships with local schools, nonprofits, and community groups, we have been able to extend our reach to middle and high school students, exposing them to careers in tech and helping them build foundational technology skills. In 2022, the Tech Academy launched a Youth Tech Talks series, an extension of its popular “Tech Talks” educational event series for M&T technologists looking to upskill on various tech topics. For the series, members of the Technology, Data, and Innovation community at M&T volunteered to visit local high school students and speak with them about careers in technology. In total, employee volunteers conducted 21 Youth Tech Talks impacting 320 students at seven different schools in Western New York, spanning topics such as cybersecurity, product ownership, agile practices, marketing, and more.

**“I believe that tech careers are the quickest way out of the students’ current situations and can provide a straight line into the middle class. I want to provide a roadmap for this kind of success to young people. When you give someone that spark, you can see their mind explode with ideas. I love being a person who can help do that for others.”**

Greg Cherry, Senior Software Engineer



Students show off their robots during Build-A-Robot Day, held at the Tech Academy.

Another way we bring tech education to youths is through M&T’s Coders Club, a five-week program during which students learn the basics of software development by creating a game in Scratch. The curriculum is designed and taught by M&T volunteers. This year’s program was conducted in partnership with Buffalo Prep and its Middle School Prep Program. In total, M&T volunteers connected with 121 students who are entering the sixth and seventh grades in the upcoming school year at a variety of Buffalo public and charter schools.

Over the summer, we welcomed 50 Buffalo middle school students in grades five through eight from various summer educational programs for Build-A-Robot Day. This event aimed to be inclusive, welcoming groups who are typically underrepresented in tech to participate in a fun, tangible STEM (Science, Technology, Engineering, Math) project.

### SPOTLIGHT

## New Pathways to Tech at the Tech Academy

In January 2022, in partnership with several of Buffalo’s largest employers and Buffalo-based nonprofit TechBuffalo, M&T’s Tech Academy launched a 12-week Data Analytics Bootcamp that upskilled 19 Buffalo community members. This first-of-its-kind collaborative talent program focused on developing technology talent locally and at no cost to participants. No technical experience was necessary to enroll, and students received a stipend to help cover the cost of some living expenses during the program.

The program was designed to serve traditionally underrepresented groups in technology, especially people of color and women. Of the students participating, about 52 percent identified as a person of color and 63 percent indicated their household incomes are below Erie County’s median income.

Upon completion, students delivered capstone presentations to regional employers showcasing their new skills. They also had the opportunity to apply for data analyst roles at the sponsoring companies. M&T hired five of the 19 graduates.



JahJah Quarles,  
Enterprise Data Specialist at M&T Bank

JahJah Quarles joined the Data Analytics Bootcamp following a seven-year career as a corrections officer in the state’s Department of Corrections, a role that helped prepare him to be a composed, critical thinker even in high-stress situations. JahJah was hired by M&T as an Enterprise Data Specialist following the Data Analytics Bootcamp.

# 83%

of students who applied to jobs after program completion have been hired full-time throughout Western New York

# 3 out of 19

students are continuing their training by enrolling in complementary training programs or full-time college programs

# 100%

program retention

# 61%

of the students who applied for jobs after program completion are employed with sponsoring partners

## Engaging Our Talent

### Listening and learning from our colleagues

M&T's commitment to recruiting top talent and regularly soliciting their feedback helps to create a highly engaged employee base that drives the company's success. Since 2001, we have conducted 17 Engagement Surveys, demonstrating a commitment to fostering candid, open and honest, two-way communication with employees to enhance the workplace. All survey results are reviewed with senior management and shared with individual managers, who identify and implement improvements based on employees' feedback, as well as presented to M&T's Board of Directors. Employees also participate in action planning within individual work groups. In 2022, 84 percent of our employees participated in the survey, including our new colleagues from People's United Bank.

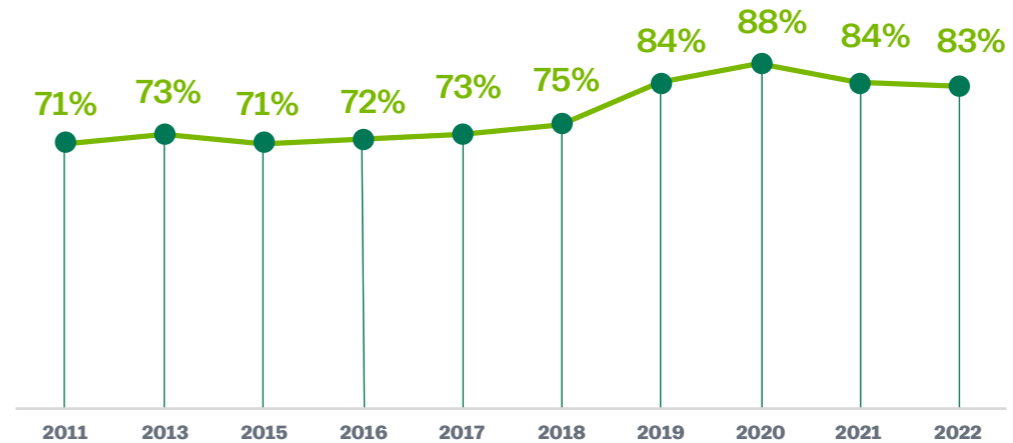
In addition to our Annual Engagement Survey, M&T conducts other surveys to monitor and guide the employee experience throughout an employee's time with the company. Life cycle surveys, such as at the crucial moments of employee onboarding and exit, are continuously conducted, in addition to pulse surveys related to numerous company priorities such as return to office, leadership performance, and more.

Following the acquisition of People's United Bank, we conducted a survey for this targeted population, assessing items such as feelings of belonging, training effectiveness, and collaboration. The results ensure the appropriate action planning is occurring to make M&T a place where all colleagues feel they can do their best work.

Some of the changes we have implemented using our various survey feedback include:

- Making improvements to the onboarding and training experience for new hires in the Retail branches
- Assisting employees in their return to the office and adoption of hybrid work schedules
- Rehauling our officer title structure for all employees (for more information on this change, see page [60](#))
- Implementing a Total Rewards educational campaign to create more transparency around the bank's compensation and benefit programs

### Annual Engagement Survey Scores from 2011 to 2022



### 2022 Annual Employee Engagement Survey Highlights

# 90%

feel their manager treats all colleagues fairly, regardless of their background

# 92%

believe the company is committed to ethical business practices

# 88%

feel good about the ways we contribute to the community

# 89%

report their team has a climate in which diverse perspectives are valued

# 89%

feel team members work well together

## Supporting Our Valued Team Members

### Nurturing through Human Resources

At M&T, it is important for us to ensure we have a thorough support framework of various teams for each of our employees to enable us to deliver the best work experience. Our Human Resources (HR) Business Partners have a thorough understanding of our organizational strategy and the talent needed by each department to excel. They liaise with leaders across the breadth of our business to ensure that our human capital strategy is being delivered in alignment with each business's needs.

The Employee Relations team provides staff and managers with guidance and tools to manage performance and behavior that meet our expectations of excellence. These include the Action Plan for Success, an interactive tool for managers to engage with employees who are struggling to achieve a higher level of performance and Corrective Action to address conduct issues. The Employee Relations team also manages bank-wide policies, helps to address issues from our confidential 24-hour Employee Complaint Hotline, and plays an important part in ensuring that appropriate employee assistance resources are available.

The Employee Experience team proactively maintains a holistic understanding of the employee experience through pulse surveys, the Annual Engagement Survey, and employee life cycle touch points (such as onboarding and exit), in addition to other feedback channels throughout the bank. The team works closely with HR Analytics to understand employee trends and utilizes different data points to identify and act on opportunities that make M&T a leading employer.

Finally, our HR Direct team is available to all employees to answer any HR-specific questions and ensure employees have the information and the resources that they need to be successful.

### Maintaining physical wellness

M&T's medical plan helps colleagues receive and pay for treatment, manage their health with free preventive services and, most importantly, stay healthy and take care of their families. We are committed to sharing that responsibility. Our medical plan is supported by concierge vendors to help employees navigate the challenges of health care. A single medical plan allows us to manage services, resources, and costs throughout our footprint.

Colleagues also benefit from the availability of healthy intervention options including access to the Foodsmart app, a digital nutrition platform, and various in-person and virtual events hosted by the MTBFit Resource Group, such as group walks, yoga, cooking classes, and guided meditations.

To maintain a healthy work-life balance, it's important that employees enjoy time to rest and relax. Our annual allowance of Paid Time Off (PTO) is determined by years of service and employment grade. In a recent survey sent to all employees, 80 percent of participants answered that they are satisfied or very satisfied with their annual PTO allotment.

We offer up to 12 weeks of Parental Leave. This pays 100 percent of base salary (or average commissions for commissioned employees). Employees returning to work from Parental Leave have the same job reinstatement protection as employees returning from family and medical leave. Break times are offered to nursing mothers, as well as private Nursing Mothers Rooms in buildings with 50 or more employees. In addition, M&T's benefits package also includes programs to support parents and families including access to Progyny's® Fertility and Family Building Benefit and Ovia Health®, two resources that support planning for fertility, pregnancy, and parenting.

We also offer other leave varieties including personal, medical, and military service.



### Supporting emotional and social wellness

Emotional health affects how we think, feel, and function. It also affects our ability to cope with stress, overcome challenges, and create a strong social support system. Therefore, we offer the following wellness programs:

- **Employee Assistance Program:** Free to employees and their dependents, this provides confidential support on a range of issues, including confidential counseling, financial resources, legal support, and work-life solutions, 24 hours a day, seven days a week.
- **Cleveland Clinic®:** Provides employees with free eCoaching programs such as Stress Free Now and the Clarity Program, which help manage overall well-being.
- **Teladoc®:** Telemedicine benefits for employees and dependents that are covered under the M&T Bank medical plan, available 24 hours a day, seven days a week, via phone or video. Behavioral health consultations with a therapist, psychologist, or psychiatrist are also covered at 100 percent with no cost to the member through 2024.





### Contributing to financial wellness

Security arises from ensuring you have resources to meet your needs, being in control of your day-to-day finances, and having the financial freedom to make choices that allow you to enjoy life and plan for the future. To help our staff enjoy that security, we provide the following opportunities:

- **401(k) Plan:** Available for all employees to join immediately. After completing six months of employment, we match the first five percent of contributions made to employee accounts on a biweekly basis.
- **Retirement Accumulation Account:** For eligible employees, M&T makes an annual contribution to this retirement savings program, based on the employees' total pay and length of service.
- **Discretionary Employer Contribution:** For eligible employees hired after January 1, 2020, the M&T contribution is based on total pay and length of service. The contribution level is determined annually and based on the bank's performance.
- **Employee Stock Purchase Plan:** This provides the opportunity to share in our growth and success. Eligible employees can purchase stock with a 10 percent discount through payroll deductions.

### Connecting colleagues to community

M&T also encourages colleagues to engage with our communities through the allotment of 40 hours of paid volunteer time per year. For colleague volunteerism numbers, see page [68](#).

### SPOTLIGHT

## In the Community with Software Engineer Wendy Saglime

It is M&T Bank's role in the community and the bank's volunteer opportunities that drew Wendy to accept a position at M&T Tech.

**"When I joined M&T, my recruiter told me about the 40 hours of time that each team member is given for volunteer work. As a mom with a young child at home and a baby on the way, it would be hard for me to find the time to volunteer. This benefit makes my community work possible.**

**I am always looking for ways that I can help, whether that is as a volunteer, working with the Tech Academy team on outreach, or sharing volunteer opportunities with my colleagues," Wendy added. "If I can be part of some kind of momentum that can change the narrative for my community...that is something that is really meaningful to me. I want my colleagues to know that there are so many opportunities to use our skill sets to make a difference."**



Wendy Saglime volunteers to teach coding to middle schoolers at the Buffalo Prep summer program through M&T Tech's Middle School Coders Club.

## M&T Leadership Competencies



### Creates Vision

Sets priorities and aligns people to them



### Inspires Followers

Energizes and mobilizes others to take action



### Builds Alliances

Creates opportunities through partnership and inclusion



### Influences

Gains buy-in without the use of position



### Delivers Results

Drives agility and accountability to elevate performance



### Develops Talent

Develops a diverse workforce for competitive advantage



### Innovates

Embraces diverse ideas and fosters a culture of change



### Grows Value

Understands our customers and the business of banking

## Developing Our People

At M&T, career development is an ongoing priority. Giving our colleagues the opportunity to develop their skills and grow their careers is crucial to our success as an organization. We want our employees to grow and succeed as team members, individuals, and members of our communities. We provide learning opportunities to enhance their knowledge, empower their performance, and maximize their positive impact.

### Using leadership competencies to strengthen talent efforts

Our development, training, career progression, and talent management programs are all built upon a consistent leadership competencies framework that has been adopted enterprise-wide. This framework is used in interviewing, providing feedback, giving recognition to colleagues, and creating clearer job descriptions. Our leadership training and development program curricula are also built upon the competencies to provide a clear path to development and growth across the organization.

Our Manager Acceleration Program is a required leadership curriculum designed for new managers and existing employees moving into managerial roles. It eases the transition to the role of a people manager, building strong foundations, and ensuring early success. It teaches managers how to support, motivate, and empower their teams to increase engagement and productivity. And it provides standardized management across all areas of our business, with a curriculum based on our leadership competencies.

## Training opportunities

Additional employee development is cultivated through a variety of learning offerings on topics such as technical skills, job-specific knowledge, and professional development, including courses aligned with the company's enterprise-wide leadership competencies. Training content is made available as synchronous, asynchronous, and blended learning solutions to promote employee access.

We want to provide training and development opportunities for every employee. Web-based and in-person training is available through our internal Workday Learning platform. Employees have access to hundreds of web-based training courses and instructor-led classes. These cover personal and professional development, leadership development, technical skills, and specialized options for specific roles.

We provide a suite of talent development programs for early career talent and existing high-potential colleagues (see page 59 for more details on these programs).

In addition, in 2021, we opened a facility dedicated entirely to technology training, called the Tech Academy, located within our Tech Hub in downtown Buffalo, NY. This facility houses three high-tech classrooms, a workspace, a café area for students, dedicated meeting space, and a lecture hall. This space is used for in-person and hybrid technology training and events designed to engage our technologists in Western New York and Wilmington, DE. Tech-focused community groups and training programs in Western New York targeted to underserved populations also use the space throughout the year at no cost to them as part of our commitment to making the space a community asset.

## 2022 Employee Training At-a-Glance

# 942

unique course offerings through M&T Learning

# 30,074\*

personnel trained through M&T programs

# 768,263

hours of training for M&T colleagues

# 33

average hours of training per employee

## Tech Academy Training At-a-Glance

# 50%

of Tech employees engaged

# 13,733

total hours spent in technology training through the Tech Academy

\*Number includes any personnel (employees and contingent workers) who completed a training in 2022 regardless of employment status at 12/31/22.

## Developing Leaders

We conduct multiple development programs to support and progress our colleagues through our business. Development program demographic reporting is included in the Appendices.

### Rising Leaders Development Program (RLDP)

is designed to build the diversity of our talent pipeline, with participation goals for women, people of color, and other diverse individuals. The 11-month program increases participants' leadership skills by focusing on leading change, customer-centricity, communication, personal branding, interpersonal leadership, and building connections.

**Emerging Leaders Program** identifies and trains high-potential talent within the Retail Bank to become Community Banking Regional Managers. This program provides broad-based leadership development to ensure that our Retail Bank has a robust pipeline of top talent that is adept at understanding and meeting the needs of their community while delivering business value for the organization.

### Senior Leadership Development Program,

our flagship program, selects participants with exceptional performance and potential who are later in career. The program incorporates training from our internal training teams with instruction from academic partner Cornell University and spans three nonconsecutive weeks with the following intended outcomes:

- Increase awareness of personal strengths and areas needing development
- Create strong leaders to drive collaboration across the business
- Provide access to the executive leadership team and other senior leaders
- Impart and apply skills based on our leadership competencies

Some of our campus recruiting programs focused on bringing new talent into the bank, such as the **Management Development Program, Operations Development Program, and Community Branch Management Program**, are also open to a small number of existing colleagues who demonstrate high performance and potential. A description of those programs can be found on page [52](#).

To encourage employees to take job-related or Center for Financial Training/Certified Financial Planning courses, we offer a Tuition Reimbursement Program. In 2022, 170 M&T employees participated in the Tuition Reimbursement Program, and the organization paid \$1,158,830 in tuition payments.

### Prioritizing talent and performance management

Another key pillar of engagement, employee development and growth, is fostered through M&T's strong performance management philosophy focused on reinforcing our corporate values; providing continuous, transparent feedback; and recognizing and rewarding outstanding performance.

In 2022, we made improvements to our talent and performance management system and cadence, including:

- We require managers to evaluate all colleagues using the 9-box talent rating system to evaluate performance and potential. Our completion rate in the first year of implementation was 99 percent.
- We launched a quarterly performance check-in process bank-wide, with manager and employee training to support the new process, resulting in increasing participation rates throughout the rollout, with 98 percent completion in the last quarter of 2022.
- We introduced a refreshed performance rating system to allow for increased transparency, equitable differentiation, and alignment to our Purpose and Values.
- We continue to evaluate the performance management process to create a more equitable system for all employees. This ongoing process improvement work is informed by results of the employee journey mapping conducted between 2020 and 2022 for Black, Latino, and Hispanic employees at M&T. Read more about the work on page [63](#).



### A revised structure to ensure an equitable experience

Our organization is growing and evolving, and we must continually reevaluate the way we do business to ensure that our processes are sustainable, equitable, and competitive in the market. As we create the best environment to attract, retain, and develop talent, we took steps in 2021 to review our corporate officer title structure, based on feedback elevated from employees through our employee listening tools.

In early 2022, the following changes to our corporate title structure were made:

- Consistent, transparent, and equitable assignment of officer titles, which will be automatically granted to employees based on job grade
- A flatter management structure, which will facilitate more empowerment and agile ways of working by reducing officer title layers from seven to five

These program updates better align job roles and corresponding officer titles with peer organizations, with the added benefit of freeing valuable time for our leaders to focus on other high-impact activities.

### Recognizing and rewarding talent

Compensation at M&T reinforces our purpose and values, engages our colleagues, and maximizes long-term performance. These elements combine to create a competitive package targeted around the market median for our sector.

We conduct regular and extensive market benchmarking to establish competitive salary ranges. This, in turn, enables us to attract, motivate, and retain talent with the experience, qualifications, and performance that align with our organization's overall talent strategy.

Competitive base pay and short-term and long-term incentives are the basis of our pay-for-performance strategy. Short-term cash incentives motivate staff to attain organizational and business unit goals. Long-term incentives—namely stock—drive retention and align the success of our employees with the long-term success of the organization and our shareholders.

### Maintaining fair and equitable pay

Equitable pay is simply the right thing to do. Compensation practices for hiring and internal mobility are designed to ensure the fair and equitable treatment of our employees. We regularly assess internal pay levels and external labor market trends to ensure M&T provides fair, equitable, and competitive compensation opportunities. As a result of the most recent assessment, our base pay structures and certain pay practices were adjusted in July 2022.

These changes reflect the rapid evolution of our company, the financial services industry, and the broader external labor market, and they help us to attract, motivate, and retain the best talent in our industry. Base pay structures and pay practices were refreshed in 2022 to reflect:

- Increased internal minimum pay rates of \$18–\$21 per hour based on geography (up from \$15–\$18 per hour)
- Increased minimum and midpoints for base pay ranges
- Base pay increases for nearly 12,000 employees in non-commissioned roles to align their pay with the new internal minimum pay rates and the refreshed pay grade structure

As a result of these changes, nearly 12,000 non-commissioned employees received an increase to their base pay. The increases were directed toward employees whose current pay falls below or remains lower in the updated salary ranges. Through our annual compensation cycle, regular pay equity reviews, and other actions, we continue to invest in our talent, considering the organization's financial performance and individual employee performance and talent attributes.



### Recognizing and rewarding excellence

Recognition has a proven effect on employee engagement, which in turn results in better performance and positive business results. We believe in recognizing the unique contributions and efforts of our employees in meaningful ways:

- Our colleague-to-colleague and customer-to-colleague “High 5” recognition program recognizes employees who embody our corporate values and behaviors
- Our ANDY Awards recognize employees who embrace a “customer first” mindset
- Our service anniversary gifts and recognition ensure that we celebrate the moments that matter for our employees

**SPOTLIGHT****Creating a Career at M&T**

When Lydia Frechette started her career journey at M&T in 2014, she wouldn't have guessed she would eventually become a Wealth Fiduciary Advisor with Wilmington Trust and challenge herself to study for the American Bankers Association Certified Trust and Fiduciary Advisor (CTFA) professional designation. But she has always known that she has an internal drive for getting to that next step. "I go for things," she said about how she has approached her career.

Lydia started in Customer Asset Management in Buffalo, NY. While she liked the work, she was looking for support to challenge herself and take the next step in her career. Leveraging the African American Resource Group at M&T, she began honing her leadership skills as a member of the group's Steering Committee and seeking out volunteer opportunities through M&T's dedicated volunteer hours benefit for employees. She credits these opportunities with introducing her to colleagues across the organization and helping her understand other roles and careers within M&T.

Lydia Frechette  
Wealth Fiduciary Advisor



When an opportunity came along to participate in a pilot sponsorship program (that would later become the EquityOne program, described on page 63), she jumped at the chance to invest time in building her network at the organization. With support from her network, she found a position that excited her and was eventually promoted to Wealth Fiduciary Advisor. In her career journey, she has also found time to dedicate to learning through the relationships she has built in the organization and through more formal learning resources, internal and external to the organization.

Throughout the process of studying for the CTFA, which is grueling at times, Lydia grounds herself in the philosophy she learned from an M&T colleague: strive to balance purpose, passion, and pay in your life. Through a combination of the challenge of her day-to-day role, investment in learning and development, employee resource groups, and paid time off, Lydia is creating the life and career that fuels her.

**Creating opportunities for our colleagues**

One area where we hope to expand our impact is in creating a system of opportunities for our existing colleagues. Making improvements to our internal hiring process has been a focus area for us in 2022 and will continue to be a focus area for us in the years to come.

In 2022, using feedback from internal candidates, improvements were made to the internal job application process and supplemented by additional training for managers and recruiters to provide actionable feedback and career support for internal candidates. Our Career Hub and Career Marketplace on our internal Workday system offer opportunities for employees to view open jobs, create a talent profile, connect with a mentor, and build a career path.

**Innovating on the colleague experience**

Improving opportunities for internal talent was identified as such a big strategic focus area that we centered the efforts of our newest talent on the challenge. In the spring, more than 125 members of M&T's leadership development programs came together for the bank's first-ever Leadership Development Program sprint. Innovation teams made up of members of our Executive Assistant Program, Management Development Program, and Technology Development Program were challenged to create programs that help attract and retain talent and would also aid in career development. In total, the teams developed 276 concepts. A narrowed field of finalist groups presented to a panel of senior leaders and three concepts were chosen for incubation.

## Promoting Diversity, Equity, and Inclusion (DEI)

### Colleague and leadership diversity

We are unwavering in providing employment opportunities without regard to applicants' race, color, national origin, religion, ethnicity, sex, gender identity, sexual orientation, age, disability, citizenship, pregnancy status, Veteran status, military status, marital status, genetic information, or any other characteristic protected under applicable federal, state, or local laws. This applies to all terms and conditions of employment, including, but not limited to, recruiting, hiring, placement, training, promotion, compensation, and termination. More on diversity in our recruitment practices can be found on page [50](#).



Colleague, Leadership & Customer Diversity



## Diversity Vision 2025

We will have diverse leadership at all levels, so employees feel like they truly belong. This will enable us to be the clear bank of choice for our diverse customers in every community where we choose to do business.

### Identifying our DEI vision

Through people-centric interviews, focused on our employees' and customers' concerns and opportunities, we identified areas that we needed to address to become a leader in DEI.



**“The transformation of our culture is underway, fueled by tangible shifts in attitudes, mindsets, and behaviors of our leaders at all levels of the organization. DEI is no longer treated as an add-on; rather, we are weaving it into the fabric of who we are and how we operate with our customers, colleagues, and communities.”**

Glenn Jackson, Chief Diversity Officer

**In 2021, we announced our goals for representation at the senior leadership level to better reflect our employee population and community demographics:**

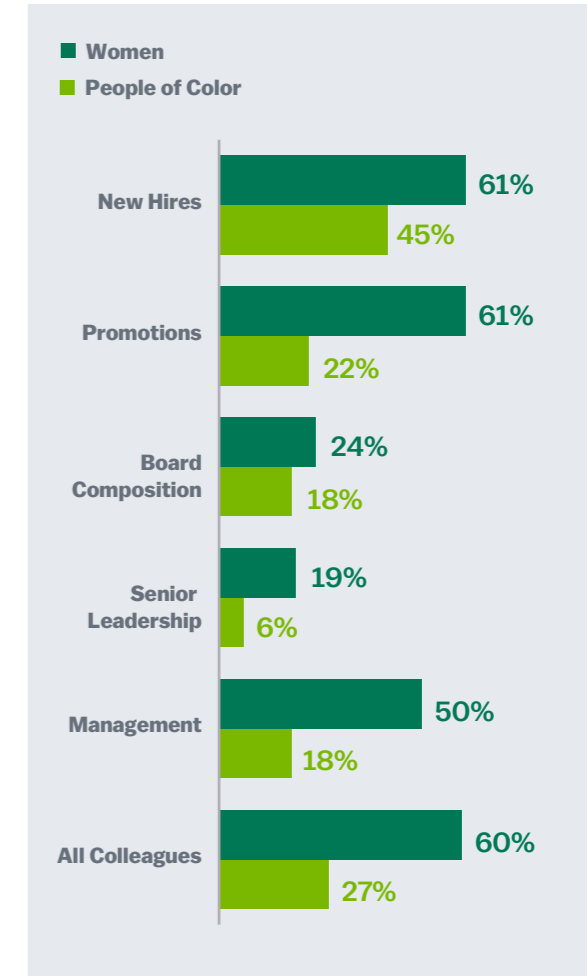
**We will achieve gender parity**

**11% of our senior leadership will be Black**

**5% will be Latino/Hispanic**

We know that achieving these goals will take time and continued focus. We feel that it is important to clearly articulate our ambitions so that we can hold ourselves accountable to strategies and behaviors that will enable us to reach our goals.

## Workforce Data by Ethnicity and Gender\*



\*For detailed workforce data, see the Appendices.

### Holding ourselves accountable

The company's DEI efforts are led by our Chief Diversity Officer, who is a member of senior leadership and the Diversity, Equity, and Inclusion Council, both of which champion inclusion efforts throughout the company. The Compensation and Human Capital Committee of the Board of Directors is responsible for oversight of the DEI program.

In 2022, the DEI Office added a layer of accountability for executives and business line leaders by leveraging a divisional DEI data dashboard, which is reviewed quarterly. This dashboard includes metrics on diversity, hiring, promotion, and attrition, which DEI leadership then uses to engage in ongoing conversations with each leader about contextualized goals and targets for each division.

The Diversity, Equity, and Inclusion Council at M&T Bank, founded in 2003, is comprised of 28 members across various business lines. The Council's mission is to promote a diverse, inclusive, and equitable environment at M&T Bank. The Council is tasked with guiding the Bank in demonstrating a visible commitment to DEI that supports the Bank's vision, business strategies, and corporate behavior, thus meeting the needs of the Bank's diverse employees, customers, shareholders, and communities. Members work diligently to guide M&T in establishing a visible commitment that supports the M&T vision, business strategies,

corporate behavior, and relationships with customers and communities, in a way that enables employees to reach their full potential and, in doing so, maximizes value for our communities and customers and shareholders.

Employee-led efforts—those that embed our DEI work across the organization and that can be leveraged by others—flourished in 2021. One of those efforts became the collaboration of informal DEI leaders to create DEI Connect, through which best practices and challenges are shared across the organization and DEI champions are created.

To ensure a positive employee experience for all, we also conduct journey mapping exercises, focused on our different diverse employee populations, that chart their experience, identify pain points, and create solutions. In 2022, we have expanded these efforts from an initial focus on Black, Latino, Hispanic, and LGBTQ+ experiences to planning for journey efforts around colleagues with disabilities, Veterans, Native Americans and indigenous people, Asian and Pacific Islanders, and Immigrants and Refugees. In 2023, our focus will be on leveraging this research to make changes to processes that may not affect all employees in the same way, such as onboarding, performance management, and recognition.

### The long road to equity in the workplace

Providing opportunities for everyone to succeed, regardless of race, ethnicity, gender, or sexual orientation, will help us achieve our true potential as an employer and as a community-focused bank. That's why we embarked on a journey to ensure that we are working to promote equity for our colleagues, customers, and community members.

Our first major effort in this space was in launching the EquityOne program in 2021. EquityOne is an enterprise-wide sponsorship program promoting racial equity, with the goal of a targeted increase of Black, Brown, and Latino/Hispanic representation in senior management. The program includes individual and cohort-based training and stretch assignments and is rooted in the protégé-sponsor relationship and based on a racial equity-centered curriculum. Both protégés and sponsors are engaging in critical learning about racial equity and bringing that knowledge to their peers.

We welcomed our newest cohort in May of 2022 and are already seeing positive and equitable outcomes for both sponsors and protégés, including promotions for nearly 44 percent of protégés and 28 percent of sponsors in the 2021–2023 cohort, and thus far, promotions for 32 percent of protégés and 11 percent of sponsors in the 2022–2024 cohort.

The newest class began in 2022 with 77 protégé participants. Between both classes, a total of nearly 250 diverse protégés are connecting with sponsors throughout the bank and developing as leaders.



### Creating an inclusive environment

M&T Bank encourages the establishment of Employee Resource Groups (ERGs) as part of our efforts to foster an inclusive environment in which the unique talents and perspectives of each stakeholder are understood, valued, respected, and leveraged. Employees have an opportunity to participate in resource groups that fit their cultural identities, interests, and passions. Our 15 resource group charters and 82 chapters are voluntary, employee-driven groups organized around shared interests or characteristics such as race, ethnicity, gender, sexual orientation, or differing abilities. In 2022, more than 7,000 employees participated in the resource group program.



### Resource Group Participation by Employees and Managers

**30%**  
of employees

**46%**  
of managers



African American Resource Group (AARG)



Wellness Resource Group



Veterans Resource Group (VRG)



Asian Pacific American Resource Group (APARG)



Hispanic Resource Group (HOLA)



STEM Resource Group (STEM)



Welcome Resource Group



PRIDE Resource Group (PRIDE)



Women's Interest Network (WIN)



Intrapreneurship Resource Group (IRG)



Intergenerational Resource Group (iGen)



Disability Advocacy Network (DAN)



Think Green Resource Group



Native American Resource Group (NARG)



Immigrant and Refugee Resource Group



## SPOTLIGHT

## Creating a Home at M&T for Immigrants and Refugees

When Maureen Wambui immigrated from Kenya in 2015, she was met with many challenges. She started her first job in the U.S. as a cashier while learning English and learning a new currency. She started working for M&T Bank as a part-time teller in Nottingham, MD, just outside of Baltimore. “Coming from a country where I had limited access to the internet, even going through training for the job was a challenge,” she remembers. Maureen found herself overwhelmed when she started on the teller line, and customers had trouble understanding her accent. Looking back, she wished she had someone with a similar experience to help her through the initial challenges.

Eventually, Maureen found her way into several of M&T’s Employee Resource Groups and participated in the Talent Acquisition Ambassador Program (see page 50 for more on this program), but never quite found her place. Although she found friends and allies among colleagues, she kept wondering “Where is my community?” That’s when she decided, along with fellow employees Omotola Olaniyi, Hortencia Hernandez, and Sara De Leon, to start the Immigrant and Refugee Community Advocacy Group, which later became the Immigrant and Refugee Resource Group.

Maureen Wambui  
Assistant Branch Manager



The group’s vision is to build upon M&T’s mission of understanding what’s important by providing networking opportunities and supporting immigrant and refugee communities both internally and externally. They’ve been working toward that vision through partnership and collaboration with our communities, campus and community outreach to prospective employees, and employee engagement and cultural awareness within the organization.

Even early into the journey as an M&T ERG, the Immigrant and Refugee Resource Group is making a huge impact in our communities and driving value for M&T. Through a partnership with Howard Community College in Columbia, MD, ERG members connect with the immigrant community and provide valuable expertise. In addition, in partnership with M&T’s Multicultural Banking team, members volunteered their time to mentor, and in some cases, interview and hire, students from Howard Community College’s Skilled Immigrant Program.

### Employee Resource Groups at M&T:

- Highlight the value we place on diversity
- Provide networking opportunities for all employees
- Ensure that the groups’ recommendations and ideas for internal policies, procedures, programs, products, and services are communicated to the Diversity and Inclusion Council and to management
- Position us to attract and retain the very best people
- Create M&T Bank ambassadors in the communities where we do business
- Create spaces for individuals that do not identify with the specific racial or identity-based communities in certain ERGs to learn, grow in their cultural competencies, develop authentic relationships, and become allies

In 2022, the Immigrant and Refugee Resource Group was recognized as a new ERG charter (see spotlight for more about the newest ERG). We also launched our first PRIDE resource group in Boston, MA. This is the first chapter in the legacy PUB markets to be approved under M&T’s program, and we encourage the establishment of other chapters within the footprint for our new colleagues in 2023 and beyond.

### Making inclusivity a reality

In 2022, we saw several “wins” for inclusivity across the organization as colleagues, ERGs, and leaders saw opportunities for positive change.

- We launched new DEI trainings, “People First! Ability Awareness Training” and “Allyship at Work”
- We officially acknowledged Indigenous Peoples Day in 2022 in addition to Columbus Day and will be recognizing Indigenous Peoples Day annually
- We officially updated our dress code policy to be inclusive of natural and protective hairstyles
- We made several improvements in accessibility to the experience of colleagues and customers thanks to the leadership of the M&T Disability Advocacy Network (DAN) Resource Group

In early 2023, we announced the launch of Safe & Accepting Spaces throughout our footprint. This signals that every M&T facility is a safe and accepting space for our colleagues, our customers, and our communities. The rollout of signage will begin in our branch facilities.

The designation of Safe & Accepting Spaces means that we’re committed to providing an environment in which people can feel confident that they will not be exposed to discrimination, harassment, or intolerance while in our places of business and work. It’s a space of psychological and physical safety, where together we will always treat each other with respect, never stop learning, have open and honest conversations, be inclusive, and value diverse perspectives.

### Educating our colleagues and leadership

As we pursue efforts to increase the diversity, equity, and inclusion of our organization in alignment with our vision and goals, we recognize that continued education and engagement is crucial to achieve those goals.

In 2022, the DEI Office hosted a virtual event called “Electrify our DEI” focused on the importance and power of DEI in our organization. With external speakers, recognition, a retrospective, and breakout sessions, many of us came together to share and learn how DEI is and can be front and center in our work, lives, and communities.

To kick off the event, Roger Ferguson, the former president and CEO of TIAA®, joined us to talk about corporate DEI programs, with an introduction from M&T CEO René Jones. We were also joined by experts in the DEI field from PwC®, LVMH®, Inc., Bank of America®, the NFL®, and more to discuss inclusivity in corporations and communities.

In partnership with the Learning and Development team, we offer a robust suite of trainings focused on various topics across DEI, available to all employees. These include:

- Unconscious Bias Awareness
- Unconscious Bias in Talent Acquisition and Performance Management
- Systemic Racism in Banking
- People First! Ability Awareness Training
- Cultural Competency
- Addressing Microaggressions in the Workplace
- LGBTQIA+
- Women in the Workplace
- Allyship at Work

**Our DEI journey doesn’t end with our people. As a financial institution and community-focused bank, DEI is part of our imperative for creating flourishing communities. See more of what we are doing for DEI within our business and communities (such as responsible sourcing, multicultural banking, inclusive products, and financial education) in the Prosperity section of this report.**

## AWARDS AND RECOGNITION



### DIVERSITY INC

2022 | Top 50 Companies for Diversity #4 for Top Regional Companies



### NATIONAL ORGANIZATION ON DISABILITY (NOD)

2022 | Leading Disability Employers



### DISABILITY EQUALITY INDEX

2022 | Disability Equality Index Best Places to Work (scored 100%)



### HUMAN RIGHTS CAMPAIGN FOUNDATION

2022 | Best Places to Work for LGBTQ+ Equality (4th year in a row)

## NEWSWEEK

2023 | America’s Greatest Workplaces for Diversity

TOGETHER WE WILL

prosper

## FOSTERING PROSPERITY

By harnessing the power of capital, we can create an equitable financial system and build long-term success for our company and our communities.

### Our Approach to Community Investment

M&T is successful when the communities we serve are successful. Our destinies are interwoven: For more than 167 years, we have lived in, worked in, volunteered in, and invested in our neighborhoods.

As a community-focused bank, our strength is in the power of our relationships. For decades, we've invested in trusting relationships with community members, community leaders, and other organizations in our neighborhoods. Our community investment approach considers the needs of each of our customers and brings the full power of the bank to every customer interaction. Whether it's business banking, commercial real estate, equity investment, tax credits, or charitable grants, we offer our full suite of services to all of our relationships.

What makes M&T's approach unique is the care and attention we bring to our customers, combined with the resources and scale of a mature bank. Even with our significant growth, our ethos is still that of a community-focused bank that puts the needs of our customers first. Our community investment strategy is rooted in relationships. It takes time, it takes intentionality, and it requires listening to the needs of our community. We do this work because we believe it produces the best results for our customers and partners.



**“At M&T, our focus is on our communities because we believe that when our communities win, we win. Our community-focused client service model meets the scope and scale of a large regional bank, creating a uniquely M&T experience that is local, human, accessible, simple, convenient, and comprehensive. Our communities trust us to do right by them because our success is so intertwined. Together, we continue to create shared prosperity in the communities we call home.”**

Mike Keegan, Head of Community Banking

## We strive to help our communities prosper by focusing on two key priorities



### Financing an Equitable Economy



### Colleague, Leadership, and Customer Diversity



# \$2.26

billion in financing to projects which contain affordable housing

# 1,440

Small Business Administration loans originated, totaling \$203.8 million

# ~159,000

hours dedicated by M&T staff to volunteering in our communities

# ~\$47

million in M&T Charitable Foundation grants committed to supporting our communities

# 2,657

home purchase loans to low- and moderate-income residents

## Supporting Our Communities Through Access to Finance

Many of the community investment services we provide are evaluated by the Federal Reserve and the New York State Department of Financial Services through the Community Reinvestment Act (CRA). These services include mortgages to low- and moderate-income (LMI) homeowners and customers living in LMI areas, low-income housing tax credits, small business lending, and financial education.

The CRA rating is an important one, and we are proud that M&T has earned the highest possible score from the Federal Reserve on every exam since 1982 and from the New York State Department of Financial Services since 1989. This includes our most recent rating in 2021.

We continually seek new ways to meet the needs of organizations serving our communities. Among the many ways we do so are New Markets Tax Credit investments and community development loans. Our New Markets Tax Credit program provides equity investment for projects that create jobs and services for LMI community members.

In 2022, our new commitments for New Markets Tax Credit investments totaled \$7 million. We've provided \$1.61 billion in new originations for community development loans and letters of credit to assist small business and nonprofit community development organizations.

## Improving Access to Housing

Safe, high-quality, affordable housing is key to tackling inequality and building communities. In 2022, the housing market was still reeling from the shift in behavior brought on by the pandemic. The median U.S. home price hit a record high, rents rose, and mortgage rates doubled in the span of just one year.<sup>1</sup> Coupled with rising inflation, renters and homeowners alike were challenged by the housing environment.

Overcoming this challenge requires long-term commitment from both the public and private sectors, and we are committed to both lending and investing in the creation and preservation of affordable housing. M&T Bank and M&T Realty Capital Corporation have teams dedicated to the financing of affordable housing (which has rent or income restrictions to help keep housing below market price), from construction and bridge loans to mortgages and tax credits.

In 2022, M&T Bank and our affiliates provided \$2.3 billion in financing to 97 transactions that contain affordable housing. This includes \$1.5 billion in CRA-eligible financing for 3,652 affordable units within M&T's state-wide footprint.

In 2022, we committed \$137.2 million in investments, through Low-Income Housing Tax Credit (LIHTC) equity, which added an estimated 919 new or renovated affordable housing units in the communities we serve. The total book value of our LIHTC investment portfolio was \$1.3 billion as of December 31, 2022.

<sup>1</sup> "2022 Housing Market Year in Review: Looking Back on a Historic Year" Redfin, Jamie Forbes, Dec. 29, 2022.

## Keeping People in Their Homes

Helping customers stay in their homes is a priority for us. Since 2013, we have supported homeowners during employment uncertainty through our partnership with the NextJob program. To those who meet our unemployed/underemployed criteria, we offer training as they prepare to reenter or progress in the workforce. In 2022, 36 percent of those who went through the program confirmed they secured a job. To bolster our support, in May 2022, we also added an additional service from NextJob called JobSeekers, available to all M&T customers. This online toolkit provides resources to help customers navigate the changing job market, develop strategies for searching for job opportunities, and prepare for an interview.

In 2021, with customers still feeling the economic effects of the pandemic, we wanted to expand what we saw as the increasing service needs of our customers. To do so, we began working with the social impact fintech SpringFour® to assist customers in finding local resources such as utility savings, food savings, financial counseling, and home repairs. Offered at no cost to customers, this worked in tandem with services we offer such as credit monitoring and financial education.

In 2022, M&T provided customers with more than 114,350 financial health referrals to local nonprofit and government resources utilizing SpringFour. The top areas of assistance most requested by our customers were those helping with heating and utility costs, food savings, employment services, and financial counseling.

## Investing in Small Businesses

Partnering with small businesses to create jobs, build our communities, and develop our economy is the core of our business model. Small businesses generate sustainable growth, keep money circulating through the economy, and create new opportunities for community members.

Although we cover just three percent of the nationwide market, we ranked sixth nationwide in units for U.S. Small Business Administration (SBA) lending in Fiscal Year 2022. We originated 1,440 SBA 7(a) loans, totaling \$203.8 million, and topped the SBA's lenders list in Baltimore, Buffalo/Rochester, Delaware, Richmond, Syracuse, and Washington, D.C. M&T also ranked fifth in the nation as a third-party lender in the 504 loan program, providing 131 loans for \$126.3 million.

In 2022, we were awarded three Greenwich Excellence Awards and one Greenwich Best Brand Award in Business Banking. These brought our total Greenwich Excellence Awards since 2011 to 166.

### SPOTLIGHT

#### Sherrice Davis, Regional CRA Officer

When Sherrice Davis started her career in banking in 1989, she didn't even know what the Community Reinvestment Act (CRA) was. She certainly didn't know there was a fulfilling career as a CRA officer ahead of her. Now Sherrice is a regional CRA officer for Baltimore, MD.

When M&T acquired the bank she had been working for, she learned about the CRA for the first time and M&T's strong dedication to the federal law designed to hold banks accountable for meeting the needs of all borrowers in our footprint. "It opened up my eyes to the commitment to communities and the importance of giving back to parts of the community that haven't benefited from a relationship with banks in the past."

Since joining M&T's CRA team, Sherrice leverages close partnerships internally and externally to deliver on the promise of the CRA. She works with nonprofits, community-based organizations, and municipalities to deliver financial education and help meet other financial needs of community members. She also collaborates with business partners within the organization such as Mortgage, Commercial Real Estate, Business Banking, and Retail Banking to deliver products and services to low- to moderate-income communities.



One of her favorite parts of the role is connecting M&T with organizations that make our communities a better place to live and work. One such organization is Urban Alliance, a nonprofit committed to building a diverse next-generation workforce by connecting high school students to paid work experiences that lead to equitable inclusive careers. Sherrice has hosted eight interns through Urban Alliance so far.

While the banking industry is evolving, fueled by advances in technology and changing market conditions, Sherrice believes that M&T's strength is in our community-focused banking model, built on strong community relationships. "Our people are very involved in communities and skilled at building relationships." As we continue to grow and evolve our products and services, Sherrice believes that it is even more important to lean into our high-touch, relationship-based model and intentional investment in the neighborhoods that need us most.



Brandon Ross, pictured here giving his pitch at the Bridgeport Multicultural Small Business Innovation Lab, is the founder and CEO of Pawsome Pet Products. His business specializes in multifunctional, multipurpose pet carriers. Ross was announced as the first-place winner in the pitch competition, landing his business a \$6,000 grant.

**“Thanks to the M&T Bank Multicultural Small Business Innovation Lab, I can now successfully and confidently describe my business, understand my shortcomings, and what I need to learn to better position my company for success.**

**I’m from Bridgeport and this is my home. And while I didn’t graduate from college or high school, I got my GED, and that journey taught me that perseverance is critical. You must persevere through all adversity. There is no quitting.”**

Brandon Ross

### Increasing small business capacity

We continue to support small businesses in our local communities by meeting them where they are. In 2021, we launched several programs with local partners such as universities and governmental agencies to build and enhance the capabilities of small businesses to better equip them to scale and compete in a complex economy. In 2022, those programs are still thriving.

Our Small Business Innovation Lab series, piloted in Buffalo in 2021, expanded to include multiple programs in Buffalo, NY; Bridgeport, CT; and Harrisburg, PA. An intensive, weeks-long program designed to empower, develop, and scale racially and ethnically diverse small businesses, it aims to promote business and financial inclusion through empowerment, providing diverse owners the much-needed access to information, tools, resources, and connections they need to grow and thrive. Through the curriculum, delivered in partnership with local organizations, business owners learn about creating a business plan, marketing and branding, credit, and other business fundamentals.

By the end of 2022, we implemented four Small Business Innovation Labs, reaching 170 multicultural small business owners and awarding \$60,000 in pitch competition award money to support winning participants’ business ventures. M&T received the Catalyst Award from the Harrisburg Chamber of Commerce for our impact in launching the Small Business Innovation Lab there.

Our Ignite program continued to serve minority- and women-owned small businesses through our business growth, or accelerator, programs, launched in 2021. Progress in 2022 included:

- Launching the 0 to 100 Accelerator in Montgomery County, MD, in partnership with the Montgomery County Office of Human Rights and Montgomery County, and graduating two cohorts of business owners. Between the two cohorts, 86 people graduated from the program, including 72 who represented a woman-, minority-, or Veteran-owned business, and \$20,000 was distributed among the winners of the culminating pitch competitions.
- Graduating two cohorts in the Howard County Accelerator, with the Maryland Innovation Center, the Howard County Economic Development Authority, the Howard County Executive’s Office, and the Maryland Small Business Development Center. Between the two cohorts, 35 people graduated from the program, including 32 who represented a woman-, minority-, or Veteran-owned business. Each graduate from the cohorts received \$5,000 in seed money from the Howard County Executive’s Office and an additional \$50,000 was distributed among the winners of the culminating pitch competition.

The accelerators provide formal education in business structure, finance, access to capital, pricing models, marketing, risk, and networking.

### Addressing Financial Inclusion and Access to Capital

We are committed to assisting customers in managing their financial wellness and are a proud member of the Bank On Coalition. This supports local financial institutions’ efforts to connect consumers to safe, affordable bank accounts. Over the past several years, M&T has introduced banking solutions with those goals in mind, including:

- MyWay Banking is a certified Bank On account that offers modern checkless services such as online bill payment and debit card access. Serving customers who may have had difficulty obtaining a checking account due to prior banking issues, it has low or no monthly service charges, depending on the number of transactions per month. MyWay Banking is designed to improve access to banking for users, including minors aged 13-17 with a parent or guardian as joint owner. If the account has insufficient funds, a transaction will, in most cases, be declined. If the account is overdrawn, an overdraft fee will not be imposed. In 2022, we opened 39,015 new MyWay accounts, adding to our 124,444-strong portfolio.
- M&T Alerts allows customers to set up an alert notifying them when funds reach a certain level that requires a money transfer or spending reduction.
- Overdraft Protection is offered through a linked savings account or, for a fee, through a line of credit or a credit card.

- M&T Money Smart in the mobile app and online banking can help customers track spending and income, as well as projected cash flow and spending trends.
- Our Mobile Flash Funds service provides immediate access to mobile check deposits, for a fee. This supports customers who may not have a financial safety net and offers security to small business owners who rely on immediate liquidity.

Throughout 2021 and 2022, we had a team focused on the impact of overdraft-related fees on customers' financial wellness, exploring how we can provide more flexible options to meet their personal financial needs. Based on the team's work and research, we implemented changes to our Overdraft Program in the second quarter of 2022 that we believe will empower customers to bank with more confidence. Some of those changes included eliminating the non-sufficient funds fee and overdraft protection transfer charge from a linked deposit account, reducing overdraft fees to \$15, and limiting the daily fee assessment to once per day.

We're happy to share that customer complaints related to M&T's Overdraft Program have declined by more than 60 percent since the first changes to our program were implemented in January 2022. We saw continued decline in complaints as the enhancements were rolled out to customers through the second quarter of 2022, which has improved the experience for both our customers and employees.

### Providing financial education

Financial education is another integral component of serving our communities. For over 20 years, we've prided ourselves on strong partnerships with outstanding, innovative nonprofits, such as Ariva®, Home HeadQuarters®, Pathstone Corporation, Goodwill of Western New York, and many others across our footprint, to facilitate the delivery of in-person education through M&T Money Mentor, our financial education program, alongside the work that our relationship bankers do with our customers every day.

### SPOTLIGHT

#### A Partnership That Goes Beyond

M&T Bank has had a long-standing partnership with Goodwill of Western New York and has collaborated with the organization on numerous projects and initiatives. Our unique partnership continues to grow and evolve in a variety of meaningful ways. When Goodwill of WNY launched their Goodskills Career Builder initiative, a workforce development program designed to provide targeted skills training and job placement into higher wage careers in 2021, M&T found new ways to partner with the organization. And in 2022, we evolved the partnership to combine financial education, career exposure, and hiring to enhance the program's support model.

M&T team members from the local neighborhood branch, like Kelly Dockery (pictured above), provide financial education for Goodskills Career Builder participants that truly makes a difference in their lives. The financial wellness classes, which cover subjects such as banking basics, credit scores and reports, mortgages, and retirement, help participants understand and take control of their personal finances.



**Kelly Dockery, Branch Manager**

Photo provided by Goodwill of Western New York/Tom Wolf Imaging

Goodskills participants tour the M&T Tech Academy at Seneca One as part of their curriculum to see the space and expose them to the advanced training and types of career opportunities available to them in the technology field.

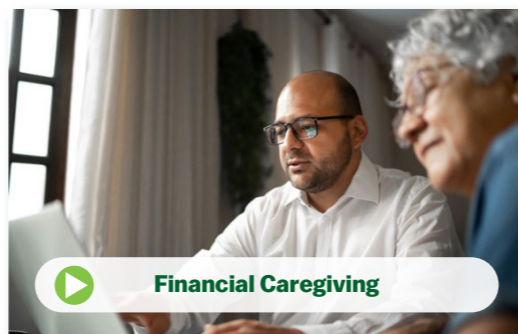
M&T's Human Resources team members connect with Goodskills graduates at the on-site job fair held monthly at Goodwill's agency headquarters to assist with résumé building and interviewing skills, and potentially offer employment opportunities to those who are a good fit for M&T. Several Goodskills graduates have now been hired in customer support, online banking, and mortgage services positions, and we are proud to call them part of the M&T family.

To expand on our in-person education, we offer an online version of M&T Money Mentor through our Financial Education Center. This online portal provides access to topics such as emergency savings, credit management, and investing in the future. Its user-friendly, interactive lessons take just three to six minutes, making them easy to fit into busy lives.



**In 2022, we made several of our M&T Money Mentor playlists available in Spanish, including Teen Banking, Banking for College Students, Becoming a Homeowner, and Preparing for Retirement.**

### M&T Money Mentor Playlist Topics







**In 2022, as part of our journey to be a culturally fluent bank for all communities, we launched our first major Spanish language television advertisement campaigns geared toward Spanish-speaking customers and community members.**



## Embracing the Diversity of Our Communities

### Committing to our many cultures

We have expanded the services we provide to communities with high concentrations of ethnic and racial diversity by designating bank branches across our footprint as multicultural centers. These centers employ bankers from the community who speak customers' preferred languages and understand the cultural nuances of the individuals and neighborhoods they serve.

We currently have 119 of these branches and are planning for the designation of additional multicultural centers in our New England area footprint in 2023 and beyond.

The centers create opportunities for businesses, nonprofits, and community members to attend networking events and financial wellness classes and to collaborate on community projects. The centers' locations are chosen based on insights from community partners, M&T's local bankers, and neighborhood-level Census data on population characteristics, growth potential, and concentration of non-English speakers.

In 2021, we launched a program to certify our colleagues who are proficient in multiple languages as bilingual. This allows us to provide high-quality service across multiple languages and to compensate bilingual employees for the additional service they provide to customers. Throughout 2022, 312 certifications were obtained by employees who successfully passed language assessments. As of December 31, 2022, 22 languages are supported, including Arabic, Bengali, Burmese, Chinese, French, Hindi, Korean, Polish, Portuguese, Russian, and Spanish. In 2023, our focus will be on expanding our language certification to our new colleagues who joined us from People's United Bank.

To make our banking tools easier to navigate for non-English speakers, we launched a Spanish-language website—[mtb.com/es](https://mtb.com/es)—that provides access to financial information and resources.

We also enhanced our customer experience by providing financial education materials in Spanish and Korean, and we updated our ATM network to provide services in Chinese and Korean. At over 1,830 ATMs, customers can complete cash transactions in Chinese, Korean, Spanish, and English, with plans for adding French and Portuguese in 2023. We also offer phone assistance through third-party interpretation in 240 languages at 1.800.724.2440.

These developments are part of our wider efforts to enhance the customer experience and contribute to inclusive growth in our communities. Through ongoing engagement with faith-based organizations, neighborhood groups, and other community partners, we learn and develop new ways to serve local families, individuals, and businesses.

## M&T's Supplier Diversity Commitment Statement

**We strive to procure with diverse suppliers at every stage of business growth.**

This includes small, local businesses that are the lifeblood of our communities.

**What truly drives us is the impact we can make on the prosperity of our communities.**

The prospect of being part of the growth journey of a local diverse business is what gets us up in the morning, especially when we might be one of the largest customers they have ever worked with.

**We commit to seeking out opportunities to engage small- and mid-size diverse suppliers in our footprint who are hungry to take that next step in their growth journey.**

As a community-focused bank, we are committed to the well-being of our customers, colleagues, and communities, and our purchasing power is a critical tool that we put to work in service to this commitment.

### Improving the diversity of our supplier pool

We use our spending power to advance economic development in underrepresented communities. The resilience and drive of these communities will help propel their businesses to success, and we want to be part of that journey.

Diverse suppliers accounted for 6.2 percent of our sourcing spend in 2022, with 171 diverse suppliers (up from 140 in 2021). We are building on this by proactively seeking to make M&T a trusted partner of businesses owned by women, people of color, Veterans, members of the LGBTQ+ community, and people with disabilities.

We have set ambitious but achievable spending goals. To reach these goals, we have examined our sourcing policies and sought to address factors that may impede new, diverse vendors in our supplier pool. Internally, we are enhancing communication, transparency, and data access to empower our leaders to take ownership of diverse spending.

Meanwhile, to connect with diverse suppliers, we are increasing our active participation in networks such as the National Minority Supplier Development Council and local organizations throughout our markets.

### Tier 1 Diverse Spend: 2020, 2021, 2022

	2020	2021	2022
<b>Diverse spend</b>	\$45,941,871	\$68,644,938	\$71,080,166
<b>Total sourceable spend</b>	\$957,170,946	\$956,438,834	\$1,142,850,739
<b>Diverse share of sourceable spend</b>	4.8%	7.2%	6.2%

In 2022, we launched a registration portal specifically for diverse suppliers to indicate interest in working with M&T Bank as a vendor. In 2023, we will work closely with businesses who register through this portal to support them through the RFP process.

M&T requested Tier 2 diverse spend data for the first time in 2022. We asked our Tier 1 suppliers for data on the diversity of their own spend. Moving forward, we will build this data collection into our regular engagement with suppliers to foster a shared responsibility for diverse and equitable supply-chain management.

## SPOTLIGHT

## Partnering to Create Scale for Diverse Suppliers

To support the conversion of former People's United Bank locations to the M&T family, our Procurement team engaged Valle Signs & Awnings, a minority-owned business in Copiague, NY. The business, owned by Oscar Valle, was awarded the contract to manufacture and install brand-new M&T Bank signs at all former People's United Bank locations in New York State. Senior Regional Construction Manager Mike Hyman recognized the potential of Oscar and the Valle Signs team to deliver the highest-quality service and craftsmanship.

"When we first sat down with Oscar, I think what we saw from him and his employees was the potential and how much their heart was in it," Mike said of his impression of the Valle Signs team. "We knew that it would be a stretch assignment, but they clearly had the ability and the determination to see it through."

Oscar also knew it would be a big undertaking. "We have been in business for 21 years but have never had a project or client this big," he said. But they were not alone in figuring out how to tackle the project: "Mike Hyman has been extremely helpful to us, helping us understand M&T's requirements and connecting us with new vendors. He has taught us a lot. A lot of times we asked Mike, 'How do you have this patience?' and he would tell us, 'Relax, I know you're under a lot of pressure, and you're doing great.'"



Mike acknowledged that there may have been larger suppliers elsewhere who may have already had the processes and infrastructure in place to take on this type of volume, but he knew the potential of the Valle Signs team. "We saw a business that was ready to take that next step, and all they needed was the opportunity, the chance to learn and grow with a client that was willing to work together and share our knowledge and experience."

Following the successful completion of the initial contract, M&T has a trusted partner on Long Island to turn to for signage needs—and, in fact, M&T and Valle Signs have continued to work together on more projects since then. Mike has also provided referrals to new customers for Valle Signs.

From Oscar's perspective, "Working with M&T has been a great experience for the whole Valle Signs team. It hasn't always been easy, but we have learned a lot. We feel like because of this project, we can handle a lot more. We have better systems, better vendors. Now we feel like we can compete with bigger companies more than we could before."

## Evolving to Better Serve Our Customers

A customer-centric mindset is vital to M&T's strategy, and growing our customer experience capability is imperative for our growth. Customer experience refers to how our customers perceive our brand based on their exposure to our products and services. M&T's Customer Experience team has been actively working alongside business lines and internal departments to design and implement moments that matter for our customers.

Putting customers at the center of everything we do and using customer experience tools and methodologies has resulted in reengineering more than 100 steps/handoffs across processes, policies, and procedures, eliminating more than 65 touch points for customers and employees, and saving 5.7 million minutes of customer and employee effort.

In 2021, we launched a platform called My Voice to empower our colleagues to identify ways to make our customer experience even better. This enterprise-wide platform provides an easy and intuitive way for employees to share feedback on what stops them from providing an exceptional customer experience.

The Customer Experience team has implemented solutions for over 1,960 pieces of feedback submitted by employees, including simplifying ways of working for ourselves and customers.

**“We as an institution, and we as a community, are in a race for relevance. For us to continue to be competitive, in order for us to create the kind of underpinning to create modern prosperity, we need to be continuously learning, continuously sharing, and continuously innovating, not just as a bank but as a community.”**

Mike Wisler  
Chief Information Officer

**Nota**  
by M&T Bank



### Innovating to Meet the Needs of Our Customers and Communities

M&T is committed to creating products and services that respond to our customers' and communities' changing needs. Our approach to innovation is inclusive and broad: We engage the full organization and our communities, and we build, partner, and invest to acquire new capabilities.

Our New Ventures team focuses on building and commercializing capabilities that provide a strategic advantage for the organization and meet an identified need for customers or community members.

Two of these concepts have been commercialized since the inception of the team:

#### Nota

Built for attorneys, Nota allows solo and small firms to take control of their accounts with annotation, real-time reconciliation, and financial services with concierge support.

#### GrowGrade

A free, digital valuation and performance tool for small businesses, GrowGrade empowers business owners with more knowledge about their business.

#### Social Innovation

In 2022, the team worked closely with community stakeholders and partners to understand how the bank can meet the needs for exploration and innovation around financial education, and how we are using resources across the organization to think about how we meet the needs of unbanked or underbanked community members.

In addition to incubating concepts to provide new capabilities, M&T engaged in the fintech ecosystem through targeted investment. We recognize the opportunity that fintech and new technology provides to the banking industry, and we leverage the fintech ecosystem to drive strategic innovation for the bank through venture investments and commercial partnerships.

Through facilitated learning, commercial engagements with fintechs, and investment in the ecosystem, we strive to position M&T as an active participant in defining the future of banking and impacting our customers in meaningful ways to help them achieve their goals.

Since inception of the initiative, M&T has committed \$60 million in investments across five funds with an additional \$3.5 million invested directly in fintechs, providing direct access to over 70 fintech

companies. Through our acquisition of People's United Bank, M&T also inherited a \$5 million investment in the Finance Technology Ventures II Partnership Fund at FTV® Capital.

In 2021 and 2022, M&T committed \$3 million in equity impact investments supporting underserved communities and communities of color within our footprint and beyond.

Another key component of our innovation journey is understanding climate-focused growth opportunities and the capabilities we need to effectively serve our customers and communities. Supporting our customers and communities through the transition to a low-carbon economy is core to our role as a bank for communities. To read more about these efforts, including our sustainable finance work, refer to the Planet section of this report.

### Fintech and Impact Investment Activity (2019-2022)

#### Direct Investments



**BIWISE** INDUSTRIES



#### Venture Investments





## Partnering with Our Communities for the Future

We are, and will continue to be, a bank for communities, understanding how each is unique with its own characteristics, cultures, economies, and challenges. We believe in providing opportunity for all our communities to prosper.

When the communities we serve are successful and have opportunity to realize their full potential, only then are we successful. In 2021, we introduced a formal Community Banking team to help build and scale our community-focused banking approach with the goal of creating better outcomes for all. We did this by first connecting to local leaders and customers through listening sessions to understand how they experience M&T. This approach allowed us to enhance our local focus and harness the full capabilities of the bank to:

- Increase emphasis on sharing insights, best practices, and challenges to leverage across communities
- Promote a community leadership structure empowered to work across business lines with accountability for the community's collective performance
- Activate go-to-market strategies and a regional support model for each of our communities

## Our ongoing commitment

While we have the capabilities of a large bank, we are committed to fostering a culture of caring and empathy as a locally focused institution. We are organized geographically around Community Bank Regions (CBRs), each led by a local regional president and business line managers. The CBR structure provides clarity and consistency as to how we show up in each market, the loans we extend, and the activities we support, giving decision-making authority to the people in the bank who know their customers and regions best.

Our Operating Model takes an objective, consistent, and data-led approach, combined with the knowledge and experience of local leaders, with the goal of creating sustainable growth for the bank and for the communities we serve. To provide alignment across regions, the model has four pillars critical to future success: Communities, Customers, Colleagues (employees), and Contribution (financial performance). Evaluating progress in these pillars helps to ensure go-to-market strategies are effective in supporting regional and enterprise goals and reinforces the expectation that we show up as one bank no matter where we are serving.

To that end, we orient our community-focused banking leadership around a common set of metrics across the four pillars through quarterly reporting, specific to each of our 28 Community Banking Regions.

## Convening community leaders

To support our stakeholders, it's crucial to be consistent, reliable, and responsive. We receive regular input and feedback from people and businesses in the areas where we operate through channels such as our network of regional Directors Advisory Councils. Each council includes both M&T colleagues and local leaders representing their community, businesses, and government organizations. The councils meet regularly to proactively identify issues, discuss opportunities to collaborate, and track progress.

## Stronger together: Amplifying community impact across our expanded footprint

Just like M&T, People's United Bank is also a bank for communities. The common legacies and complementary footprints of M&T and People's United strengthen our ability to serve our communities and customers and provide solutions that make a difference in people's lives. Our relationships with businesses and borrowers are built on local knowledge. Our approach to credit underwriting, wealth management, and corporate philanthropy are all built on knowing and helping to improve the places we serve, from Buffalo to Baltimore, and now Bridgeport, Boston, and Burlington.

M&T sees significant economic and growth opportunities for the community with the acquisition of People's United Bank and will build on expanding existing community investment legacies and partnerships in the region.



**“The work of The M&T Charitable Foundation helps strengthen the bank’s mission and bolster our commitment to the communities we serve. I look forward to the opportunities to build upon the many strong partnerships M&T has with our community partners to further elevate the bank’s philanthropic impact and fully realize our corporate citizenship.”**

Dominique Goss, The M&T Bank Charitable Foundation Executive Director

## Strengthening Communities Through Philanthropy

Established in 1993, The M&T Charitable Foundation supports thousands of nonprofit organizations focused on improving the quality of life for our customers, employees, and neighbors. Over the past decade, M&T and the Foundation have together contributed \$306,271,343 million to more than 9,000 nonprofits.

The work of the Foundation is conducted by regional committees comprised of M&T employees who live and work in those communities. The regional committees make local funding decisions that help ensure the bank’s philanthropy addresses the specific needs of each community. Local decision-making is a cornerstone of M&T’s community-focused bank model and distinguishes the bank from other corporate givers.

In 2022, with the acquisition of People’s United Bank, the legacy of charitable impact from The M&T Charitable Foundation is joined by the incredible history of community philanthropy from the charitable arms of People’s United Bank. Since their inceptions, People’s United Community Foundation and People’s United Community Foundation of Eastern Massachusetts have collectively granted over \$47 million to thousands of nonprofits within the geographic area they serve.

In 2022, M&T created the new role of Executive Director of The M&T Charitable Foundation. The Executive Director steers the bank’s corporate giving strategy and helps to ensure that the Foundation’s community impact remains inclusive, equitable, and diverse throughout its 12-state footprint, thereby uniting the M&T and People’s

charitable giving footprint. The newly created role also oversees management for the daily operations of the Foundation, including strategic direction, program development, operations, financial management, talent development, and community relations.

In 2022, M&T and the Foundation together contributed \$47.7 million to more than 3,461 nonprofit organizations. These beneficiaries represent a diverse range of organizations, including those that represent civic affairs, human services, education, arts and culture, and health care. These contributions fund work in areas such as food security, homelessness, frontline health care, and racial equity, as well as needs exposed and magnified by the pandemic, such as digital access and workforce development.

### Investing in our expanded footprint through the AMPLIFY Fund

In 2022, M&T announced the AMPLIFY Fund, a \$25 million fund aimed at providing unrestricted multiyear support to trusted organizations to enable them to improve the lives of their communities through programmatic, capacity-building, or policy-based work.

The creation of the AMPLIFY Fund, which serves Connecticut, Maine, New Hampshire, New York, Massachusetts, and Vermont, was a result of the merger between People’s United Bank and M&T Bank, which was completed in 2022, and represents a significant investment in the organizations that serve the communities across M&T’s expanded footprint. The grants were awarded by The M&T Charitable Foundation based on the responses to proposals submitted by the nonprofits earlier in the year.

### 2022 contributions

~\$47

million contributed by M&T and The M&T Charitable Foundation

3,461

nonprofit organizations received contributions from M&T and The M&T Charitable Foundation

AMPLIFY Fund grants provide finite, multiyear funding to community-based organizations and intermediaries with a demonstrated commitment to high-need, underserved, or underestimated communities. Priority was given to applicant organizations that most clearly articulated the needs to be addressed, the strategies to be employed in response to those needs, and a plan to demonstrate the effectiveness of those strategies. Additionally, there was a separate category devoted to organizations working to address environmental justice and equity in communities across Connecticut. To read about the work funded by AMPLIFY Fund grants for environmental justice, see page [35](#) (Planet section).

### Buffalo Promise Neighborhood: an investment in families through education

M&T's commitment to education began in 1993 when we partnered with Buffalo Public School 68, converting to Westminster Community Charter School in 2004, and in 2010, Buffalo Promise Neighborhood (BPN) was established. This unique initiative aims to provide a continuum of solutions to children and families with a focus on building a strong educational foundation that carries children from cradle to career. M&T employs a team of dedicated professionals with backgrounds in business, academia, and human services whose primary focus is revitalization through education.

In addition to our dedicated staff, over 1,400 volunteers have contributed more than 8,000 hours of their time to BPN since inception. These volunteers play a vital role in supporting our BPN community to help address educational, social, and environmental needs. Through volunteerism and donations from M&T employees, along with our community members, our programs have empowered thousands of students and strengthened our Western New York community. Our students and their families enroll in programs such as tutoring, after-school clubs, financial education, and community events.

Over 75 percent of our eighth grade graduates attend criteria-based public and private high schools, including 53 graduates who have attended private high schools through our Promise Scholars Program. These students also receive college preparatory coaching during their four years in high school. In May 2022, our first cohort of Promise Scholars graduated from college. In addition to these seven college graduates, there are 28

Promise Scholars currently attending colleges and universities.

Within Buffalo Promise Neighborhood there are two early childhood education centers for infants through Pre-K children and an innovative parent support program that provides resources aimed at helping parents achieve the best for themselves and their children. These resources include family support specialists and one-on-one coaching to assist with financial stability, housing and health care, continuing education, and career advancement. To date, more than 750 children have attended BPN's Children's Academies and nearly 600 parents and caregivers have engaged in BPN's adult-centered programs.

BPN's overall focus on family well-being also includes community initiatives such as neighborhood beautification projects and health and wellness programs. Through BPN, M&T invests in the WNY community in a unique and different way, revitalizing community through holistic education.

### Giving our time to local organizations

Being a community-focused bank means being active in the communities we serve, as an organization and as individuals. Volunteering plays a strong role in M&T's culture and is a key driver that colleagues cite for joining M&T. We empower our people to be active in their communities and give every full-time employee 40 hours of paid time off each year to volunteer.

We rely on our colleagues who serve on boards and committees of local organizations to be a positive influence, advancing nonprofits and making our

communities more vibrant and successful. Serving as a board or committee member is not only a rewarding experience for colleagues, but also a great leadership development opportunity.

To create a more seamless and accessible experience for colleagues, we've introduced a platform to promote volunteer opportunities and to track volunteer time. We've also introduced a mandatory digital learning course to help employees understand the importance of volunteering and tracking the impact of volunteerism across the organization.

In 2022, our staff dedicated ~159,000 hours to volunteering in our communities.

# ~159,000

hours colleagues spent volunteering  
in our communities in 2022

# 702

employees served on 831 boards or  
committees for community organizations

### SPOTLIGHT

## WNY Community Impact Week



M&T Bank announced the launch of its first-ever WNY Community Impact Week in November of 2022, building on our long-standing commitment to supporting causes and organizations that strengthen the Buffalo region. This initiative, with the theme of "Giving With Gratitude," was a large-scale effort that empowered our workforce and branch network to uplift the community through volunteerism and charitable activities.

Hundreds of employees joined volunteer activities coordinated at WNY-based office and retail branch locations. Later in the week, the focus shifted to the on-site needs of community organizations across the region. Approximately 1,000 M&T employees volunteered to assist with a range of projects for 18 different community partners. Through our community-focused banking model, we plan to scale Community Impact Week throughout our footprint to reach all of our extended regions.

WNY M&T employees volunteer with the Tool Library, an all-volunteer nonprofit tool-lending library



### Responding to a racist attack on our community

On May 14, 2022, our hometown of Buffalo tragically experienced one of the most painful and devastating days in the city's history. A racist mass shooting targeting East Buffalo claimed 10 Black lives and changed our community forever. This act of hate, which took place across the street from our Jefferson Avenue branch, prompted an outpouring of love, bringing our neighbors together to meet community needs and help each other heal.

As we grieved the lives of 10 Buffalo neighbors, some of whom had personal ties to M&T employees, we understood our community, customers, and colleagues needed support—and we channeled our grief into action.



**“This is a time for action. A time to channel the range of emotions we’re all navigating—the anger, the sadness, and the frustration—into doing what we do, stepping up for our communities when they need us most and making a difference.”**

Eric Feldstein  
WNY Regional President

Our employees responded immediately and instinctively, rallying to help when their community most needed them. They led an organizational response that was urgent, earnest, and wide-ranging.

Among the many ways the M&T team deployed resources in the days, weeks, and months following May 14:

- Colleagues volunteered more than 2,200 hours of time to support East Buffalo, including distributing supplies at three of our retail branches located near the site of the shooting. Within days, these branch locations were stocked with nonperishable food items and packages of diapers, including significant donations by M&T employees, from not just Buffalo, but from across our footprint.
- M&T committed \$500,000 to the victims' families and organizations serving East Buffalo to support long-term rebuilding initiatives in the community. The M&T Charitable Foundation and Community Reinvestment Act teams continue to work closely with our African American Employee Resource Group to ensure the dedicated funds make the most significant impact possible.
- We expanded our culturally competent mental and emotional health resources and quickly made these resources available to colleagues and customers.
- We created new standing forums for connecting with community partners and civic leaders in East Buffalo to understand how to work together best to drive positive change.

Moving forward, we recognize there is much work ahead and more healing needed for our Buffalo and M&T communities. The entrenched racist and violent views of the attacker still permeate our country and present an ongoing threat to our Black customers, colleagues, and community members.

As a bank, we have a unique platform to use our dollars and the strength of our organization to finance equitable opportunities across the diverse markets we serve. In the months since the tragedy, we activated cross-functional teams to dig into some of these opportunities and create enduring capabilities around them, such as:

- We completed a thorough review of our crisis response processes for external community-based crises. We updated as necessary to ensure they were equipped to respond to the needs of our employees and community partners.
- We piloted a special loan program in East Buffalo for community members most in need of capital and are evaluating the program for other use cases in our footprint.
- We are strengthening our support for community partners through more consistent, open dialogue with community leaders and additional service initiatives like the WNY Community Impact Week, a massive mobilization of thousands of our Western New York employees to complete local volunteer projects.

We are prioritizing work that identifies critical equity opportunities, in partnership with community leaders and advocates, and aligning our resources to create positive change. This is a time for action, and our colleagues, customers, and community are holding us accountable.



TOGETHER WE WILL

# report

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ESG Metrics Index

**SECTION 2**

Task Force on Climate-related  
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**SECTION 3**

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**SECTION 4**

Disclosures

## SECTION 1 ESG Metrics Index

### ESG metrics index

We have created the following ESG metrics index to report on key areas of our performance that tie to the ESG Strategy and Sustainable Development Goals Alignment introduced on page 7. This 2022 ESG Report is the second time such an index has been created. Disclosures on these topics will likely evolve and mature with time. In line with our 2022 ESG Report, this index is organized according to the World Economic Forum's Stakeholder Capitalism Pillars: Planet, People, and Prosperity. Progress on Key Performance Indicators for Planet targets as presented in the Planet section in the 2022 ESG Report are highlighted in the index below.

Metrics have been identified based on both internal importance and data availability and, where relevant, have been informed by disclosure frameworks, including the United Nations' Sustainable Development Goals (SDGs), the Sustainability Accounting Standards Board (SASB), the Global Reporting Index (GRI), and the Task Force on Climate-related Financial Disclosures (TCFD). Unless otherwise specified, the Planet section includes calendar years 2019-2022; the Prosperity and People sections include calendar years 2021-2022. Unless otherwise noted, 2022 data cover calendar year January 1, 2022 through December 31, 2022, with data as of December 31, 2022. Where possible, the tables include the Legacy M&T (M&T) and People's United Bank (PUB) components that comprise the 2022 data totals. PUB full year 2022 data is included for the planet metrics section. See Disclosures on page 109 for more information.

## planet

### Key performance indicators for environmental sustainability goals and targets

	2019	2020	2021	2022 M&T	2022 PUB	2022 Leased Prop <sup>1</sup>	2022 EU <sup>1</sup>	2022 TOTAL
Scope 1 & 2 Emissions	48,590	41,061	38,418	34,265	11,555	13,519	11	<b>59,350</b>
Water usage in gallons	62,917,847	44,274,313	45,405,907	41,714,305	20,463,539	–	–	<b>62,177,844</b>
Non-diverted waste produced in pounds	4,489,027	4,130,252	3,910,259	3,819,126	136,556	–	–	<b>3,955,682</b>
Financing provided for renewable energy projects <sup>2</sup>	\$289,224,322	\$175,442,565	\$173,758,292	\$231,580,299	–	–	–	<b>\$231,580,299</b>

## SECTION 1 ESG Metrics Index

## planet

## Emissions

Scope 1, Scope 2, and Scope 3 (business travel) carbon dioxide equivalent (CO <sub>2</sub> e) emissions in metric tons <sup>3</sup>	2019	2020	2021	2022 M&T	2022 PUB	2022 Leased Prop	2022 EU	2022 Total	2019-2022 % change Legacy M&T <sup>4</sup>
<b>Scope 1<sup>5</sup></b>									
Natural gas	19,784	16,263	14,412	9,672	3,965	2,277	–	<b>15,914</b>	-51.1%
Oil	807	690	708	648	458	–	–	<b>1,106</b>	-19.7%
Propane	–	–	–	10	296	–	–	<b>306</b>	–
Diesel	Not available	Not available	Not available	43	–	–	–	<b>43</b>	–
Kerosene	Not available	Not available	Not available	–	28	–	–	<b>28</b>	–
Owned and leased vehicle fleet	1,506	1,168	1,253	1,376	Not separated	–	–	<b>1,376</b>	-8.6%
Corporate aircraft	Not available	Not available	Not available	151	–	–	–	<b>151</b>	–
<i>Scope 1 total</i>	22,098	18,121	16,373	11,900	4,747	2,277	–	<b>18,924</b>	-46.2%
<b>Scope 2: Location Based<sup>6</sup></b>									
Electricity: eGRID subregion	26,043	22,610	21,676	22,040	6,808	11,242	11	<b>40,101</b>	-15.4%
Steam	Not available	Not available	Not available	325	–	–	–	<b>325</b>	–
<i>Scope 2 total</i>	26,043	22,610	21,676	22,365	6,808	11,242	11	<b>40,426</b>	-14.1%
<i>Scope 1 (with vehicle fleet in 2019, 2020, 2021, and 2022 only) and Scope 2 total</i>	48,141	40,731	38,049	34,265	11,555	13,519	11	<b>59,350</b>	-28.8%
<b>Scope 3 (Business travel)<sup>7</sup></b>									
Employee vehicle miles (including rental cars)	3,322	1,141	820	1,540	62	–	–	<b>1,602</b>	-53.6%
Corporate air travel	3,781	741	485	2,593	288	–	–	<b>2,881</b>	-31.4%
Rail travel	Not available	Not available	Not available	208	9	–	–	<b>217</b>	–
<i>Scope 3 total</i>	7,103	1,882	1,305	4,341	359	–	–	<b>4,700</b>	-38.9%

## SECTION 1 ESG Metrics Index

## planet

Resource usage and waste production<sup>8</sup>

	2019	2020	2021	2022 M&T	2022 PUB	2022 Leased Prop	2022 TOTAL	2019-2022 % change Legacy M&T
<b>NATURAL GAS CONSUMPTION</b> Consumption in Metric Million British thermal units (MMBtu)	252,664	215,327	202,667	182,105	74,656	42,823	<b>299,622</b>	-27.9%
<b>OIL CONSUMPTION</b> Consumption in gallons	71,609	64,424	64,924	63,242	44,699	-	<b>107,941</b>	-11.7%
<b>PROPANE CONSUMPTION</b> Consumption in gallons	6,957	2,251	8,644	1,727	51,616	-	<b>53,343</b>	-75.2%
<b>DIESEL CONSUMPTION</b> Consumption in gallons	Not available	3,819	2,977	4,149	-	-	<b>4,149</b>	-
<b>KEROSENE CONSUMPTION</b> Consumption in gallons	Not available	Not available	Not available	-	2,730	-	<b>2,730</b>	-
<b>ELECTRICITY CONSUMPTION</b> Consumption in Megawatt hours (MWh)	111,240	102,974	98,050	96,630	25,330	28,920	<b>150,880</b>	-13.1%
<b>TOTAL ENERGY CONSUMPTION (natural gas, oil, electricity)</b> Consumption in Megawatt hours (MWh)	Not available	Not available	Not available	-	-	-	<b>244,754</b>	-
<b>WATER USAGE</b> Usage in gallons	62,917,847	44,274,313	45,405,907	41,714,305	20,463,539	-	<b>62,177,844</b>	-33.7%
Usage per employee in gallons	5,079	3,738	4,438	Not separated	Not separated	-	<b>2,744</b>	-46%
<b>WASTE PRODUCED</b> Diverted and non-diverted waste produced in pounds	5,644,403	5,244,063	5,012,693	4,998,801	168,683	-	<b>5,167,484</b>	-11.4%
Diverted waste produced in pounds	1,155,376	1,113,812	1,102,434	1,179,675	136,556	-	<b>1,211,802</b>	2.1%
Non-diverted waste produced in pounds	4,489,027	4,130,252	3,910,259	3,819,126	32,127	-	<b>3,955,682</b>	-14.9%
<b>SENSITIVE DOCUMENTS RECYCLED</b> Paper recycled in pounds	2,145,468	1,474,838	3,355,695	5,251,258	1,176,052	-	<b>6,427,310</b>	144.8%
<b>SHEETS PRINTED</b> Number of printed sheets <sup>9</sup>	-	46,149,739	44,270,821	46,145,672	6,181,819	-	<b>52,327,491</b>	-
<b>TECHNICAL EQUIPMENT RECYCLED</b> Technical equipment recycled in pounds	115,819	127,376	270,045	Not separated	Not separated	-	<b>524,929</b>	-

## SECTION 1 ESG Metrics Index

## planet

## Philanthropy and finance

<b>M&amp;T Charitable Foundation contributions to environmental or conservation organizations</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021 M&amp;T</b>	<b>2022 M&amp;T</b>	<b>2022 PUB</b>	<b>2022 TOTAL</b>
Contributions in dollars	\$677,196	\$900,065	\$743,025	\$893,550	Not separated	Not separated	<b>\$1,511,140</b>
<b>Financing provided for renewable energy projects<sup>2</sup></b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>			
Financing in dollars	\$28,649,266	\$289,224,322	\$175,442,565	\$173,758,292	\$231,580,299	–	<b>\$231,580,299</b>
<b>Green program loans</b>			<b>2020</b>	<b>2021</b>			
\$ of loan originations <sup>10</sup>	Not available	Not available	\$547,064,433	\$855,961,867	\$562,089,689	–	<b>\$562,089,689</b>

**Planet notes:**

- 1 Leased Prop and EU data sets are separate for the reporting year, since this is the first year they are being included in our inventory and rely on spend based estimations for those calculations.
- 2 Financing instruments include tax equity investments, tax leases, loans and conditional sales contracts.
- 3 Energy data and associated emission calculations are for our branches and offices in the United States, Canada, and the European Union in addition to air and ground fleet vehicle use and business travel in the United States. Emission factors for Scope 1, 2, and 3 emissions were sourced from the most recent versions available at the time of the 2022 ESG Report's production. Emissions factors for US-based Scope 1 & 2 were sourced from the Environmental Protection Agency's Center for Corporate Climate Leadership's GHG Emission Factors Hub. US EEIO (Environmentally Extended Input Output) emission factors were used for properties in Canada and the European Union following conversion from local currency. For all conversions to carbon dioxide equivalent emissions, the global warming potentials (GWP) cited within Table 11 (Global Warming Potentials (GWPs)) in the GHG Emission Factors Hub for methane CH4 and nitrous oxide N2O were used. These were sourced from IPCC AR5.
- 4 The 2019-2022 % change to Legacy M&T excludes both leased prop and EU calculations since this is the first year that leased prop and EU are being calculated, there is no baseline data to reference from 2019.
- 5 The following tables and fuel types were used for the Scope 1 calculations from Table 1 (Stationary Combustion) within the GHG Emission Factors Hub: Branches and offices: fuel types of natural gas, oil (distillate fuel oil no.2), propane, diesel, and kerosene; owned and leased vehicle fleet; fuel types of motor gasoline and motor diesel; aircraft: fuel type of jet fuel. Fugitive emissions are also relevant but not yet calculated. At the time of production of the 2022 ESG Report, approximately 12% of reported Scope 1 emissions were estimated.
- 6 Emissions factors for US-based Scope 2 emissions were sourced from the Environmental Protection Agency's Center for Corporate Climate Leadership's GHG Emission Factors Hub. US EEIO (Environmentally Extended Input Output) emission factors were used for properties in Canada and the European Union following a conversion from local currency. The 2020 M&T Environmental, Social, and Governance Report included Scope 2 emissions based on eGRID U.S. national average output emission rates. Because the eGRID subregion rates provide more precision, this method was adopted for the 2021 M&T Environmental, Social, and Governance Report and is used again in the 2022 ESG Report. At the time of production of the 2022 ESG Report, approximately 30% of reported Scope 2 emissions were estimated.
- 7 For Scope 3 calculations, Table 10 (Scope 3 Category 6: Business Travel) from the GHG Emission Factors Hub was used with the following units applied: For employee vehicle miles, passenger car vehicle miles were used because employee vehicle type is not available; for corporate air travel, air travel passenger miles for short-haul, medium-haul, and long-haul flights were used. Emissions from chartered air travel: Calculated using the estimated fuel burn for each aircraft type, once estimated fuel consumption is determined, emissions are calculated using the fuel-based method. Gallons of fuel consumed were estimated based on aircraft make and model (US EPA Emissions Factor Hub Tables 2 & 5 used for this calculation). Mobile combustion emissions from rail and rental cars are also relevant and were calculated using of the Environmental Protection Agency's Center for Corporate Climate Leadership's GHG Emission Factors Hub ([GHG Emission Factors Hub | US EPA](#)) in addition to spend- and distance-based emissions calculations using US EEIO. Air Travel is calculated using the spend-based method for Legacy PUB data and via the distance-based method for Legacy M&T data. Rail Travel is calculated using the spend based method for both M&T and PUB. Mileage reimbursement and legacy M&T rental car emissions are calculated using the distance based method. Legacy PUB mileage reimbursement and legacy M&T rail travel are calculated via the spend based method.
- 8 Energy, water, and waste data are for our owned or leased offices and branches in the United States, and estimated consumption for our EU properties are based on spend.
- 9 Does not include printing from home, which is available for a small portion of employees (~120, <1% of employees).
- 10 Includes new originations and loan modifications for Fannie Mae, Freddie Mac, and/or FHA green program loans. Due to system of record reporting, Freddie Mac and FHA do not include closings in November and December of 2022.

## SECTION 1 ESG Metrics Index

## people

Category	Metric	Units	2021 M&T	2022 M&T	2022 PUB	2022 TOTAL
Talent attraction	Number and percentage of new employee hires by demographic category (employee category is noted where available)	# and % of new hires	See pages 72 and 73 of the 2021 ESG report	Not separated	Not separated	See tables on pages <a href="#">90</a> and <a href="#">91</a>
	Number and percentage of employees (new and internal hires) in training and development programs by demographic category	# and % of program participants	See table on page 73 of the 2021 ESG report	Not separated	Not separated	See table on page <a href="#">92</a>
	Z Development Program (ZDP): number of participants (apprentices) and hours of pre-apprenticeship training <sup>1</sup>	# of apprentices	23	34	–	<b>34</b>
		# of pre-apprenticeship training hours	2,300	1,400	–	<b>1,400</b>
CareerWise Greater Buffalo Apprenticeship	# of apprentices	–	9	–	<b>9</b>	
Talent development	Average hours of training per employee <sup>2</sup>	# of average hours of training	33	34	31	<b>33</b>
	Tuition Reimbursement Program participation <sup>3</sup>	# of employees reimbursed	204	145	25	<b>170</b>
		\$ of tuition reimbursed	\$1,354,676	\$1,093,940	\$64,890	<b>\$1,158,830</b>
	General Assembly (technology training provider): number of employees trained and certified (i.e., employee meets all course requirements) and number of training hours	# of employees trained and certified	204	108	–	<b>108</b>
		# of training hours	342	1,590	–	<b>1,590</b>
	Pluralsight (online technology skills platform): number of employees trained, number of training hours (including average view time), and total courses completed	# of employees trained	1,440	903	–	<b>903</b>
		# of training hours spent and average view time	11,812 (10 hours average)	8,830 (6 hours average)	–	<b>8,830 (6 hours average)</b>
		# of courses completed	8,902	3,937	–	<b>3,937</b>
	O'Reilly (online technology skills platform and technology training provider): number of employees trained and number of training hours	# of employees trained	–	256	–	<b>256</b>
		# of training hours	–	3,313	–	<b>3,313</b>
Percentage of employees who received an annual performance appraisal <sup>4</sup>	% of employees	Not reported	Not separated	Not separated	<b>92%</b>	

## SECTION 1 ESG Metrics Index

## people

Category	Metric	Units	2021 M&T	2022 M&T	2022 PUB	2022 TOTAL
<b>Talent retention</b>	Number of promotions and lateral moves by demographic category	# of promotions and # of lateral moves	See page 74 of the 2021 ESG report	Not separated	Not separated	See table on page <a href="#">93</a>
	Number and percentage of voluntary turnovers by demographic category	# of employees and % of employees	Not reported	Not separated	Not separated	See tables on pages <a href="#">93</a> , <a href="#">94</a> , and <a href="#">95</a>
	Average employee tenure <sup>5</sup>	# of years	9.9	9.2	10.8	<b>9.5</b>
	Employee engagement index <sup>6</sup>	Engagement index %	84%	84%	80%	<b>83%</b>
<b>Employee diversity and inclusion</b>	Number and percentage of employees by demographic category (employee category is noted where available)	# of employees and % of employees	See tables on pages 70 and 71 of the 2021 ESG report	Not separated	Not separated	See tables on pages <a href="#">88</a> and <a href="#">89</a>
	Percentage of employees who feel their manager treats all colleagues fairly, regardless of background <sup>7</sup>	% of employees	90%	91%	84%	<b>90%</b>
	Percentage of employees who feel their team has a climate in which diverse perspectives are valued <sup>7</sup>	% of employees	88%	90%	84%	<b>89%</b>
	Percentage of employees who feel the company has created an environment where people with diverse backgrounds can succeed <sup>7</sup>	% of employees	82%	85%	79%	<b>84%</b>
	Percentage of employees who feel like they really belong at the company <sup>7</sup>	% of employees	74%	76%	72%	<b>75%</b>
	Percentage of employees who feel they work in an environment that is free of discrimination and offensive behavior <sup>7</sup>	% of employees	Not asked in 2021	88%	86%	<b>88%</b>
	Percentage of employees who feel they can be their authentic selves at work <sup>7</sup>	% of employees	Not asked in 2021	81%	80%	<b>81%</b>

## SECTION 1 ESG Metrics Index

## people

Number and percentage of employees by gender, 2022 <sup>8,9,10</sup>							
Employee category	Women		Men		Undeclared		Total
	#	%	#	%	#	%	#
Executive/Senior Officials and Managers	26	19%	108	81%	0	0.0%	134
First/Mid Level Officials and Managers	1,874	50%	1,845	50%	2	0.1%	3,721
Professionals	3,930	51%	3,694	48%	16	0.2%	7,640
All Other	7,872	71%	3,267	29%	22	0.2%	11,161
<b>Total</b>	<b>13,702</b>	<b>60%</b>	<b>8,914</b>	<b>39%</b>	<b>40</b>	<b>0.2%</b>	<b>22,656</b>

Number and percentage of employees by race/ethnicity, 2022<sup>8,9,10</sup>

Employee category	White		Asian		Black/African American		Hispanic or Latino		American Indian or Alaska Native		Native Hawaiian or Other Pacific Islander		Two or More Races		Not Specified		Total
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#
Executive/Senior Officials and Managers	126	94%	4	3%	2	1%	0	0%	1	0.7%	0	0.0%	1	1%	0	0%	134
First/Mid Level Officials and Managers	3,030	81%	181	5%	253	7%	161	4%	5	0.1%	3	0.1%	61	2%	27	1%	3,721
Professionals	5,885	77%	550	7%	600	8%	288	4%	22	0.3%	12	0.2%	165	2%	118	2%	7,640
All Other	7,176	64%	529	5%	1,775	16%	1,147	10%	30	0.3%	25	0.2%	333	3%	146	1%	11,161
<b>Total</b>	<b>16,217</b>	<b>72%</b>	<b>1,264</b>	<b>6%</b>	<b>2,630</b>	<b>12%</b>	<b>1,596</b>	<b>7%</b>	<b>58</b>	<b>0.3%</b>	<b>40</b>	<b>0.2%</b>	<b>560</b>	<b>2%</b>	<b>291</b>	<b>1%</b>	<b>22,656</b>



## SECTION 1 ESG Metrics Index

## people

Number and percentage of employees by age group, 2022 <sup>8,9,10</sup>							
Employee category	Age <30		Age 30-50		Age >50		Total
	#	%	#	%	#	%	#
Executive/Senior Officials and Managers	0	0%	30	22%	104	78%	134
First/Mid Level Officials and Managers	156	4%	1,969	53%	1,596	43%	3,721
Professionals	1,295	17%	3,768	49%	2,577	34%	7,640
All Other	2,487	22%	4,784	43%	3,890	35%	11,161
<b>Total</b>	<b>3,938</b>	<b>17%</b>	<b>10,551</b>	<b>47%</b>	<b>8,167</b>	<b>36%</b>	<b>22,656</b>

Number and percentage of employees self-identifying as having a disability, as a Veteran, or as LGBTQ+, 2022 <sup>8,9,10,11</sup>						
Employee status	Disability		Veteran		LGBTQ+	
	#	%	#	%	#	%
<b>Employee self-identifies</b>	<b>2,609</b>	<b>12%</b>	<b>374</b>	<b>2%</b>	<b>398</b>	<b>2%</b>
All others	20,047	88%	22,282	98%	22,258	98%
Total	22,656	100%	22,656	100%	22,656	100%

## SECTION 1 ESG Metrics Index

## people

Number and percentage of new employee hires by gender, 2022 <sup>8,10,12,13</sup>							Women		Men		Undeclared		Total
Employee category	#	%	#	%	#	%	#	%	#	%	#		
Executive/Senior Officials and Managers	1	50%	1	50%	0	0.0%	2						
First/Mid Level Officials and Managers	112	44%	142	56%	0	0.0%	254						
Professionals	422	36%	735	63%	5	0.4%	1,162						
All Other	2,346	70%	980	29%	8	0.2%	3,334						
<b>Total</b>	<b>2,881</b>	<b>61%</b>	<b>1,858</b>	<b>39%</b>	<b>13</b>	<b>0.3%</b>	<b>4,752</b>						

Number and percentage of new employee hires by race/ethnicity, 2022 <sup>8,10,12,13</sup>																	
Employee category	White		Asian		Black/African American		Hispanic or Latino		American Indian or Alaska Native		Native Hawaiian or Other Pacific Islander		Two or More Races		Not Specified		Total
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#
Executive/Senior Officials and Managers	2	100%	0	0%	0	0%	0	0%	0	0.0%	0	0.0%	0	0%	0	0%	2
First/Mid Level Officials and Managers	162	64%	41	16%	29	11%	15	6%	0	0.0%	0	0.0%	2	1%	5	2%	254
Professionals	784	67%	168	14%	96	8%	66	6%	2	0.2%	2	0.2%	22	2%	22	2%	1,162
All Other	1,608	48%	172	5%	786	24%	587	18%	11	0.3%	9	0.3%	118	4%	43	1%	3,334
<b>Total</b>	<b>2,556</b>	<b>54%</b>	<b>381</b>	<b>8%</b>	<b>911</b>	<b>19%</b>	<b>668</b>	<b>14%</b>	<b>13</b>	<b>0.3%</b>	<b>11</b>	<b>0.2%</b>	<b>142</b>	<b>3%</b>	<b>70</b>	<b>1%</b>	<b>4,752</b>

## SECTION 1 ESG Metrics Index

## people

Number and percentage of new employee hires by age group, 2022 <sup>8,10,12,13</sup>							
Employee category	Age <30		Age 30-50		Age >50		Total
	#	%	#	%	#	%	#
Executive/Senior Officials and Managers	0	0%	0	0%	2	100%	2
First/Mid Level Officials and Managers	9	4%	186	73%	59	23%	254
Professionals	280	24%	640	55%	242	21%	1,162
All Other	1,476	44%	1,390	42%	468	14%	3,334
<b>Total</b>	<b>1,765</b>	<b>37%</b>	<b>2,216</b>	<b>47%</b>	<b>771</b>	<b>16%</b>	<b>4,752</b>

Number and percentage of new employee hires self-identifying as having a disability, as a Veteran, or as LGBTQ+, 2022 <sup>8,10,11,12,13</sup>						
Employee status	Disability		Veteran		LGBTQ+	
	#	%	#	%	#	%
Employee self-identifies	551	12%	148	3%	121	3%
All others	4,201	88%	4,604	97%	4,631	97%
<b>Total</b>	<b>4,752</b>	<b>100%</b>	<b>4,752</b>	<b>100%</b>	<b>4,752</b>	<b>100%</b>

## SECTION 1 ESG Metrics Index

## people

Number and percentage of employees (new and internal hires) in training and development programs by gender and race/ethnicity, 2022<sup>8,13,14</sup>

Program	Women		Men		Gender Undeclared		White		Asian		Black/ African American		Hispanic or Latino		American Indian or Alaska Native		Native Hawaiian or Other Pacific Islander		Two or More Races		Race/ Ethnicity Not Specified		Total
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#
Community Branch Management Program	21	48%	23	52%	0	0%	25	57%	3	7%	9	20%	5	11%	0	0%	0	0%	1	2%	1	2%	44
Executive Associate Program	7	35%	13	65%	0	0%	11	55%	4	20%	4	20%	0	0%	0	0%	1	5%	0	0%	0	0%	20
Management Development Program	37	51%	35	49%	0	0%	49	68%	7	10%	12	17%	2	3%	0	0%	0	0%	2	3%	0	0%	72
Rising Leaders Development Program	47	77%	14	23%	0	0%	25	41%	6	10%	20	33%	5	8%	0	0%	0	0%	3	5%	2	3%	61
Senior Leadership Development Program	17	50%	17	50%	0	0%	25	74%	2	6%	4	12%	1	3%	0	0%	0	0%	2	6%	0	0%	34
Technology Development Program	9	17%	43	81%	1	2%	25	47%	18	34%	6	11%	1	2%	0	0%	0	0%	2	4%	1	2%	53
<b>Total across programs</b>	<b>138</b>	<b>49%</b>	<b>145</b>	<b>51%</b>	<b>1</b>	<b>0.4%</b>	<b>160</b>	<b>56%</b>	<b>40</b>	<b>14%</b>	<b>55</b>	<b>19%</b>	<b>14</b>	<b>5%</b>	<b>0</b>	<b>0%</b>	<b>1</b>	<b>0.4%</b>	<b>10</b>	<b>4%</b>	<b>4</b>	<b>1%</b>	<b>284</b>

## SECTION 1 ESG Metrics Index

## people

Number of promotions and lateral moves by demographic category, 2022<sup>8,11,13</sup>

	Women	Men	Gender Undeclared	White	Asian	Black/African American	Hispanic or Latino	American Indian or Alaska Native	Native Hawaiian or Other Pacific Islander	Two or More Races	Race/Ethnicity Not Specified	Age <30	Age 30-50	Age >50	Employee Self-Identifies as Having a Disability <sup>8</sup>	Employee Self-Identifies as a Veteran <sup>8</sup>	Employee Self-Identifies as LGBTQ+ <sup>8</sup>	Total
	#	#	#	#	#	#	#	#	#	#	#	#	#	#	#	#	#	#
Number of promotions	2,331	1,485	6	2,897	170	325	208	11	6	118	87	888	2,153	781	456	54	88	3,822
Number of lateral moves	1,891	1,052	0	1,896	191	335	383	5	7	75	51	503	1,020	1,420	359	41	61	2,943
<b>Total promotions and lateral moves</b>	<b>4,222</b>	<b>2,537</b>	<b>6</b>	<b>4,793</b>	<b>361</b>	<b>660</b>	<b>591</b>	<b>16</b>	<b>13</b>	<b>193</b>	<b>138</b>	<b>1,391</b>	<b>3,173</b>	<b>2,201</b>	<b>815</b>	<b>95</b>	<b>149</b>	<b>6,765</b>

Number and percentage of voluntary turnovers by gender, 2022<sup>8,10,13,15</sup>

Employee category	Women		Men		Undeclared		Total
	#	%	#	%	#	%	#
Executive/Senior Officials and Managers	5	45%	6	55%	0	0.0%	11
First/Mid Level Officials and Managers	160	43%	214	57%	0	0.0%	374
Professionals	429	44%	553	56%	4	0.4%	986
All Other	1,964	69%	860	30%	10	0.4%	2,834
<b>Total</b>	<b>2,558</b>	<b>61%</b>	<b>1,633</b>	<b>39%</b>	<b>14</b>	<b>0.3%</b>	<b>4,205</b>

## SECTION 1 ESG Metrics Index

## people

Number and percentage of voluntary turnovers by race/ethnicity, 2022<sup>8,10,13,15</sup>

Employee category	White		Asian		Black/African American		Hispanic or Latino		American Indian or Alaska Native		Native Hawaiian or Other Pacific Islander		Two or More Races		Not Specified		Total
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#
Executive/Senior Officials and Managers	8	73%	0	0%	2	18%	0	0%	0	0.0%	0	0.0%	0	0%	1	9.1%	11
First/Mid Level Officials and Managers	296	79%	27	7%	25	7%	17	5%	0	0.0%	0	0.0%	7	2%	2	0.5%	374
Professionals	686	70%	115	12%	112	11%	33	3%	1	0.1%	0	0.0%	26	3%	13	1.3%	986
All Other	1,563	55%	146	5%	626	22%	347	12%	15	0.5%	4	0.1%	91	3%	42	1.5%	2,834
<b>Total</b>	<b>2,553</b>	<b>61%</b>	<b>288</b>	<b>7%</b>	<b>765</b>	<b>18%</b>	<b>397</b>	<b>9%</b>	<b>16</b>	<b>0.4%</b>	<b>4</b>	<b>0.1%</b>	<b>124</b>	<b>3%</b>	<b>58</b>	<b>1.4%</b>	<b>4,205</b>

Number and percentage of voluntary turnovers by age group, 2022<sup>8,10,13,15</sup>

Employee category	Age <30		Age 30-50		Age >50		Total
	#	%	#	%	#	%	#
Executive/Senior Officials and Managers	0	0%	1	9%	10	91%	11
First/Mid Level Officials and Managers	19	5%	203	54%	152	41%	374
Professionals	253	26%	485	49%	248	25%	986
All Other	1,024	36%	1,191	42%	619	22%	2,834
<b>Total</b>	<b>1,296</b>	<b>31%</b>	<b>1,880</b>	<b>45%</b>	<b>1,029</b>	<b>24%</b>	<b>4,205</b>

## SECTION 1 ESG Metrics Index

## people

Number and percentage of voluntary turnovers by employees self-identifying as having a disability, as a Veteran, or as LGBTQ+, 2022<sup>9,10,11,13,15</sup>

Employee status	Disability		Veteran		LGBTQ+	
	#	%	#	%	#	%
Employee self-identifies	405	10%	87	2%	99	2%
All others	3,800	90%	4,118	98%	4,106	98%
<b>Total</b>	<b>4,205</b>	<b>100%</b>	<b>4,205</b>	<b>100%</b>	<b>4,205</b>	<b>100%</b>

## People notes:

- 1 Because hours are tracked for the program, rather than the calendar year, the 2022 total includes 2021 hours and the 2021 total includes 2020 hours. These hours cannot be split out.
- 2 Training hours include activities tracked through our internal learning and development platform, development training programs, and estimates for some additional training. There are some activities not yet included that we are working to track.
- 3 Data for former PUB employees include reimbursements provided by M&T to former PUB employees starting May 20, 2022. Prior to May 20, 2022, PUB had reimbursed \$84,968 to 45 employees since January 1, 2022.
- 4 Data are as of 12/31/22. Includes active employees eligible for annual performance appraisal (hired before 10/1/2022); does not include termed employees or employees in to-be-severed roles; includes U.S. and non-U.S. employees.
- 5 Data are as of 12/31/22. Calculation includes People's United employees not retained, includes employees active or on leave as of the 12/31/22 employee roster, and excludes terminated individuals and non-employee records.
- 6 Based on responses within the 2022 Employee Engagement Survey.
- 7 Based on responses within the 2022 Employee Engagement Survey. The percentage is the share of employees who answered the survey question with a favorable rating (strongly agree or agree); the remaining percentage includes neutral (neither agree nor disagree) and unfavorable (strongly disagree or disagree) ratings.
- 8 Includes employees with work locations in the United States, or if work from home, with a home address in the United States.
- 9 Data are as of 12/31/2022.
- 10 Employee categories align to EEO-1 employment category definitions.
- 11 Self-identification as having a disability, as a Veteran, or as LGBTQ+ is not required to be reported by employees and is voluntarily self-disclosed by employees. As such, we expect these numbers to grow as M&T continues efforts to enhance data collection by working with employees to provide guidance on and understanding of self-reporting.
- 12 Includes external hires to corporate positions only.
- 13 Data are as of 12/31/2022 and covers 1/1/2022-12/31/2022.
- 14 These numbers reflect anyone hired into the 2022 classes for these programs; it does not remove anyone terminated from the rosters. The total includes the following programs: Community Branch Management Program, Executive Associate Program, Management Development Program, Rising Leaders Development Program, Senior Leadership Development Program, and Technology Development Program.
- 15 Excludes fixed-term employees and terminations due to no call, no show, or renegeing and individuals termed as a result of the PUB acquisition. PUB turnover is tracked from 4/2/2022 forward.

## SECTION 1 ESG Metrics Index

## prosperity

Category	Metric	Units	2021 M&T	2022 M&T	2022 PUB	2022 TOTAL
Housing	Low-income housing tax credits (LIHTC) <sup>1</sup>	investment \$ committed	\$117,079,631	\$116,066,076	\$21,125,991	<b>\$137,192,067</b>
		# of new or renovated affordable housing units created (estimated)	768	746	173	<b>919</b>
		total \$ book value of all investments as of year end (12/31)	\$785,203,471	\$782,532,559	\$525,985,520	<b>\$1,308,518,079</b>
	Affordable housing debt: Total transactions, financing, and units in projects that contain affordable housing <sup>2,3,4</sup>	# of transactions	In-footprint: 88	82	4	<b>86</b>
			Out-of-footprint: 18	11	0	<b>11</b>
			Total: 106	93	4	<b>97</b>
		\$ of total project debt	In-footprint: \$1,587,077,317	\$2,056,469,577	\$6,837,000	<b>\$2,063,306,577</b>
			Out-of-footprint: \$141,328,492	\$199,577,640	\$0	<b>\$199,577,640</b>
			Total: \$1,728,405,809	\$2,256,047,217	\$6,837,000	<b>\$2,262,884,217</b>
		# of total project units	In-footprint: 9,221	11,706	64	<b>11,770</b>
			Out-of-footprint: 2,153	869	0	<b>869</b>
			Total: 11,374	12,575	64	<b>12,639</b>
	Affordable housing debt: Total CRA-eligible transactions, financing, and affordable units <sup>2,3,4</sup>	# of transactions	In-footprint: 47	63	4	<b>67</b>
			Out-of-footprint: Not applicable	–	–	<b>–</b>
			Total: 47	63	4	<b>67</b>
		\$ total CRA-eligible debt	In-footprint: \$589,762,000	\$1,451,396,000	\$6,837,000	<b>\$1,458,233,000</b>
			Out-of-footprint: Not applicable	–	–	<b>–</b>
			Total: \$589,762,000	\$1,451,396,000	\$6,837,000	<b>\$1,458,233,000</b>
		# of total affordable units	In-footprint: 2,790	3,625	27	<b>3,652</b>
			Out-of-footprint: Not applicable	–	–	<b>–</b>
			Total: 2,790	3,625	27	<b>3,652</b>
Originated and purchased home purchase loans by low- and moderate-income (LMI) applicants <sup>5</sup>	# of home purchase loans	3,255	2,514	143	<b>2,657</b>	
	% of home purchase loans	37%	32%	2%	<b>33%</b>	
Originated and purchased home purchase loans by low- and moderate-income (LMI) Census Tracts <sup>6</sup>	# of home purchase loans	2,111	1,904	74	<b>1,978</b>	
	% of home purchase loans	24%	24%	1%	<b>25%</b>	



## SECTION 1 ESG Metrics Index

## prosperity

Category	Metric	Units	2021 M&T	2022 M&T	2022 PUB	2022 TOTAL
Small business	Small business and small farm loans within low- and moderate-income (LMI) Census Tracts <sup>7</sup>	# of loans	6,832	2,784	167	<b>2,951</b>
		% of total loans	20%	22%	1%	<b>23%</b>
		\$ amount of loans	\$688,256,000	\$288,702,000	\$23,016,000	<b>\$311,718,000</b>
		% of total \$ amount of loans	20%	20%	2%	<b>22%</b>
	Small business and small farm loans to businesses with Gross Annual Revenue (GAR) <=\$1,000,000 <sup>8</sup>	# of loans	12,107	8,067	323	<b>8,390</b>
		% of total loans	36%	64%	3%	<b>66%</b>
		\$ amount of loans	\$723,284,000	\$505,523,000	\$28,820,000	<b>\$534,343,000</b>
		% of total \$ amount of loans	21%	35%	2%	<b>37%</b>
	Small Business Association (SBA) loan # and \$ originated by Fiscal Year (October 1 to September 30) <sup>9</sup>	# of loans originated	1,115	1,409	31	<b>1,440</b>
		\$ amount of loans originated	\$201,474,900	\$200,229,100	\$3,572,200	<b>\$203,801,300</b>
	Number of small business education events and estimated attendees <sup>10</sup>	# of events	106	Not separated	Not separated	<b>180</b>
		# of estimated attendees	5,566	Not separated	Not separated	<b>6,423</b>
	Number of activity starts for business-oriented content on the online Financial Education Center <sup>11</sup>	# of activity starts	1,523	Not separated	Not separated	<b>1,455</b>

## SECTION 1 ESG Metrics Index

## prosperity

Category	Metric	Units	2021 M&T	2022 M&T	2022 PUB	2022 TOTAL
Retail customers	MyWay checking: Originations, number of accounts, and balances	# of originations	46,247	Not separated	Not separated	<b>39,015</b>
		# of open accounts in portfolio	102,396	Not separated	Not separated	<b>124,444</b>
		\$ balances in portfolio	\$108,922,333	Not separated	Not separated	<b>\$140,409,104</b>
	Secured Credit Card: Originations, number of accounts, and balances	# of originations	8,200	Not separated	Not separated	<b>5,626</b>
		# of open accounts in portfolio	11,624	Not separated	Not separated	<b>13,243</b>
		\$ of balances in portfolio	\$3,459,349	Not separated	Not separated	<b>\$4,003,450</b>
	Number of branches designated as multicultural centers in the year and overall	# of branches designated in the year	99	1	–	<b>1</b>
		# of branches designated overall	118	119	–	<b>119</b>
	Retail and mortgage events: Number of events and estimated attendees for events to expand access to financial services and education <sup>12</sup>	# of events	Retail: 157 Mortgage: 584	Not separated	Not separated	<b>Retail: 568 Mortgage: 918</b>
		# estimated attendees	Retail: 2,013 Mortgage: 7,669	Not separated	Not separated	<b>Retail: 11,648 Mortgage: 15,323</b>
	Number of activity starts for consumer-oriented content on the online Financial Education Center <sup>11</sup>	# of activity starts	16,578	Not separated	Not separated	<b>6,129</b>

## SECTION 1 ESG Metrics Index

## prosperity

Category	Metric	Units	2021 M&T	2022 M&T	2022 PUB	2022 TOTAL
<b>Community development</b>	Community development investment and loan activities	Community development investment \$ commitments and total \$ book value; community development lending \$ originated	See table on page 79 of the 2021 ESG Report	See tables on pages <a href="#">100</a> and <a href="#">101</a>	See tables on pages <a href="#">100</a> and <a href="#">101</a>	See tables on pages <a href="#">100</a> and <a href="#">101</a>
	CRA Rating	Rating	Outstanding	–	–	–
<b>Charitable contributions</b>	\$ contributed through corporate giving and the M&T Charitable Foundation <sup>13</sup>	\$ contributed	~\$33.9 million	Not separated	Not separated	<b>~\$47 million</b>
<b>Responsible sourcing</b>	Number and share of suppliers, \$ spent, and share of overall spend \$ by diverse supplier ownership <sup>14</sup>	# of suppliers	140	Not separated	Not separated	<b>171</b>
		% of suppliers	4.1%	Not separated	Not separated	<b>4.2%</b>
		\$ of sourceable spend	\$68,644,938	Not separated	Not separated	<b>\$71,080,166</b>
		% of sourceable spend	7.2%	Not separated	Not separated	<b>6.2%</b>

## SECTION 1 ESG Metrics Index

## prosperity

## Community development investments

Investment type	2021 M&T	2022 M&T	2022 PUB	2022 TOTAL
<b>New Markets Tax Credits (NMTTC)</b>				
New commitments	\$23,500,000	\$7,000,000	\$0	<b>\$7,000,000</b>
Total book value as of year end <sup>15</sup>	\$60,978,466	\$64,980,678	\$0	<b>\$64,980,678</b>
<b>Equity Equivalent Investments (EQ2)</b>				
New commitments	\$0	\$250,000	\$0	<b>\$250,000</b>
Total book value as of year end	\$6,701,084	\$6,576,083	\$6,570,678	<b>\$13,146,761</b>
<b>Rural Business Investment Companies (RBIC)</b>				
New commitments	\$0	\$0	\$0	<b>\$0</b>
Total book value as of year end	\$1,662,585	\$2,688,615	\$268,861	<b>\$2,957,476</b>
<b>Venture Capital Investments (previously called impact pools)</b>				
New commitments	\$0	\$0	\$0	<b>\$0</b>
Total book value as of year end	\$2,898,917	\$5,327,952	\$3,578,958	<b>\$8,906,910</b>
<b>Small Business Investment Companies (SBIC)</b>				
New commitments	\$1,165,631	\$0	\$0	<b>\$0</b>
Total book value as of year end	Not available	\$0	\$12,601,360	<b>\$12,601,360</b>
<b>CRA-eligible Community Development Credit Unions (CDCU) (non-member deposits)</b>				
New commitments	\$708,191	\$583,707	\$0	<b>\$583,707</b>
Total book value as of year end	\$783,191	\$683,707	\$249,809	<b>\$933,516</b>
<b>CRA-eligible Bonds</b>				
New commitments	\$33,965,000	\$48,448,267	\$0	<b>\$48,448,267</b>
Total book value as of year end	Not available	Not available	Not available	<b>Not available</b>
<b>Other investments<sup>16</sup></b>				
New commitments	\$3,531,401	\$7,156,243	\$0	<b>\$7,156,243</b>
Total book value as of year end	Not available	Not available	Not available	<b>Not available</b>

## SECTION 1 ESG Metrics Index

## prosperity

## Community development lending

Loan type	2021 M&T	2022 M&T	2022 PUB	2022 TOTAL
<b>Community development loans and letters of credit originated amounts<sup>17, 18</sup></b>	\$1,379,284,000	\$1,558,347,000	\$54,420,000	<b>\$1,612,767,000</b>

## Prosperity notes:

- PUB investments initiated from the PUB pipeline and closed/committed by M&T. PUB book values include investments made prior to the 2022 merger that were brought into the M&T portfolio.
- 2022 includes financing for group homes and homeless shelters.
- Does not include PUB transactions made prior to Legal Day 1. These total ~\$16,920,000 in CRA-eligible debt.
- In-footprint includes FL and MA.
- 2022 M&T data include 266 LMI loans within legacy M&T counties that overlap with legacy PUB counties. 2022 PUB data include loans made prior to the acquisition by M&T and in legacy PUB counties after the acquisition. Data shown are for the CRA assessment area. The bank's entire home purchase loan volume to LMI applicants, including activity outside of the CRA assessment area, was 2,954 loans in 2022 and 3,571 loans in 2021.
- 2022 M&T data include 314 LMI loans within legacy M&T counties that overlap with legacy PUB counties. 2022 PUB data include loans made prior to the acquisition by M&T and in legacy PUB counties after the acquisition. Data shown are for the CRA assessment area. The entire bank's home purchase loan volume within LMI Census Tracts, including activity outside of the CRA assessment area, was 2,255 loans in 2022 and 2,361 loans in 2021.
- Loans included are less than or equal to \$1,000,000. 2022 M&T data include 716 loans totaling \$474,284,000 within legacy M&T counties that overlap with legacy PUB counties. 2022 PUB data include loans made prior to the acquisition by M&T and in legacy PUB counties after the acquisition. Data shown are for the CRA assessment area. The entire bank's small business and small farm loan volume within LMI Census Tracts, including activity outside of the CRA assessment area, was 3,043 loans totaling \$325,559,000 in 2022 and 7,040 loans totaling \$747,782,000 in 2021.
- Loans included are less than or equal to \$1,000,000. 2022 M&T data include 1,328 loans totaling \$94,632,000 to businesses with GAR<=\$1,000,000 within legacy M&T counties that overlap with legacy PUB counties. 2022 PUB data include loans made prior to the acquisition by M&T and in legacy PUB counties after the acquisition. Data shown are for the CRA assessment area. The entire bank's small business and small farm loan volume to businesses with GAR<=\$1,000,000, including activity outside of the CRA assessment area, was 8,596 loans totaling \$554,005,000 in 2022 and 12,417 loans totaling \$754,717,000 in 2021.
- The 31 loans for PUB were originated prior to the merger and through 2/28/22. Following that date, any loans originated within former PUB areas were reported as M&T originations.
- These events are self-reported and therefore may not represent the full scope of financial education activities conducted by M&T employees for our customers and broader communities. Events included in-person and virtual sessions (e.g., webinars, Facebook Live), as well as other media (e.g., radio).
- These represent the number of users who started education modules. These may be non-unique; we do not have the ability to track unique users. The methodology used to track activity starts changed between 2021 and 2022.
- These events are self-reported and therefore may not represent the full scope of financial education activities conducted by M&T employees for our customers and broader communities. Events included in-person and virtual sessions (e.g., webinars). In addition, retail events for 2021 do not represent the full 2021 calendar year because tracking began July 23, 2021.
- People's United Bank made over \$2 million in charitable contributions prior to the merger in April 2022. These are not included in this table. The 2022 total includes the ~\$6 million contributed through the AMPLIFY Fund within the former PUB regions. M&T has a history of giving in some of the former PUB regions, totaling ~\$5 million in 2021.
- The diverse supplier ownership categories are minority-owned, women-owned, LGBTQ+-owned, Veteran-owned, and disabled-owned.
- 2021 book values for New Markets Tax Credits have been updated to include both the equity and debt portions of the investment; 2022 book values for New Markets Tax Credits include both the equity and debt portions of the investment.
- 2022 includes certain tax credits and CRA-eligible mortgage-backed securities. 2021 includes certain tax credits and preferred stock not captured under the other investment types.
- Includes \$532,256,000 in 2021 and \$785,729,000 in 2022 in financing that is also captured within the "CRA-eligible debt" amount for affordable housing debt.
- M&T includes \$22,067,000 originated in legacy PUB areas and PUB includes \$54,420,000 originated by PUB in Q1 2022 prior to the merger.




## SECTION 2 Task Force on Climate-related Financial Disclosures (TCFD)






### Task Force on Climate-related Financial Disclosures (TCFD) index

The Financial Stability Board established the Task Force on Climate-related Financial Disclosures (TCFD) to develop recommendations for transparent disclosures. The result, published in 2017, is a voluntary reporting framework with four pillars: governance, strategy, risk management, and metrics and targets. We endorsed the TCFD recommendations in 2021. The index below references our disclosures pertaining to TCFD's four recommended pillars, following the updated and supplemental guidance from October 2021. This alignment provides a foundation for our future climate-related financial disclosures.

*Certain information may not be disclosed within the index if it is not considered material; if it is privileged or confidential; if it could cause a competitive disadvantage to our business if publicly disseminated; or if it is not currently collected in a manner wholly correlative with the related TCFD disclosure framework.*

#### Reporting status:

- Fully reporting 
- Partially reporting 
- Not reporting 

Disclosure	Reporting status	Response
<b>Governance</b>		
Describe the Board's oversight of climate-related risks and opportunities		Refer to the "Integrating Climate Risk into Our Risk Framework" (pages <a href="#">42-47</a> ), "Our Climate-Focused Operating Model and Governance Structure" (pages <a href="#">31-32</a> ), and "ESG governance: the Board's role in ESG oversight" (page <a href="#">9</a> ) sections of the 2022 ESG Report
Describe management's role in assessing and managing climate-related risks and opportunities		Refer to the "ESG governance: the Board's role in ESG oversight" (page <a href="#">9</a> ), "Integrating Climate Risk into Our Risk Framework" (pages <a href="#">42-47</a> ), and "Our Climate-Focused Operating Model and Governance Structure" (pages <a href="#">31-32</a> ) sections of the 2022 ESG Report
<b>Strategy</b>		
Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term		Refer to the <a href="#">10-K</a> form for the Fiscal Year ended December 31, 2022 (pages 28, 52-53), the "Growing Climate Finance" (page <a href="#">32</a> ), "Building Climate-Resilient Communities" (pages <a href="#">35-37</a> ), and "Integrating Climate Risk into Our Risk Framework" (pages <a href="#">42-47</a> ) sections of the 2022 ESG Report
Describe the impact of climate-related risks and opportunities on the organization's business, strategy, and financial planning		Refer to the "Growing Climate Finance" (page <a href="#">32</a> ), "Building Climate-Resilient Communities" (pages <a href="#">35-37</a> ), "Reducing Our Carbon Footprint" (pages <a href="#">38-41</a> ), and "Integrating Climate Risk into Our Risk Framework" (pages <a href="#">42-47</a> ) sections of the 2022 ESG Report
Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a two degree Celsius or lower scenario		Refer to the "Integrating Climate Risk into Our Risk Framework" (pages <a href="#">42-47</a> ) section of the 2022 ESG Report

## SECTION 2 Task Force on Climate-related Financial Disclosures (TCFD)

### Task Force on Climate-related Financial Disclosures (TCFD) index continued

Disclosure	Reporting status	Response
<b>Risk management</b>		
Describe the organization's processes for identifying and assessing climate-related risks	●	Refer to the "Integrating Climate Risk into Our Risk Framework" (pages <a href="#">42-47</a> ) section of the 2022 ESG Report and the <a href="#">10-K</a> form for the Fiscal Year ended December 31, 2022 (pages 45-46)
Describe the organization's processes for managing climate-related risks	◐	Refer to the "Integrating Climate Risk into Our Risk Framework" (pages <a href="#">42-47</a> ) section of the 2022 ESG Report
Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management	●	Refer to the "Integrating Climate Risk into Our Risk Framework" (pages <a href="#">42-47</a> ) section of the 2022 ESG Report
<b>Metrics and targets</b>		
Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process	◐	Refer to the "Growing Climate Finance" (page <a href="#">32</a> ), "Building Climate-Resilient Communities" (pages <a href="#">35-37</a> ), "Reducing Our Carbon Footprint" (pages <a href="#">38-41</a> ), and "Integrating Climate Risk into Our Risk Framework" (pages <a href="#">42-47</a> ) sections, and the Planet index (pages <a href="#">82-85</a> ) of the 2022 ESG Report
Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 greenhouse (GHG) emissions, and the related risks	◐	Refer to the "Reducing Our Carbon Footprint" (pages <a href="#">38-41</a> ) and "Integrating Climate Risk into Our Risk Framework" (pages <a href="#">42-47</a> ) sections, and the Planet index (pages <a href="#">82-85</a> ) of the 2022 ESG Report
Describe the targets used by the organization to manage climate-related risks and opportunities and performance against the targets	●	Refer to the "Growing Climate Finance" (page <a href="#">32</a> ), "Building Climate-Resilient Communities" (pages <a href="#">35-37</a> ), "Reducing Our Carbon Footprint" (pages <a href="#">38-41</a> ), and "Integrating Climate Risk into Our Risk Framework" (pages <a href="#">42-47</a> ) sections, and the Planet index (pages <a href="#">82-85</a> ) of the 2022 ESG Report

## SECTION 3 Sustainability Accounting Standards Board® (SASB)

### SASB index

#### About this index

For readers who want a simpler way to view our performance against industry standards, we include this index. The Sustainability Accounting Standards Board (SASB) is an independent standards-setting organization that supports reporting standards for companies to identify, manage, and communicate sustainability information to their stakeholders. This 2022 ESG Report is M&T's third disclosure pursuant to the SASB standards.

SASB guidelines differ depending on the industry. This report provides SASB information for the 2022 calendar year, referencing SASB's reporting framework for the following industries: Asset Management & Custody Activities and Commercial Banks. For more information on SASB, visit [www.sasb.org](http://www.sasb.org). All data cover the period of January 1–December 31, 2022, and are as of December 31, 2022, unless otherwise noted.

Certain information is not included below because the information (1) is not considered material or is privileged or confidential; (2) could cause competitive disadvantage to our business if publicly disseminated; or (3) is not currently collected in a manner wholly correlative with the related SASB metric. Where possible, we have shared alternative information that we believe covers the SASB topic.

Asset management & custody activities			
Topic	Accounting metric	SASB code	2022
<b>Transparent Information and Fair Advice for Customers</b>	(1) Number and (2) percentage of covered employees with a record of investment-related investigations, consumer-initiated complaints, private civil litigations, or other regulatory proceedings	FN-AC-270a.1	Refer to page 47 (Legal Proceedings) and page 181 (Note 22 to Financial Statements: Commitments and Contingencies) within the 2022 <a href="#">10-K</a> for disclosure of material legal proceedings and the company's commitments and contingencies
	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	Refer to page 47 (Legal Proceedings) and page 181 (Note 22 to Financial Statements: Commitments and Contingencies) within the 2022 <a href="#">10-K</a> for disclosure of material legal proceedings and the company's commitments and contingencies
	Description of approach to informing customers about products and services	FN-AC-270a.3	Refer to pages <a href="#">24-26</a> of the 2022 ESG Report
<b>Employee Diversity &amp; Inclusion</b>	Percentage of gender and racial/ethnic group representation for (1) executive management, (2) non-executive management, (3) professionals, and (4) all other employees	FN-AC-330a.1	Refer to page <a href="#">88</a> of the 2022 ESG Report



### SECTION 3 Sustainability Accounting Standards Board (SASB)

Asset management & custody activities			
Topic	Accounting metric	SASB code	2022
<b>Incorporation of Environmental, Social, and Governance Factors in Investment Management and Advisory</b>	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	Not disclosed – see introduction
	Description of approach to incorporation of environmental, social, and governance (ESG) factors in investment and/or wealth management processes and strategies	FN-AC-410a.2	Refer to page <a href="#">35</a> of the 2022 ESG Report
	Description of proxy voting and investee engagement policies and procedures	FN-AC-410a.3	Refer to page <a href="#">35</a> of the 2022 ESG Report
<b>Business Ethics</b>	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations	FN-AC-510a.1	Refer to page 47 (Legal Proceedings) and page 181 (Note 22 to Financial Statements: Commitments and Contingencies) within the 2022 <a href="#">10-K</a> for disclosure of material legal proceedings and the company's commitments and contingencies
	Description of whistleblower policies and procedures	FN-AC-510a.2	Refer to page <a href="#">15</a> of the 2022 ESG Report and to the <a href="#">Code of Business Conduct and Ethics</a>

Asset management & custody activities			
Topic	Activity metric	SASB code	2022
	(1) Total registered and (2) total unregistered assets under management (AUM)	FN-AC-000.A	Refer to page 87 in the 2022 <a href="#">10-K</a> for total assets under management; we do not disclose the breakdown between registered and unregistered assets under management
	Total assets under custody and supervision	FN-AC-000.B	Refer to page 87 in the 2022 <a href="#">10-K</a> for total assets under management; we do not disclose the breakdown of assets under custody and supervision

## SECTION 3 Sustainability Accounting Standards Board (SASB)

Commercial banks			
Topic	Accounting metric	SASB code	2022
<b>Data Security</b>	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of account holders affected	FN-CB-230a.1	Any breach with a material impact on the financial statements would be disclosed in the <a href="#">10-K</a> . No such breaches occurred in 2022. Refer to pages 46-48 (Operational Risks) of the 2022 <a href="#">10-K</a> for a disclosure of the risk of such an event. Also refer to page 47 (Legal Proceedings) and page 181 (Note 22 to Financial Statements: Commitments and Contingencies) within the 2022 <a href="#">10-K</a> for disclosure of material legal proceedings and the company's commitments and contingencies.
	Description of approach to identifying and addressing data security risks	FN-CB-230a.2	Refer to pages <a href="#">20-22</a> of the 2022 ESG Report
<b>Financial Inclusion &amp; Capacity Building</b>	(1) Number of loans outstanding qualified to programs designed to promote small business and community development	FN-CB-240a.1	We do not report this metric on the portfolio-level. As an alternative metric, 2022 originated loans as reported on the CRA Loan/Application Register (LAR) were: Small business loans: 12,999   Small farm loans: 17   Community development loans: 168 Prior to the merger, between January 1 and April 1, 2022, People's United Bank had the following originated loans as reported on the CRA Loan/Application Register (LAR): Small business loans: 692   Small farm loans: 0   Community development loans: 15 M&T's efforts to promote and support small business and community development are discussed on pages <a href="#">68-70</a> of the 2022 ESG Report. M&T has earned the highest possible score from the Federal Reserve on every CRA exam since 1982 and from the New York State Department of Financial Services since 1989. This includes our most recent rating in 2021.
	(2) Amount of loans outstanding qualified to programs designed to promote small business and community development	FN-CB-240a.1	We do not report this metric on the portfolio-level. As an alternative metric, 2022 originated loan amounts as reported on the CRA LAR were: Small business loans: \$1,492,981,000   Small farm loans: \$3,673,000 Community development loans: \$1,450,272,000 Prior to the merger, between January 1 and April 1, 2022, People's United Bank had the following originated loan amounts as reported on the CRA Loan/Application Register (LAR): Small business loans: \$70,102,000   Small farm loans: \$0 Community development loans: \$53,600,000 M&T's efforts to promote and support small business and community development are discussed on pages <a href="#">68-70</a> of the 2022 ESG Report. M&T has earned the highest possible score from the Federal Reserve on every CRA exam since 1982 and from the New York State Department of Financial Services since 1989. This includes our most recent rating in 2021.
	(1) Number and (2) amount of past due and nonaccrual loans qualified to programs designed to promote small business and community development	FN-CB-240a.2	Refer to Note 4 (Loans and Leases) on page 135-136 of the 2022 <a href="#">10-K</a> for disclosure of nonaccrual and past due loans as of December 31, 2022. Loans are not reported at the small business and community development level of detail.

## SECTION 3 Sustainability Accounting Standards Board (SASB)

Commercial banks			
Topic	Accounting metric	SASB code	2022
<b>Financial Inclusion &amp; Capacity Building</b>	Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers	FN-CB-240a.3	124,444 MyWay Accounts (a checkless checking account with no overdraft fee, available to minors and customers who do not qualify for traditional checking accounts)
	Number of participants in financial literacy initiatives for unbanked, underbanked, or underserved customers	FN-CB-240a.4	7,584 people participated in M&T's online financial education program in 2022 <sup>1</sup> Additionally, an estimated 33,394 people participated in in-person and virtual events that were held to support financial education for consumer and small business customers and community members. <sup>2</sup> Refer to pages <a href="#">71-72</a> of the 2022 ESG Report for more information on financial education
<b>Incorporation of Environmental, Social, and Governance Factors in Credit Analysis</b>	Commercial and industrial credit exposure, by industry	FN-CB-410a.1	Refer to page 65 of the 2022 <a href="#">10-K</a>
	Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis	FN-CB-410a.2	Not disclosed – see introduction
<b>Business Ethics</b>	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations	FN-CB-510a.1	Refer to page 47 (Legal Proceedings) and page 181 (Note 22 to Financial Statements: Commitments and Contingencies) within the 2022 <a href="#">10-K</a> for disclosure of material legal proceedings and the company's commitments and contingencies
	Description of whistleblower policies and procedures	FN-CB-510a.2	Refer to pages <a href="#">15-16</a> of the 2022 ESG Report and to the <a href="#">Code of Business Conduct and Ethics</a>
<b>Systemic Risk Management</b>	Global Systemically Important Bank (G-SIB) score, by category	FN-CB-550a.1	According to the Basel Committee on Banking Supervision's assessment methodology, M&T is not considered to be a Global Systemically Important Bank (G-SIB) and, accordingly, does not have a G-SIB score
	Description of approach to incorporation of results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities	FN-CB-550a.2	Refer to pages 7 and 8 in the 2022 <a href="#">10-K</a>

## SECTION 3 Sustainability Accounting Standards Board (SASB)

Commercial banks			
Topic	Activity metric	SASB code	2022
	(1) Number of checking and savings accounts by segment: (a) personal and (b) small business <sup>3</sup>	FN-CB-000.A	(a) 4,415,033 personal checking and savings accounts (b) 377,461 small business checking and savings accounts
	(2) Value of checking and savings accounts by segment: (a) personal and (b) small business <sup>3</sup>	FN-CB-000.A	(a) \$68,677,584,556 in deposits in personal checking and savings accounts (b) \$21,434,716,079 in deposits in small business checking and savings accounts
	(1) Number of loans by segment: (a) personal, (b) small business, and (c) corporate <sup>3</sup>	FN-CB-000.B	(a) 515,762 non-revolving personal loans (b) 29,007 non-revolving small business loans (c) Refer to page 65 of the 2022 <a href="#">10-K</a>
	(2) Value of loans by segment: (a) personal, (b) small business, and (c) corporate <sup>3</sup>	FN-CB-000.B	(a) \$14,493,034,189 in outstanding balances for non-revolving personal loans (b) \$6,312,808,045 in outstanding balances for non-revolving small business loans (c) Refer to page 65 of the 2022 <a href="#">10-K</a>

### SASB notes:

- 1 These represent the number of users who started education modules. These may be non-unique; we do not have the ability to track unique users.
- 2 These events are self-reported and therefore may not represent the full scope of financial education activities conducted by M&T employees for our customers and broader communities. Events included in-person and virtual sessions (e.g., webinars), as well as other media (e.g., radio broadcasts).
- 3 Small business is generally defined by M&T as businesses with less than \$10 million in revenue.

## SECTION 4 Disclosures

## Disclosures

M&T Bank Corporation (M&T or we) is publishing this report solely for informational purposes for our stakeholders and to help illustrate how we bring our purpose to life through our business activities. We share information about our environmental, social, and governance (ESG) efforts through several channels—including various reports and presentations, our website, press releases, and conversations with stakeholders. This report is designed to summarize our ESG approach and key ESG efforts and performance data for the financial year ended December 31, 2022, focusing on issues that we believe are of interest to our stakeholders. In some cases, we have also provided ESG performance data for previous years to present a view of trends in our performance. The report is intended to provide a high-level overview of our ESG approach and efforts with selected examples; it is not a comprehensive description, a financial report or a financial presentation, or legal summary of our ESG programs and involvements. Accordingly, this report should be read in conjunction with our 2022 Annual Report on Form 10-K and any subsequent Quarterly Reports on Form 10-Q (including the “Forward-Looking Statements” and “Risk Factors” sections in such filings), our 2023 Proxy Statement, and any subsequent filings with the U.S. Securities and Exchange Commission (SEC), which can be found on our Investor Relations website at [ir.mtb.com](http://ir.mtb.com). This ESG Report and other information on our website is not incorporated by reference into, nor is otherwise a part of, any of our SEC filings, except as may be expressly set forth by specific reference.

All information and reporting and performance data in this report is provided for the financial year ended December 31, 2022, unless otherwise noted. On April 1, 2022, M&T closed its acquisition of People’s United Financial, Inc. (“People’s United”). Unless otherwise noted, data in this report does not include People’s United data prior to the acquisition. ESG data and metrics in this report are not prepared in accordance with generally accepted accounting principles (GAAP) or audited.

Any forecasts, projections, forward-looking statements, or other goals discussed in this report are aspirational; as such, no guarantees or promises are made that any such goals will be met. Information contained in this report may not be comprehensive or up to date, and is subject to change without notice. M&T has no obligation, does not assume any duty, and does not undertake to update the information or data in this report.

There are a number of frameworks and standards-setting organizations that guide reporting of ESG efforts of companies; we have not used any one specific framework for the reporting of data in this report. However, we have included indices that indicate where content in this report is specifically aligned to the Sustainability Accounting Standards Board (SASB) standards and Task Force on Climate-related Financial Disclosures (TCFD).

This report uses certain terms, including those that the SASB refers to as “material” topics, to reflect the issues we believe are of importance to M&T and our stakeholders. Used in this context, these terms are distinct from, and should not be confused with, the terms “material” and “materiality” as defined by or construed in accordance with securities law, the rules or regulations of the SEC, or as used in the context of financial statements and reporting.

The content presented in this report is for general, informational purposes only. This report is not intended to provide legal, tax, accounting, financial, investment, or other professional advice, and is not to be used as such. This report does not constitute a recommendation or advice by M&T of any kind. Information in this report is not tailored to specific requirements, circumstances, and/or investment philosophies, and does not take into

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## SECTION 4 Disclosures

### Important Investments Information

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- Not FDIC Insured
- Not Bank Guaranteed
- Not a Deposit
- Not Insured By Any Federal Government Agency
- May Lose Value

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M&T Bank



INSPIRED BY PEOPLE. DRIVEN BY PURPOSE.

**together  
we will**

**Additional information about M&T Bank  
can be found on our website and in our  
Letter to Shareholders**

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