

BlackRock®

2021 Sustainability Disclosure

Reporting under the Sustainability Accounting Standards Board (“SASB”) Standards and Management Criteria

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Important Notes: This Disclosure contains information about BlackRock and may contain forward-looking statements within the meaning of the Private Securities Litigation Reform Act. All statements, other than statements of historical facts, may be forward-looking statements, including statements related to BlackRock's climate and other sustainability-related strategies, plans, developments, targets, goals, and expectations.

BlackRock cautions that forward-looking statements are subject to numerous assumptions, risks and uncertainties, which change over time. Forward-looking statements speak only as of the date they are made, and BlackRock assumes no duty to and does not undertake to update forward-looking statements. Actual results could differ materially from those anticipated in forward-looking statements and future results could differ materially from historical performance. The companies mentioned in this document should not be considered a recommendation to buy or sell any security.

Factors that can cause results to differ, as well as additional factors that can affect forward-looking statements, are discussed in BlackRock's Annual Report on Form 10-K and Quarterly Reports on Form 10-Q, accessible on the SEC's website at www.sec.gov and on BlackRock's website at www.blackrock.com.

The information provided herein is based in part on information from third-party sources that BlackRock believes to be reliable, but which has not been independently verified by BlackRock, and BlackRock does not represent that the information is accurate or complete. The inclusion of information contained in this report should not be construed as a characterization regarding the materiality or financial impact of that information.

This Disclosure includes metrics that are subject to measurement uncertainties resulting from limitations inherent in the nature and the methods used for determining such data. The selection of different but acceptable measurement techniques can result in materially different measurements. The precision of different measurement techniques may also vary. Unless specified otherwise, the information set forth herein is expressed as of December 2021 and BlackRock reserves the right to update its measurement techniques and methodologies in the future.

About this disclosure

BlackRock's 2021 Sustainability Disclosure ("Disclosure") is being provided for BlackRock, Inc. (together, with its subsidiaries, unless the context otherwise indicates, "BlackRock" or the "Company" or the "firm"). This Disclosure is comprised of two types of metrics:¹

- 1) Reporting presented in accordance with the SASB Standard for Asset Management and Custody Activities; and
- 2) Reporting in accordance with select additional criteria defined by management ("Management Criteria").

Sustainability Accounting Standards Board ("SASB")

SASB is an independent non-profit organization that sets standards to guide the disclosure of sustainability information by companies to their investors. The SASB reporting standards are sector specific, covering environmental, social, and governance ("ESG") reporting criteria for 77 different industries. Each SASB Standard defines a minimum set of ESG-related topics that are reasonably likely to affect a company's long-term performance based on the industry it operates within. For BlackRock, the most relevant industry group is Asset Management & Custody Activities. In 2021, SASB and the Integrated Reporting Framework formalized their merger to become the Value Reporting Foundation. Moving forward, the International Financial Reporting Standards ("IFRS") Foundation, through the newly formed International Sustainability Standards Board ("ISSB") will consolidate the Climate Disclosure Standards Board and the Value Reporting Foundation in 2022. As such, while BlackRock's reporting in this document is performed in accordance with the SASB Standard version 2021-12, BlackRock supports the ISSB's efforts to develop a global baseline of sustainability reporting standards, on which different jurisdictions can build, to enable reliable and comparable corporate reporting about enterprise value. BlackRock will monitor the evolution of the global standards and may evolve its reporting to these new standards as they emerge.

Management Criteria and Stakeholder Assessment

In 2020, BlackRock conducted an assessment to hone its understanding of the ESG topics that matter most to its stakeholders. The assessment drew on research conducted and compiled in 2020 from a variety of sources including feedback from business groups, BlackRock's Employee Opinion Survey, shareholder engagement, external reports, and articles, ESG ratings questionnaires, and peer benchmarking. BlackRock defines its stakeholders to include clients, shareholders, employees, shareholders, and the communities in which BlackRock operates. BlackRock believes this assessment is still accurate and representative of what is most material to its stakeholders. While many of the topics most important to BlackRock's stakeholders were covered by third-party standards and recommendations – including SASB and the Task Force on Climate-related Financial Disclosures ("TCFD") – against which BlackRock was already reporting, several topics were not fully covered by either reporting standard. As a result, BlackRock has elected to supplement its SASB disclosures with additional metrics defined by Management ("Management Criteria"). Management criteria were informed by a number of frameworks including SASB Standards for sectors outside of the Asset Management and Custody Activities Standard and the United Nations Global Compact Communication on Progress ("CoP") advanced reporting requirements. A detailed index of the criteria used to prepare this report is included in the Notes section beginning on page 35.

ESG Topics identified by BlackRock's Stakeholders*

ESG Topic**	Disclosure Location ²
Business Ethics & Conduct	Sustainability Disclosure
Sustainable Investing & Stewardship	Sustainability Disclosure, Stewardship Reports
Climate-Related Risks & Opportunities	TCFD Report
Employee Diversity, Equity & Inclusion (“DEI”)	Sustainability Disclosure
Employee Health, Safety & Wellbeing	Sustainability Disclosure
Board Composition	Proxy Statement
Public Policy & Political Activities	Sustainability Disclosure
Human Rights	Sustainability Disclosure
Natural Capital-Related Risks & Opportunities	Sustainability Disclosure
Selling Practices & Product Labelling	Sustainability Disclosure
Supply Chain Management	Sustainability Disclosure
Community Relations & Social Impact	Sustainability Disclosure

* The inclusion of information contained in this Disclosure should not be construed as a characterization regarding the materiality or financial impact of that information. Please also see BlackRock's Annual Report on Form 10-K, Quarterly Reports on Form 10-Q and other current and periodic reports with the SEC, accessible on the SEC's website at www.sec.gov and on BlackRock's website at <https://ir.blackrock.com/>.

**See Note 1 Basis of Presentation on page 35 for additional information on the disclosure criteria.

This disclosure is as of, and for the year ended, December 31, 2021. To the extent material updates have taken place between year-end 2021 and June 17, 2022, when this document was completed, those changes are specified.

UN Global Compact Communication on Progress

In 2020, BlackRock became a participant of the United Nations Global Compact (“UNGC”). As a participant of the UNGC, BlackRock is committed to supporting the Ten Principles of the UNGC, and the United Nations Sustainable Development Goals (“SDGs”). In 2021, BlackRock submitted its first Communication on Progress to describe its efforts to align its operations with universal principles on human rights, labor, environment, and anti-corruption, and its actions to advance societal goals, and achieved Global Compact Advanced level reporting. This year, as a part of its participation in the UNGC, BlackRock is submitting this Disclosure as its 2022 Communication on Progress.³

Management's Assertion

Management of BlackRock, Inc. is responsible for the completeness, accuracy, and validity of the disclosures included in this Disclosure as of, and for the year-ended December 31, 2021. Management is also responsible for the collection, quantification, and presentation of the information included in the Disclosure and for the selection or development of the criteria, which management believes provide an objective basis for measuring and reporting on the selected metrics.

Management of BlackRock, Inc. asserts that the specified metrics included in the Disclosure as of, and for the year ended December 31, 2021 are presented in accordance with the criteria set forth in Note 1: Basis of Presentation to the Disclosure on page 35.

Limited Assurance

BlackRock engaged Deloitte & Touche LLP (“Deloitte”) to perform a review engagement on management's assertion related to specified metrics (included in the Description of Management Criteria in the Notes section on page 37) in this Disclosure as of, and for the year-ended December 31, 2021. Deloitte's review report for BlackRock's 2021 Sustainability disclosure is available on page 39.

Feedback from Stakeholders

As the sustainability landscape evolves, with new information and greater standardization, BlackRock will continue to refine and expand its disclosures. The firm looks forward to feedback from stakeholders. BlackRock encourages its stakeholders to provide feedback on this Disclosure by emailing invrel@blackrock.com.

Sustainable Investing & Stewardship

Incorporation of Environmental, Social, and Governance Factors in Investment Management & Advisory

SASB FN-AC-410a.1

Amount of assets under management, by asset class, that employ (1) integration of ESG issues, (2) sustainability themed investing, and (3) screening

Dedicated Sustainable Investments⁴

BlackRock currently defines Dedicated Sustainable Investments as: (i) strategies with an explicit ESG objective which may include a targeted quantifiable ESG outcome (“Broad ESG”); (ii) strategies that capitalize on long-term transformative industry or societal trends through pursuit of specific E, S, or G themes (“Thematic”); (iii) strategies where investments are made with the intention to generate positive measurable social and environmental impact alongside financial return (“Impact”) and; (iv) strategies that incorporate a package of sustainability screens (“Dedicated Screened”). BlackRock has designed an extensive platform encompassing index, active, and alternative strategies across asset classes to help clients meet their financial objectives and sustainability goals.

BlackRock offers over 300 sustainable funds covering the spectrum of sustainable solutions, as well as customized solutions to meet clients’ objectives. As of December 31, 2021, BlackRock managed \$509 billion across its Dedicated Sustainable Investing platform which is inclusive of funds and separate accounts. Dedicated Sustainable Investment strategies are categorized into the following product types: Dedicated Screened⁵, Broad ESG, Thematic, and Impact.⁶

ESG Integrated Portfolios

BlackRock draws a clear distinction between Dedicated Sustainable Investments and ESG-integrated portfolios.⁷ BlackRock’s investment conviction is that ESG-integrated portfolios may provide better long-term risk-adjusted returns to investors and clients. As such, BlackRock’s active investment platform has been ESG integrated, representing \$3.37 trillion of BlackRock’s assets under management (“AUM”). ESG-integrated portfolios are not considered a separate product category at BlackRock and do not necessarily have an ESG objective as part of their mandates. Therefore, ESG-integrated portfolios are not included in the Dedicated Sustainable Investments figures reported below. Additional information about ESG integration is provided under SASB FN-AC-410a.2.

Quantitative Metrics

Exhibit 1 provides the AUM in Dedicated Sustainable Investments and Screened Investments strategies. Screened Investments are products that BlackRock considers to sit alongside, but not within, its Dedicated Sustainable Investments, as they do not apply the comprehensive criteria of what BlackRock has developed for its Dedicated Screened funds. Dedicated Screens are included under Dedicated Sustainable Investments. BlackRock’s clients may request portfolios that avoid exposure to certain companies or sectors that do not align with their views.

Exhibit 1: Dedicated Sustainable Investments and Screened Investments AUM Breakdown

Asset Class / Investment Style	Dedicated Sustainable Investments (\$US billions) ^a		Screened Investments (\$US billions) ^b	
	2021	YoY Change*	2021	YoY Change*
Active				
Equity	\$35	▲+\$23	\$47	▲+\$9
Fixed Income	31	▲ +5	177	▼ -1
Index and iShares ETFs				
Equity	220	▲+99	374	▲+68
Fixed Income	27	▲ +12	54	▼-11
Multi-Asset	14	▲ +11	28	▲ +12
Alternatives	9	▲ +2	7	▲ +3
Long-term	336	▲+152	687	▲+80
Cash Management	173	▲ +157	9	--
Total AUM	\$509	▲+\$309	\$696	▲+\$80

Data as of December 31, 2021.

* The year-over-year changes presented in this table were calculated by management using the December 31, 2021 data presented within this table and comparable data as of December 31, 2020.

- a) BlackRock modified this category to refer to "Dedicated Sustainable Investments" from SASB's "Sustainability Themed Investing" to better reflect the types of investments included. These investments include: 1) strategies with an explicit ESG objective which may include a targeted quantifiable ESG outcome ("Broad ESG"); 2) strategies that capitalize on long-term transformative industry or societal trends through pursuit of specific E, S or G themes ("Thematic"); 3) strategies where investments are made with the intention to generate positive measurable social and environmental impact alongside financial return ("Impact") and; 4) strategies that incorporate a package of sustainability screens ("Dedicated Screened"). BlackRock's definition of impact investments is in line with the International Finance Corporation's Operating Principles for Impact Management.
- b) Screened Investments are products that BlackRock considers to sit alongside, but not within, its Dedicated Sustainable Investments, as they do not apply the comprehensive criteria of what BlackRock has developed for its Dedicated Screened funds. In other words, these products may provide one or more screens but do not apply the full package of screens to qualify them as Dedicated Screened products under BlackRock's definition.

SASB FN-AC-410a.2

Description of approach to incorporate ESG factors in investment and/or wealth management processes and strategies

ESG Integration

BlackRock defines ESG integration as the practice of incorporating ESG information into the investment process with the objective of improving long-term financial outcomes of BlackRock's clients' portfolios. BlackRock does this in its active portfolios in both public and private markets. In index portfolios where the objective is to replicate a predetermined market benchmark, BlackRock engages with investee companies on ESG issues to enhance long-term value for its clients.

BlackRock's firm-level ESG Integration Statement details its firmwide efforts to integrate ESG information into investment processes. The ESG Integration Statement outlines the mechanisms that underpin BlackRock's approach. This ESG Integration Statement applies across BlackRock's investment divisions and investment teams and is reviewed at least annually to reflect changes within BlackRock's business. Given the breadth of the firm's investment platform, this ESG Integration Statement is written to cover the full spectrum of investment styles and asset classes at BlackRock.

In addition, each investment platform has produced a platform-level ESG Integration Statement that describes different implementations of the firm-wide approach.

BlackRock's consistent yet flexible framework allows for cohesion with the firm's overall ESG integration efforts, while permitting a diversity of approaches across different investment teams. ESG considerations will vary by client objectives, investment style, sector, and market trends.

Oversight & Accountability

At the portfolio level, BlackRock portfolio managers are accountable for appropriately managing exposure to ESG risks. Investment teams can develop views on the financial materiality of specific sustainability-related topics by considering external and proprietary ESG research from a variety of sources.

Investment platform leadership within BlackRock's investment divisions oversees and is accountable for ESG integration into the investment processes for each business. This includes determining appropriate methodologies for each underlying investment team and facilitating ESG integration into the investment processes

and portfolio objectives for each respective business. Many investment teams have specialized sustainability-focused experts and/or units to help drive ESG integration and sustainable investment product development within the business.

In addition, BlackRock employs dedicated resources to support sustainable investing. The BlackRock Sustainable Investing team (“BSI”) and individuals across the technology and analytics platform work together to advance ESG research and tools that support ESG integration. BSI encourages consistency in consideration of ESG factors across investment processes, aggregates resources and shares best practices.

BlackRock’s Risk and Quantitative Analysis Group (“RQA”) is responsible for BlackRock’s Enterprise Risk and Investment risk management framework which includes oversight of ESG-related investment risks. RQA conducts regular reviews with portfolio managers to ensure that investment decisions are taken in light of relevant investment risks, including sustainability-related risks, and that decisions exposing portfolios to ESG risks are deliberate and consistent with the investment objectives of BlackRock’s clients’ portfolios.

Furthermore, in January 2022, RQA formed a dedicated Sustainability Risk group to support the ongoing application of ESG considerations across investment and enterprise activities. The team will partner with risk managers and businesses to reinforce constructive engagement across BlackRock’s investment platform, through dedicated ESG research and enhanced second line sustainability risk oversight processes.

BSI and RQA jointly report on ESG integration progress to the Global Executive Committee Investment Sub-Committee at least annually.

As described under FN-AC-410a.3, the BlackRock Investment Stewardship team (“BIS”) engages with companies to promote corporate governance standards that the team believes contribute to companies’ abilities to deliver the durable long-term profitability our clients depend on to meet their long-term financial goals.

Sustainable Investing Research

BSI maintains a dedicated sustainable investing research function, producing insights that inform firm investment processes. In addition, BlackRock’s investment teams often have dedicated sustainability-focused experts and research teams. BSI develops proprietary views on specific sustainability-related topics by leveraging external data, as well as proprietary research, and delivers these insights via BlackRock Sustainable Investing Intelligence™, a proprietary investment framework, along with thematic research publications, custom analytics, advisory solutions, and innovative product development.

Sustainable Investing Technology

Aladdin® is BlackRock’s end-to-end portfolio management software that combines sophisticated risk analytics with portfolio management, trading, and operations tools on a single, unified platform. In 2020, BlackRock launched an initiative to build new sustainability-focused capabilities within Aladdin. Aladdin Sustainability and Aladdin Sustainability Lab were formed with a vision to power the shift to sustainable investing by integrating sustainability data, analytics, and functionalities into investors’ daily workflows to drive more informed investment and risk management.

This effort includes Aladdin Climate, a platform that seeks to help investors uncover investment risks and opportunities associated with both the physical impacts of a changing climate and the uncertain transition to a net zero world. Aladdin Climate provides scenario analysis capabilities, helping investors consider how climate-related risks and opportunities may evolve and their potential business implications under different physical and transition risk scenarios. Please see Risks, Opportunities & Scenario Analysis – Climate Scenario Analysis (page 24) within BlackRock’s 2021 TCFD Report for a discussion of climate risk scenario analysis conducted by BlackRock.

In addition to Aladdin Climate, BlackRock has integrated more than 8,000 ESG-related data points into Aladdin from leading third-party ESG data providers. This integrated data provides users the ability to analyze the ESG profile of their portfolios and portfolio holdings, bringing in historical data and forward-looking impact analytics alongside more traditional risk metrics.

In addition to Aladdin’s capabilities, BlackRock maintains sustainable investing technologies that cater to the unique needs of alternative market investors. eFront® is BlackRock’s technology solution for alternative investment management, covering the needs of alternative investment professionals end-to-end. Investment professionals in alternative asset classes have a growing need to access ESG data to help identify risk and opportunities. In 2021, eFront launched ESG Outreach, an extension of BlackRock’s eFront Insight platform, a leader in digitalizing private market data. ESG Outreach gathers and analyzes a standardized set of ESG data for the needs of the whole alternatives ecosystem and aims to provide a consistent ESG framework, aligned with existing regulatory and reporting initiatives.

“Climate Aware” Capital Markets Assumptions

The BlackRock Investment Institute provides investors with “climate-aware” capital market assumptions, which are long-term asset class estimates of risk and return that account for the impact of climate change and the net zero transition across asset classes. The climate-aware capital market assumptions are the core set of assumptions used by many BlackRock portfolio managers to construct strategic asset allocations.

SASB FN-AC-410a.3

Description of proxy voting and investee engagement policies and procedures

Investment Stewardship

As a fiduciary, clients depend on BlackRock to help them achieve their investment goals. These clients include public and private pension plans, governments, insurance companies, endowments, universities, charities, and ultimately individual investors, among others. The BlackRock Investment Stewardship team's ("BIS") purpose is to support companies in their efforts to create long term durable financial performance on behalf of BlackRock's clients. BIS serves as an important link between BlackRock's clients and the companies they invest in— and the trust BlackRock's clients place in us gives us a great responsibility to advocate on their behalf. The BIS team is responsible for engaging with companies in which BlackRock invests on behalf of clients, as well as voting proxies for those clients who have given us authority. We are interested in hearing from companies about their

strategies for navigating the challenges and capturing the opportunities they face. As BlackRock is a long-term investor on behalf of our clients, the business and governance decisions that companies make will have a direct impact on BlackRock's clients' investment outcomes and financial well-being.

Consistent with our leadership position in the industry, BlackRock has invested to establish one of the industry's largest investment stewardship teams. BIS is organized regionally, reflecting the different regulatory requirements, corporate governance standards, and client expectations in different jurisdictions. In addition, there is global oversight of centralized BIS functions related to daily operations, research, policy, and communications. The team has grown steadily from 13 members in 2009 to nearly 70 members as of year-end 2021. Located across ten global offices, the team has global presence and local expertise across the 57 countries in which BIS engaged companies.

Exhibit 2*: 2022 BIS Engagement Priorities⁸






Engagement Priority	Key Performance Indicators (KPIs)
 <p>Board quality and effectiveness</p> <p>Quality leadership is essential to performance. Board composition, effectiveness, diversity, and accountability remain top priorities</p>	<p>Board effectiveness – A core component of BIS' work to advance our clients' financial interests is direct engagement with a board member, so that BIS can provide direct feedback from our perspective as a long-term shareholder. For those companies with which BIS wishes to engage to understand their board's role, BIS seeks dialogue with the most appropriate non-executive, and preferably independent, director(s) who has been identified by the company as having a responsibility to meet with shareholders.</p> <p>Board quality – BIS looks to companies to disclose their approach to ensuring meaningful board diversity and encourages the board to set out the self-identified demographic profiles of the directors in aggregate, consistent with local law, and how this aligns with the company's strategy and business model.</p>
 <p>Strategy, purpose, and financial resilience</p> <p>A purpose driven long-term strategy, underpinned by sound capital management, supports financial resilience</p>	<p>In discussing their corporate strategy and financial resilience, BIS encourages companies to set out how they have integrated business relevant sustainability risks and opportunities. To aid investor understanding, companies can demonstrate in their disclosures how they are aligning their strategy with their purpose to address these risks and opportunities and create long-term value, evidenced by metrics relevant to their business model. BIS appreciates when companies disclose industry- or company-specific metrics to support their narrative on how they have considered key stakeholders' interests in their business decision-making.</p>
 <p>Incentives aligned with value creation</p> <p>Appropriate incentives reward executives for delivering sustainable long-term value creation</p>	<p>BIS looks to companies to disclose incentives that are aligned with long-term value creation and sustained financial performance, underpinned by material and rigorous metrics that align with the company's long-term strategic goals.</p>

Exhibit 2: 2022 BIS Engagement Priorities (cont'd from previous page)

Engagement Priority	Key Performance Indicators (KPIs)
 <p>Climate and natural capital</p> <p>Business plans with targets to advance the transition to a low-carbon economy. Managing natural capital dependencies and impacts through sustainable business practices</p>	<p>Climate — BIS appreciates when companies discuss in their reporting how their business model is aligned to a scenario in which global warming is limited to well below 2°C, moving towards global net zero emissions by 2050. Companies help investors understand their approach when they provide disclosures aligned with the four pillars of the TCFD—including Scope 1 and 2 emissions, along with short-, medium-, and long-term science-based reduction targets, where available for their sector.</p> <p>Natural Capital — BIS looks to companies to disclose detailed information on their approach to managing material natural capital-related business risks and opportunities, including how their business models are consistent with the sustainable use and management of natural resources such as air, water, land, minerals, and forests.</p>
 <p>Company impacts on people</p> <p>Sustainable business practices create enduring value for key stakeholders – employees, customers, suppliers, and communities</p>	<p>BIS looks to companies to demonstrate a robust approach to human capital management and provide shareholders with the necessary information to understand how their approach aligns with their stated strategy and business model.</p> <p>BIS appreciates when companies disclose the actions they are taking to support a diverse and engaged workforce, and how that aligns with their strategy and business model.</p> <p>BIS looks to companies to discuss in their disclosures how the board oversees management's approach to due diligence and remediation of adverse impacts to people arising from their business practices.</p>

The aforementioned Engagement Priorities were published in February 2022.

* Any information relating to forward-looking statements, goals, and progress against goals was not subject to Deloitte's review and, accordingly, Deloitte does not express a conclusion or any form of assurance on such information.

BIS Global Principles

BIS' approach to corporate governance and stewardship is outlined in its Global Principles. The Global Principles describe BIS' stewardship philosophy and views on corporate governance and resilient business models that may support long-term value creation by companies. The Global Principles⁹ cover seven key themes: (i) boards and directors; (ii) auditors and audit-related issues; (iii) capital structure, mergers, asset sales, and other special transactions; (iv) compensation and benefits; (v) environmental and social issues; (vi) general corporate governance matters and shareholder protections; and (vii) shareholder proposals. Regional and market-specific voting guidelines explain how the Global Principles inform voting decisions in relation to specific ballot items for shareholder meetings, taking into consideration local market standards and norms.

Voting choice

Over the past five decades, innovation and regulatory support have led to a greater choice and democratization in investing strategies, structures, and products. Greater choice now extends to shareholder proxy voting. Many investors are looking to exercise greater control over their voting for the companies in their index equity portfolios, and technology has made this more easily available.

BlackRock Voting Choice introduced more voting options for institutional clients invested in certain pooled funds while also making voting easier for institutional clients invested in separately managed accounts, who have long had this option. The ease of use, implementation, and accessibility by providing greater choice for investors in separate accounts and certain pooled vehicles to vote their

shares has been met with great interest by our clients. BlackRock Voting Choice currently allows these investors to vote their shares in line with their preferences via four main options, which includes the opportunity to continue to authorize BlackRock's stewardship team to vote on their behalf. BlackRock Voting Choice is seen as a natural extension of our efforts to bring greater choice to our clients and to empower them with greater options and ease around how they want to engage with their money. For further information on BlackRock Voting Choice, please see BIS' latest paper, 'It's All About Choice', under this disclosure's Additional Resources on page 40.

Approach to Engagement

Engagement is core to BIS' efforts, enabling the team's analysts to improve their understanding of the business risks and opportunities that are material to the companies in which our clients invest, including those related to ESG matters. Engagement also informs BIS' voting decisions. As long-term investors on behalf of clients, BIS seeks to have regular and continuing dialogue with executives and board directors to advance sound governance, as well as to understand the effectiveness of the company's management and oversight of material issues.

BIS reviews and refreshes the team's engagement priorities each year. BIS' engagement priorities provide clients with insight into how BIS is conducting engagement and voting activities on key governance and sustainability issues BIS believes are critical drivers of a company's ability to deliver durable, long-term financial returns on their behalf. Some issues have long been core components of BIS' work.

Exhibit 3: BIS Engagement Priorities – Alignment with Sustainable Development Goals*

Sustainable Development Goals

BIS Engagement Priorities	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Board quality and effectiveness					•					•						•	
Climate and natural capital						•	•	•	•			•	•	•	•		•
Strategy, purpose, and financial resilience								•	•			•	•				•
Incentives aligned with value creation								•									
Company impacts on people	•		•	•	•	•		•		•	•		•			•	

	No Poverty		Clean Water & Sanitation		Reduced Inequalities		Life Below Water
	Zero Hunger		Affordable & Clean Energy		Sustainable Cities & Communities		Life on Land
	Good Health & Well-Being		Decent Work & Economic Growth		Responsible Consumption & Production		Peace, Justice, & Strong Institutions
	Quality Education		Industry, Innovation, & Infrastructure		Climate Action		Partnerships for the Goals
	Gender Equality						

* The aforementioned BIS Engagement Priorities – Alignment with SDGs were published in February 2022.

Others have become priorities more recently, driven by BIS' observations of emerging risks and opportunities for companies, market developments, and changing client and societal expectations.

Many of the topics that BIS discusses with companies intersect with aspects of the SDGs in which the private sector has a role to play. Exhibit 3 shows how BIS' engagement priorities align with the SDGs, where relevant to a company's governance and business practices.

Approach to Proxy Voting

BIS votes on behalf of those clients who have given BlackRock authority to do so. When exercising clients' voting rights, BIS votes in accordance with its published voting guidelines for the relevant market, which are applied on a case-by-case basis. BIS updates the regional voting guidelines annually to reflect changes in market standards and to help companies understand the team's views on emerging corporate governance issues.

As a long-term investor, we generally support companies when our engagement affirms that they are taking

appropriate steps to address shareholders' concerns. However, when concerns persist despite ongoing engagement, or a company's actions do not seem aligned with long-term value creation, we may signal our concerns in our voting on behalf of clients.

Approach to Shareholder Proposals

In many markets in which BlackRock invests on behalf of clients, shareholders have the right to submit proposals to be voted on by shareholders at a company's annual or extraordinary meeting, as long as eligibility and procedural requirements are met. The matters put forward by shareholders address a wide range of topics, including governance reforms, capital management, and improvements in the management or disclosure of environmental and social risks. In 2021 BIS voted on more than 164,000¹⁰ total proposals; 829 of those were shareholder proposals,¹¹ representing less than 1% of total proposals.

BlackRock does not submit shareholder proposals, but we still can vote on shareholder proposals put forth by others. BlackRock complies with requirements under various laws

and regulations that limit how BlackRock can interact with the companies in which it invests on behalf of its clients. As with all voting, when assessing how to vote on shareholder proposals, BIS evaluates each proposal on its merit, taking a case-by-case approach with a singular focus on its implications for long-term value creation. More information on our approach is in our Global Principles. An example of how BIS applies a case-by-case approach is explained in the commentary “2022 Climate-related shareholder proposals more prescriptive than 2021”.

Approach to Environmental Risks & Opportunities

As an asset manager, BlackRock’s approach to climate risk and opportunities and the global energy transition is based on our fundamental role as a fiduciary to our clients. As the world works towards a transition to a low-carbon economy, BIS is interested in hearing from companies about their strategies and plans for responding to the challenges and capturing the opportunities this transition creates. As BlackRock is a long-term investor on behalf of our clients, how well companies navigate and adapt through the transition will have a direct impact on our clients’ investment outcomes and financial well-being.

In this context, BIS seeks to understand companies’ plans for how they intend to deliver long-term financial performance through the energy transition, consistent with their business model, sector, and geography. BIS looks for companies to demonstrate they have strategies in place that address and are resilient to a range of scenarios, including likely decarbonization pathways well below 2°C, as well as global ambitions to limit temperature rise to 1.5°C.¹² BIS also encourages companies to disclose how considerations related to having a reliable energy supply and just transition affect their plans. For information about BIS’ engagements with companies and approach to climate risk, please see BIS’ commentary: “Climate Risk and the Global Energy Transition”. For information regarding BIS’ approach to engagement on natural capital, please see BIS’ commentary: “Our Approach to Engagement on Natural Capital.” Please also see the response provided under Management Criteria 6.

Approach to Human Capital Management

BIS views Human Capital Management (“HCM”) as both a board and a management issue. In BIS’ experience, companies that build strong relationships with their stakeholders – including their workforce – are more likely to meet their own strategic objectives, while poor relationships may create adverse impacts that could expose companies to legal, regulatory, operational, and reputational risks, and jeopardize their license to operate. This is why BIS encourages companies to report on how they consider the interests of their workforce in business decision-making. For information about BIS’ engagements with companies and approach to human capital management, please see BIS’ commentary: “Our Approach to Engagement on Human Capital Management”.

Approach to Human Rights

BIS engages with companies to understand how they are monitoring and managing their impacts on people, including human rights-related risks. For information about BIS’ approach to engagement with companies on their human rights impacts, please see BIS’ commentary: “Our Approach to Engagement with Companies on their Human Rights Impacts”. Please also see the discussion under Management Criteria 4 for information about BIS’ approach to human rights-related risks.

Commitment to Transparency

BIS is committed to providing transparency into its stewardship activities on behalf of clients. Since January 2020, BlackRock has enhanced existing disclosures and initiated others, including, vote bulletins covering BIS’ voting rationale on key proposals at specific meetings that may be of particular interest to clients, annual and mid-year thematic reports and position papers explaining BIS’ approach to engagement with companies on governance and sustainability issues. BIS also makes company-specific engagement activity available quarterly, along with its voting record.

Quantitative Metrics

Exhibit 4 provides quantitative information about BIS’ engagement and voting activities for the year ended December 31, 2021.

Exhibit 4: Quantitative Metrics Related to BlackRock Investment Stewardship Activities

BIS Engagement Statistics

Indicator	Quantitative Metric ^a
BIS Team Size ^b	69
Total Engagements ^c	3,642
Unique Companies Engaged ^c	2,354
Countries in which BIS engaged companies	57

BIS Voting Statistics

Indicator	Quantitative Metric ^a
Meetings Voted	17,212
Proposals Voted ^d	164,074
% of Meetings where BIS did not support one or more management recommendations ^e	43%
% of Proposals where BIS did not support management's recommendation ^e	12%

a. Reflects data between January 1, 2021 – December 31, 2021, except when otherwise noted.

b. As of December 31, 2021.

c. BlackRock counts only direct interaction as an engagement. BIS also writes letters to raise companies' awareness of thematic issues on which the team is focused or changes in policy, but this outreach is considered distinct from engagement as it is difficult to monitor the effectiveness of letter writing without direct interaction with any given company.

d. Includes all proposals filed in Japan.

e. Votes to not support managements' recommendation includes votes in support of shareholder proposals, abstentions and votes withheld. Calculation includes all proposals filed in Japan.

Business Ethics & Conduct

Transparent Information & Fair Advice for Customers

SASB FN-AC-270a.1

(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

There were no covered employees¹³ with a record of new investment-related investigations, consumer-initiated complaints, private civil litigations, or other regulatory proceedings disclosed during 2021. As of December 31, 2021, BlackRock had one covered employee, representing 0.06% of covered employees, who disclosed a matter of the kind listed under SASB Item FN-AC-270a.1 (also shown in the text above) during their employment tenure at BlackRock.

BlackRock has policies, procedures, and controls that address compliance with applicable rules and regulations, including the requirement that the firm and its employees maintain accurate regulatory filings.

BlackRock maintains an internal US Registrations Policy, which requires employees to register with one or more regulators and/or jurisdictions depending on the activities they engage in. These activities include, but are not limited to:

- 1) marketing or offering specific investment products or services offered by BlackRock with current or prospective clients, or financial intermediaries which may distribute BlackRock investment products or services;
- 2) trading of securities on behalf of BlackRock Execution Services;

- 3) supervising or training employees engaged in activities which require registration;
- 4) performing activities that are directly attributed to any of BlackRock's broker-dealer entities;
- 5) reviewing or approving broker-dealer related advertising and sales literature;
- 6) engaging in Municipal Advisor activities under BlackRock Institutional Trust Company;
- 7) soliciting orders, customers, or customer funds on behalf of BlackRock's commodity trading advisor or commodity pool operator, including separate accounts which trade derivatives; and
- 8) marketing, soliciting, or negotiating an insurance product.

Additionally, if an employee performs a control function in Operations or Finance and the function is related to one of the regulated entities, such as back and middle office functions, broker-dealer financial reporting or recordkeeping, registrations may be required.

SASB FN-AC-270a.2

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

BlackRock did not sustain any monetary losses in the reporting period as a result of legal proceedings associated

with its marketing and communications to customers, as described in SASB Item FN-AC-270a.2 (also described in text above).

SASB FN-AC-270a.3

Description of approach to informing customers about products and services

BlackRock is a publicly traded investment management firm, offering a broad range of investment management and technology services to a diverse mix of institutional and retail clients across the globe. Clients include tax-exempt institutions, such as defined benefit and defined contribution

pension plans, charities, foundations, and endowments; official institutions, such as central banks, sovereign wealth funds, supranational, and other government entities; taxable institutions, including insurance companies, financial institutions, corporations, and third-party fund sponsors; and

retail intermediaries. When communicating with clients about its investment management services and specific products, BlackRock is subject to various laws and regulations, as well as BlackRock's own policies, procedures, and guidelines requiring its communications to be clear and accurate, fair, and balanced, and not misleading. Additionally, BlackRock considers the nature of the audience to which its communications are directed to provide details and explanations as may be appropriate.

BlackRock communicates with its clients in a manner designed to:

- be transparent with respect to its business, practices, and potential conflicts of interest;
- identify key risks associated with its products and services and disclose these risks in its materials;
- engage with its clients to understand and address their evolving needs; and
- respond to client questions and address client feedback.

BlackRock has a framework aimed at assuring that marketing materials adhere to applicable laws and regulations and BlackRock's policies, procedures, and guidelines. Marketing materials may not be used with clients or distributed to the public until they are approved in accordance with BlackRock's procedures, which includes the approval of BlackRock employees with responsibility for accuracy and completeness, in an electronic compliance system that facilitates the review and approval.

Below is a general description of the information about the products and services that BlackRock makes available to clients. However, this description is not exhaustive because the way BlackRock communicates with clients varies based on a number of factors including applicable laws and regulations, the type of client, and the product or service in question.

Institutional

BlackRock serves a variety of institutional investors on six continents including: pensions, endowments and foundations, official institutions, and financial institutions. Institutional clients may work with investment consultants who help them make decisions about their allocations to investment products. BlackRock's relationship managers work with current and prospective institutional clients and their consultants to provide information about its products and services.

Retail

BlackRock serves investors globally through a wide array of vehicles across the investment spectrum, including separate accounts, open-end and closed-end funds, and unit trusts. Retail investors are served principally through intermediaries, including broker-dealers, banks, trust companies, insurance companies, and independent financial advisors.

Mutual Funds

Information about BlackRock's mutual funds that are available to retail investors is provided on BlackRock's website, www.blackrock.com. BlackRock's website is tailored to the client type and region of domicile. Information that is made available includes the fund's constituent documentation (e.g., prospectus) and the fund's investment strategy, characteristics, fees and expenses, financial statements, and performance.

Exchange Traded Funds (ETFs)

Information about iShares ETFs can be found on www.ishares.com. The iShares website is tailored to the visitor's region of domicile. Information that is made available includes the fund's constituent documentation (e.g., prospectus) and the fund's investment strategy, characteristics, fees and expenses, financial statements, and performance.

Additional Information

BlackRock makes available information about its business practices and potential conflicts of interest through:

- **Form ADVs** for BlackRock's investment advisers registered with the SEC are available on the SEC's Investment Adviser Public Disclosure website. The Form ADVs provide information about BlackRock's SEC-registered investment advisers and their business, ownership, clients, employees, business practices, affiliations, conflicts of interest, disciplinary events, advisory services, and fees.
- **BlackRock's Code of Business Conduct and Ethics** (the "Code") is available on the BlackRock website. This document sets out basic principles to guide employee conduct. The Code is supported by separate employee conduct policies and programs and reinforced through employee training.
- **BlackRock Investment Stewardship Global Principles & Engagement Priorities** are available on the BlackRock website. Please see SASB FN-AC-410a.3 for further information.

Business Ethics

SASB FN-AC-510a.1

Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, and anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations

BlackRock's reputation for integrity is one of its most important assets. BlackRock holds itself to standards that not only meet those required by applicable laws and regulations, but are consistent with its principles, which are rooted in exceeding its clients' expectations. BlackRock's Code of Business Conduct and Ethics (the "Code") sets out basic principles to guide employee conduct. The Code is supported by employee conduct policies and programs and reinforced through employee training.

From time to time, BlackRock receives subpoenas or other requests for information from various US federal and state governmental and regulatory authorities and international governmental and regulatory authorities in connection with

industry-wide or other investigations or proceedings. It is BlackRock's policy to cooperate fully with such matters. The Company, certain of its subsidiaries and employees have been named as defendants in various legal actions, including arbitrations and other litigation arising in connection with BlackRock's activities. In 2021, any monetary losses in the form of fines and disgorgement related to the types of matters described in SASB FN-AC-510a.1 were not material to BlackRock's results of operations, financial position, or cash flows. Further information regarding legal proceedings is provided in BlackRock's current and periodic reports with the SEC, including its Annual Report on Form 10-K and Quarterly Reports on Form 10-Q.

SASB FN-AC-510a.2

Description of whistleblower policies and procedures

Whistleblower Policies

BlackRock maintains a Global Policy for Reporting Illegal or Unethical Conduct, which establishes the framework by which an employee or any third-party may report a concern. BlackRock makes available a Business Integrity Hotline and reporting website, which is administered on behalf of BlackRock by an independent external third-party.

The Code provides an overview of the Global Policy for Reporting Illegal or Unethical Conduct. BlackRock employees are required to complete a mandatory compliance training annually on topics that cover employee responsibilities included in the Code and the Global Policy for Reporting Illegal and Unethical Conduct.

Every BlackRock employee is required to report any illegal or unethical conduct about which they become aware, as outlined in the Code, including those concerning accounting or auditing matters and violations of BlackRock policies.

Employees may report concerns to their managers or a Managing Director on BlackRock's Legal & Compliance team directly, or by contacting the Business Integrity Hotline or reporting website.

Anti-Bribery and Corruption

BlackRock's Anti-Bribery and Corruption Policy explicitly prohibits any transaction, including facilitation payments, which could constitute a bribe or a corrupt payment to or from a public official or body, or a private entity or individual.

BlackRock's policy applies to its employees and to those who represent the firm, including any business partners who operate on BlackRock's behalf. BlackRock considers the anti-bribery and corruption policies of potential new business partners as it conducts its due diligence. BlackRock has a dedicated Financial Crime team that oversees these policies. Any potential violations of BlackRock's policies are investigated, and violations are reported to relevant governance committees.

Supply Chain Management

Vendor Sustainability & Diversity

Management Criteria 1

Description of policies and engagement processes to manage risks and opportunities associated with supply chain, incorporating environmental, social, and governance issues

Vendor Sustainability & Diversity

BlackRock is a financial services company, its “supply chain” is comprised primarily of vendors, custodian banks and fund administrators, trading counterparties, market data providers, and other entities that support BlackRock’s activities and business operations (collectively, “Suppliers”).

Risks & Opportunities

As a participant of the UNGC, BlackRock is committed to aligning its operations with universal principles on human rights, labor, the environment, and anti-corruption. BlackRock has established expectations for the companies and individuals who supply goods, materials, or services to BlackRock to adhere to these same standards and principles, or their equivalent.

By adopting high expectations for its Suppliers, encouraging best practices in both diversity, equity, and inclusion and environmental sustainability, and fostering the growth and development of veteran, minority, LGBTQ+, and women-owned businesses, BlackRock has the opportunity to increase its effectiveness as an organization and build stronger relationships with its Suppliers and the communities in which it operates. In addition, BlackRock recognizes the importance of managing risks that could arise from ineffective management of environmental and social issues by its Suppliers.

Supplier Code of Conduct & Ethics

BlackRock maintains a Supplier Code of Conduct & Ethics, which outlines the minimum expectations and standards of Suppliers in relation to human rights, DEI, environmental sustainability, and integrity, ethics, and anti-corruption in management practices as BlackRock believes that effective management of these issues, including adherence to applicable laws and regulations, reduces potential risk to BlackRock and its Suppliers. In 2021, BlackRock updated its Supplier Code of Conduct & Ethics to embed the Ten Principles of the UNGC into its stated expectations for Suppliers and to incorporate recommended best practices that BlackRock encourages its Suppliers to adopt, where appropriate, including being transparent about their diversity

representation and environmental performance, and seeking to make meaningful progress on these aspects of their businesses.

Supplier Diversity

BlackRock is committed to developing and seeking out qualified diverse businesses from historically underrepresented groups, including companies owned and operated by minorities, women, military veterans, disabled veterans, people with disabilities, and members of the LGBTQ+ community. In support of this, BlackRock’s Sourcing and Vendor Management team seeks to include at least one Supplier that meets its diverse business criteria in all competitive bid events.

Diverse Broker Program

BlackRock maintains a dedicated “Diverse Broker” program which looks to proactively engage with minority, women, and/or veteran owned broker-dealers in the US to help them become stronger liquidity providers in the broader marketplace. The program looks to: 1) identify ways to increase BlackRock’s connectivity and trading activities with Diverse Brokers while introducing new opportunities for these firms to become more competitive in the broader marketplace; and 2) identify new brokers and strengthen current relationships by focusing on a Diverse Broker’s core competencies and aligning BlackRock trading activity and efforts with the broker accordingly. BlackRock’s trading activities with all trading counterparties, including Diverse Brokers, are on behalf of BlackRock’s clients and are subject at all times to BlackRock’s fiduciary obligations, as an asset manager, including its obligations to seek best execution and meet independent counterparty credit risk assessment criteria.

Diverse Manager Program

BlackRock established a formal Diverse Manager Program, which engages diverse third-party asset managers to deliver competitive returns and advance economic outcomes of these firms and their communities consistent with BlackRock’s fiduciary obligations to its clients. The Diverse Manager Program is BlackRock’s initiative to increase partnerships with minority business enterprises and deepen its commitment to DEI. BlackRock integrates specific DEI criteria within its

qualitative evaluation of managers. BlackRock seeks to identify market leaders whose policies provide transparent metrics and support internal and external initiatives. The key areas of this assessment include (i) overall DEI philosophy and policies; (ii) firm compositional diversity; (iii) practices within investment process; and (iv) talent policies.

Governance

A number of teams at BlackRock play a role in advancing its vendor sustainability and diversity efforts.

- The global **Sourcing and Vendor Management** and **Index and Data Solutions** teams are responsible for engaging with Suppliers to uphold BlackRock's Supplier Code of Conduct & Ethics.
- The **Global Provider Strategy** ("GPS") team develops and executes the firm's post-trade relationship strategy with custodians, fund administrators, and transfer agents.
- The **Global Trading** team is responsible for the competitive execution and sourcing of liquidity on behalf of all BlackRock's clients. Global Trading also manages the Diverse Broker Program, which seeks to increase connectivity and engagement with minority, women, and veteran-owned broker-dealers.

- The **Corporate Sustainability** team oversees efforts to incorporate sustainability considerations into BlackRock's business strategy and operations, including BlackRock's supply chain.
- **The Diversity, Equity, and Inclusion** team drives the firm's long-term strategy to increase diversity across all levels of the firm through hiring, retention, promotion, and development initiatives. The team is responsible for expanding partnerships with minority-, women-, veteran-, and LGBTQ-owned businesses. In 2021, BlackRock hired a Global Head of Supplier Diversity, who is focused on advancing the firm's supplier diversity and works in partnership with the Sourcing and Vendor Management team to achieve the firm's objectives in this area.
- Individual business units at BlackRock are responsible for direct engagement with and management of relationships with Suppliers.

Risk Management

RQA Third Party Risk creates and implements enterprise-wide risk frameworks which take into account supplier diversity as described above. RQA acts as a second line of defense, overseeing risk assessments and ongoing oversight of BlackRock's supplier landscape.

Additionally, RQA and relevant stakeholders provide periodic updates to the Third Party Risk Committee, an internal risk committee, which reviews how the enterprise monitors, manages, and reports on these risks.

Human Capital & Human Rights

Employee Diversity & Inclusion

SASB FN-AC-330a.1

Percentage of gender and racial/ethnic group representation for (1) executive management, (2) non-executive management, (3) professionals, and (4) all other employees

Diversity, Equity, and Inclusion (“DEI”)

BlackRock is committed to embedding DEI across every level of the firm and within every region and country where it operates. BlackRock’s clear sense of purpose to help more and more people experience financial well-being is core to who it is as a firm and to the difference it can make in the world. A diverse workforce engaged in BlackRock’s purpose is foundational to its ability to deliver value to its stakeholders including clients, employees, shareholders, and communities.

DEI Strategy

BlackRock has made a long-term commitment to cultivating diversity in its workforce and leadership team through its hiring, retention, promotion, and development practices. As a part of this long-term commitment, BlackRock instituted a multi-year DEI strategy in March 2021 that is actionable and measurable with global and local relevance. BlackRock reviews the strategy annually, along with the corporate policies and programs that support it, so that the strategy remains aligned with the firm’s business imperatives and long-term objectives. BlackRock’s DEI strategy centers on three core pillars: (i) talent and culture; (ii) responding to the needs of its clients; (iii) policy and social impact in the communities in which it operates. Please see Management Criteria 1 and SASB FN-AC-410a.3 for further detail on BlackRock’s role as a fiduciary on behalf of its clients. Please also see Management Criteria 5 and Management Criteria 9 for more on BlackRock’s commitment to public policy and social impact.

To accelerate progress, BlackRock has committed to raising awareness of racial equity issues and setting high behavioral expectations for employees, as well as to holding firm leaders and managers accountable for continued progress against the firm’s goals. In 2020, BlackRock set goals for increasing the overall workplace representation of Black and Latinx employees by 30% in the US and doubling the number of US Black and Latinx senior leaders (Director and above) by 2024. Recruitment, retention, and promotions are the key levers enabling BlackRock to reach its 2024 goals. In addition, as BlackRock continued to consider the

development and retention of its employees, the firm invested in comprehensive leadership development programs. See below for more detail on leadership development.

Governance

BlackRock’s Board of Directors (the “Board”) plays an important role in the oversight of human capital management at BlackRock. The Board devotes an annual meeting to conduct an in-depth review of BlackRock’s human capital strategy which includes, but is not limited to, talent acquisition and talent management, the DEI strategy, leadership and succession planning, employee sentiment, and employee engagement. BlackRock’s vision for talent is for every employee to live and embrace the BlackRock Principles, the firm’s cultural values, and to have its employees fully engaged and enabled in helping more and more people experience financial well-being, which is the firm’s purpose. Partnership between Human Resources (“HR”) and the business is critical to enabling this vision. BlackRock senior management made it a priority in 2021 to establish and maintain firmwide DEI governance models to accelerate progress against its multi-year global DEI strategy and commitments.

To do so, BlackRock launched the Global Diversity, Equity, and Inclusion Steering Committee (“GDSC”). The GDSC is comprised of 25 BlackRock leaders, across regions and functions, who work collaboratively to accelerate the firm’s progress on DEI firm-wide. Members have a proven track record of influencing and progressing DEI within their respective businesses and have a unique ability to bring innovative ideas to fulfilling the firm’s DEI mission.

In addition, approximately 40 senior executives representing different business groups took on the role of DEI Executive Committee Lead. They develop, drive and are accountable to the DEI action plan for their respective businesses. These key decision makers on Executive Committee-level teams can initiate DEI discussions and dialogues during Executive Committee meetings and across their businesses. They each identify DEI priorities for their business with their Chief Operating Officers and HR business partners and keep their Executive Committee team accountable to deliver against specific DEI objectives and plans.

Accountability

In 2021, BlackRock further developed its accountability system to drive greater collective ownership of the firm's DEI efforts by:

1. Implementing business-specific DEI goals, establishing clear action plans, and reviewing business-specific progress at mid and end of year with each of its businesses and functions.
2. Embedding DEI into BlackRock's talent, performance management, and promotion processes by explicitly including strengths and areas for improvement in promoting an inclusive, respectful, and equitable work environment and culture.
3. Providing greater disclosure on diversity, including the release of its Global DEI Annual Report.

Feedback Mechanisms

BlackRock values continuous dialogue with its employees about their experiences at the firm in order to understand employee expectations and assess the efficacy of its human capital management practices. The Company uses several employee feedback mechanisms, including: (i) employee opinion surveys; (ii) interactive townhalls and communications; and (iii) employee, professional, and social impact networks. These employee engagement mechanisms provide BlackRock with actionable feedback for each team and for BlackRock as a whole.

Recruiting

In 2021, BlackRock launched its DEI Center of Excellence within Talent Acquisition ("TA") with four strategic areas of focus around partnerships, hiring practices, projects, and DEI thought leadership.

BlackRock seeks to hire diverse teams as it believes diverse teams lead to better decision-making, especially in complex, changing environments. BlackRock regularly reviews job postings for potentially biased language and actively engages in outreach and recruitment efforts for its open positions to endeavor to have candidate slates that are diverse, including with respect to gender, race, ethnicity, disability, veteran status, and beyond. BlackRock also designed a recruitment process to mitigate bias through hiring manager training on competency-based interviewing and has implemented diverse interview panel guidelines.

BlackRock has seen significant increases in its recruitment of diverse talent over the past three years. In 2021, nearly half of all hires were women (46.9%), bringing the firm's global female representation to 43.5% as of January 1, 2022. In the US, 28% of overall hires in 2021 identified as Asian, 14% identified as Black or African American, and 9% identified as Hispanic or Latinx. Over the past several years, BlackRock has also made progress in its campus recruiting program. Globally, 55% of its 2021 Graduate Analysts are women. In the US, 23% of Graduate Analysts in 2021 identified as Asian, 19% identified as Black or African American, and 15% identified as Hispanic or Latinx.

Leadership Development

BlackRock believes that a critical driver of its future growth is its ability to grow strong leaders. BlackRock is committed to sponsoring diverse talent through targeted development programs designed to foster career growth. For example, eligible employees from underrepresented backgrounds are invited to participate in BlackRock's flagship leadership programs, which include assessments, executive coaching, in-person and virtual learning, and senior management sponsorship. In 2021, BlackRock designed a comprehensive, ecosystem-focused approach intended to develop the individual leader and influence the system around them to better enable their growth and success. For example, BlackRock invites managers of program participants to participate in training that focuses on inclusive leadership, cultural competency skills and deepening and building high-quality relationships with leaders from underrepresented groups.

Employee Learning

The firm understands that progress requires a long-term mindset with sustained focus and persistence. Belonging and inclusion are integral to bringing the firm's shared purpose and values to life. One way BlackRock is furthering its efforts in this journey is by raising awareness of and educating its employees on issues related to DEI and the systemic barriers many underrepresented individuals face in the workplace. In 2021, BlackRock hosted "Inclusion Dialogue" sessions, virtual small group conversations led by external facilitators that helped build the skills necessary to cultivate inclusive environments.

Reinforcing BlackRock's culture is critical to its continued success and moving the organization forward. Ensuring all employees are grounded in BlackRock's history, the BlackRock Principles and the firm's purpose is more important than ever. To that end, in October 2021, the firm introduced the BlackRock Citizen Academy ("BCZA") – a suite of courses and content designed to ensure every employee has a foundational knowledge of BlackRock's business and a stake in its culture. Foundations of Our Culture, a required accreditation within BCZA, further embeds diversity, equity and inclusion throughout its content and delivery experience.

Employee Networks

BlackRock employee networks provide an opportunity for employees with a diverse range of backgrounds, experiences, and perspectives to connect with one another and help shape BlackRock's culture. Employee networks are sponsored by senior leaders and are proudly designed by employees, for employees. BlackRock's first network, the Women's Initiative & Allies Network was established in 2006. BlackRock has 15 employee, professional, and social impact networks, which come together in a forum called Mosaic. Mosaic works across many populations and groups within the firm to focus on shared interests. It is open to all employees and is a forum to share best practices, showcase

comradery and reinforce the One BlackRock mindset. BlackRock continues to add new networks to support its employees. In March 2021, BlackRock launched two new networks, the Asian Middle Eastern & Allies Professional Network, and the Gives Network, which is a global community of employees committed to making a positive impact in the places where they live and work through volunteerism, fundraising, and pro-bono support.

Employee Benefits

The firm offers a wide range of benefits that are aimed at supporting its employees in all aspects of their physical,

mental, and financial well-being. Please see the discussion provided under Management Criteria 3 for an overview of Employee Benefits.

Quantitative Data

Exhibit 5 below provides breakdowns of gender representation globally and racial/ethnic group representation for US employees. The ▲ ▼ symbols and associated percentages represent year-over-year change in percentage points. BlackRock also discloses its Equal Employment Opportunity (“EEO-1”) reports.

Exhibit 5: Diversity Representation

BlackRock uses voluntarily disclosed diversity data to review hiring, promotion, and attrition at the firm, regional, and functional levels. BlackRock reviews performance data, promotion, and compensation outcomes as part of its efforts to monitor for fair and objective decision-making in the annual performance review process.

Gender Representation of Global Employees (%)						
SASB Category	Female		Male		Not Disclosed ^{vii}	
Executive Management ⁱ	24.0%	▲ +0.4%	76.0%	▼ -0.4%	0.0%	-
Non-Executive Management ⁱⁱ	31.5%	▲ +1.5%	68.5%	▼ -1.5%	0.0%	-
Senior Leaders ⁱⁱⁱ	31.2%	▲ +1.5%	68.8%	▼ -1.5%	0.0%	-
Professionals ^{iv}	45.9%	▲ +0.8%	54.0%	▼ -0.8%	0.1%	-
All Other Employees ^v	92.0%	▼ -1.6%	8.0%	▲ +1.6%	0.0%	-
Total Employees	43.5%	▲ +0.8%	56.4%	▼ -0.8%	0.1%	-
2021 Hires ^{vi}	46.9%	▼ -0.4%	52.8%	▲ +0.3%	0.2%	▲ +0.1%

US Ethnicity Distribution %						
	Asian	Black or African American	Hispanic or Latino	White	Other ^{viii}	Not Disclosed ^{vii}
Executive Management	23.2% ▲ +1.7%	5.1% ▲ +0.1%	3.0% ▲ +0.1%	63.6% ▼ -6.0%	1.0% ▲ +1.0%	4.0% ▲ +3.1%
Non-Executive Management	19.1% ▲ +0.9%	3.5% ▲ +0.5%	3.5% ▲ +0.2%	69.9% ▼ -2.2%	1.7% --	2.3% ▲ +0.6%
Senior Leaders	19.2% +0.9%	3.5% +0.5%	3.5% +0.2%	69.7% -2.3%	1.7% +0.1%	2.4% +0.7%
Professionals	30.3% ▼ -0.9%	8.1% ▲ +1.8%	7.9% ▲ +0.7%	48.1% -2.7%	2.8% ▲ +0.3%	2.9% ▲ +0.7%
All Other Employees	10.2% ▼ -1.1%	15.5% ▼ -0.9%	15.5% ▲ +1.1%	50.8% ▼ -0.5%	5.3% ▲ +0.1%	2.6% ▲ +1.3%
Total Employees	26.0% -0.3%	6.9% ▲ +1.3%	6.8% ▲ +0.6%	55.1% ▼ -2.4%	2.5% ▲ +0.2%	2.7% ▲ +0.7%
2021 Hires	28.0% ▲ +1.7%	14.1% ▲ +4.5%	8.6% ▼ -2.3%	40.4% ▼ -5.7%	3.2% ▲ +0.1%	5.7% ▲ +1.8%

i. Represents Executives/Senior Officials & Managers as defined by the EEO-1 Job Classification Guide.

ii. Represents First/Mid Officials & Managers as defined in the EEO-1 Job Classification Guide.

iii. Represents a weighted average of executive management and non-executive management, including Directors and above.

iv. Represents Professionals and Sales Workers as defined in the EEO-1 Job Classification Guide.

v. Represents Administrative Support Workers as defined in the EEO-1 Job Classification Guide.

vi. Represents new employees hired between January 2, 2021 and January 1, 2022.

vii. Not disclosed represents not available or not disclosed by BlackRock employees.

viii. Other includes Native American or Alaska Native, Native Hawaiian or Pacific Islander, and “Two or More Races”.

Note: The year-over-year change in this table was calculated by management comparing data as of January 1, 2021 to January 1, 2022. All other data as of January 1, 2022. Data includes acquisitions. Calculations are done using exact figures. The percentages and percentage change figures above are rounded figures and may not tie exactly.

Employee Health, Safety & Wellbeing

Management Criteria 2

Description of employee health & safety program and policies

Employee Health & Safety

BlackRock is committed to providing a safe and healthy working environment for its workforce. To do this, BlackRock designs and executes global programs, including environmental and occupational health and safety programs, to meet or exceed local requirements. Moreover, in line with the firm's corporate culture, BlackRock enforces the ability for employees to raise issues of concern and expressly prohibits retaliation.

Safety Management System

BlackRock utilizes a Safety Management System, in line with ISO 45001 and ISO 14001¹⁴ to manage health, safety and environmental risks throughout the firm. BlackRock has established Environmental and Occupational Health and Safety Policies that extend beyond its employees, and are designed to protect clients, contractors, and visitors to its offices and events. This design enables BlackRock to proactively manage all processes with health and safety implications, while centrally managing core programs to deliver state of the art health and safety programs. BlackRock provides all employees with health and safety workplace training programs to cover both general and function-specific health and safety knowledge.

Policies and Standards

BlackRock's health and safety standards and programs are developed and managed by the Global Health & Safety team. They are delivered in partnership with the HR, Enterprise Security, Enterprise Resilience, and Workplace Experience teams. BlackRock employs a multi-faceted strategy to manage and reduce risk through in-depth oversight and global standards that include:

Occupational Health and Safety Policy. Details BlackRock's overarching health and safety policy statements and defines associated health and safety standards that support program delivery.

Hazard Identification and Risk Assessment. Defines BlackRock's approach to health and safety regulatory audits, building inspections, job hazards, and exposure assessments.

- **Workplace Injury and Illness Prevention.** Defines BlackRock's approach to workplace injury and illness prevention, investigations and case management, ergonomics, corrective action management, and regulatory and insurance reporting. All incidents are reported to the Health & Safety team through online tool/robotic chat box or by phone via the Corporate Security Command Center. Detailed investigation and necessary corrective and preventive measures are taken to prevent recurrence and enhance BlackRock's work environment.
- **Emerging Health Concerns and Pandemic.** Defines BlackRock's framework to address contagious illness and pandemic monitoring and sets the framework for response to environmental health concerns related to air, chemicals, pests, and water.
- **Travel and Event Safety and Security.** Defines BlackRock's approach to manage safety and security risks related to business travel and corporate events. This standard is jointly managed by the Enterprise Security and Global Health & Safety teams. Employees are provided with 24/7 access to travel advice and emergency support when travelling internationally. All travelers and event attendees have access to the 24/7 Corporate Security Command Center for emergency support when travelling or attending an event in-country. BlackRock travel safety site provides access to travel safety advice, country-specific vaccine information, local health and safety alerts, pre-trip advice, emergency information, food and water precautions and health threats available to all staff for business or personal travel.
- **Building Emergency Preparedness and Response.** Defines BlackRock's approach to address life safety preparedness initiatives including fire and safety roles, training, emergency drills, and exercises. This standard also includes the protocol for equipment inspections, preventative maintenance, and emergency supplies. All employees are made aware of the evacuation procedures and emergency action plans in case of emergency. Site specific emergency action plans and resources are posted on the BlackRock intranet and highlighted in the all-staff emergency preparedness training.

Management Criteria 3

Description of employee benefits & efforts to promote employee well-being

Employee Benefits

BlackRock is committed to responsible business practices and believes that investing in the financial, physical, emotional, and mental well-being of its employees is a critical component of the firm's human capital management strategy. BlackRock offers a wide range of benefits as described in this section.

Financial Well-being

BlackRock offers retirement plans to help benefits-eligible employees build a sound financial future. BlackRock's Employee Stock Purchase Plan allows eligible employees to share in the ownership of the company by purchasing BlackRock stock at a discounted price. A financial counseling benefit, which includes an assessment and personalized financial wellness action plan, is available to employees in certain geographies including those in the US, UK, and Hong Kong. BlackRock offers life, accident, disability, and travel insurance to help protect its eligible employees' financial security. BlackRock's Education Reimbursement Program offers benefits-eligible employees up to \$5,250 (or equivalent in local currency) per year to help employees expand the skills and knowledge to help them build their careers. BlackRock offers employees a financial counseling benefit through Ayco. The Ayco benefit provides US employees with an integrated solution that blends digital tools and education with unlimited one-on-one financial coaching.

Sustainable Investing Options in BlackRock Retirement Plans

Sustainable investing options are available to employees in many of BlackRock's global retirement plans including those in the US, UK, Hong Kong, Australia, Belgium, Japan, Netherlands, South Korea, and Sweden. Investment choices available to employees differ from country to country depending on the availability, cost, and quality of sustainable investing options and any applicable laws and regulations, including those governing the types of funds that are eligible as a default investment.

Health and Physical Well-being

BlackRock's medical plans are designed to help benefits-eligible employees maintain their health and well-being, with a focus on comprehensive coverage, preventive care, and virtual access where available. Throughout the COVID-19 pandemic, BlackRock focused on enhancing access to telemedicine support, where available. BlackRock's global well-being platform, powered by Virgin Pulse, helps employees build healthy habits so they can be more successful in their everyday lives. This encompasses tips,

incentives, and BlackRock-sponsored challenges to support better eating, sleep, and exercise, including access to a free library of over 1,000 virtual fitness classes.

Since the start of the COVID-19 pandemic, BlackRock's priority has been the health and safety of its employees and their families. As such, BlackRock provided a voluntary, company paid COVID-19 testing benefit, designed to make testing for COVID-19 and its antibodies more accessible and convenient to its global employees and their dependents. BlackRock also offered employees COVID-19 vaccines education and access onsite, where available.

Emotional Well-being

BlackRock's health plans cover mental health, and BlackRock offers a variety of emotional and mental health benefits that are available to benefits-eligible employees, including confidential counseling through BlackRock's Employee Assistance Program ("EAP"). The EAP is designed to support employees and their families across a wide range of needs, offering emergency assistance, as well as counseling, by telephone or in person, for personal stress and family problems, including marital and relationship difficulties, financial worries, anxiety, and emotional issues. The EAP also provides work and life resources, as well as everyday support through research and referral services.

To help reduce stress and improve sleep, BlackRock offers employees a free annual subscription to the Calm App. In 2021, BlackRock introduced a Mental Health Ambassador program with more than 400 volunteers across the firm who have been trained in empathetic listening skills and refer colleagues to the benefits, tools, and resources that BlackRock offers to support mental health.

Volunteering & Donation Matching

BlackRock has a matching gifts program that provides benefits-eligible employees with up to US \$10,000 per year in matched donations and volunteer time to any IRS qualified charitable organization.

Benefits-eligible employees are also given two paid volunteer days per year. BlackRock also matches volunteer time with eligible charities at US \$25 per hour. Through local, employee-led BlackRock Gives committees, BlackRock supports nonprofit organizations nominated by employees in the communities where BlackRock operates.

Life Management

BlackRock's flexible time off policy offers benefits-eligible employees as many paid days off per year as they need, with manager approval. BlackRock also provides leave through a variety of policies and programs, depending on

the reason for the leave. BlackRock's inclusive time off benefits for employees also include paid leave following the birth or adoption of a child for both primary and non-primary caregivers. BlackRock supports benefits-eligible employees by offering a flexible return-to-work transition period for primary caregivers. BlackRock offers a reimbursement benefit to eligible employees to help offset

the costs associated with adopting a child and/or completing a surrogacy arrangement, where legally permissible. In 2021, BlackRock began offering an enhanced bereavement leave policy and introduced a paid leave for parents who have the unfortunate experience of a miscarriage or stillbirth.

Human Rights & Labor Standards

Management Criteria 4

Description of engagement process and due diligence practices with respect to management of human rights, indigenous rights, and the local community

As defined by the United Nations Universal Declaration of Human Rights, human rights are inherent to all human beings and include the right to life, health and well-being, privacy, fair wages, and decent working conditions; freedom from discrimination, slavery, and torture; and freedom of association.¹⁵

BlackRock approaches human rights from two main perspectives:

1. As an **asset manager** with a responsibility to manage material risks to client portfolios, including how the firm engages with companies on their human rights impacts; and
2. As a **corporate entity** that seeks to support and respect the protection of international human rights in the management of BlackRock's employees, operations, and supply chain.

Asset Management

Investment Stewardship: A discussion of BlackRock's approach to investment stewardship is provided under FN-AC-410a.3. BIS engages on material business issues. BIS believes companies are best placed to deliver value for shareholders when they also consider the interests of their other key stakeholders. BIS is committed to engaging with companies on how they manage the human rights issues that are inherent in their businesses and monitor human rights practices on a best-efforts basis. BIS' assessment is based on information in the public domain, including third-party research.

While BIS engages with companies, and where appropriate, may not support management in our voting on behalf of clients, BIS lacks the authority to direct companies to address weaknesses in their business practices. Rather, the responsibility for managing human rights issues – and all

business practices – lies with boards and management of companies and the governments that regulate them. Governments and other public policy makers are responsible for implementing and enforcing relevant laws and regulations in their respective markets. BIS does not engage with governments on these issues. Yet, BIS believes that, over time, the approach that the stewardship team and other investors take to evaluating and engaging with companies on their human rights impacts can encourage companies to integrate sound business practices that benefit relevant stakeholders over the long-term. The following case studies illustrate BIS' engagement and voting related to human rights matters in 2021:

- At the January 2021 Annual General Meeting ("AGM") of the Malaysia-based Top Glove Corporation Bhd ("Top Glove") – the world's largest rubber gloves manufacturer – BIS did not support the re-election of six Independent Non-Executive Directors ("INEDs"). BIS also did not support a proposal for the Senior Independent Director to continue as an INED. Given the company's role as a leading personal protective equipment manufacturer and as a supplier of such equipment to hospitals around the world, BIS viewed the company's ineffectiveness in implementing COVID-19 protections for its own workforce as especially concerning. Prior to COVID-19, Top Glove had already faced serious financial and reputational impacts, after the US Customs and Border Protection ("CBP") determined that there was reasonable evidence of forced labor at Top Glove's manufacturing facilities. Following the 2021 AGM, Top Glove was proactive in engaging with various stakeholders, including BIS. The company has provided regular updates of the measures it adopted to address the various worker health and safety issues as well as labor rights concerns. On September 9, 2021, the US CBP announced the modification of the forced labor finding

on Top Glove.¹⁶ The US CBP communicated it had reviewed the evidence provided by Top Glove and determined that the company had addressed all indicators of forced labor identified at its Malaysian manufacturing facilities. BIS acknowledged the progress demonstrated by the company and will continue to monitor the various measures aimed at improving labor conditions in its facilities and across its operations. Read more about this case in the BIS Vote Bulletin.¹⁷

- At its June 2021 AGM, Thomson Reuters Corporation (“Thomson Reuters”) – a business information services company – put to a vote a shareholder proposal asking the company to broadly assess human rights risk and compare its human rights risk mitigation practices to its peers. The shareholder proposal made specific reference to Thomson Reuters’ announced change in strategy to become a content-driven technology company.¹⁸ In advance of the AGM, BIS engaged with Thomson Reuters to gain further understanding of its policies around board oversight and human rights risk in light of their new business focus. Technology companies are playing an increasingly important role in both the global economy and society. With that influence comes increased responsibility to consider how the use of personal data is integrated into a company’s strategy, and how this information is protected. While Thomson Reuters was able to detail some efforts to integrate additional oversight, which included the adoption of the “AI Principles” in 2020, BIS determined that more progress in this area would be beneficial to the company as it looks to reposition itself strategically. BIS voted in support of the shareholder proposal as the team believed the company could accelerate the implementation of policies to help mitigate future legal, operational, and reputational risk and support long-term shareholder value.

ESG Integration & Risk Management: Investment teams that have greater potential exposure to human rights, indigenous rights and local community violations consider these issues during portfolio construction and management. For example, the BAI Real Assets team considers these issues and risk exposure during asset review and due diligence. Where applicable, the BAI Real Assets team reviews factors such as land rights and community impact and rights. Examples of the team’s efforts include seeking informed consent for projects from local or indigenous communities where applicable, undertaking detailed reviews of land rights as part of investment due diligence, and aligning community and social engagement best practice with the International Finance Corporation’s (“IFC”) Performance Standards for several of its emerging market strategies.¹⁹ BlackRock’s Real Assets team also regularly reviews and monitors on-site health and safety, in addition to wider community

engagements and impacts. BlackRock Real Assets uses commercially reasonable efforts to comply with all relevant jurisdictional laws and expects BlackRock’s appointed contractors to do the same.

Fundamental investors also consider these issues using a range of tools to identify potential risk and exposure levels such as third-party provider controversy scores. If a concern is identified, fundamental investors may engage with companies to understand these risks, which will inform portfolio construction and management. Companies classified as UN Global Compact violators will also be flagged where relevant and material during regular Risk and Quantitative Analysis review meetings as well as Chief Investment Officer portfolio reviews.

Please see FN-AC-410a.2 for more information on ESG integration.

Transparency: BlackRock manages a variety of different products, each with their own investment strategy, guidelines, and constraints. BlackRock’s goal is for investors to be able to clearly see the sustainability characteristics of their investments. As such, ESG metrics including business involvement exposures (such as UNGC violators) based on third-party data sources are made publicly available for publicly offered funds including iShares ETFs and BlackRock mutual funds, where permitted by local and applicable regulation and where data is available. These metrics are also provided to separate account portfolio clients upon request, where permitted and applicable.

Corporate Operations

As a participant of the UNGC, BlackRock is committed to aligning its operations with universal principles on human rights, labor, environment, and anti-corruption, and to taking actions that advance societal goals.

BlackRock has implemented policies related to non-harassment, equal employment opportunity, and acceptable conditions of work with respect to wages, hours of work and occupational safety and health. These policies seek to provide applicants and employees equal opportunity without regard to legally protected characteristics that have attracted historical stereotyping or bias in relation to employment. BlackRock complies with all applicable laws and regulations on forced and child labor and the rights of association and to organize and bargain collectively.

Non-Harassment

BlackRock’s non-harassment policy details its commitment to providing equal employment opportunities and a workplace that is respectful, productive, and free from harassment, including, but not limited to, sexual

harassment. This policy outlines clear procedures for reporting and responding to issues of concern. BlackRock investigates all complaints raised in good faith. If BlackRock determines that an employee has engaged in activities that are in violation of, or inconsistent with the policy, the firm will take appropriate disciplinary action, up to and including termination of employment.

Employees are required to complete “Respect in the Workplace” training, which focuses on creating a respectful work environment and on preventing harassment and discrimination, including sexual harassment. Managers receive targeted training on their responsibility for preventing harassment and discrimination and escalating concerns of which they become aware regarding violations of policy. All employees are strongly encouraged to raise concerns regarding violations of BlackRock’s policy. Employees have numerous options for reporting concerns, including their manager, HR Business Partner, Employee Relations Advisor, BlackRock’s US EEO Officer, and BlackRock’s Business Integrity Hotline and reporting website, which permits anonymity, if desired. BlackRock expressly prohibits retaliation against any individual who reports a concern or assists with an inquiry or investigation.

BlackRock takes complaints of discrimination, harassment, and retaliation very seriously. The firm takes steps to respect confidentiality in conducting any investigation (recognizing that some disclosure may be necessary to investigate the complaint effectively).

Equal Employment Opportunity

Since its founding, BlackRock has been committed to equal employment opportunity for all applicants and existing employees. BlackRock is also committed to seeking ways in which affirmative actions can help reinforce this commitment. BlackRock developed and implemented its US Affirmative Action Program to ensure that good faith efforts are made to provide equal employment opportunity to every employee and qualified potential employee. BlackRock also fully supports the Americans with Disabilities Act and other relevant local laws by taking steps to attract and hire qualified individuals with disabilities, as well as engaging in an interactive process in response to requests for reasonable job accommodations during the application process, hiring process, and during employment. The firm also is committed to the recruitment, outreach, and development of disabled and protected veterans. It actively recruits with veteran organizations and, through its Veteran Employee Network, hosts a variety of events to highlight the value of transferrable military skills and experiences.

Each employee is responsible for complying with BlackRock’s equal employment opportunity and non-harassment policies at all times. All managers share the responsibility of assuring compliance with and continued implementation of these policies and are required to report any concerns of discrimination, harassment, or retaliation immediately, so the concerns can be promptly investigated. Any employee who is found to have violated any of these policies may be subject to disciplinary action, up to and including termination.

Suppliers

Please see the section on Supply Chain Management under Management Criteria 1 for further detail. BlackRock’s Supplier Code of Conduct & Ethics outlines the expectations and standards of Suppliers that BlackRock has established in relation to human rights, DEI, environmental sustainability, and integrity, ethics, and anti-corruption in management practices as well as recommended best practices that it encourages its Suppliers to adopt. As it relates to human rights and labor standards, BlackRock expects the following from its Suppliers:

Provide a safe and secure workplace for their employees²⁰ that complies with all health and safety laws, regulations, and practices. In addition, Suppliers are expected to ensure that all employees are provided with appropriate health and safety training, such as safe work practices and emergency preparedness.

Fully comply with all applicable laws and regulations when setting employee conditions on working hours, benefits, and wages (such as minimum legal wages).

Fully comply with all applicable child labor laws and only employ workers who meet the minimum legal age for that jurisdiction. Where local laws are less stringent than the International Labor Organization (“ILO”) minimum age convention, BlackRock expects Suppliers to comply with ILO standards.²¹

Not to use any involuntary labor, such as slave, forced, bonded, indentured, or prison labor, and not be involved in any human trafficking or exploitation.

Manage their employees in a fair and ethical manner and assure that all employees are treated with dignity and respect. BlackRock expects its Suppliers to maintain a workplace that is free from unlawful discrimination and harassment in any form.

Community Relations & Social Impact

Philanthropy & Volunteering

Management Criteria 5

Description of monetary contributions, charitable gifts, and partnerships with organizations, as well as community time contributions through volunteering in paid time

Social Impact

Social Impact, BlackRock's philanthropic arm, works to advance more sustainable economies and communities. Social Impact has two distinct pillars:

1. The BlackRock Foundation ("The Foundation"), which funds and partners with organizations globally that help more people build financial security and participate in the low-carbon transition.
2. BlackRock's employee engagement programs, which enable employees to drive local impact and address the needs of our communities.

Through mission-aligned grantmaking from The Foundation, disaster relief philanthropic commitments, and employee engagement and volunteerism, BlackRock's Social Impact work strives to make a meaningful positive impact on the communities where BlackRock operates.

Governance BlackRock's philanthropic efforts are led by BlackRock's Social Impact team. The team is guided by an internal Social Impact Board, comprised of senior global executives, which provides oversight to the Social Impact team to help align on annual strategies and budgets, and to review and approve large grants and special initiatives. Social Impact activity that is funded through The BlackRock Foundation is overseen by The BlackRock Foundation's Board of Directors, which annually reviews and approves The Foundation's budget, as well as significant grants and special initiatives. Finally, the Nominating, Governance and Sustainability Committee of the BlackRock Board of Directors annually reviews BlackRock's philanthropic programs and related policies and strategy.

Charitable Commitments

In 2021, Social Impact made progress on the firm's ongoing charitable commitments and made new commitments.

SDG 13



Breakthrough Energy Catalyst. In September 2021, The Foundation made a 5-year \$100 million grant, its largest philanthropic commitment to date, to Breakthrough Energy Catalyst Foundation ("Catalyst"), a program within the larger Breakthrough Energy network. Catalyst aims to accelerate the development of clean energy technologies to achieve net-zero emissions by 2050 and make these solutions available and affordable across the world. This philanthropic capital will support efforts that reduce the "Green Premium" across four critical decarbonization technologies: clean hydrogen; direct air capture; long-duration energy storage; and sustainable aviation fuel ("SAF").

SDG 10



Job Upskilling Grants. In 2021, BlackRock awarded over \$6 million in grants to non-profit partners in the US, Canada, Brazil, Chile, Colombia, Mexico, Peru, the UK, Germany, and India focused on removing barriers to economic opportunity and helping people access higher paying, long-term employment. BlackRock's non-profit partners include Per Scholas, Laboratoria, Merit America, CodeDoor, Technoserve, and RefuAid, among others. These partners are working around the world to provide training and employment support that will put more people on the path to sustainable prosperity.

SDG 2



COVID-19 Relief and Recovery. In 2020, BlackRock committed \$50 million in philanthropic funding to support COVID-19 relief and recovery efforts globally. In 2021, BlackRock continued to channel resources to meet ongoing needs in its communities, while also pivoting its focus to support a sustainable economic recovery. To address persistent and widespread food insecurity, BlackRock donated over \$2 million to local food banks around the world. Additionally, BlackRock deployed \$1 million to two India-based non-governmental organizations (“NGO”) to provide medical equipment and vital supplies as the country faced a devastating second wave of COVID-19. In 2021 BlackRock fulfilled its 2020 commitment of \$13 million to the non-profit, Generation, and joined their Global Recovery Coalition to help put people back to work at scale, partnering locally with Generation’s operations across France, India, Italy, Spain, the UK, and the US to help people access long-term employment in high-growth sectors, such as tech, healthcare, and green jobs. Finally, the firm sponsored a \$1 million campaign with non-profit tech accelerator FFWF, providing each BlackRock employee with a \$50 credit to donate to 1 of 14 tech non-profits innovating solutions for COVID-19 recovery.

SDG 1



Emergency Savings Initiative.

BlackRock’s Emergency Savings Initiative (“ESI”) was launched in 2019 to test, innovate and scale solutions that make short-term saving easier and more accessible to low- to moderate-income people in the US and UK. In 2021, BlackRock renewed grants totalling \$5.9 million to BlackRock’s three US-based financial health expert non-profit partners: Commonwealth, Financial Health Network, and Common Cents Lab. These non-profits are working with 30+ corporate partners, including employers, payroll providers, record keepers, financial institutions, and fin-techs, to expand access to short-term savings products reaching approximately 1 million people in the US. In 2021, BlackRock funded UK-based non-profit partner, Nest Insight, to launch a first-of-its-kind research trial to automatically enroll workers into an emergency savings plan.

SDG 8



Employee Network Grants. In addition, BlackRock’s Employee Networks (“Networks”) are advocates, volunteers, and supporters of important social issues beyond the walls of the firm. To help Networks stand up, speak out and contribute to organizations doing important work around their areas of focus, Social Impact launched a \$1 million Network Grants program in partnership with BlackRock’s DEI team in 2021. BlackRock’s Networks nominate organizations working regionally, nationally, or globally for review by Social Impact and DEI. The inaugural program resulted in nine grants totalling nearly \$800K being given to organizations nominated by five of BlackRock’s Networks.

Volunteering & Employee Charitable Contribution Matching

In 2021, BlackRock launched a new Employee Network – the Gives Network – to empower employees to channel their shared passions to positively impact their communities. The Gives Network builds upon BlackRock’s existing Gives Grant program in which 24 employee-led Gives committees located in offices around the world make grants to support local nonprofit organizations nominated by employees in their offices. In 2021, 325 grants totaling \$4.1 million were awarded to address community-centric needs such as educational access and food insecurity.

In addition, BlackRock has a robust matching gifts program that provides full-time employees with up to US \$10,000 (or local equivalent) per year in matched donations and volunteer time. Benefits-eligible employees are also given two paid volunteer days per year to volunteer. 37% of employees either matched their gifts or their time in 2021, collectively contributing \$17.6 million, including matched contributions by BlackRock, to charities around the world.

BlackRock activates 2:1 matching in response to natural disasters and humanitarian crises. In 2021 disaster relief campaigns addressing flooding in Western Europe and Afghanistan humanitarian aid, among others, collectively raised \$1.2 million for charities providing immediate support and long-term resilience to impacted communities.

BlackRock also offers a number of pro-bono volunteering opportunities and board service programs where employees can put their skills, expertise, and leadership toward the pursuit of social innovation and change.

Natural Capital & Biodiversity

Natural Capital & Biodiversity

Management Criteria 6

Description of approach to incorporation of ecological impacts in investment processes and strategies

As a financial services company, BlackRock's physical operations, which are located in cities around the globe, generally do not have a material impact on ecosystems or indigenous communities. Nonetheless, BlackRock makes investments on behalf of clients in equities, bonds, and alternative assets that may be subject to risks associated with, or that arise from negative ecological impacts. As different asset classes present different risks and opportunities, BlackRock approaches these issues by considering ecological impacts through its investment stewardship function, its integration of ESG factors into investment processes, its philanthropy efforts, and its operations.

Investment Stewardship

A discussion of BlackRock's approach to investment stewardship is provided under FN-AC-410a.3. BIS engages on material business risks and opportunities. For companies whose business models have material dependencies or impacts on natural capital, the management of these factors can be a determinant of their ability to generate sustainable, long-term financial returns for shareholders, like BlackRock's clients.²² Natural capital encompasses the supply of the world's natural resources from which economic value and benefits can be derived — such as forests, oceans, and fresh water — and the biodiversity that supports these ecosystems.²³ Given the growing pressures on the natural ecosystems from which many companies derive economic benefits, businesses will increasingly face financial risks and opportunities associated with their impacts and dependencies on natural capital. As a result, BIS views the careful management of natural capital as a core component of a resilient long-term corporate strategy for companies that rely on the benefits that nature provides.

While recognizing that natural capital is a complex issue and ecosystems are interconnected, for the purposes of BIS' work, the team focuses on three key areas — biodiversity,

deforestation, and water — which BIS believes can impact the long-term financial returns of certain companies. BIS looks to companies to disclose how they have adopted or plan to incorporate business practices consistent with the sustainable use and management of natural capital, including resources such as clean air, water, land, minerals, and forests. BIS is also interested to hear from companies how they contribute to biodiversity and ecosystem health and consider their broader impact on the communities in which they operate. The following case studies illustrate BIS' engagement and voting related to natural capital matters in 2021.

- At Bunge Limited's May 2021 AGM, BIS supported a shareholder proposal requesting the company "issue a report assessing if and how it could increase the scale, pace, and rigor of its efforts to eliminate native vegetation conversion in its soy supply chain."²⁴ The company recommended that shareholders support this proposal and BIS agreed that the proposal may accelerate the company's progress on managing biodiversity loss and deforestation in its operations and supply chain.
- During 2021, BIS increasingly engaged on plastic pollution. BIS believes company valuations can be influenced by risks associated with a company not adequately addressing the sourcing and use of plastic products in their operations. At the Kroger Co. June 2021 AGM, BIS supported a shareholder proposal requesting that the company issue a report on its use of plastic packaging, as well as the company's strategies or goals to reduce plastic packaging and impacts. While acknowledging the efforts the company had made to address its exposure to natural capital-related risks, specifically in connection to the packaging of its "Our Brands" products, BIS ultimately agreed with the proposal's intent to address the material business risk of plastic packaging and determined that support for it could accelerate the company's progress on this issue.²⁵

ESG Integration & Risk Management

As part of BlackRock's ESG integration approach for actively managed strategies investing in the public markets, BlackRock's investment teams may consider natural capital-related risks where financially material, where data is available, and where relevant to the given strategy and investment style. For example, one component of BlackRock's asset management business where natural capital risks may arise in the course of ESG integration is in BlackRock's Alternative Investments business ("BAI"). BAI takes a proactive approach to identifying, analyzing, and documenting applicable ESG factors – from initial deal sourcing and screening, through detailed due diligence and investment committee review and approval. Within the BAI Real Assets team, where BlackRock invests in real estate and infrastructure on behalf of clients, this may include a detailed review of environmental factors, including those relating to environmental protection, pollution prevention and the conservation of local habitats and biodiversity. Environmental risk assessments are undertaken for new investments in real assets. Where appropriate, BAI partners with specialist environmental and ecological consultants to undertake such reviews. For greenfield projects, or those comprising new construction and major development, environmental considerations are factored into the design process and project planning and are regularly monitored throughout the duration of the construction activity.

Please see FN-AC-410a.2 for more information on ESG integration.

Investment teams that have greater potential exposure to ecological impacts consider these issues as part of their research and portfolio management process. For example, the BAI Real Assets team considers natural capital and risk exposure during asset review and due diligence whereas fundamental investors, who are reliant upon company disclosures, are exploring a range of new data capabilities to help identify potential risks. In public markets, portfolio managers focused on exposure to natural-capital related risks are testing new third-party data sets and tools to better understand risk exposure, and where material may bring this issue into engagement conversations with companies.

Partnerships & Philanthropy

BlackRock seeks to make positive contributions to its local communities and to the planet by sponsoring and participating in a variety of environmental conservation efforts including:

- Through a partnership driven by the firm's employee-led Green Team Network, BlackRock supports Earthwatch Europe, an environmental charity, which plants "tiny forests" in urban areas across the UK to help capture carbon emissions, increase biodiversity, and contribute to a more climate resilient society.

- BlackRock collaborates with organizations to bring greater awareness and support action on climate and natural capital-related efforts. BlackRock is also one of the early signatories to the Terra Carta, unveiled at the One Planet Summit in January 2021.
- BlackRock Social Impact efforts support a number of environment-focused entrepreneurs through its partnership with social entrepreneurship accelerator Echoing Green. In 2021, BlackRock engaged in both long-term (7-week) and short-term (90-minute) projects where employees were paired with a climate-focused Echoing Green Fellow to tackle a strategic challenge.
- Additionally, in September 2021 BlackRock became a member of the Taskforce on Nature-related Financial Disclosures ("TNFD") with the goal of supporting the initiative with global, cross-sector expertise. The TNFD was launched to develop a framework for organizations to report and act on evolving nature-related risks, and build on the success of the Task Force on Climate-related Financial Disclosures.

Corporate Operations

In its operations, BlackRock pursues a sustainability strategy that seeks to decouple company growth from its impact on the environment, while increasing the efficiency and resiliency of its operations. BlackRock is finding innovative ways to power its business with renewable energy, lower its emissions, and reduce waste, among other efforts, to reduce its environmental impact.

Through its global Green Team Network, BlackRock employees have also augmented these efforts. Until the COVID-19 pandemic prevented group volunteering, employees globally were partnering with local nonprofits to plant trees in a variety of areas, including those affected by wildfires in California and Australia.

Additionally, BlackRock formalized an environmental policy for BlackRock's operations, outlining new standards that are consistent with ISO 14001:2015 Environmental Management System protocols in 2021. The policy defines the roles and responsibilities of the firm, specific teams and each employee plays in seeking to reduce the impact BlackRock's facilities and their operations have on the environment.

Public Policy & Political Activities

Public Policy & Political Activities

Management Criteria 7

Discussion of company's approach to public policy engagement and political activities

Public Policy & Political Engagement

BlackRock believes that responsible corporate citizenship requires active engagement in legislative and regulatory processes. As part of its responsibilities to its shareholders and clients, BlackRock advocates for public policies that BlackRock believes are in its shareholders' and clients' long-term best interests. BlackRock supports the creation of regulatory regimes that increase financial market transparency, protect investors, and facilitate responsible growth of capital markets, while preserving consumer choice and properly balancing benefits versus implementation costs. BlackRock comments on public policy topics through, among other things, its published ViewPoints, which examine public policy issues and assess their implications for investors, and through comment letters and consultation responses that BlackRock submits to policy makers. BlackRock believes in the value of open dialogue and transparency on these important issues; its position papers and letters are available on the "Insights – Public Policy" section of its website.

Governance of Public Policy Engagement

BlackRock's External Affairs group manages the firm's key reputational and policy challenges and opportunities. BlackRock's engagements with policy makers and advocacy on public policy issues are coordinated by the Global Public Policy Group ("GPPG"), a division of BlackRock's External Affairs group. Members of GPPG work closely with business and legal teams to identify legislative and regulatory priorities, both regionally and globally, that will protect investors, increase shareholder value, and facilitate responsible economic growth.

BlackRock's Chief Legal Officer and Head of External Affairs periodically brief BlackRock's Board or its Committees to keep directors apprised of, and engaged in, the Company's legislative and regulatory priorities and advocacy initiatives. Members of GPPG and executive leadership regularly meet

and exchange views on legislation and regulatory priorities with public officials and policy makers, regionally and globally, and provide such individuals with educational materials to help inform their decisions.

Political Participation

BlackRock's ability to engage policy makers and participate in the public policy arena is subject to extensive laws and regulations at the international, federal, state, and local levels. Under United States federal law, BlackRock may not contribute corporate funds or make in-kind contributions to candidates for federal office or to national party committees. In addition to federal limits on corporate political action, its political contributions at the state and local level in the United States are governed by Municipal Securities Rulemaking Board Rule G-37, SEC Rule 206(4)-5 of the Investment Advisors Act of 1940, and CFTC Rule 23.451, as well as applicable state and local law. Accordingly, BlackRock does not contribute corporate funds to candidates, political party committees, political action committees ("PAC"), or any political organization exempt from federal income taxes under Section 527 of the Internal Revenue Code. Although permitted under federal law, BlackRock has voluntarily elected not to spend corporate funds directly on independent expenditures, including electioneering communications. Information about BlackRock's lobbying activities, including contributions required to be disclosed under the Lobbying Disclosure Act of 1995, as amended, is publicly available on the Senate website.

BlackRock maintains a political action committee that is funded in accordance with applicable federal law on a voluntary basis by employees of the Company who are US citizens or green card holders. The PAC makes contributions at the federal level on a bi-partisan basis consistent with the Company's contribution policies and public policy goals and without regard to the private political preferences of management. As required by law, all political contributions by the PAC are reported to the Federal Election Commission ("FEC") and are publicly disclosed on the FEC website. BlackRock also provides information on the PAC's contributions annually and information for 2021 can be found on its Public Policy Engagement and Political Activities Policies webpage.

In the third quarter of 2021, BlackRock implemented a number of enhancements to strengthen governance, improve transparency and encourage employee engagement with eligible employees.

BlackRock maintains compliance processes designed to ensure that its activities are conducted in accordance with its Public Policy Engagement and Political Participation Policies and all relevant laws governing political contributions in the US. All employees are required to annually review and acknowledge their compliance responsibilities regarding political contributions and must submit all of their proposed personal political contributions to BlackRock's Legal and Compliance Department to determine if such contributions are consistent with applicable legal restrictions.

Investment Stewardship's perspective on corporate political activities

A discussion of BlackRock's approach to investment stewardship is provided under FN-AC-410a.3. BIS engages on financially material, business issues. In February 2022, BIS updated its perspective on corporate political activities and companies' participation in industry and trade associations. BIS regularly engages with companies to understand how corporate political activities support policy matters material to their long-term strategy and shareholder value. As part of this, BIS looks at a company's publicly available disclosures to understand how lobbying and political contributions support stated policy positions. BIS also considers whether there is general consistency between a company's stated positions on policy matters material to its strategy and the positions taken by significant industry groups of which it is a member. As investors, it helps our understanding when companies provide easy to navigate information on their public websites and disclose information related to their political activities and lobbying.

Management Criteria 8

Disclose memberships in trade associations

As a part of BlackRock's engagement in the public policy process, BlackRock belongs to a number of trade associations that advocate for and shape public policy positions that are important to the asset management industry and the global business community. Trade associations also provide educational, training, and professional networking opportunities for their members. BlackRock participates in these associations for such opportunities and to help build consensus on issues that it believes will serve investors, increase shareholder value, and facilitate responsible economic growth. BlackRock does not control these organizations, and its membership and participation in these organizations are not an endorsement of their activities and positions. Accordingly, there may be instances where specific positions diverge from those of BlackRock.

The following is a list of the principal US trade associations to which BlackRock belongs as well as those US trade associations to which it paid in excess of \$25,000 in 2021 for membership fees and/or dues.²⁶ This list has been prepared in good faith and is for general information purposes only. Variances in payment and fee schedules may impact the accuracy of the information presented, and this list should not be taken as definitive. This list is updated annually.

- American Clean Power Association (formerly American Wind Energy Association)
- American Council for Renewable Energy
- Business Roundtable
- Council of the Americas Inc.
- Council on State Taxation
- Defined Contribution Institutional Investment Association
- Institute of International Finance Inc.
- Insured Retirement Institute
- International Swap and Derivatives Association
- Investment Company Institute
- Managed Funds Association
- Metro Atlanta Chamber of Commerce
- Mutual Fund Directors Forum
- Partnership for New York City
- San Francisco Chamber of Commerce
- Securities Industry and Financial Markets Association (Asset Management Group)
- US Chamber of Commerce

BlackRock periodically reviews its memberships in these trade associations, and the positions they support, to evaluate whether there is alignment between BlackRock's views and those of these organizations on public policy matters. BlackRock considers material to its efforts to serve its clients. Where BlackRock identifies a significant inconsistency on a material strategic policy issue, BlackRock will discuss and review its options with respect to such organization, including review of the benefits and challenges associated with its continued membership. Actions that BlackRock may take to address material misalignment include engagement with the trade

association, clarifying BlackRock's position through public statements, or consideration of the termination of its membership in the trade association.

Additionally, BlackRock instructs these organizations²⁷ to refrain from using any portion of the firm's membership dues or fees to influence the outcome of a federal, state or local election, including using the firm's membership dues or fees to make contributions or expenditures in support of, or opposition to, any candidate for any office, political party, political committee, or other political organization exempt from federal income taxes under Section 527 of the Internal Revenue Code of 1986, as amended.

Management Criteria 9

Discussion of corporate positions related to government regulations and/or policy proposals that address environmental and social factors affecting the industry

Public Policy Engagement on Sustainability Issues

BlackRock advocates for public policies that BlackRock believes are in its shareholders' and clients' long-term best interests. BlackRock supports the creation of regulatory regimes that increase financial market transparency, protect investors, and facilitate responsible growth of capital markets, while preserving consumer choice and properly balancing benefits versus implementation costs.

Risks & Opportunities

ESG and sustainability have been the subject of increased regulatory focus across jurisdictions. At the global level, the International Financial Reporting Standards ("IFRS") Foundation established the International Sustainability Standards Board ("ISSB") in November 2021 to establish a global baseline for sustainability-related disclosure standards that may inform national regulators' approaches to sustainability disclosure regulation, and in March 2022, the ISSB released two exposure drafts on climate-related and general sustainability disclosure. In the US, the Securities and Exchange Commission ("SEC") has proposed rules to require enhanced disclosure regarding climate change and has publicly announced that it plans to propose rules related to disclosure of human capital management and board diversity for public issuers.²⁸ It has also increased its scrutiny and compliance enforcement related to disclosure of investment advisers' and funds' ESG strategies, and in May 2022, the SEC proposed (i) amendments to its investment fund "Names Rule" that would regulate the use of sustainability terminology in fund naming and (ii) amendments related to ESG disclosure by investment funds and investment advisers. In addition, the

US Department of Labor has proposed regulations that could affect how ESG factors are considered for purposes of investing assets of plans that are subject to the Employee Retirement Income Security Act of 1974, as amended, and the exercise of voting rights with respect to plan investments.

The European Union ("EU") has introduced regulatory proposals to underpin sustainable investment products; require disclosure of sustainability-related information by market participants, investment products, and issuers; require integration of sustainability considerations into the investment and risk management processes of asset managers and other institutional investors; and make the advice and financial product distribution process more receptive to end-investor sustainability preferences. The first set of rules initially took effect in March 2021, with secondary rules to come over the course of 2022 and 2023. In addition, requirements for asset managers to report against an EU-wide taxonomy of environmentally sustainable activities took effect at the start of 2022, with a further phase expected in 2023, and new proposed regulation to enhance sustainability reporting for EU-based corporate issuers is expected to take effect in 2024. Moreover, several European jurisdictions impose additional restrictions around the offer of ESG funds through labeling, disclosure, or marketing requirements at both the fund and asset management level. In Asia, regulators in Singapore and Hong Kong have introduced requirements for asset managers to integrate climate risk considerations in investment and risk management processes, together with enhanced disclosure and reporting, beginning in 2022. Hong Kong has also issued enhanced rules for ESG funds sold to retail investors and guidelines for pension trustees on ESG risk management and disclosure.

Policy Positions

BlackRock comments on public policy topics through its *ViewPoint* and Policy Spotlight white papers, public comment letters, and consultation responses that are submitted to policy makers, among other mediums. Examples of BlackRock's positions on sustainability matters are discussed below.

Climate-Related Disclosure

BlackRock supports efforts to implement requirements for public issuers to provide investors with more comparable and high-quality climate-related disclosures because this data is necessary to help the firm's clients effectively navigate the global energy transition and achieve their objectives. BlackRock offers principles for high quality climate-related disclosures which it discusses in its paper titled "Spotlight: BlackRock supports consistent climate-related disclosures; urges global coordination", which can be found under this disclosure's Additional Resources on page 40. The principles outlined in the paper are applied in BlackRock's response to the SEC's climate-related disclosure proposal and are consistent with the views articulated in the firm's June 2021 response to Commissioner Allison Herron Lee's request for input ("RFI") on climate-related disclosure. BlackRock's response to the SEC's climate related disclosure proposal can be found in this disclosure's Additional Resources on page 40 titled "SEC - The Enhancement and Standardization of Climate-Related Disclosures for Investors."

Sustainable Product Standards & Disclosures

BlackRock is supportive of efforts to provide end-investors with more clarity regarding investment products' sustainability characteristics and claims. Products that rely on sustainability metrics to meet their investment objectives or sustainability claims should provide appropriate disclosure on those metrics to enable investors to evaluate such claims.

BlackRock submitted a response to the International Organization of Securities Commissions ("IOSCO") consultation on sustainability-related regulatory and supervisory expectations in asset management following the release of the consultation report, "Recommendations on Sustainability-Related Practices, Policies Procedures and Disclosure in Asset Management" on June 30, 2021. In that response, BlackRock supported IOSCO's endorsement of asset managers disclosing how their investment processes map on to the four pillars of the TCFD. It is BlackRock's view that mandatory corporate issuer disclosure is an important first step to achieving consistent and comparable product-level disclosure, and that a sustainable product terminology framework is essential to give investors a consistent and comparable understanding of the various types of sustainable investing solutions available to them.

Activity Metrics

SASB FN-AC-000.A and FN-AC-000.B²⁹

Metric	Description	AUM
FN-AC-000.A	(1) Total registered AUM	\$6.31 trillion
	(2) Total unregistered AUM	\$3.70 trillion
FN-AC-000.B	Total AUM	\$10.01 trillion

Notes

Note 1: Basis of Presentation

The summary table below defines the criteria for each metric included in the BlackRock 2021 Sustainability Disclosure. The criteria were established by referencing a variety of external frameworks, with a primary focus on SASB Standards. In a number of instances, the topic areas identified through BlackRock's stakeholder assessment were not covered by the SASB Standard for Asset Management & Custody Activities, but were included in other SASB sector standards. As such, BlackRock reviewed relevant SASB metrics for different sectors and adapted them to be relevant for the firm's business. In addition, criteria were informed by the UN Global Compact Communication of Progress advanced reporting criteria. Finally, where necessary and applicable to a given topic area, BlackRock referenced additional sustainability disclosure frameworks.

Area	Topic	Metric	Category	Criteria
Sustainable Investing & Stewardship	Incorporation of ESG factors in investment management & advisory	Amount of AUM, by asset class, that employ (1) integration of ESG issues, (2) sustainability themed investing, and (3) screening	Quantitative	SASB Standards; FN-AC-410a.1
		Description of approach to incorporation of ESG factors in investment and/or wealth management processes and strategies	Discussion and Analysis	SASB Standards; FN-AC-410a.2
		Description of proxy voting and investee engagement policies and procedures	Discussion and Analysis	SASB Standards; FN-AC-410a.3
Business Ethics & Conduct	Transparent information & fair advice for customers	(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	Quantitative	SASB Standards; FN-AC-270a.1
		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	Quantitative	SASB Standards; FN-AC-270a.2
		Description of approach to informing customers about products and services	Discussion and Analysis	SASB Standards; FN-AC-270a.3
	Business ethics	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	Quantitative	SASB Standards; FN-AC-510a.1
		Description of whistleblower policies and procedures	Discussion and Analysis	SASB Standards; FN-AC-510a.2
Supply Chain Management	Vendor sustainability & diversity	Description of policies and engagement processes to manage risks and opportunities associated with supply chain, incorporating environmental, social and governance issues.	Discussion and Analysis	Management Criteria 1 (see below)
Human Capital & Human Rights	Employee diversity & inclusion	Percentage of gender and racial/ethnic group representation for (1) executive management, (2) non-executive management, (3) professionals, and (4) all other employees	Quantitative	SASB Standards; FN-AC-330a.1
	Employee health, safety & wellbeing	Description of employee health and safety program and policies	Discussion and Analysis	Management Criteria 2 (see below)
		Description of employee benefits and efforts to promote employee well-being	Discussion and Analysis	Management Criteria 3 (see below)

Area	Topic	Metric	Category	Criteria
Human Capital & Human Rights	Human rights & labor standards	Description of engagement process and due diligence practices with respect to management of human rights, indigenous rights, and the local community	Discussion and Analysis	Management Criteria 4 (see below)
Community Relations & Social Impact	Philanthropy & Volunteering	Description of monetary contributions, charitable gifts, and partnerships with organizations, as well as community time contributions through volunteering in paid time	Quantitative & Discussion and Analysis	Management Criteria 5 (see below)
Natural Capital & Biodiversity	Natural Capital & Biodiversity	Description of approach to incorporation of ecological impacts in investment processes and strategies	Discussion and Analysis	Management Criteria 6 (see below)
Public Policy & Political Activities	Public Policy & Political Activities	Discussion of company's approach to public policy engagement and political activities	Discussion and Analysis	Management Criteria 7 (see below)
		Disclose memberships in trade associations	Discussion and Analysis	Management Criteria 8 (see below)
		Discussion of corporate positions related to government regulations and/or policy proposals that address environmental and social factors affecting the industry	Discussion and Analysis	Management Criteria 9 (see below)
Activity Metrics	None	(1) Total registered AUM	Quantitative	<u>SASB Standards;</u> FN-AC-000.A
		(2) Total unregistered AUM	Quantitative	<u>SASB Standards;</u> FN-AC-000.A
		Total AUM	Quantitative	<u>SASB Standards;</u> FN-AC-000.B

Description of Management Criteria

Management Criteria 1: Description of policies and engagement processes to manage risks and opportunities associated with supply chain, incorporating environmental, social, and governance issues.

Standards and frameworks considered for development of Management Criteria 1: SASB FB-IN-430a.3, and UNGC CoP Standards and frameworks considered for development of Management Criteria 1: SASB FB -IN-430a.3, and UNGC CoP Advanced Reporting Criterion 2.

- A. Describe how the company defines its supply chain.
- B. Describe environmental and social risks and opportunities with respect to the company's supply chain that have been identified through internal assessments.
- C. Discuss approach to managing environmental and social risks that are present within, or arise out of, the company's supply chain.
- D. Describe the teams and processes involved with assessing, managing, and overseeing environmental and social risks and opportunities within the supply chain.

Management Criteria 2: Description of employee health & safety program and policies.

Standards and frameworks considered for development of Management Criteria 2: SASB EM-RM-320a.2.

- A. Discuss management systems, policies, and standards used to support employee health and safety and maintain a safe working environment, including preventing incidents, fatalities, and illness.

Management Criteria 3: Description of employee benefits & efforts to promote employee well-being.

Standards and frameworks considered for development of Management Criteria 3: GRI³⁰ 401-2

- A. Describe benefits provided to benefits-eligible employees including: life insurance, health care, disability, and invalidity coverage, parental leave, retirement provision, and stock ownership.

Management Criteria 4: Description of engagement process and due diligence practices with respect to management of human rights, indigenous rights, and the local community.

Standards and frameworks considered for development of Management Criteria 4: SASB RR-FM-210a.2, SASB SV-HL-310a.4, and UNGC CoP Advanced Reporting Criteria 3, 4, and 5.

- A. Describe approach to engaging on and managing human rights risks across the company's value chain including its own operations, its supply chain, and its asset management activities including any relevant commitments, strategies, and policies.
- B. Discuss due diligence processes and practices the company employs with respect to upholding the principles covered in human rights frameworks (e.g., United Nations Guiding Principles on Business and Human Rights) and respecting indigenous rights of communities in which it operates or intends to operate.
- C. Describe policies and programs for detecting and preventing worker harassment in the Company's operations.

Management Criteria 5: Description of monetary contributions, charitable gifts, and partnerships with organizations and community time contributions through volunteering in paid time.

Standards and frameworks considered for development of Management Criteria 5: WEF -IBC Framework – GRI 201-1 and UNGC CoP Advanced Reporting Criteria 16 and 18.

- A. Describe community investment, charitable gifts and community partnerships, and staff volunteering.
- B. Quantify community investment, including monetary contributions such as charitable gifts and community partnerships.
- C. Describe strategic social investments and philanthropy activities including strategic partnerships.
- D. Discuss the governance structures in place to oversee philanthropic efforts.

Management Criteria 6: Description of approach to incorporation of ecological impacts in investment processes and strategies.

Standards and frameworks considered for development of Management Criteria 6: SASB RR-FM-160a.4, UNGC Advanced Reporting Criterion 9.

- A. Discuss the relevance of ecological impacts (or associated investment risks) to investment strategies or investee companies and any specific ecological impacts of focus, including biodiversity or deforestation.
- B. Discuss strategies to incorporate ecological impacts into investment processes and strategies including through investment stewardship and the integration of ESG factors into investment processes.
- C. Describe commitments, strategies, or policies in the area of environmental stewardship in the company's operations including with respect to philanthropy and supply chain.

Management Criteria 7: Discussion of company's approach to public policy engagement and political activities.

Frameworks and benchmarks considered for development of Management Criteria 7: CPA Zicklin Index, UNGC Advanced Reporting Criterion 18.

- A. Disclose the governance structures in place to oversee the company's political activities and public policy engagement efforts.
- B. Disclose corporate contributions to political candidates, parties, and committees, or where this information can be found.
- C. Disclose whether the company makes payments to 527 groups, such as governors associations and super PACs.
- D. Disclose whether the company makes payments to influence the outcome of ballot measures.
- E. Discuss approach to compliance with political spending policies, laws, and regulations.

Management Criteria 8: Disclosure and description of memberships in trade associations.

Standards and benchmarks considered for development of Management Criteria 8: SASB EM-EP-530a.1, CPA Zicklin Index.

- A. Disclose trade associations where the company pays more than \$25,000 in annual dues.
- B. Describe whether the company monitors whether its stance may align with or differ from the official stance of its industry organization(s) and trade associations on material and strategic policy issues and discuss how the company addresses instances of divergence.

Management Criteria 9: Discussion of corporate positions related to government regulations and/or policy proposals that address environmental and social factors affecting the industry.

Standards and frameworks considered for development of Management Criteria 9: SASB EM-EP-530a.1.

- A. Discuss material risks and opportunities the company faces related to legislation, regulation, and/or rulemaking, (hereafter referred to collectively as "legal and regulatory environment") related to environmental, social, or sustainability factors which are relevant to the company's business. This includes regulation related to the sustainability characteristics or disclosures of investment products.
- B. Discuss the company's policy positions related to the items discussed in A. above.

INDEPENDENT ACCOUNTANT'S REVIEW REPORT

BlackRock, Inc.
New York, NY

We have reviewed management of BlackRock, Inc.'s ("BlackRock") assertion that the specified metrics included in the accompanying BlackRock's 2021 Sustainability Disclosure as of, and for the year-ended December 31, 2021 (the "Disclosure") are presented in accordance with the criteria set forth in Note 1: Basis of Presentation to the Disclosure (the "criteria"). BlackRock's management is responsible for its assertion. Our responsibility is to express a conclusion on management's assertion based on our review.

Our review was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants (AICPA) in AT-C section 105, *Concepts Common to All Attestation Engagements*, and AT-C section 210, *Review Engagements*. Those standards require that we plan and perform the review to obtain limited assurance about whether any material modifications should be made to management's assertion in order for it to be fairly stated. The procedures performed in a review vary in nature and timing from, and are substantially less in extent than an examination, the objective of which is to obtain reasonable assurance about whether management's assertion is fairly stated, in all material respects, in order to express an opinion. Accordingly, we do not express such an opinion. Because of the limited nature of the engagement, the level of assurance obtained in a review is substantially lower than the assurance that would have been obtained had an examination been performed. We believe that the review evidence obtained is sufficient and appropriate to provide a reasonable basis for our conclusion.

We are required to be independent and to meet our ethical responsibilities in accordance with the *Code of Professional Conduct* issued by the AICPA. We applied the *Statements on Quality Control Standards* established by the AICPA and, accordingly, maintain a comprehensive system of quality control.

The procedures we performed were based on our professional judgment. In performing our review, we conducted inquiries and performed analytical procedures. For a selection of specified metrics, we performed tests of mathematical accuracy of computations, read relevant policies to understand terms related to relevant information about the specified metrics, and reviewed supporting documentation in regard to the accuracy of the data in the specified metrics.

The preparation of the specified metrics included in the Disclosure requires management to establish and interpret the criteria, make determinations as to the relevancy of information to be included, and make estimates and assumptions that affect reported information. Measurements of certain metrics include estimates and assumptions that are subject to substantial inherent measurement uncertainty. Obtaining sufficient, appropriate review evidence to support our conclusion does not reduce the inherent uncertainty in the amounts and metrics. The selection by management of different but acceptable measurement methods, input data, or assumptions may have resulted in materially different amounts or metrics being reported.

Any information relating to forward looking statements, goals and progress against goals, was not subject to our review and, accordingly, we do not express a conclusion or any form of assurance on such information, as denoted by an asterisk (*) in the Disclosure. Further, the information included within the Additional Resources section of the Disclosure, including linked information, was not subject to our review and, accordingly, we do not express a conclusion, opinion, or any form of assurance on such information.

Based on our review, we are not aware of any material modifications that should be made to management of BlackRock's assertion that the specified metrics included in the accompanying Disclosure as of, and for the year-ended December 31, 2021 are presented in accordance with the criteria set forth in Note 1: Basis of Presentation to the Disclosure, in order for it to be fairly stated.

Deloitte & Touche LLP

June 17, 2022

Additional Resources

For further information on BlackRock's sustainability efforts, please see the following resources. The information included within the Additional Resources section was not subject to Deloitte's review and, accordingly, Deloitte does not express a conclusion, opinion, or any form of assurance on such information.

Corporate Reports

- [BlackRock's 2022 Proxy Report](#)
- [How to invest in the net zero transition](#)
- [BlackRock's 2021 Annual Report](#)
- [BlackRock's 2021 TCFD Report](#)
- [Where We Stand](#)

Sustainable Investing & ESG Integration

- [2030 Net Zero Statement](#)
- [BlackRock EMEA Baseline Screens](#)
- [Climate-Aware Capital Market Assumptions](#)
- [SFDR Sustainability Risk Statement](#)
- [2021 SFDR Principal Adverse Sustainability Impact Statement](#)
- [ESG Integration Statement](#)
- [Making Sustainability our Standard](#)

Diversity, Equity, and Inclusion

- [2021 Global Diversity, Equity and Inclusion Report: Driving Accountability](#)
- [Action Plan to Advance Racial Equity and Inclusion](#)
- [BlackRock's Consolidated EEO-1 reports](#)
- [BlackRock Foundation's Commitment to Breakthrough Energy Catalyst Program](#)
- [BlackRock's Emergency Savings Initiative](#)
- [BlackRock's Social Impact website](#)

Public Policy

- [Spotlight: BlackRock supports consistent climate-related disclosures; urges global coordination](#)
- [SEC - The Enhancement and Standardization of Climate-Related Disclosures for Investors](#)
- [Public Policy – Insights](#)
- [Public Policy – Sustainability](#)
- [Towards a Common Language for Sustainable Investing](#)

Global Operating Principles

- [Code of Business Conduct and Ethics](#)
- [Supplier Code of Conduct & Ethics](#)
- [Doing Business with BlackRock](#)
- [BlackRock Principles](#)

Investment Stewardship

- [It's all about choice](#)
- [BIS' 2022 Engagement Priorities](#)
- [BIS 2022 climate-related shareholder proposals more prescriptive than 2021](#)
- [BIS Approach to Sustainability](#)
- [BIS Annual Report for Calendar Year 2021](#)
- [BIS Global Principles and Market-Level Voting Guidelines](#)
- [BIS' 2021 Stewardship Expectations](#)
- [Global Quarterly Stewardship Reports](#)
- [Global Engagement Summary Report](#)
- [Global Vote Disclosures](#)
- [Vote bulletins](#)
- [Perspective on Corporate Political Activities](#)
- BIS position papers. Available at: www.blackrock.com/stewardship

Endnotes

1. The inclusion of information contained in this Disclosure should not be construed as a characterization regarding the materiality or financial impact of that information. Please also see BlackRock's Annual Report on Form 10-K, Quarterly Reports on Form 10-Q and other current and periodic reports with the Securities and Exchange Commission ("SEC"), accessible on the SEC's website at www.sec.gov and on BlackRock's website at <https://ir.blackrock.com/>.
2. The Disclosure Locations list in the table is not exhaustive. Disclosure of the identified ESG Topics may be published elsewhere beyond this list.
3. Any information relating to forward looking statements, goals, and progress against goals was not subject to Deloitte's review and, accordingly, Deloitte does not express a conclusion or any form of assurance on such information.
4. Note that BlackRock modified this category to refer to "Dedicated Sustainable Investments" from SASB's "Sustainability Themed Investing" to better reflect the types of Investments included. See note (a) to Exhibit 1.
5. Dedicated Screened Investments apply a package of sustainability-related screens, which BlackRock refers to as "Baseline Screens." The Baseline Screens were developed to build scalable solutions that address clients' requests for exclusionary screens. See note (b) to Exhibit 1.
6. See note a) to Exhibit 1 for explanations of Broad ESG, Thematic and Impact.
7. See SASB FN-AC-410a.2 of this report for an explanation of ESG-integrated portfolios.
8. BIS' engagement priorities were updated in February 2022, effective immediately. Although this Disclosure relates to 2021, as BIS' policies were recently updated, we have included the Global Principles and engagement priorities that are effective as of January 2022 and February 2022 in this Disclosure.
9. BIS' Global Principles were updated in December 2021 and effective January 2022. Although this Disclosure relates to 2021, as the Global Principles were recently updated, we have included the Global Principles that are effective as of January 2022 in this Disclosure.
10. Total proposals voted include director-related proposals and shareholder proposals filed in Japan.
11. This metric excludes shareholders proposals filed in Japan, the global count of shareholder proposals excludes shareholder proposals voted in the Japanese market, where numerous legally binding proposals are filed every year due to the low filing threshold. Japanese law allows proxy access for essentially any proposal and the threshold to file a legally binding shareholder proposal is relatively low, at 1% of outstanding shares or 300 trading-units, held for over six months. By separating these proposals, we believe we can show a better comparison of our voting activities on behalf of clients across markets.
12. The global aspiration is reflective of aggregated efforts; companies in developed and emerging markets are not equally equipped to transition their business and reduce emissions at the same rate — those in developed markets with the largest market capitalization are better positioned to adapt their business models at an accelerated pace. Government policy and regional targets may be reflective of these realities.
13. "Covered employees" is defined by SASB as employees subject to filing the following forms: U4, U5 and U6 with the Central Registration Depository of the Financial Industry Regulatory Authority; Form BD with the Investment Adviser Registration Depository ("IARD") of the SEC; and Form BDW with the IARD of the SEC.
14. The ISO Standards are international standards for quality assurance developed by the International Organization for Standardization.
15. The Universal Declaration of Human Rights was adopted by the UN General Assembly in 1948. Since then, the core principles have been reiterated in various international human rights conventions and treaties. Today, all UN member states have ratified at least one of the nine core international human rights treaties on behalf of their governments, and 80% have ratified four or more.
16. U.S. Customs and Border Protection. "CBP Modifies Forced Labor Finding on Top Glove Corporation Bhd." September 9, 2021. Available at: https://www.cbp.gov/newsroom/national-media-release/cbp-modifies-forced-labor-finding-top-glove-corporation-bhd?_ga=2.87680280.1441926935.1631305334-725231838.1631305334
17. BIS Vote Bulletin available here: <https://www.blackrock.com/corporate/literature/press-release/blk-vote-bulletin-top-glove-jan-2021.pdf>
18. Thomson Reuters. "Transitioning to a Content-Driven Technology Company." March 16, 2021.
19. The IFC Performance Standards were developed by the International Finance Corporation's ("IFC") to define IFC clients' responsibilities for managing their environmental and social risks. The Performance Standards include Risk Management, Labor, Resource Efficiency, Community, Land Resettlement, Biodiversity, Indigenous People and Cultural Heritage.
20. BlackRock considers all workers including temporary, migrant, student, contract, direct employees, and any other type of worker as "employees" of BlackRock's suppliers under the Supplier Code.
21. The ILO Convention No. 138 on Minimum Age Convention (C138) of 1973 defines child labor as any work performed by children under the age of 12, non-light work done by children aged 12-14 or under and hazardous work done by children aged 15-17 or under.
22. See "Why is Biodiversity Important" in Natural Capital Coalition's Integrating Biodiversity into Natural Capital Assessments, and Biodiversity and the 2030 Agenda for Sustainable Development.
23. According to the International Integrated Reporting Council (IIRC), natural capital refers to "all renewable and non-renewable environmental stocks that provide goods and services that support the current and future prosperity of an organization." Natural capital includes air, water, land, forests and minerals, and biodiversity and ecosystem health.
24. Bunge Limited, "Notice of Annual General Meeting of Shareholders and 2021 Proxy Statement." March 23, 2021. Available at: <http://investors.bunge.com/sites/bungeltd-ir/files/bunge-proxy-statement-2021.pdf>
25. Additional information can be found in BIS' Vote Bulletin: The Kroger Co. June 2021. Available at: <https://www.blackrock.com/corporate/literature/press-release/blk-vote-bulletin-kroger-jun-2021.pdf>
26. Names are organized in alphabetical order and based on information during 2021.
27. To the best of our knowledge, BlackRock did not make any payments in 2021 to 501(c)(4) groups that were used for election-related purposes. Going forward, should BlackRock make any payments to 501(c)(4) organizations, we will instruct these organizations to refrain from using any portion of BlackRock's membership dues or fees to influence the outcome of a federal, state or local election, including using our membership dues or fees to make contributions or expenditures in support of, or opposition to, any candidate for any office, political party, political committee or other political organization exempt from federal income taxes under Section 527 of the Internal Revenue Code of 1986, as amended.
28. Additional information on the SEC Regulatory Agenda is available at: <https://www.sec.gov/news/press-release/2021-99>
29. As of December 31, 2021
30. Global Reporting Initiative ("GRI") Standards

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