

Sustainability Accounting Standards Board Index

SVB Financial Group is committed to providing investors and other stakeholders with meaningful data on our environmental, social and governance (ESG) performance, underscoring our long-standing pledge of transparency and accountability. Our goal is to enable relevant comparisons of our ESG performance with peer companies. This is our first disclosure in accordance with the Sustainability Accounting Standards Board (SASB). We are using SASB's Commercial Bank Standards, Version 2018-10, which are most applicable to our core operations. Unless otherwise specified, the data and descriptions are current as of year-end 2019.

There are two key contextual issues to take into account when reviewing our SASB disclosure. First, our client base includes startups, some of which are considered small businesses under Small Business Administration guidelines. Small business lending is at the core of SVB's business strategy, but the definition of "small business" varies. For Financial Inclusion and Capacity Building metrics, we use the US Community Reinvestment Act definition of small business, which covers businesses with less than \$1 million in gross annual revenues. Second, SVB provides private banking services to individuals associated with its business clients—we do not offer retail banking services to the general public. As a result, metrics related to retail banking activity and retail aspects of financial inclusion are not relevant for our strategy and disclosure.

While this is our first SASB disclosure, we have reported many metrics previously in public reports such as our Annual Corporate Social Responsibility report, quarterly investor presentations and annual 10-K filings. For this report, there are some SASB metrics that we are not including. In some cases, the SASB metric would require a new disclosure, and we are working through our disclosure governance process to evaluate best practice disclosure standards and new metrics for future release. In other cases, the metric is not relevant given the mission of our business, which we have noted with an explanation.

Section	Disclosure	Response
<u>Data Security</u>	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of account holders affected	Not previously disclosed: please see introduction.
	Description of approach to identifying and addressing data security risks	Please view the Privacy and Cybersecurity section on page 19 of SVB's 2019 Form 10-K.
<u>Financial Inclusion & Capacity Building</u>	(1) Number and (2) amount of loans outstanding qualified to programs designed to promote small business and community development ³	2019 Small Business ¹ : 2700 loans totaling \$221,000,000 2019 Community Development ² : 12 loans totaling \$165,912,000 2019 Community Development Investments ³ : \$168,200,000 For more information on SVB's small business and community development support, please see page 4 of our 2019 Corporate Social Responsibility Report.

Section	Disclosure	Response
Continued... <u>Financial Inclusion & Capacity Building</u>	(1) Number and (2) amount of past due and nonaccrual loans qualified to programs designed to promote small business and community development	Not previously disclosed: please see introduction.
	Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers	Not applicable: SVB's community development strategy derives from our business strategy. SVB provides private banking services to individuals associated with its business clients. SVB does not offer retail banking services to the general public and, due to our very limited domestic branch network, we recognize that the bank is not set up to effectively deliver retail banking services to LMI individuals. For more information on SVB's community development strategy, please see our 2018-2020 Community Reinvestment Act Strategic Plan on the Federal Reserve's website.
	Number of participants in financial literacy initiatives for unbanked, underbanked, or underserved customers ⁴	SVB's financial literacy program, United and Counting, is designed to teach students financial literacy skills, including principles of saving, banking, credit card use, financing higher education and other relevant topics. United and Counting is an online course offered in schools that serve primarily low- and moderate-income students. Since 2014, United and Counting has reached 10,298 students in 100 schools in the San Francisco Bay Area, providing nearly 32,000 hours of online education.
<u>Incorporation of Environmental, Social, and Governance Factors in Credit Analysis</u>	Commercial and industrial credit exposure, by industry	Please view SVB's latest 10-Q for more information on our composition of loans at amortized cost basis broken out by risk-based segment. SVB's 2019 year-end data can be found on page 31 of our 10-Q for the period-end September 30, 2020.
	Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis	Please view the ESG webpage section, "Managing risks and opportunities from climate, environmental and social drivers".
<u>Business Ethics</u>	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 regulation	For more information on SVB's material legal proceedings, please view pages 181-182 of our 2019 Form 10-K.
	Description of whistleblower policies and procedures	SVB encourages employees to report suspected violations of our Code of Conduct to their immediate supervisor, group manager, Human Resources Business Partner, the General Counsel, the Chief Human Resources Officer, or any member of the Executive Committee. Employees may anonymously submit a letter, report through a third-party website or call the toll-free number. We take all reports seriously and investigate them promptly. For more information on our whistleblower policies and procedures, please view page 8 of our U.S. Code of Conduct.

Section	Disclosure	Response
<u>Systemic Risk Management</u>	Global Systemically Important Bank (G-SIB) score, by category	<p>Globally Systemically Important Banks (G-SIBs) are generally defined as financial institutions that could cause a financial crisis should they fail. Due to our size, SVB does not qualify as determined by the Financial Stability Board in consultation with national regulators.</p> <p>For more information, please view the Financial Stability Board's 2019 list of globally systemically important banks.</p>
	Description of approach to incorporation of results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities	Bank holding companies with less than \$100 billion in total consolidated assets are not subject to company-run or supervisory stress-testing requirements. However, we conduct capital stress tests as part of our annual capital planning process. The capital stress tests allow us to assess the impact of adverse changes in the economy and interest rates on our capital adequacy position. For more information on our approach to stress testing, please view pages 10 and 85 of our 2019 Form 10-K.
<u>Activity Metrics</u>	(1) Number and (2) value of checking and savings accounts by segment: (a) personal and (b) small business	<p>SVB provides private banking services to individuals associated with its business clients. SVB does not offer retail banking services to the general public.</p> <p>For more information, please view the "Deposits" section on page 82 of our 2019 Form 10-K.</p>
	(1) Number and (2) value of loans by segment: (a) personal, (b) small business, and (c) corporate	Please view SVB's latest 10-Q for more information on our composition of loans at amortized cost basis broken out by risk-based segment. SVB's 2019 year-end data can be found on page 31 of our 10-Q for the period-end September 30, 2020.

¹ A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by non-farm or non-residential real estate or are classified as commercial and industrial loans.

² Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

³ Low-income housing tax credit funds that support affordable housing in the San Francisco Bay Area and California.

⁴ Everfi