

## GRI Content Index

In preparation of the BNY Mellon 2009 CSR Report, we used the Global Reporting Initiative (GRI) G3 Sustainability guidelines. Previous reports were prepared using the GRI guidelines as directional only; content was not identified or disclosed as such. This year, we are self-declaring a "B" Application Level. This index either provides the location within the 2009 CSR report or points to the external report or website where the information is available.

Report Application Level	C	C+	B	B+	A	A+
<b>Standard Disclosures</b>						
G3 Profile Disclosures	Report on: 1.1 2.1 - 2.10 3.1 - 3.8, 3.10 - 3.12 4.1 - 4.4, 4.14 - 4.15		Report on all criteria listed for Level C plus: 1.2 3.9, 3.13 4.5 - 4.13, 4.16 - 4.17		Same as requirement for Level B	
G3 Management Approach Disclosures	Not Required		Management Approach Disclosures for each Indicator Category		Management Approach disclosed for each Indicator Category	
G3 Performance Indicators & Sector Supplement Performance Indicators	Report on a minimum of 10 Performance Indicators, including at least one from each of: social, economic, and environment.		Report on a minimum of 20 Performance Indicators, at least one from each of: economic, environment, human rights, labor, society, product responsibility.		Respond on each core G3 and Sector Supplement* indicator with due regard to the materiality Principle by either: a) reporting on the indicator or b) explaining the reason for its omission.	
		Report Externally Assured		Report Externally Assured		Report Externally Assured

\*Sector supplement in final version

GRI Indicator	Page	Location within report / Comments
<b>Strategy and Analysis</b>		
1.1	3	Letter from Our Chairman
1.2	2, 7-9	Introduction, Key Performance Indicators
<b>Organizational Profile</b>		
2.1	4	Our Company
2.2	4	Our Company; Annual Report "Highlights of Our Business" pp 3-4; BNY Mellon "At a Glance" <a href="http://www.bnymellon.com/news/factsheet.pdf">http://www.bnymellon.com/news/factsheet.pdf</a>
2.3	61	GRI Index; Annual Report <a href="http://www.bnymellon.com/investorrelations/annualreport/index.html">http://www.bnymellon.com/investorrelations/annualreport/index.html</a>
2.4	4	Our Company; Annual Report
2.5	4	Our Company; Annual Report
2.6	61	GRI Index; Annual Report
2.7	4	Our Company; Annual Report
2.8	5	CSR Snapshot; Annual Report
2.9	61	GRI Index; Annual Report p 10
2.10	18, 27, 35	Client Satisfaction, Supplier Diversity, Diversity and Inclusion
<b>Report Parameters</b>		
<b>Report Profile</b>		
3.1	67	Basis for this report
3.2	67	Basis for this report
3.3	67	Basis for this report
3.4	67	Basis for this report
<b>Report Scope and Boundary</b>		
3.5	67	Basis for this report
3.6	67	Basis for this report
3.7	67	Basis for this report
3.8	67	Basis for this report
3.9	67	Basis for this report
3.10	67	Basis for this report
3.11	2	Introduction
<b>GRI Content Index</b>		
3.12	61	GRI Index
<b>Assurance</b>		
3.13	67	Basis for this report

GRI Indicator	Page	Location within report / Comments
<b>Governance, Commitments &amp; Engagements</b>		
<b>Governance</b>		
4.1	11	Corporate Governance; 2010 Proxy Statement "Board Meetings and Board Committee Information" pp 20-23 <a href="http://www.bnymellon.com/investorrelations/annualreport/2009/proxy.pdf">http://www.bnymellon.com/investorrelations/annualreport/2009/proxy.pdf</a>
4.2	11	Corporate Governance; 2010 Proxy Statement "Board Meetings and Board Committee Information" pp 26-34
4.3	11	Corporate Governance; 2010 Proxy Statement "Board Meetings and Board Committee Information" pp 26-34
4.4	11	Corporate Governance
4.5	61	GRI Index; 2010 Proxy Statement "Director Compensation" p 37, "Executive Compensation Compensation Discussion and Analysis" p 41
4.6	10	Corporate Governance
4.7	10	Corporate Governance; 2010 Proxy Statement "Director Qualifications" p 6
4.8	6,10,12	CSR Statement and Commitments, Corporate Governance, Ethics and Compliance
4.9	11	Corporate Social Responsibility Governance
4.10	10	Corporate Governance; BNY Mellon website <a href="http://www.bnymellon.com/governance/committees/index.html">http://www.bnymellon.com/governance/committees/index.html</a>
<b>Commitments to External Initiatives</b>		
4.11	61	BNY Mellon does not use the precautionary approach to address climate change impact at the organizational level; Annual Report "Risk Management" p 67
4.12	57	Cultivating Engagement
4.13	15-16	Stakeholder Engagement
<b>Stakeholder Engagement</b>		
4.14	15	Stakeholder Engagement
4.15	15	Stakeholder Engagement
4.16	15	Stakeholder Engagement
4.17	16, 29, 36	Creating Value for Shareholders, Engaging our Employees, Employee Communication
<b>Economic Performance</b>		
DMA	16, 18-20	Disclosure on Management Approach Creating Value for Shareholders, Responsible Business
<b>Economic Performance</b>		
EC1		Economic value generated and distributed Not reported
EC2	12, 21, 36	Financial implications, risks & opportunities due to climate change Active Risk Management, Growing the Environmental Commodities Markets, Green Power; 2009 Carbon Disclosure Project response <a href="http://www.cdproject.net">www.cdproject.net</a>
EC3	67	Coverage of defined benefit plan obligations Policies and Procedures
EC4	16	Significant financial assistance received from government Troubled Asset Relief Program
<b>Market Presence</b>		
EC5		Ratio of standard entry level wage compared to local minimum wage Not reported
EC6		Proportion of spending on locally-based suppliers Not reported
EC7	37	Procedures for local hiring and proportion of local senior management Policies and Procedures
<b>Indirect Economic Impacts</b>		
EC8		Development and impact of infrastructure investments through commercial, in-kind, or pro bono engagement Not reported
EC9		Understanding and describing significant indirect economic impacts Not reported

GRI Indicator	Page	Location within report / Comments
<b>Environmental</b>		
DMA	Disclosure on Management Approach	49 The Path to Sustainability
<b>Materials</b>		
EN1	Materials used by weight or volume	58 Waste Management
EN2	Percentage of materials used that are recycled input materials	58 Waste Management
<b>Energy</b>		
EN3	Direct energy consumption by primary energy source	51 Greenhouse Gas Emissions Summary <a href="http://www.bnymellon.com/environment/greenemissions.pdf">http://www.bnymellon.com/environment/greenemissions.pdf</a>
EN4	Indirect energy consumption by primary source	51 Greenhouse Gas Emissions Summary <a href="http://www.bnymellon.com/environment/greenemissions.pdf">http://www.bnymellon.com/environment/greenemissions.pdf</a>
EN5	Energy saved due to conservation and efficiency improvements	52-56 Green Buildings, Green Power, not reported at a global company level
EN6	Initiatives to provide renewable energy based products and services	20-22 Socially Responsible Investments, Growing the Environmental Commodities Markets
EN7	Initiatives to reduce indirect energy consumption and reductions achieved	26, 56 Corporate Travel Services, Green Power
<b>Water</b>		
EN8	Total water withdrawal by source	Not reported
EN9	Water sources significantly affected by withdrawal of water	Not reported
EN10	Percentage and total volume of water recycled and reused	Not reported
<b>Biodiversity</b>		
EN11	Land in protected areas and areas of high biodiversity value	Not applicable
EN12	Significant impacts on biodiversity	Not applicable
EN13	Habitats protected or restored	Not applicable
EN14	Strategies and current actions for managing impacts on	Not applicable
EN15	IUCN Red List species & national conservation list species	Not applicable
<b>Emissions, Effluents &amp; Waste</b>		
EN16	Total direct and indirect greenhouse gas emissions by weight	51 Greenhouse Gas Emissions Summary <a href="http://www.bnymellon.com/environment/greenemissions.pdf">http://www.bnymellon.com/environment/greenemissions.pdf</a>
EN17	Other relevant indirect greenhouse gas emissions by weight	51 Greenhouse Gas Emissions Summary <a href="http://www.bnymellon.com/environment/greenemissions.pdf">http://www.bnymellon.com/environment/greenemissions.pdf</a>
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved	56 Green Power
EN19	Emissions of ozone-depleting substances by weight	61 Carbon Disclosure Project 2009 response <a href="http://www.cdproject.net">www.cdproject.net</a>
EN20	NOx, SOx, and other significant air emissions by type and weight	61 Carbon Disclosure Project 2009 response <a href="http://www.cdproject.net">www.cdproject.net</a>
EN21	Total water discharge by quality and destination	Not reported
EN22	Total weight of waste by type and disposal method	58-59 Waste Management
EN23	Total number and volume of significant spills	Not applicable
EN24	Transported, imported, exported, or treated hazardous waste	Not applicable
EN25	Water bodies significantly affected by discharges of water and runoff	Not applicable
<b>Products &amp; Services</b>		
EN26	Initiatives to mitigate environmental impacts of products and services	Not reported
EN27	Products sold and packaging materials that are reclaimed	Not applicable
<b>Compliance</b>		
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations	Not reported
<b>Transport</b>		
EN29	Significant environmental impacts of transporting products and other goods and materials used for the organization's operations, and transporting members of the workforce	51 Greenhouse Gas Emissions Summary <a href="http://www.bnymellon.com/environment/greenemissions.pdf">http://www.bnymellon.com/environment/greenemissions.pdf</a> (employee travel Scope 3)
<b>Overall</b>		
EN30	Total environmental protection expenditures and investments	Not reported

<b>GRI Indicator</b>	<b>Page</b>	<b>Location within report / Comments</b>
<b>Labor</b>		
DMA Disclosure on Management Approach	28	Fostering an Engaged Workforce
<b>Employment</b>		
LA1 Total workforce by employment type, employment contract, and region	33	Diversity and Inclusion
LA2 Total number and employee turnover rate by age, gender, and region	29	Engaging Our Employees
LA3 Difference in benefits for full-time, part-time or temp. employees		Not reported
<b>Labor/Management Relations</b>		
LA4 Percentage of employees covered by collective bargaining agreements		Not reported
LA5 Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements		Not reported
<b>Occupational Health &amp; Safety</b>		
LA6 Percentage of total workforce represented in formal joint management-worker health and safety committees		Not reported
LA7 Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region		Not reported
LA8 Education, training, counseling, prevention, and risk-control programs in place to assist workforce regarding serious diseases		Not reported
LA9 Health and safety topics covered in formal agreements with trade unions		Not reported
<b>Training &amp; Education</b>		
LA10 Average hours of training per year per employee	32	Employee Development
LA11 Programs for skills management and lifelong learning		Not reported
LA12 Percentage of employees receiving regular performance and career development reviews	31	Employee Development
<b>Diversity &amp; Equal Opportunity</b>		
LA13 Composition of governance bodies and breakdown of employees per category by gender, age and minority group membership		Not reported
LA14 Ratio of basic salary of men to women		Not reported
<b>Human Rights</b>		
DMA Disclosure on Management Approach	37	Policies and Procedures
<b>Investment &amp; Procurement Practices</b>		
HR1 Percentage and total number of significant investment agreements that include human rights clauses or that have undergone human rights screening		Not reported
HR2 Percentage of significant suppliers and contractors that have undergone screening on human rights and actions taken	22-25	Supplier CSR Review
HR3 Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained		Not reported
<b>Non-discrimination</b>		
HR4 Total number of incidents of discrimination and actions taken		Not reported
HR5 Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk, and actions taken to support these rights		Not reported
<b>Child Labor</b>		
HR6 Operations identified as having significant risk for incidents of child labor, and measures taken to contribute to the elimination of child labor	37	Policies and Procedures
<b>Forced &amp; Compulsory Labor</b>		
HR7 Operations identified as having significant risk for incidents of forced or compulsory labor, and measures taken to contribute to the elimination of forced or compulsory labor	37	Policies and Procedures
<b>Security Practices</b>		
HR8 Percentage of security personnel trained in aspects of human rights	12	Uncompromising Compliance and Ethics Principles
<b>Indigenous Rights</b>		
HR9 Violations involving rights of indigenous people and actions taken		Not reported

GRI Indicator	Page	Location within report / Comments
<b>Society</b>		
DMA Disclosure on Management Approach	16	Government Engagement
<b>Community</b>		
SO1 Programs that manage the impacts of operations on communities		Not reported
FS13 Access points in low-populated or economically disadvantaged areas		Not reported
FS14 Initiatives to improve access to financial services for disadvantaged people		Not reported
<b>Corruption</b>		
SO2 Percentage and total number of business units analyzed for risks related to corruption		Not reported
SO3 Percentage of employees trained in organization's anti-corruption policies and procedures		Not reported
SO4 Actions taken in response to incidents of corruption		Not reported
<b>Public Policy</b>		
SO5 Public policy positions and participation in public policy development and lobbying	16-17	Government Engagement; BNY Mellon website <a href="http://www.bnymellon.com/foresight/costello.html">http://www.bnymellon.com/foresight/costello.html</a>
SO6 Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country	16-17	Political Activity; Federal Election Commission filings <a href="http://www.fec.gov">www.fec.gov</a>
<b>Anti-Competitive Behavior</b>		
SO7 Total number of legal actions for anticompetitive behavior, anti-trust, and monopoly practices and their outcomes	61	GRI Index, see footnote below *
<b>Compliance</b>		
SO8 Monetary value of significant fines and total number of non-monetary sanctions for noncompliance with laws and regulations	61	GRI Index, see footnote below *

\* As a public company with securities traded on the New York Stock Exchange, The Bank of New York Mellon Corporation (the "Company") is required to file periodic reports with the Securities and Exchange Commission ("SEC"), including a quarterly report for the first three calendar quarters on Form 10-Q and an annual report on Form 10-K. These reports are publicly available from the SEC's website ([sec.gov](http://sec.gov)), and are also available on the Company's website (<http://www.bnymellon.com/investorrelations/financialreports/index.html>).

Under the SEC's disclosure rules, the Company must disclose certain legal proceedings in its quarterly and annual reports on Form 10-Q or 10-K. These rules require that the Company describe any material legal proceedings, other than ordinary routine litigation incidental to its business, to which the Company or any of its subsidiaries is a party or of which any their properties is subject. The description must include the name of the court or agency in which the proceedings are pending, the date instituted, the principal parties to the proceeding, a description of the factual basis alleged to underlie the proceeding and the relief sought. The Company must disclose similar information as to any such proceeding known to be contemplated by government authorities. The SEC's rules include specific instructions on how these rules are applied, including certain exceptions for matters that do not need to be disclosed.

The Company's disclosures as to these legal proceedings can be found under the caption "Legal Proceedings" included in its periodic reports on Form 10-Q or 10-K, as well as the "Legal Proceedings" section in the Notes to Consolidated Financial Statements accompanying the financial statements included in those reports.

GRI Indicator		Page	Location within report / Comments
<b>Product Responsibility</b>			
DMA	Disclosure on Management Approach	18-21	Responsible Business
<b>Financial Services Sector Supplement</b>			
FS1	Policies with specific environmental and social components applied to business lines	12-13	Active Risk Management, Uncompromising Compliance and Ethics Principles
FS2	Procedures for assessing and screening environmental and social risks in business lines	19	ESG Screening
FS3	Processes for monitoring clients' environmental and social requirements included in agreements or transactions		Not reported
FS4	Process(es) for improving staff competency to implement the environmental and social policies and procedures as applied to business lines	20-21	Socially Responsible Investments
FS5	Interactions with clients/investees/business partners regarding environmental and social risks and opportunities	19	ESG Screening
<b>Customer Health &amp; Safety</b>			
FS6	Percentage of the portfolio for business lines by specific region, size, and by sector		Not reported
FS7	Monetary value of products and services designed to deliver a specific social benefit for each business line broken down by purpose	20-21	Socially Responsible Investments, Growing the Environmental Commodities Markets
FS8	Monetary value of products and services designed to deliver a specific environmental benefit for each business line broken down by purpose	20-21	Socially Responsible Investments, Growing the Environmental Commodities Markets
FS9	Coverage and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures		Not reported
FS10	Percentage and number of companies held in the institution's portfolio with which the reporting organisation has interacted on environmental or social issues		Not reported
FS11	Percentage of assets subject to positive and negative environmental or social screening		Not reported
FS12	Voting polic(ies) applied to environmental or social issues for shares over which the reporting organisation holds the right to vote shares or advises on voting		Not reported
FS15	Policies for the fair design and sale of financial products/services	12	Active Risk Management
<b>Customer Health &amp; Safety</b>			
PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures		Not applicable
PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services, by type of outcomes		Not applicable
<b>Product &amp; Service Labeling</b>			
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements		Not reported
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes		Not reported
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction	19	Ensuring Client Satisfaction
<b>Marketing Communications</b>			
FS16	Initiatives to enhance financial literacy by type of beneficiary		Not reported
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship		Not reported
PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship, by type of outcomes		Not reported
<b>Customer Privacy</b>			
PR8	Substantiated complaints regarding breaches of customer privacy and losses of customer data	61	GRI Index, see footnote on previous page *
<b>Compliance</b>			
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services	61	GRI Index, see footnote on previous page *