

Socially and Environmentally Responsible Practices Survey

Wilmington Trust Company

Please note: As part of our commitment to an open and transparent government, your completed survey will be posted in its entirety in electronic format on Treasury’s Web site at <http://www.patreasury.org>,

A. Women and Ethnic Minority Query

Firm Practices

1. Please detail the employee diversification of your firm, emphasizing executive and management positions that have decision-making responsibilities. Count each employee only once, except owners may be counted both as owners and employees if the owner has significant operational responsibilities. If s/he has multiple roles, count the employee in the category where s/he spends the most time.

The diversity of our team, and the unique creativity and energy they bring to serving our clients, is an inherent strength of Wilmington Trust. It is essential to achieving our strategic goals. Our corporate vision, Possibilities and Dreams Fulfilled, applies to everyone we work with - our staff, clients, the communities we serve, and the neighborhoods where we operate.

As of March 31, 2010, Wilmington Trust had 2,924 full-time equivalent staff members with 20 dedicated to Fixed Income Investment Management.

	Total Employee	Male		Women	
		White/Caucasian	Ethnic Minority	White/Caucasian	Ethnic Minority
Wilmington Trust	2924	919	179	1392	434
%		31%	6%	48%	15%
Fixed Income	20	10	3	6	1
%	100	50%	15%	30%	5%

The classification of Ethnic Minority above is based on observation and voluntary self-reporting.

Wilmington Trust is a publicly owned company governed by a Board of Directors.

2. Please describe relevant initiatives and/or policies that assist in recruiting women and minorities to your firm and retaining and promoting those employees in your firm.

Wilmington Trust has several Staff Networking Groups which offer staff members the opportunity to interact with others who share a common interest or experience, and to support each other with professional development and community building. Our diversity efforts include the following staff member networking groups: BEACON (Blacks Empowered

Socially and Environmentally Responsible Practices Survey

Wilmington Trust Company

and Committed Through Opportunity and Networking), GenerationNow (promotes collaboration among different generations), JUNTOS (“together” in Spanish, a Hispanic heritage group), WILPride (gay and lesbian, bisexual, and transgender community), WIN (Women in Networking), and WWW (Wilmington WorldWide).

These Staff Networking Groups benefit our company by providing referrals for qualified candidates, helping us identify candidates who share our values and commitment. The groups also participate in the development of new programs or initiatives.

Wilmington Trust is committed to hiring and promoting people on the basis of their ability to do the job. Therefore, each staff member is treated equally in all employment opportunities, without discrimination based on race, color, religion, sex, sexual orientation, age, national origin, disability, or veteran status.

Vendors and Subcontractors

3. What percentage of your trades utilizes minority/women-owned brokerage firms?

Our electronic trading platform, Market Access, has recently added minority firms to their eligible list of broker dealers and we are considering adding those firms to our list.

4. Do you consider women and minority ownership or makeup when hiring vendors/sub-contractors, consultants, advisors or other professional services? If so, how? If not, please explain why you do not.

The mission of our Supplier Diversity Program is to grow on a continuous basis our portfolio of viable, competitive suppliers that are minority and women-owned businesses, enabling Wilmington Trust to work with suppliers that reflect employee and client diversity. Wilmington Trust is an active member in the NMSDC (National Minority Supplier Council).

5. Please provide any other information you feel may be relevant or may help Treasury understand your approach to employee and vendor/subcontractor diversification.

Senior leadership has chartered a cross-functional Diversity Council and hired a dedicated Diversity Manager to provide consistent focus on diversity and inclusion for our staff, clients, vendors and community initiatives. The Mission of the Diversity Council is to provide a companywide focus and guidance for making diversity and inclusion a part of the fabric of how we do business.

The Diversity Council worked closely with vendor management to develop our intentional supplier diversity initiative - the Supplier Diversity Program - and continues to collaborate on successful integration. The Council has also

Socially and Environmentally Responsible Practices Survey

Wilmington Trust Company

chartered Staff Networking Groups to focus on recruiting and retention of diverse staff, and to draw on diverse perspectives to help us serve our clients.

We want to be viewed as one of the best company employers, and are creating a culture that ignites creativity, leadership, and exceptional performance. Our goal is to create a workplace where all staff members can grow to their greatest potential.

We challenge each other to contribute our best in an environment that is inclusive and respectful of individual strengths and differences, including age, culture, disability, educational background, family status, gender, sexual orientation, ethnicity, religion, race, and thinking style.

Every staff member is accountable for living our vision by promoting our diversity efforts with colleagues, clients, suppliers, and the communities in which we work. By engaging everyone, our vision becomes a reality.

B. Environmental/Sustainability Query

Firm Practices

1. Please provide information related to your firm's policy/initiatives/efforts with respect to environmentally responsible and sustainable practices.

It is a practice at Wilmington Trust to continually identify on a continuous basis opportunities to assess and make business decisions with consideration to their environmental impact. As citizens of our local communities, we are also citizens of the world, and Wilmington Trust is pursuing green business practices, including:

- **OZOCar – Our New York office uses a transportation company considered New York City's first eco-friendly car service, employing hybrid vehicles;**
- **e-Vites – we have replaced paper invitations for many of our seminars, meetings, and other events with electronic invites;**
- **Hybrid auto loans – we offer a discount on our automobile loan rates for purchasing hybrid vehicles;**
- **Check imaging deposits – our new teller system enables us to take an image of processed checks, check deposits, and other transactions and send them electronically to our processor. Courier runs are reduced, thereby reducing our carbon footprint;**
- **e-Statements – clients may opt to receive their statements electronically;**
- **All printers are internally set as a default to print on both sides of the paper saving significant amounts of paper.**

Socially and Environmentally Responsible Practices Survey

Wilmington Trust Company

- **Recycling – we recycled approximately 9,000 computer-related assets over the past three years, including PCs, laptops, keyboards, and printers;**
- **Heating system – we employ an internal heat pump system in our two primary Wilmington offices that allows us to heat one part of our building while cooling others. Therefore, we do not waste any of the heat generated by lights, office equipment, and people during the months of October through March; and**
- **Shredding – we ensure that the vendors that provide our shredding services recycle all discarded documents.**

Vendors and Subcontractors

2. Do you consider the environmental or sustainable practices of vendors and subcontractors in hiring decisions? If so, how? If not, please explain why you do not.

All facilities vendor contracts with Wilmington Trust have standard guidelines requiring:

- **Environmentally friendly chemicals for cleaning carpets, furniture, windows and floors**
- **Use of low-impact chemicals for exterior landscape management, and**
- **Least toxic methods used for pest control.**

All else being equal, we also hire firms who are environmentally conscious.

Investment Decisions

3. Do you consider environmental / sustainability issues when making investment decisions? If so, how? If not, please explain why you do not.

Investment decisions are made on the basis of providing the portfolio with the best possible total return. If environmental issues help to provide an edge in achieving this, they are considered.

4. Are there specific sectors or industries that you are likely to over or underweight due to climate risk or opportunity? If so, which ones?

Investment decisions are made on the basis of providing the portfolio with the best possible total return. If climate management opportunities help to provide an edge in achieving this, they are considered.

5. How do you obtain information about climate risk and environmental factors?

Through the normal course of credit and investment management decision making

Socially and Environmentally Responsible Practices Survey
Wilmington Trust Company

6. Have you adopted the United Nations Principles for Responsible Investing? (<http://www.unpri.org/>). If not, are you in the process of evaluating, or would you consider evaluating adoption of the United Nations Principles for Responsible Investing?

Currently, we do not manage accounts that require us to invest according to the UNIPRO guidelines. We invest primarily in large, U.S. domiciled companies.

We are not looking to officially adopt these guidelines but we consider ethical issues in the normal course of our investment process.

Please detail any other information you feel may be relevant or helpful for Treasury to understand your approach to evaluating the significance of environmental and sustainability issues in making investment decisions.

Attached as Exhibit One is our brochure “Global Reach. Local Commitment” which provides more information about our community commitment.

C. Pennsylvania Commitment Query

Please provide numbers detailing the firm and client presence in Pennsylvania.

As of March 31, 2010, Wilmington Trust had 84 offices worldwide, including 5 offices and 45 staff members in the state of Pennsylvania:

**One East Broad Street, Suite 510
Bethlehem, PA 18018**

**797 East Lancaster Avenue
Villanova, PA 19085-1598**

**2003 South Easton Road, Suite 204
Doylestown, PA 18901-4321**

**2 West Market Street, Suite 100
West Chester, PA 19382-3002**

**One Liberty Place
1650 Market Street, Suite 3150
Philadelphia, PA 19103-7899**

We have clients headquartered throughout the United States and in over 89 countries.

Please detail any other information you think relevant regarding the extent of your business contacts or activities in Pennsylvania.

D. Geopolitical Risk

1. How do you take geopolitical risk into account when making investment decisions? If so, how? If not, please explain why you do not.

Wilmington Trust maintains policies and procedures in compliance with all applicable U.S. anti-money laundering regulations, including country-specific OFAC sanctions programs. These policies and procedures are regarded in all investment decisions.

Socially and Environmentally Responsible Practices Survey
Wilmington Trust Company

2. Do you currently have in place policies that prohibit or limit investment in companies doing business with countries identified as state sponsors of terrorism by the U.S. State Department? If so, please provide those policies.

Wilmington Trust maintains policies and procedures in compliance with all applicable U.S. anti-money laundering regulations, including country-specific OFAC sanctions programs.