Zions Bancorporation, National Association

Basel III Regulatory Capital Disclosures

September 30, 2024

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FORWARD-LOOKING INFORMATION

These regulatory capital disclosures include “forward-looking statements” as that term is defined in the Private Securities Litigation Reform Act of 1995. These statements are based on management’s current expectations and assumptions regarding future events or determinations, all of which are subject to known and unknown risks, uncertainties, and other factors that may cause our actual results, performance or achievements, industry trends, and results or regulatory outcomes to differ materially from those expressed or implied. Forward-looking statements include, among others:

- Statements with respect to the beliefs, plans, objectives, goals, targets, commitments, designs, guidelines, expectations, anticipations, and future financial condition, results of operations, and performance of Zions Bancorporation, National Association and its subsidiaries (collectively “Zions Bancorporation, N.A.,” “the Bank,” “we,” “our,” “us”); and
- Statements preceded or followed by, or that include the words “may,” “might,” “can,” “continue,” “could,” “should,” “would,” “believe,” “anticipate,” “estimate,” “forecasts,” “expect,” “intend,” “target,” “commit,” “design,” “plan,” “projects,” “will,” and the negative thereof and similar words and expressions.

Forward-looking statements are not guarantees, nor should they be relied upon as representing management’s views as of any subsequent date. Actual results and outcomes may differ materially from those presented. Although the following list is not comprehensive, important factors that may cause material differences include:

- The quality and composition of our loan and securities portfolios and the quality and composition of our deposits;
- Changes in general industry, political, and economic conditions, including elevated inflation, economic slowdown or recession, or other economic challenges; changes in interest and reference rates, which could adversely affect our revenue and expenses, the value of assets and liabilities, and the availability and cost of capital and liquidity; deterioration in economic conditions that may result in increased loan and lease losses;
- The effects of newly enacted and proposed regulations affecting us and the banking industry, as well as changes and uncertainties in applicable laws, and fiscal, monetary, regulatory, trade, and tax policies, and actions taken by governments, agencies, central banks, and similar organizations, including those that result in decreases in revenue; increases in bank fees, insurance assessments, and capital standards; and other regulatory requirements;
- Competitive pressures and other factors that may affect aspects of our business, such as pricing and demand for our products and services, and our ability to recruit and retain talent;
- The impact of technological advancements, digital commerce, artificial intelligence, and other innovations affecting the banking industry;
- Our ability to complete projects and initiatives and execute on our strategic plans, manage our risks, control compensation and other expenses, and achieve our business objectives;
- Our ability to develop and maintain technology, information security systems, and controls designed to guard against fraud, cybersecurity, and privacy risks;
- Our ability to provide adequate oversight of our suppliers to help us prevent or mitigate effects upon us and our customers of inadequate performance, systems failures, or cyber and other incidents by, or affecting, third parties upon whom we rely for the delivery of various products and services;
- Natural disasters, pandemics, catastrophic events, and other emergencies and incidents, and their impact on our and our customers’ operations, business, and communities, including the increasing difficulty in, and the expense of, obtaining property, auto, business, and other insurance products;
- Governmental and social responses to environmental, social, and governance issues, including those with respect to climate change;
- Securities and capital markets behavior, including volatility and changes in market liquidity and our ability to raise capital;

- The possibility that our recorded goodwill could become impaired, which may have an adverse impact on our earnings and shareholders' equity;
- The impact of bank closures or adverse developments at other banks on general investor sentiment regarding the stability and liquidity of banks;
- Adverse news and other expressions of negative public opinion whether directed at us, other banks, the banking industry, or otherwise that may adversely affect our reputation and that of the banking industry generally;
- Protracted congressional negotiations and political stalemates regarding government funding and other issues, including those that increase the possibility of government shutdowns, downgrades in United States ("U.S.") credit ratings, or other economic disruptions; and
- The effects of wars and geopolitical conflicts, such as the ongoing war between Russia and Ukraine, the war in the Middle East, and other local, national, or international disasters, crises, or conflicts that may occur in the future.

We caution against the undue reliance on forward-looking statements, which reflect our views only as of the date they are made. Except to the extent required by law, we specifically disclaim any obligation to update any factors or to publicly announce the revisions to any forward-looking statements to reflect future events or developments.

BACKGROUND

The Federal Reserve Board ("FRB"), the Federal Deposit Insurance Corporation ("FDIC"), and the Office of the Comptroller of the Currency ("OCC") have published rules ("Basel III capital rules") establishing a comprehensive capital framework for U.S. banking organizations. The Basel III capital rules define the components of capital and address other issues affecting the numerator in banking institutions' regulatory capital ratios and also address risk weights and other issues affecting the denominator in financial institutions' regulatory capital ratios. The Basel III capital rules, among other things, (1) introduced a new capital measure called Common Equity Tier 1 ("CET1"), (2) specified that Tier 1 capital consists of CET1 and "Additional Tier 1 capital" instruments meeting specified requirements, (3) applied most deductions and adjustments to regulatory capital measures to CET1 and not to the other components of capital, thus potentially requiring higher levels of CET1 in order to meet minimum ratios, and (4) expanded the scope of the deductions and adjustments from capital, as compared with prior regulations.

Basel III also required additional regulatory capital disclosures, commonly referred to as "Pillar 3" disclosures. These disclosures require us to present prescribed regulatory information on a quarterly basis regarding our capital structure adequacy and risk-weighted assets, and should be read in conjunction with our most recent Form 10-K, Form 10-Q, and our Call Report. Our Regulatory Capital Disclosures Matrix in the Appendix specifies where all disclosures required by the Basel III capital rules are located in the aforementioned documents. These Basel III regulatory capital disclosures have not been audited by our external auditors.

OVERVIEW

We are a bank headquartered in Salt Lake City, Utah, and we provide a wide range of banking products and related services, primarily in the states of Arizona, California, Colorado, Idaho, Nevada, New Mexico, Oregon, Texas, Utah, Washington, and Wyoming. We conduct our operations primarily through seven separately managed and geographically defined bank divisions, which we refer to as "affiliates," or "affiliate banks," each with its own local branding and management team. We emphasize local authority, responsibility, pricing, and customization of certain products that are designed to maximize customer satisfaction, strengthen community relations, and improve profitability and shareholder returns. Our affiliate banks are supported by an enterprise operating segment (referred to as the "Other" segment) that provides governance and risk management, allocates capital, establishes strategic objectives, and includes centralized technology, back-office functions, and certain lines of business not operated through our affiliate banks.

Our Annual Report, filed with the OCC on forms designated under the Securities Act of 1933, contains management's discussion of our overall corporate risk profile and related management strategies, including capital management. The basis of consolidation used for regulatory reporting is consistent with that used under U.S. Generally Accepted Accounting Principles ("GAAP").

CAPITAL STRUCTURE

Under the Basel III capital rules, the minimum capital ratio requirements are as follows:

- 4.5% CET1 to risk-weighted assets;
- 6.0% Tier 1 capital (i.e., CET1 plus Additional Tier 1) to risk-weighted assets;
- 8.0% Total capital (i.e., Tier 1 plus Tier 2) to risk-weighted assets; and
- 4.0% Tier 1 capital to average consolidated assets (i.e., the “Tier 1 leverage ratio”).

At September 30, 2024, we exceeded all capital adequacy requirements under the Basel III capital rules, which include certain risk-based capital and leverage ratio requirements prescribed by the OCC. The Basel III capital rules define the components of capital and other factors, such as risk weights, affecting banking institutions’ regulatory capital ratios.

Schedule 1 presents a reconciliation of total shareholders’ equity to Basel III CET1 capital, Tier 1 capital, Tier 2 capital, and total capital. As a non-advanced approach Bank, we have elected to opt out of the requirement to include most components of AOCI in regulatory capital. Therefore, changes in AOCI do not impact our regulatory capital ratios.

Schedule 1

RISK-BASED CAPITAL COMPONENTS AND ASSETS

(In millions)	September 30, 2024
Total shareholders’ equity	**$ 6,385**
CECL adjustment	—
Less: Preferred stock	440
Common shareholders’ equity	**5,945**
Less: Goodwill	1,027
Less: Other intangible assets	26
Less: Accumulated other comprehensive income	(2,336)
Other CET1 capital adjustments	(22)
CET1 capital	**7,206**
Preferred stock	440
Less: Other Tier 1 adjustments	—
Tier 1 capital	**7,646**
Long-term debt and other instruments qualifying as Tier 2 capital	509
Qualifying allowance for credit losses	736
Other	(1)
Tier 2 capital	**1,244**
Total risk-based capital	**$ 8,890**
Total risk-weighted assets	**$ 67,305**

We utilize stress testing as an important mechanism to inform our decisions on the appropriate level of capital, based upon actual and hypothetically stressed economic conditions, including the FRB’s supervisory severely adverse scenario. The timing and amount of capital actions are subject to various factors, including our financial performance, business needs, prevailing and anticipated economic conditions, the results of our internal stress testing, and our capital levels relative to the regulatory requirements, as well as our Board of Directors (“Board”) and OCC approval.

During the third quarter of 2023, federal bank regulators issued a proposal to implement the Basel Committee on Banking Supervision’s finalization of the post-crisis bank regulatory capital reforms. The proposal, commonly referred to as the “Basel III Endgame,” would significantly revise the capital requirements applicable to large banking organizations, defined as those with total assets of $100 billion or more, and would potentially impact our current and future capital planning, including share repurchase activity. At September 30, 2024, we had $87.0

billion in total assets and do not currently qualify as a large banking organization. We continue to evaluate the potential impact of the proposal, as we expect it is more likely than not we would become subject to this proposal in the future, were it to be finalized in its current form.

Federal bank regulators also issued proposals that would (1) expand a long-term debt requirement to all banks with total assets of $100 billion or more, and (2) revise requirements for resolution planning. For more information about these regulatory proposals and their potential impact, see "Recent Regulatory Developments" in the Supervision and Regulation section of our 2023 Form 10-K.

CAPITAL ADEQUACY

The Board is responsible for approving key policies associated with capital management. The Board has delegated responsibility of managing our capital risk to the Capital Management Committee ("CMC"), which is chaired by the Chief Financial Officer, consists of members of management, and whose primary responsibility is to recommend and administer the approved capital policies that govern our capital management. Other major CMC responsibilities include:

- Setting overall capital targets within the Board-approved Capital Policy, monitoring performance compared with our Capital Policy limits, and recommending changes to capital including dividends, common stock issuances and repurchases, subordinated debt, and changes in major strategies to maintain ourselves at well-capitalized levels;
- Maintaining an adequate capital cushion to withstand adverse stress events while continuing to meet the borrowing needs of our customers, and to provide reasonable assurance of continued access to wholesale funding, consistent with fiduciary responsibilities to depositors and bondholders; and
- Reviewing our credit agency ratings.

Based on our internal stress testing and other assessments of capital adequacy, we believe we hold capital sufficiently in excess of internal and regulatory requirements for well-capitalized banks. For more information regarding our capital management, see the "Capital Management" section of Management's Discussion and Analysis of our 2023 Form 10-K. Schedule 2 presents our risk-weighted assets by risk type.

Schedule 2

BASEL III RISK-WEIGHTED ASSETS BY RISK TYPE

(In millions)	September 30, 2024
On-balance sheet assets	
Exposures to sovereign entities	$ 3,150
Exposures to depository institutions, foreign banks, and credit unions	98
Exposures to public sector entities	2,829
Corporate exposures	39,966
Residential mortgage exposures	7,988
Statutory multifamily mortgages and pre-sold construction loans	99
High volatility commercial real estate (HVCRE) loans	33
Past due loans	420
Other assets	3,296
Equity exposures	259
Off-balance sheet exposures	
Financial standby letters of credit	481
Performance standby letters of credit	83
Commercial and similar letters of credit with an original maturity of one year or less	3
Unused commitments with an original maturity of one year or less	254
Unused commitments with an original maturity exceeding one year	7,933
All other off-balance sheet liabilities	413
Total risk-weighted assets before excess allowance	**67,305**
Less: Excess allowance for loan and lease losses	—
Total risk-weighted assets	**$ 67,305**

CAPITAL CONSERVATION BUFFER

The Basel III capital rules require us to maintain certain minimum capital ratios, as well as a 2.5% "capital conservation buffer," which is designed to absorb losses during periods of economic stress, composed entirely of CET1. The following schedule presents minimum capital ratio and capital conservation buffer requirements, compared with our capital ratios at September 30, 2024:

Schedule 3

MINIMUM CAPITAL RATIO AND CAPITAL CONSERVATION BUFFER REQUIREMENTS

	September 30, 2024			
	Minimum capital requirement	Capital conservation buffer	Minimum capital ratio requirement with capital conservation buffer	Current capital ratio
CET1 to risk-weighted assets	4.5 %	2.5 %	7.0 %	10.7 %
Tier 1 capital (i.e., CET1 plus additional Tier 1 capital) to risk-weighted assets	6.0	2.5	8.5	11.4
Total capital (i.e., Tier 1 capital plus Tier 2 capital) to risk-weighted assets	8.0	2.5	10.5	13.2
Tier 1 capital to average consolidated assets (known as the "Tier 1 leverage ratio")	4.0	N/A	4.0	8.6

Financial institutions with a ratio of CET1 to risk-weighted assets above the minimum capital requirement, but below the minimum plus the capital conservation buffer, face constraints on dividends, equity repurchases, and compensation based on the amount of the shortfall. The severity of the constraint depends on the amount of the shortfall and the institution's "eligible retained income," which is defined as four quarters of trailing net income, net of distributions and associated tax effects not already reflected in net income.

CREDIT RISK: GENERAL DISCLOSURES

Risk management is an integral part of our operations and is a key determinant of our overall performance. We employ various strategies to reduce the risks to which our operations are exposed, including credit risk, interest rate and market risk, liquidity risk, strategic and business risk, operational risk, technology risk, cybersecurity risk, capital/financial reporting risk, legal/compliance risk (including regulatory risk), and reputational risk. These risks are overseen by various management committees including the Enterprise Risk Management Committee. For a more comprehensive discussion of these risks, see "Risk Factors" in our 2023 Form 10-K.

Credit Risk Management

Credit risk is the possibility of loss from the failure of a borrower, guarantor, or another obligor to fully perform under the terms of a credit-related contract. Credit risk arises primarily from our lending activities, as well as from off-balance sheet credit instruments. For a more comprehensive discussion of our credit risk management, see "Credit Risk Management" in our 2023 Form 10-K.

The following schedules present major types of credit exposures. Schedule 4 presents our total credit risk exposure at September 30, 2024 and our average credit risk exposure during the third quarter of 2024, together with a remaining contractual maturity distribution according to credit risk exposure categories.

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Schedule 4

TOTAL CREDIT RISK EXPOSURE

	Amortized Cost		September 30, 2024 Remaining contractual maturity			
(In millions)	September 30, 2024	3Q 2024 average [1]	One year or less	One year through five years	Over five years	Total
Investment securities with government/ agency guarantees	$ 18,988	$ 19,218	$ 239	$ 227	$ 18,522	$ 18,988
Investment securities without government/ agency guarantees	1,600	1,629	199	508	893	1,600
Derivative receivables [2]	378	428	6	104	268	378
Securities financing transactions	977	943	977	—	—	977
Loans and leases, net [3]	58,884	58,650	8,661	21,383	28,840	58,884
Unfunded lending commitments	29,121	29,122	8,693	11,430	8,998	29,121
Total	$ 109,948	$ 109,990	$ 18,775	$ 33,652	$ 57,521	$ 109,948

[1] *Calculated on a simple average of the beginning and ending quarterly balances.*

[2] *Does not include $119 million of derivative receivables that are cleared through the Chicago Mercantile Exchange ("CME") and LCH.Clearnet ("LCH") with our Futures Commission Merchant.*

[3] *Net of unamortized purchase premiums, discounts, and deferred loan fees and costs.*

Credit Disclosures by Geography and Industry

Schedules 5 and 6 provide our total credit exposures by geography and industry, respectively. Geographies are presented following the manner in which we manage our credit exposure. For commercial and consumer loans, geographies are based on the location of the primary borrower. For commercial real estate loans, geographies are based on the location of the primary collateral.

Schedule 5 presents geographic distribution by major types of credit exposure. The credit exposure includes loans and leases, net of unamortized purchase premiums, discounts, and deferred loan fees and costs, and includes contractual commitments to extend credit and letters of credit.

Schedule 5

CREDIT EXPOSURE BY GEOGRAPHY

(Amounts in millions)	September 30, 2024			
	Loans and leases	Unfunded lending commitments	Total exposure	Percentage of total
Commercial				
Arizona	$ 2,277	$ 778	$ 3,055	6.6 %
California	6,091	2,791	8,882	19.1
Colorado	1,935	673	2,608	5.6
Nevada	1,339	470	1,809	3.9
Texas	7,233	5,629	12,862	27.7
Utah/Idaho	6,294	3,177	9,471	20.4
Washington/Oregon	1,428	658	2,086	4.5
Other [1]	4,188	1,464	5,652	12.2
Total commercial	30,785	15,640	46,425	100.0 %
Commercial real estate				
Arizona	$ 1,808	$ 318	$ 2,126	12.8 %
California	3,609	712	4,321	25.9
Colorado	724	167	891	5.3
Nevada	1,155	232	1,387	8.3
Texas	2,539	911	3,450	20.7
Utah/Idaho	2,129	587	2,716	16.3
Washington/Oregon	1,088	218	1,306	7.8
Other	431	43	474	2.9
Total commercial real estate	13,483	3,188	16,671	100.0 %
Consumer				
Arizona	$ 1,323	$ 1,275	$ 2,598	10.4 %
California	2,980	1,876	4,856	19.5
Colorado	1,356	1,088	2,444	9.8
Nevada	1,277	940	2,217	8.9
Texas	3,701	1,397	5,098	20.5
Utah/Idaho	3,413	3,387	6,800	27.3
Washington/Oregon	210	117	327	1.3
Other	356	213	569	2.3
Total consumer	14,616	10,293	24,909	100.0 %
Total	$ 58,884	$ 29,121	$ 88,005	

[1] *No other geography exceeds 2.7%.*

Schedule 6 presents industry or collateral distribution by major types of credit exposure. The credit exposure includes loans and leases, net of unamortized purchase premiums, discounts, and deferred loan fees and costs, and includes contractual commitments to extend credit and letters of credit.

Schedule 6

CREDIT EXPOSURE BY INDUSTRY OR COLLATERAL TYPE

	September 30, 2024			
(Amounts in millions)	Loans and leases	Unfunded lending commitments	Total exposure	Percentage of total
Commercial [1]				
Finance and insurance	$ 2,863	$ 2,012	$ 4,875	10.5 %
Real estate, rental and leasing	3,003	1,636	4,639	10.0
Retail trade	2,913	837	3,750	8.1
Manufacturing	2,304	1,317	3,621	7.8
Wholesale trade	1,992	1,405	3,397	7.3
Healthcare and social assistance	2,453	678	3,131	6.7
Construction	1,280	1,525	2,805	6.0
Transportation and warehousing	1,515	990	2,505	5.4
Mining, quarrying, and oil and gas extraction	1,094	1,117	2,211	4.8
Public Administration	2,115	51	2,166	4.7
Utilities [2]	1,406	413	1,819	3.9
Professional, scientific, and technical services	1,084	731	1,815	3.9
Other Services (except Public Administration)	1,103	536	1,639	3.5
Educational services	1,301	325	1,626	3.5
Hospitality and food services	1,267	291	1,558	3.4
Other [3]	3,092	1,776	4,868	10.5
Total commercial	30,785	15,640	46,425	100.0 %
Commercial real estate				
Commercial property				
Multi-family	$ 3,904	$ 1,272	$ 5,176	31.1 %
Industrial	3,027	586	3,613	21.7
Office	1,867	137	2,004	12.0
Retail	1,524	161	1,685	10.1
Hospitality	642	8	650	3.9
Land	236	145	381	2.3
Other [4]	1,613	115	1,728	10.4
Residential property				
Single family	327	315	642	3.8
Land	100	58	158	0.9
Condo/Townhome	26	29	55	0.3
Other [4]	217	362	579	3.5
Total commercial real estate	13,483	3,188	16,671	100.0 %
Consumer				
Home equity credit line	$ 3,543	$ 7,458	$ 11,001	44.2 %
1-4 family residential	9,489	—	9,489	38.1
Construction and other consumer real estate	997	713	1,710	6.8
Bankcard and other revolving plans	461	2,122	2,583	10.4
Other	126	—	126	0.5
Total consumer	14,616	10,293	24,909	100.0 %
Total	$ 58,884	$ 29,121	$ 88,005	

[1] *Industry classification is based on the North American Industry Classification System.*
[2] *Includes primarily utilities, power, and renewable energy.*
[3] *No other industry group exceeds 3.5%.*
[4] *Included in the total amount of the "Other" commercial and residential categories was approximately $356 million of unsecured loans at September 30, 2024.*

Our investment securities portfolio includes agency guaranteed mortgage-backed securities, municipal securities, Small Business Administration ("SBA") loan-backed securities, agency securities, and other securities. The most important feature management relies on when assessing credit risk for SBA loan-backed securities, agency guaranteed mortgage-backed securities, and agency securities is the guarantee of the federal government or its agencies.

We evaluate the credit risk of our investment securities portfolio using a variety of factors. Refer to Note 5 in our 2023 Form 10-K for further information regarding these factors. Geography is typically not one of the primary factors we consider in managing our derivatives, securities financings, or investment securities portfolio, with the exception of municipal securities.

Schedule 7 presents the amortized cost and relative percentage of our total held-to-maturity ("HTM") and available-for-sale ("AFS") municipal securities by major region of the United States.

Schedule 7

MUNICIPAL SECURITIES BY GEOGRAPHY

	September 30, 2024	
(Amounts in millions)	Amortized cost	Percentage of total
West	$ 555	35 %
South	547	35
Midwest	455	29
Northeast	18	1
Total HTM and AFS municipal securities	$ 1,575	100 %

Allowance for Credit Losses, Past Due Loans, and Nonaccrual Loans

The allowance for credit losses ("ACL") is the combination of both the allowance for loan and lease losses ("ALLL") and the reserve for unfunded lending commitments ("RULC"). The ACL represents our estimate of current expected credit losses related to the loan and lease portfolio and unfunded lending commitments as of the balance sheet date. To determine the adequacy of the allowance, we segment our loan and lease portfolio based on loan type.

Refer to the "Allowance for Credit Losses" and "Critical Accounting Policies and Significant Estimates" sections of Management's Discussion and Analysis and Note 6 in our 2023 Form 10-K for more information on the evaluation of the ACL.

Schedule 8 presents the loans past due (accruing and nonaccruing) and nonaccrual loans by industry distribution and major type of credit exposure.

Schedule 8

PAST DUE AND NONACCRUAL LOANS BY INDUSTRY

(In millions)	September 30, 2024							
	Past due loans				Nonaccrual loans			
	Accruing loans		Nonaccruing loans		Amortized cost basis			
	30-89 days past due	90+ days past due	30-89 days past due	90+ days past due	with no allowance	with allowance	Total amortized cost basis	Related allowance
Commercial [1]								
Retail trade	$ 2	$ —	$ —	$ 4	$ 25	$ 14	39	$ —
Real estate, rental and leasing	31	—	—	1	—	7	7	3
Finance and insurance	7	—	—	1	—	1	1	—
Healthcare and social assistance	1	—	—	1	9	26	35	3
Manufacturing	7	1	5	1	1	7	8	1
Wholesale trade	1	4	—	2	—	2	2	1
Transportation and warehousing	1	—	2	2	3	4	7	1
Utilities [2]	—	—	—	—	—	6	6	3
Construction	13	1	1	1	2	25	27	7
Hospitality and food services	—	—	—	1	—	1	1	—
Mining, quarrying, and oil and gas extraction	—	—	—	14	—	15	15	4
Professional, scientific, and technical services	1	—	4	3	4	26	30	2
Other Services (except Public Administration)	—	—	—	1	1	2	3	1
Other	1	—	1	—	—	34	34	2
Total commercial	65	6	13	32	45	170	215	28
Commercial real estate								
Commercial property								
Multi-family	1	—	—	—	—	1	1	1
Office	—	—	1	22	35	23	58	1
Retail	1	—	—	—	—	—	—	—
Industrial	1	—	—	1	—	—	—	—
Hospitality	—	—	—	8	3	5	8	—
Residential property								
Single family	1	—	—	2	—	2	2	—
Land	1	—	—	—	—	—	—	—
Total commercial real estate	5	—	1	33	38	31	69	2
Consumer								
Home equity credit line	7	—	5	10	4	26	30	6
1-4 family residential	7	—	3	29	12	35	47	4
Construction and other consumer real estate	1	—	—	—	—	—	—	—
Bankcard and other revolving plans	3	1	—	—	—	1	1	1
Other	1	—	—	—	—	1	1	—
Total consumer	19	1	8	39	16	63	79	11
Total	$ 89	$ 7	$ 22	$ 104	$ 99	$ 264	$ 363	$ 41

[1] *Industry classification is based on the North American Industry Classification System.*
[2] *Includes primarily utilities, power, and renewable energy.*

In addition to industry, we use the geography of the borrower's business, or property location in the case of real estate secured loans, among other key risk characteristics, to determine estimates about the likelihood of default and the severity of loss in the event of default. Schedule 9 presents geographic detail on past due and nonaccrual loans.

Schedule 9

PAST DUE AND NONACCRUAL LOANS BY GEOGRAPHY

	September 30, 2024							
	Past due loans				Nonaccrual loans			
	Accruing loans		Nonaccruing loans		Amortized cost basis			
(In millions)	30-89 days past due	90+ days past due	30-89 days past due	90+ days past due	with no allowance	with allowance	Total amortized cost basis	Related allowance
Commercial								
Arizona	$ 2	$ —	$ 1	$ 1	$ 2	$ 3	$ 5	$ 1
California	11	1	2	4	3	54	57	8
Colorado	1	—	1	—	—	23	23	1
Nevada	2	—	9	2	4	8	12	1
Texas	10	1	—	17	11	64	75	13
Utah/Idaho	38	—	—	2	—	6	6	1
Washington/Oregon	1	—	—	2	21	11	32	3
Other	—	4	—	4	4	1	5	—
Total commercial	65	6	13	32	45	170	215	28
Commercial real estate								
Arizona	—	—	—	—	—	—	—	—
California	1	—	—	22	35	24	59	1
Colorado	1	—	—	—	—	—	—	—
Nevada	—	—	—	1	—	—	—	—
Texas	2	—	1	10	3	7	10	1
Utah/Idaho	—	—	—	—	—	—	—	—
Washington/Oregon	1	—	—	—	—	—	—	—
Other	—	—	—	—	—	—	—	—
Total commercial real estate	5	—	1	33	38	31	69	2
Consumer								
Arizona	1	—	1	2	—	5	5	1
California	3	—	1	4	4	11	15	2
Colorado	2	—	2	3	1	8	9	1
Nevada	1	—	—	5	2	6	8	1
Texas	7	1	3	15	3	20	23	4
Utah/Idaho	3	—	1	7	2	12	14	2
Washington/Oregon	—	—	—	—	—	—	—	—
Other	2	—	—	3	4	1	5	—
Total consumer	19	1	8	39	16	63	79	11
Total	$ 89	$ 7	$ 22	$ 104	$ 99	$ 264	$ 363	$ 41

COUNTERPARTY CREDIT RISK-RELATED EXPOSURES

Exposure to credit risk arises from the possibility of nonperformance by counterparties primarily of over-the-counter ("OTC") derivatives, but can also arise from repurchase agreements, securities lending and borrowing, and other similar products and activities. These counterparties primarily consist of financial institutions that are well established and well capitalized. The amount of counterparty exposure depends on underlying market factors (e.g., interest rates and foreign exchange rates), which can be volatile and uncertain in nature. We manage this credit risk through credit approvals, limits, pledges of collateral, and other monitoring procedures.

As a result of the Dodd-Frank Act, all newly eligible derivatives entered into are cleared through a central clearinghouse. No significant losses on derivative instruments have occurred as a result of counterparty nonperformance. Nevertheless, the related credit risk is considered and measured when and where appropriate.

Collateral

We manage the credit risk of our derivative positions by diversifying our positions among various counterparties, entering into master netting arrangements where possible with counterparties, and requiring collateral. Credit exposures are monitored daily for counterparties with an established Credit Support Annex ("CSA"), to assure that collateral levels are appropriately sized to cover risk. For more information regarding our credit risk management of derivatives, see Note 7 in our 2023 Form 10-K.

Our derivative contracts require us to pledge collateral for derivatives that are in a net liability position at a given date. Certain derivative contracts contain credit-risk-related contingent features that include the requirement to maintain a minimum debt credit rating. We may be required to pledge additional collateral if a credit-risk-related feature were triggered, such as a downgrade of our credit rating. However, in past situations, not all counterparties have demanded that additional collateral be pledged when provided for under their contracts. For information regarding the amount of collateral that we may be required to pledge under certain events, see Note 7 in our 2023 Form 10-K.

Eligible collateral types are documented by a CSA to the International Swaps and Derivatives Association ("ISDA") Master Agreement and are controlled under our general credit policies. A valuation haircut policy reflects the fact that collateral may fall in value between the date the collateral is called and the date of liquidation or enforcement. Generally, all of our collateral held as credit risk mitigation under a CSA is cash. Schedule 10 presents the fair value of our contracts, collateral held for risk mitigation, and net credit exposure.

Schedule 10

GROSS POSITIVE FAIR VALUE OF CONTRACTS, COLLATERAL HELD, AND NET CREDIT EXPOSURE

(In millions)	September 30, 2024
Derivatives:	
Gross positive fair value [1]	$ 378
Netting benefit	—
Net derivatives credit exposure	$ 378
Securities financing transactions:	
Gross positive fair value	$ 977
Less: Collateral held for risk mitigation	1,068
Excess collateral	91
Net securities financing transactions exposure	$ —

[1] *The derivatives gross positive fair value does not include $119 million of derivative receivables that are cleared through the CME and LCH with our Futures Commission Merchant.*

CREDIT RISK MITIGATION

Credit Risk Framework

Our strategy for credit risk management includes well-defined, centralized credit policies, uniform underwriting criteria, and ongoing risk monitoring and review processes for all commercial and consumer credit exposures. Our strategy also emphasizes diversification on an industry, geographic and customer level, regular credit examinations, and management reviews of loans exhibiting deterioration of credit quality. Our credit risk management strategy, including our loan risk-grading systems, is subject to an independent review function to ensure that controls are operating as designed.

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Credit risk associated with guarantors and derivative counterparties and their creditworthiness are presented in Note 7 in our 2023 Form 10-K. Credit risk associated with securities is discussed in Note 5 in our 2023 Form 10-K. See also the Appendix for the location of other off-balance sheet credit risk disclosures.

For information regarding credit risk associated with our loan portfolio, commitments, and guarantors, see "Risk Management" in Management's Discussion and Analysis in our 2023 Form 10-K.

Credit Risk Exposures

The following schedules provide information regarding our credit risk exposures that are covered by eligible financial collateral, guarantees, or credit derivatives. Schedule 11 does not include any derivative receivables because substantially all of the derivative receivables are from loan customers whose credit risk is aggregated and managed with their loans. Because the collateral applies to both the swap and the loan, and is not eligible financial collateral, these derivatives are not included among those exposures with credit mitigation from collateral.

Schedule 11

CREDIT EXPOSURE COVERED BY ELIGIBLE FINANCIAL COLLATERAL

		September 30, 2024	
(In millions)	Collateral type(s)	Exposure covered by eligible collateral	Exposure after collateral
Securities financing transactions	U.S. Treasuries and Agencies	$ 977	$ —
Loans and leases, net [1]	Cash, U.S. Treasuries	142	—
Unfunded lending commitments	Cash, U.S. Treasuries	77	—
Total		$ 1,196	$ —

[1] *Net of unamortized purchase premiums, discounts, and deferred loan fees and costs.*

Schedule 12 presents our credit exposure covered by guarantees and/or credit derivatives, together with the risk-weighted asset amount associated with that exposure.

Schedule 12

CREDIT EXPOSURE COVERED BY GUARANTEES OR CREDIT DERIVATIVES

	September 30, 2024	
(In millions)	Exposure covered by guarantees/ credit derivatives	Risk-weighted assets
Investment securities [1]	$ 18,988	$ 2,624
Securities financing transactions	977	—
Loans and leases, net [2]	549	110
Unfunded lending commitments	45	4
Total	$ 20,559	$ 2,738

[1] *Exposures are covered by the guarantee of the U.S. federal government or its agencies.*
[2] *Amount includes loans held for sale.*

SECURITIZATION

Our securitization-related activity has generally been limited to investing in securitized products created by third parties, as we do not currently originate or sponsor securitizations. In determining what exposures constitute securitization exposures, we used the definition as provided in Basel III. Our current securitization exposure is not significant. See Note 5 in our 2023 Form 10-K for more information regarding the securities that we hold.

EQUITY SECURITIES NOT SUBJECT TO THE MARKET RISK RULE

At September 30, 2024, we had total equity exposure of approximately $386 million that is not subject to the Market Risk Rule. Our equity exposure includes shares of the FRB, Federal Home Loan Bank ("FHLB"), and Federal Agricultural Mortgage Corporation ("Farmer Mac"), which are held to conduct certain forms of business. Other equity exposures held include Small Business Investment Company ("SBIC") and private equity investment funds, separate account bank-owned life insurance ("BOLI"), and other investments. Equity exposures are included in "Other noninterest-bearing investments" and "Other assets" in the Consolidated Financial Statements in our 2023 Form 10-K.

Accounting and Valuation of Equity Investments

Investments in companies in which we have significant influence over operating and financing decisions, but do not own a majority of the voting equity interests, are accounted for in accordance with the equity method of accounting, which requires us to recognize our proportionate share of the entity's net earnings. Investments in companies in which we do not have significant influence over operating and financing decisions, and do not own a majority of voting equity interests, are accounted for either at fair value or cost plus observable price changes in orderly transactions from an identical or similar investment of the same issuer (subject to impairment).

At September 30, 2024, we had approximately $202 million of SBIC investments and approximately $36 million of non-SBIC investments. The majority of these investments are measured at fair value. During the third quarter of 2024, we had a total of $2 million of mark-to-market adjustments related to our SBIC investments and net realized gains related to sales, liquidations, or distributions of other equity securities.

Schedule 13 presents the carrying value and fair value of equity investment securities not subject to the Market Risk Rule, including any gains/losses, all categorized by type and nature of investment.

Schedule 13

EQUITY SECURITIES NOT SUBJECT TO THE MARKET RISK RULE

	September 30, 2024		
(In millions)	Nonpublic	Public	Total
Carrying value	$ 359	$ 27	$ 386
Latent revaluations gains/(losses) [1]	—	19	19
Fair value	$ 359	$ 46	$ 405
Unrealized gains (losses) included in risk-based capital	$ —	$ —	$ —

[1] *Represents unrealized gains (losses) on our equity investment in Farmer Mac stock, which is publicly traded and not marked-to-market because it is accounted for under the equity method. The unrealized gains (losses) are not recognized in the balance sheet nor through earnings.*

Schedule 14 presents capital requirements of equity securities by risk-weighted groupings.

Schedule 14

CAPITAL REQUIREMENTS OF EQUITY SECURITIES

	September 30, 2024	
(In millions)	Exposure	Risk-weighted assets
0%	$ 65	$ —
20%	83	17
100%	235	235
Full look-through approach	32	8
Total capital requirements for equity securities	$ 415	$ 260

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APPENDIX – BASEL III REGULATORY CAPITAL DISCLOSURES MATRIX

Table	Disclosure Requirement	Disclosure Location	Disclosure Page(s)
§63 Disclosures by the bank holding company described in §61			
§63(b)	(1) Common equity Tier 1 capital, additional Tier 1 capital, Tier 2 capital, Tier 1 and total capital ratios, including the regulatory capital elements and all the regulatory adjustments and deductions needed to calculate the numerator of such ratios; (2) Total risk-weighted assets, including the different regulatory adjustments and deductions needed to calculate total risk-weighted assets; (3) Regulatory capital ratios during any transition periods, including a description of all the regulatory capital elements and all regulatory adjustments and deductions needed to calculate the numerator and denominator of each capital ratio during any transition period; and (4) A reconciliation of regulatory capital elements as they relate to its balance sheet in any audited consolidated financial statements.	Form 10-Q (3Q 2024) MD&A - Capital Management Call Report Schedule RC-R – Regulatory Capital, Part I Basel III Regulatory Capital Disclosures Capital Structure – Schedule 1 Capital Adequacy – Schedule 2	 pg. 35-37 pg. 51-53 pg. 3 pg. 4
1. Scope of Application – General Disclosures			
Qualitative: (a)	The name of the top corporate entity in the group to which subpart D of this part applies.	2023 Form 10-K Item 1 – Business (Description) Basel III Regulatory Capital Disclosures Overview	 pg. 5-12 pg. 2
(b)	A brief description of the differences in the basis for consolidating entities for accounting and regulatory purposes, with a description of those entities: (1) That are fully consolidated; (2) That are deconsolidated and deducted from total capital; (3) For which the total capital requirement is deducted; and (4) That are neither consolidated nor deducted (for example, where the investment in the entity is assigned a risk weight in accordance with this subpart).	Basel III Regulatory Capital Disclosures Overview	 pg. 2
(c)	Any restrictions, or other major impediments, on transfer of funds or total capital within the group.	Basel III Regulatory Capital Disclosures Overview	 pg. 2
Quantitative: (d)	The aggregate amount of surplus capital of insurance subsidiaries included in the total capital of the consolidated group.	Basel III Regulatory Capital Disclosures Overview	 pg. 2
(e)	The aggregate amount by which actual total capital is less than the minimum total capital requirement in all subsidiaries, with total capital requirements and the name(s) of the subsidiaries with such deficiencies.	Basel III Regulatory Capital Disclosures Capital Structure	 pg. 3
2. Capital Structure			
Qualitative: (a)	Summary information on the terms and conditions of the main features of all regulatory capital instruments.	Form 10-Q (3Q 2024) Note 13 – Long-Term Debt Note 14 – Shareholders' Equity	 pg. 133-134 pg. 134-136
Quantitative: (b)	The amount of common equity Tier 1 capital, with separate disclosure of: (1) Common stock and related surplus; (2) Retained earnings; (3) Common equity minority interest; (4) AOCI; and (5) Regulatory adjustments and deductions made to common equity Tier 1 capital.	Form 10-Q (3Q 2024) Consolidated Balance Sheet MD&A - Capital Management MD&A - Non-GAAP Financial Measures Call Report Schedule RC-R – Regulatory Capital, Part I Basel III Regulatory Capital Disclosures Capital Structure – Schedule 1	 pg. 40 pg. 35-37 pg. 38-39 pg. 51-53 pg. 3
(c)	The amount of Tier 1 capital, with separate disclosure of: (1) Additional Tier 1 capital elements, including additional Tier 1 capital instruments and Tier 1 minority interest not included in common equity Tier 1 capital; and (2) Regulatory adjustments and deductions made to Tier 1 capital.	Call Report Schedule RC-R – Regulatory Capital, Part I Basel III Regulatory Capital Disclosures Capital Structure – Schedule 1	 pg. 51-53 pg. 3

(d)	The amount of total capital, with separate disclosure of: (1) Tier 2 capital elements, including Tier 2 capital instruments and total capital minority interest not included in Tier 1 capital; and (2) Regulatory adjustments and deductions made to total capital.	Call Report Schedule RC-R – Regulatory Capital, Part I Basel III Regulatory Capital Disclosures Capital Structure – Schedule 1	 pg. 51-53 pg. 3
3. Capital Adequacy			
Qualitative: (a)	A summary discussion of the Bank's approach to assessing the adequacy of its capital to support current and future activities.	Form 10-Q (3Q 2024) MD&A - Capital Management Basel III Regulatory Capital Disclosures Capital Adequacy	 pg. 35-37 pg. 4
Quantitative: (b)	Risk-weighted assets for: (1) Exposures to sovereign entities; (2) Exposures to certain supranational entities and MDBs; (3) Exposures to depository institutions, foreign banks, and credit unions; (4) Exposures to PSEs; (5) Corporate exposures; (6) Residential mortgage exposures; (7) Statutory multifamily mortgages and pre-sold construction loans; (8) HVCRE loans; (9) Past due loans; (10) Other assets; (11) Cleared transactions; (12) Default fund contributions; (13) Unsettled transactions; (14) Securitization exposures; and (15) Equity exposures.	Basel III Regulatory Capital Disclosures Capital Adequacy – Schedule 2	 pg. 4
(c)	Standardized market risk-weighted assets as calculated under subpart F of this part.	The Company is not covered by subpart F (the market risk rule).	N/A
(d)	Common equity Tier 1, Tier 1 and total risk-based capital ratios: (1) For the top consolidated group; and (2) For each depository institution subsidiary.	Form 10-Q (3Q 2024) MD&A - Capital Management Call Report Schedule RC-R – Regulatory Capital, Part I, lines 41-43	 pg. 35-37 pg. 53
(e)	Total standardized risk-weighted assets.	Call Report Schedule RC-R – Regulatory Capital, Part I and Part II Basel III Regulatory Capital Disclosures Capital Adequacy – Schedule 2	 pg. 51-64 pg. 4
4. Capital Conservation Buffer			
Quantitative: (a)	At least quarterly, the Bank must calculate and publicly disclose the capital conservation buffer as described under §___.11.	Basel III Regulatory Capital Disclosures Capital Conservation Buffer	 pg. 5
(b)	At least quarterly, the Bank must calculate and publicly disclose the eligible retained income* of the Bank, as described under §___.11.	Basel III Regulatory Capital Disclosures Capital Conservation Buffer	 pg. 5
(c)	At least quarterly, the Bank must calculate and publicly disclose any limitations it has on distributions and discretionary bonus payments resulting from the capital conservation buffer framework described under §___.11, including the maximum payout amount for the quarter.	Basel III Regulatory Capital Disclosures Capital Conservation Buffer Capital Conservation Buffer – Schedule 3	 pg. 5 pg. 5
General Qualitative Disclosure Requirement			

	For each separate risk area described in tables 5 through 10, the bank holding company must describe its risk management objectives and policies, including: (1) Strategies and processes; (2) The structure and organization of the relevant risk management function; (3) the scope and nature of risk reporting and/or measurement systems; and (4) policies for hedging and/or mitigating risk and strategies and processes for monitoring the continuing effectiveness of hedges/mitigants.	Form 10-Q (3Q 2024) MD&A – Loan and Lease Portfolio pg. 18-19 MD&A – Risk Management pg. 20 MD&A – Interest Rate and Market Risk Management pg. 31-33 MD&A – Liquidity Risk Management pg. 34-35 MD&A – Capital Management pg. 35-37 Note 5 – Investments pg. 50-54 Note 6 – Loans and Allowance For Credit Losses pg. 54-72 Note 7 – Derivatives Instruments and Hedging Activities pg. 72-76 Note 10 – Commitments, Guarantees, & Contingent Liabilities pg. 79-80
5. Credit Risk – General Disclosures		
Qualitative: (a)	The general qualitative disclosure requirement with respect to credit risk (excluding counterparty credit risk disclosed in accordance with Table 6) including: (1) Policy for determining past due or delinquency status; (2) Policy for placing loans on nonaccrual; (3) Policy for returning loans to accrual status; (4) Definition of and policy for identifying impaired loans (for financial accounting purposes). (5) Description of the methodology that the entity uses to estimate its allowance for loan and lease losses, including statistical methods used where applicable; (6) Policy for charging-off uncollectible amounts; and (7) Discussion of the bank's credit risk management policy	Form 10-Q (3Q 2024) MD&A –Credit Risk Management pg. 21-30 Note 6 – Loans and Allowance For Credit Losses pg. 54-72 Basel III Regulatory Capital Disclosures Credit Risk: General Disclosures pg. 5-11
Quantitative: (b)	Total credit risk exposures and average credit risk exposures, after accounting offsets in accordance with GAAP, without considering the effects of credit risk mitigation techniques (for example, collateral and netting not permitted under GAAP), over the period categorized by major types of credit exposure. For example, the bank could use categories similar to that used for financial statement purposes. Such categories might include, for instance: (1) Loans, off-balance sheet commitments, and other non-derivative off-balance sheet exposures; (2) Debt securities; and (3) OTC derivatives.	Basel III Regulatory Capital Disclosures Total Credit Risk Exposure – Schedule 4 pg. 6
(c)	Geographic distribution of exposures, categorized in significant areas by major types of credit exposure.	Basel III Regulatory Capital Disclosures Credit Exposure by Geography – Schedule 5 pg. 7 Municipal Securities by Geography – Schedule 7 pg. 9
(d)	Industry or counterparty type distribution of exposures, categorized by major types of credit exposure.	Basel III Regulatory Capital Disclosures Credit Exposure by Industry – Schedule 6 pg. 8
(e)	By major industry or counterparty type: (1) Amount of impaired loans for which there was a related allowance under GAAP; (2) Amount of impaired loans for which there was no related allowance under GAAP; (3) Amount of loans past due 90 days and on nonaccrual; (4) Amount of loans past due 90 days and still accruing; (5) The balance in the allowance for loan and lease losses at the end of each period, disaggregated on the basis of the bank's impairment method. To disaggregate the information required on the basis of impairment methodology, an entity shall separately disclose the amounts based on the requirements in GAAP; and (6) Charge-offs during the period.	Form 10-Q (3Q 2024) MD&A – Credit Quality pg. 28-30 Note 6 – Loans and Allowance For Credit Losses pg. 54-72 Basel III Regulatory Capital Disclosures Past Due and Impaired Loans by Industry – Schedule 8 pg. 10
(f)	Amount of impaired loans and, if available, the amount of past due loans categorized by significant geographic areas including, if practical, the amounts of allowances related to each geographical area, further categorized as required by GAAP.	Basel III Regulatory Capital Disclosures Past Due and Impaired Loans by Geography – Schedule 9 pg. 11
(g)	Reconciliation of changes in the ALLL.	Form 10-Q (3Q 2024) Note 6 – Loans and Allowance For Credit Losses pg. 54-72

(h)	Remaining contractual maturity delineation (for example, one year or less) of the whole portfolio, categorized by major types of credit exposure.	Basel III Regulatory Capital Disclosures Total Credit Risk Exposure – Schedule 4	 pg. 6
6. Counterparty Credit Risk-Related – General Disclosure			
Qualitative: (a)	The general qualitative disclosure requirement with respect to OTC derivatives, eligible margin loans, and repo-style transactions, including a discussion of: (1) The methodology used to assign credit limits for counterparty credit exposures; (2) Policies for securing collateral, valuing and managing collateral, and establishing credit reserves; (3) The primary types of collateral taken; and discussion of policies with wrong-way risk exposures (4) The impact of the amount of collateral the Bank would have to provide given a deterioration in the Bank's own creditworthiness.	Form 10-Q (3Q 2024) Note 4 – Offsetting Assets and Liabilities Note 7 – Derivatives Instruments and Hedging Activities	 pg. 50 pg. 72-76
Quantitative: (b)	Gross positive fair value of contracts, collateral held (including type, for example, cash, government securities), and net unsecured credit exposure. A Bank also must disclose the notional value of credit derivative hedges purchased for counterparty credit risk protection and the distribution of current credit exposure by exposure type.	Basel III Regulatory Capital Disclosures Counterparty Credit Risk-Related Exposures – Schedule 10	 pg. 12
(c)	Notional amount of purchased and sold credit derivatives, segregated between use for the Bank's own credit portfolio and in its intermediation activities, including the distribution of the credit derivative products used, categorized further by protection bought and sold within each product group.	The Company does not currently have any purchased or sold credit derivatives.	N/A
7. Credit Risk Mitigation – General Disclosure			
Qualitative: (a)	The general qualitative disclosure requirement with respect to credit risk mitigation, including: (1) Policies and processes for, and indication of the extent to which the bank holding company uses, on-and-off balance sheet netting; (2) Policies and processes for collateral valuation and management; (3) A description of the main types of collateral taken by the Bank; (4) The main types of guarantors/credit derivative counterparties and their creditworthiness; and (5) Information about (market or credit) risk concentrations with respect to credit risk mitigation.	Form 10-Q (3Q 2024) Note 4 – Offsetting Assets and Liabilities Note 7 – Derivatives Instruments and Hedging Activities Basel III Regulatory Capital Disclosures Credit Risk Mitigation	 pg. 50 pg. 72-76 pg. 12-13
Quantitative: (b)	For each separately disclosed credit risk portfolio, the total exposure that is covered by eligible financial collateral, and after the application of haircuts.	Basel III Regulatory Capital Disclosures Credit Risk Mitigation – Schedule 11	 pg. 13
(c)	For each separately disclosed portfolio, the total exposure that is covered by guarantees/credit derivatives and the risk-weighted asset amount associated with that exposure.	Basel III Regulatory Capital Disclosures Credit Risk Mitigation – Schedule 12	 pg. 13
8. Securitization			
Qualitative: (a)	The general qualitative disclosure requirement with respect to a securitization (including synthetic securitizations), including a discussion of: (1) The Bank's objectives for securitizing assets, including the extent to which these activities transfer credit risk of the underlying exposures away from the Bank to other entities and including the type of risks assumed and retained with resecuritization activity;[1] (2) The nature of the risks (e.g., liquidity risk) inherent in the securitized assets; (3) The roles played by the Bank in the securitization process[2] and an indication of the extent of the Bank's involvement in each of them; (4) The processes in place to monitor changes in the credit and market risk of securitization exposures including how those processes differ for resecuritization exposures; (5) The Bank's policy for mitigating the credit risk retained through securitization and resecuritization exposures; and (6) The risk-based capital approaches that the Bank follows for its securitization exposures including the type of securitization exposure to which each approach applies.	N/A	N/A
(b)	A list of: (1) The type of securitization SPEs that the Bank, as sponsor, uses to securitize third-party exposures. The Bank must indicate whether it has exposure to these SPEs, either on- or off- balance sheet; and (2) Affiliated entities: (i) That the Bank manages or advises; and (ii) That invest either in the securitization exposures that the Bank has securitized or in securitization SPEs that the Bank sponsors.[3]	N/A	N/A

(c)	Summary of the Bank's accounting policies for securitization activities, including: (1) Whether the transactions are treated as sales or financings; (2) Recognition of gain-on-sale; (3) Methods and key assumptions applied in valuing retained or purchased interests; (4) Changes in methods and key assumptions from the previous period for valuing retained interests and impact of the changes; (5) Treatment of synthetic securitizations; (6) How exposures intended to be securitized are valued and whether they are recorded under subpart D of this part; and (7) Policies for recognizing liabilities on the balance sheet for arrangements that could require the Bank to provide financial support for securitized assets.	N/A	N/A
(d)	An explanation of significant changes to any quantitative information since the last reporting period.	N/A	N/A
Quantitative: (e)	The total outstanding exposures securitized by the Bank in securitizations that meet the operational criteria provided in §___.41 (categorized into traditional and synthetic securitizations), by exposure type, separately for securitizations of third-party exposures for which the bank acts only as sponsor.[4]	N/A	N/A
(f)	For exposures securitized by the Bank in securitizations that meet the operational criteria in §___.41: (1) Amount of securitized assets that are impaired/past due categorized by exposure type;5 and (2) Losses recognized by the Bank during the current period categorized by exposure type.6	N/A	N/A
(g)	The total amount of outstanding exposures intended to be securitized categorized by exposure type.	N/A	N/A
(h)	Aggregate amount of: (1) On-balance sheet securitization exposures retained or purchased categorized by exposure type; and (2) Off-balance sheet securitization exposures categorized by exposure type.	N/A	N/A
(i)	(1) Aggregate amount of securitization exposures retained or purchased and the associated capital requirements for these exposures, categorized between securitization and resecuritization exposures, further categorized into a meaningful number of risk weight bands and by risk-based capital approach (e.g., SSFA); and (2) Exposures that have been deducted entirely from Tier 1 capital, CEIOs deducted from total capital (as described in §___.42(a)(1), and other exposures deducted from total capital should be disclosed separately by exposure type.	N/A	N/A
(j)	Summary of current year's securitization activity, including the amount of exposures securitized (by exposure type), and recognized gain or loss on sale by exposure type.	N/A	N/A
(k)	Aggregate amount of resecuritization exposures retained or purchased categorized according to: (1) Exposures to which credit risk mitigation is applied and those not applied; and (2) Exposures to guarantors categorized according to guarantor creditworthiness categories or guarantor name.	N/A	N/A
9. Equities Not Subject to Subpart F			
Qualitative: (a)	The general qualitative disclosure requirement with respect to equity risk for equities not subject to subpart F of this part, including: (1) Differentiation between holdings on which capital gains are expected and those taken under other objectives including for relationship and strategic reasons; and (2) Discussion of important policies covering the valuation of and accounting for equity holdings not subject to subpart F of this part. This includes the accounting techniques and valuation methodologies used, including key assumptions and practices affecting valuation as well as significant changes in these practices.	Form 10-Q (3Q 2024) MD&A – Interest Rate and Market Risk Management Note 3 – Fair Value Basel III Regulatory Capital Disclosures Equities not Subject to the Market Risk Rule	pg. 31-33 pg. 47-49 pg. 14
Quantitative: (b)	Value disclosed on the balance sheet of investments, as well as the fair value of those investments; for securities that are publicly traded, a comparison to publicly-quoted share values where the share price is materially different from fair value.	Basel III Regulatory Capital Disclosures Equities not Subject to the Market Risk Rule – Schedule 13	pg. 13
(c)	The types and nature of investments, including the amount that is: (1) Publicly traded; and (2) Non publicly traded.	Basel III Regulatory Capital Disclosures Equities not Subject to the Market Risk Rule – Schedule 13	pg. 13
(d)	The cumulative realized gains (losses) arising from sales and liquidations in the reporting period.	Basel III Regulatory Capital Disclosures Equities not Subject to the Market Risk Rule	pg. 14

(e)	(1) Total unrealized gains (losses) (2) Total latent revaluation gains (losses). (3) Any amounts of the above included in Tier 1 or Tier 2 capital.	Basel III Regulatory Capital Disclosures Equities not Subject to the Market Risk Rule – Schedule 13 pg. 13
(f)	Capital requirements categorized by appropriate equity groupings, consistent with the Bank's methodology, as well as the aggregate amounts and the type of equity investments subject to any supervisory transition regarding regulatory capital requirements.	Basel III Regulatory Capital Disclosures Equities not Subject to the Market Risk Rule – Schedule 14 pg. 13
10. Interest Rate Risk for Non-Trading Activities		
Qualitative: (a)	The general qualitative disclosure requirement, including the nature of interest rate risk for non-trading activities and key assumptions, including assumptions regarding loan prepayments and behavior of non-maturity deposits, and frequency of measurement of interest rate risk for non-trading activities.	Form 10-Q (3Q 2024) MD&A – Interest Rate and Market Risk Management pg. 31-33
Quantitative: (b)	The increase (decline) in earnings or economic value (or relevant measure used by management) for upward and downward rate shocks according to management's method for measuring interest rate risk for non-trading activities, categorized by currency (as appropriate).	Form 10-Q (3Q 2024) MD&A – Interest Rate and Market Risk Management pg. 31-33