

# ZIONS BANCORPORATION

A COLLECTION OF GREAT BANKS

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## **Zions Bancorporation, National Association**

### Basel III Regulatory Capital Disclosures

**March 31, 2026**

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## FORWARD-LOOKING INFORMATION

These regulatory capital disclosures contain “forward-looking statements” as defined under the Private Securities Litigation Reform Act of 1995. These statements reflect management’s current expectations and assumptions regarding future events and outcomes. However, they are inherently subject to known and unknown risks, uncertainties, and other factors that could cause actual results, performance, achievements, industry developments, or regulatory outcomes to differ materially from those expressed or implied. Forward-looking statements may include, among others:

- Statements concerning the beliefs, plans, objectives, goals, targets, commitments, designs, guidelines, expectations, anticipations, and future financial condition, operating results, 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, terminology such as “may,” “might,” “can,” “continue,” “could,” “should,” “would,” “believe,” “anticipate,” “estimate,” “forecast,” “expect,” “intend,” “target,” “commit,” “design,” “plan,” “project,” “will,” or similar words and expressions, including their negative forms.

Forward-looking statements are not guarantees and should not 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, key factors that may cause material differences include:

- The quality and composition of our loan portfolio, investment securities, and deposits;
- Changes in general industry, political, and economic conditions, including increases in the national debt, elevated or persistent inflation, economic slowdowns or recessions, and other macroeconomic challenges; changes in interest rates or reference rates, which could negatively impact our revenues and expenses, the valuation and performance of our assets and liabilities, and the availability and cost of capital and liquidity;
- Political developments, including government shutdowns and other significant disruptions and changes in the funding, size, scope, and effectiveness of the government and its agencies and services;
- The effects of newly enacted and proposed regulations affecting us and the banking industry, as well as changes and uncertainties in the interpretation, enforcement, and applicability of laws and fiscal, monetary, regulatory, trade, and tax policies;
- Actions taken by governments, agencies, central banks, and similar organizations, including those that result in decreases in revenue, increases in regulatory bank fees, insurance assessments, and capital standards; and other regulatory requirements;
- Evolving trade policies and disputes, including proposed and implemented tariffs, and the resulting economic uncertainty that may adversely affect supply chains, operating costs, and revenues for both us and our customers;
- Judicial, regulatory, and administrative inquiries, investigations, examinations or proceedings and the outcomes thereof that create uncertainty for, or are adverse to, us or the banking industry;
- Changes in our credit ratings;
- The growing presence of credit unions, financial technology companies (“fintechs”), and other emerging competitors within the financial services industry, including in the markets in which we operate;
- Our ability to innovate and address competitive pressures and other factors that may affect aspects of our business, such as pricing, the relevance of and demand for our products and services, and our ability to recruit and retain talent;
- The potential for both positive and disruptive impacts of emerging technologies, including stablecoins and other digital currencies, tokenized deposits, blockchain, artificial intelligence (“AI”), quantum computing, and related innovations affecting both us and the banking industry;
- Our ability to complete projects and initiatives and execute our strategic plans, manage our risks, control compensation and other expenses, and achieve our business objectives;

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- Our ability to develop and maintain technology and information security systems, along with effective controls designed to guard against fraud, cybersecurity, and privacy risks and related incidents, particularly given the accelerating pace at which threat actors are developing and deploying increasingly sophisticated and targeted tactics against the financial services industry;
- The occurrence of fraud, theft, or other forms of misconduct perpetrated by external parties, including customers and business partners, or by our own employees;
- 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;
- The effects of wars, geopolitical conflicts, and other local, national, or international disasters, crises, or conflicts that may occur in the future;
- Natural disasters, pandemics, wildfires, catastrophic events, and other emergencies and incidents, and their impact on our operations, our customers' business, and the communities we serve, including the increasing difficulty and expense of obtaining property, auto, business, and other insurance products;
- Diverging and evolving policy, legal, regulatory, and political developments—combined with differing stakeholder perspectives related to governance, environmental, and social matters—may subject us to conflicting requirements and expectations;
- Volatility in securities and capital markets behavior, including changes in market liquidity and our ability to access funding or raise capital on favorable terms;
- 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 financial institutions, the banking industry, or the broader market—that may adversely affect our reputation and the industry more broadly; and
- Other assumptions, risks, or uncertainties described in our 2025 Form 10-K, including in Part I, Item 1A. Risk Factors, and other Securities and Exchange Commission (“SEC”) filings.

We caution against placing undue reliance on forward-looking statements, as they reflect our views only as of the date they are issued. Except as required by law, we expressly disclaim any obligation to update any factors or publicly announce revisions to 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 adopted the Basel III regulatory capital framework, which establishes the regulatory capital requirements applicable to U.S. banking organizations. These rules define the components of regulatory capital and prescribe risk-weighting methodologies used to calculate regulatory capital adequacy ratios.

Under the Basel III capital rules:

- Common Equity Tier 1 (“CET1”) is identified as the primary measure of regulatory capital.
- Tier 1 capital consists of CET1 and qualifying “Additional Tier 1 capital” instruments.
- Regulatory deductions and adjustments are applied to CET1 and may influence the amount of capital required to satisfy minimum regulatory standards.
- The scope of regulatory deductions and adjustments is broader than under prior capital frameworks.

Collectively, these requirements form the basis of the regulatory capital standards against which the Bank manages its capital position and assesses capital adequacy as part of its overall capital management strategy.

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In March 2026, the federal banking agencies issued notices of proposed rulemaking related to the Basel III Endgame framework that would revise aspects of the U.S. regulatory capital requirements, including risk-weighted asset calculations and the treatment of AOCI. Under the proposals, most components of AOCI would be included in regulatory capital. The proposals are subject to ongoing regulatory review and potential modification, and while their potential impact remains uncertain, we are evaluating the proposals and expect to remain well capitalized as we continue to manage our capital position in light of evolving regulatory and supervisory requirements.

Basel III also requires enhanced transparency through Pillar 3 disclosures, which mandate quarterly reporting of specific information related to capital structure, capital adequacy, and risk-weighted assets. These disclosures should be reviewed in conjunction with our most recent Form 10-K, Form 10-Q, and Call Report, which provide additional context regarding the Bank's regulatory capital position and related risk management practices.

The Regulatory Capital Disclosures Matrix in the Appendix identifies where all required Basel III disclosures are located within these 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. We provide a wide range of banking products and related services, primarily in 11 Western states: Arizona, California, Colorado, Idaho, Nevada, New Mexico, Oregon, Texas, Utah, Washington, and Wyoming.

Our operations are organized principally through seven separately managed, geographically defined bank divisions, which we refer to as “affiliates,” or “affiliate banks,” each operating under its own local brand and management team. These affiliate banks constitute our primary operating segments. Our affiliate model emphasizes local authority and accountability, including locally informed pricing and product customization, to maximize customer satisfaction, strengthen community relationships, and improve profitability and shareholder returns.

The affiliate banks are supported by an enterprise-level segment—referred to as the “Other” segment— which provides governance and risk oversight, capital allocation, and strategic objectives, and includes centralized technology infrastructure, back-office operations, and certain business lines that are not managed through the affiliate structure.

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 aligns with U.S. Generally Accepted Accounting Principles (“GAAP”).

## **CAPITAL STRUCTURE**

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

- 4.5% CET1 to risk-weighted assets;
- 6.0% Tier 1 capital (CET1 plus additional Tier 1 capital) to risk-weighted assets;
- 8.0% Total capital (Tier 1 plus Tier 2) to risk-weighted assets; and
- 4.0% Tier 1 leverage ratio (Tier 1 capital to average consolidated assets).

At March 31, 2026, we exceeded all capital adequacy requirements under the Basel III capital framework, which includes specific risk-based capital ratio requirements prescribed by the OCC.

The following schedule 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 opted out of the requirement to include most components of accumulated other comprehensive income (“AOCI”) in regulatory capital. Therefore, changes in AOCI do not impact our regulatory capital ratios.

## RISK-BASED CAPITAL COMPONENTS AND ASSETS

<i>(In millions)</i>	March 31, 2026
<b>Total shareholders' equity</b>	<b>\$ 7,296</b>
Less: Preferred stock	66
<b>Common shareholders' equity</b>	<b>7,230</b>
Less: Goodwill	1,060
Less: Other intangible assets	29
Less: Accumulated other comprehensive income	(1,935)
Other CET1 capital adjustments	(26)
<b>CET1 capital</b>	<b>8,050</b>
Preferred stock	66
Other Tier 1 adjustments	—
<b>Tier 1 capital</b>	<b>8,116</b>
Long-term debt and other instruments qualifying as Tier 2 capital	781
Qualifying allowance for credit losses	713
<b>Tier 2 capital</b>	<b>1,494</b>
<b>Total capital</b>	<b>\$ 9,610</b>
<b>Total risk-weighted assets</b>	<b>\$ 69,651</b>

We utilize stress testing as an important tool to inform our decisions on the appropriate level of capital to maintain, based on hypothetically stressed economic conditions, including the FRB's supervisory severely adverse scenario. The timing and magnitude of capital actions are influenced by various factors, such as financial performance, business needs, prevailing and anticipated economic conditions, internal stress testing results, and approvals from both the Board of Directors ("Board") and the OCC.

### CAPITAL ADEQUACY

The Board is responsible for approving key policies related to capital management and has delegated the oversight of capital risk to the Capital Management Committee ("CMC"). Chaired by the Chief Financial Officer and comprising members of management, the CMC's primary role is to recommend and administer Board-approved capital policies governing our capital strategy. Major responsibilities of the CMC include:

- Setting overall capital targets within the Board-approved Capital Policy, monitoring performance against policy limits, and recommending adjustments to capital structure, including dividends, common stock issuances and repurchases, subordinated debt, and other strategic actions to maintain well-capitalized levels.
- Maintaining an adequate capital buffer to withstand adverse stress scenarios while continuing to meet customer borrowing needs and ensuring access to wholesale funding, consistent with fiduciary responsibilities to depositors and bondholders.
- Evaluating capital adequacy, stress-testing results, and related indicators that influence our ability to maintain strong market confidence and flexible access to funding.

Based on the results of our internal stress testing and other capital adequacy assessments, we believe our capital levels sufficiently exceed both our internal benchmarks and the regulatory requirements applicable to well-capitalized banks. For more information regarding our capital management practices, see the "Capital Management" section of Management's Discussion and Analysis in our 2025 Form 10-K.

The following schedule presents our risk-weighted assets categorized by risk type.

**BASEL III RISK-WEIGHTED ASSETS BY RISK TYPE**

<i>(In millions)</i>	<u>March 31, 2026</u>
<b>On-balance sheet assets</b>	
Exposures to sovereign entities	\$ 2,734
Exposures to depository institutions, foreign banks, and credit unions	109
Exposures to public sector entities	2,987
Corporate exposures	40,583
Residential mortgage exposures	8,856
Statutory multifamily mortgages and pre-sold construction loans	347
High volatility commercial real estate (HVCRE) loans	20
Past due loans	230
Other assets	3,485
Equity exposures	337
<b>Off-balance sheet exposures</b>	
Financial standby letters of credit	562
Performance standby letters of credit	120
Commercial and similar letters of credit with an original maturity of one year or less	8
Unused commitments with an original maturity of one year or less	280
Unused commitments with an original maturity exceeding one year	8,340
All other off-balance sheet liabilities	653
<b>Total risk-weighted assets before excess allowance</b>	<b>\$ 69,651</b>
Less: Excess allowance for loan and lease losses	—
<b>Total risk-weighted assets</b>	<b>\$ 69,651</b>

**CAPITAL CONSERVATION BUFFER**

Under the Basel III capital rules, we are required to maintain minimum capital ratios, along with a 2.5% capital conservation buffer intended to absorb losses during periods of economic stress. This buffer is composed entirely of common equity Tier 1 (“CET1”).

The following schedule presents minimum capital ratio requirements, the capital conservation buffer, our capital ratios at March 31, 2026, and the thresholds required to be considered well capitalized:

**MINIMUM CAPITAL RATIO AND CAPITAL CONSERVATION BUFFER REQUIREMENTS**

	<u>March 31, 2026</u>				
	Minimum capital requirement	Capital conservation buffer	Minimum capital ratio requirement with capital conservation buffer	Current capital ratio	Minimum requirement to be “well capitalized”
CET1 to risk-weighted assets	4.5%	2.5%	7.0%	11.6%	6.5%
Tier 1 capital (CET1 plus additional Tier 1 capital) to risk-weighted assets	6.0%	2.5%	8.5%	11.7%	8.0%
Total capital (Tier 1 capital plus Tier 2 capital) to risk-weighted assets	8.0%	2.5%	10.5%	13.8%	10.0%
Tier 1 leverage ratio (Tier 1 capital to average consolidated assets)	4.0%	N/A	4.0%	9.1%	5.0%

Financial institutions with CET1 ratios above the minimum but below the buffer threshold are subject to limitations on dividend distributions, equity repurchases, and discretionary compensation. The extent of these restrictions is determined by the size of the shortfall and the institution’s “eligible retained income,” defined as the greater of (1) net income over the preceding four quarters, adjusted for distributions and related tax effects not reflected in net income, or (2) the average net income over the same four-quarter period. At March 31, 2026, all of our capital amounts and ratios exceeded the thresholds required to be considered well-capitalized.

## CREDIT RISK: GENERAL DISCLOSURES

We are exposed to a broad range of risks, 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. Oversight of these risks is conducted through various management committees, with the Enterprise Risk Management Committee serving as the primary coordinating body. To address these risks, we employ comprehensive risk management practices designed to promote prudent risk-taking and effective oversight. Risk management is embedded in our operations and functions as a critical driver of overall performance, closely aligned with our key strategic objectives. For a more comprehensive discussion of these risks, see “Risk Factors” in our 2025 Form 10-K.

### Credit Risk Management

Credit risk represents the potential for loss resulting from the failure of a borrower, guarantor, or other obligor to perform in accordance with the terms of a credit-related agreement. This risk arises primarily from our lending activities and from off-balance sheet credit instruments. For more information about our credit risk management, see “Credit Risk Management” in our 2025 Form 10-K.

The following schedules present major types of credit exposures at March 31, 2026. They include both our total credit risk exposure and our average credit risk exposure during the first quarter of 2026, along with a remaining contractual maturity distribution categorized by credit risk exposure types.

### TOTAL CREDIT RISK EXPOSURE

(In millions)	Amortized Cost		March 31, 2026			
	March 31, 2026	1Q 2026 average <sup>1</sup>	Remaining contractual maturity			Total
			One year or less	One year through five years	Over five years	
Investment securities with government/agency guarantees	\$ 17,867	\$ 17,919	\$ 112	\$ 561	\$ 17,194	\$ 17,867
Investment securities without government/agency guarantees	1,204	1,227	119	466	619	1,204
Derivative receivables <sup>2</sup>	484	422	114	138	232	484
Securities financing transactions	1,109	1,251	1,109	—	—	1,109
Loans and leases, net <sup>3</sup>	61,312	61,115	9,859	22,286	29,167	61,312
Unfunded commitments	30,492	30,368	9,014	12,470	9,008	30,492
<b>Total</b>	<b>\$ 112,468</b>	<b>\$ 112,302</b>	<b>\$ 20,327</b>	<b>\$ 35,921</b>	<b>\$ 56,220</b>	<b>\$ 112,468</b>

<sup>1</sup> Calculated as a simple average of the beginning and ending quarterly balances.

<sup>2</sup> Excludes \$178 million of derivative receivables cleared through the Chicago Mercantile Exchange (“CME”) and LCH.Clearnet (“LCH”) with our Futures Commission Merchant.

<sup>3</sup> Net of unamortized purchase premiums, discounts, and deferred loan fees and costs.

### Credit Disclosures by Geography and Industry

The following schedules present our total credit exposures by geography and industry. Geographies are categorized based on how we manage our credit exposure. For commercial and consumer loans, geographic classification is determined by the location of the primary borrower. For commercial real estate loans, geographies are determined by the location of the primary collateral. Credit exposure includes loans and leases, net of unamortized purchase premiums, discounts, and deferred loan fees and costs. It also includes contractual commitments to extend credit and outstanding letters of credit.

**CREDIT EXPOSURE BY GEOGRAPHY**

	March 31, 2026			
<i>(Amounts in millions)</i>	Loans and leases	Unfunded commitments	Total exposure	Percentage of total
<b>Commercial</b>				
Arizona	\$ 2,263	\$ 816	\$ 3,079	6.4 %
California	6,432	3,142	9,574	19.7
Colorado	1,667	619	2,286	4.7
Nevada	1,439	520	1,959	4.1
Texas	8,110	5,725	13,835	28.3
Utah/Idaho	6,672	3,384	10,056	20.8
Washington/Oregon	1,332	655	1,987	4.1
Other	3,943	1,795	5,738	11.9
Total commercial	<u>31,858</u>	<u>16,656</u>	<u>48,514</u>	<u>100.0 %</u>
<b>Commercial real estate</b>				
Arizona	\$ 1,771	\$ 490	\$ 2,261	13.1 %
California	3,363	603	3,966	23.0
Colorado	787	249	1,036	6.0
Nevada	1,031	265	1,296	7.5
Texas	2,702	994	3,696	21.4
Utah/Idaho	2,458	756	3,214	18.7
Washington/Oregon	1,210	90	1,300	7.5
Other	336	140	476	2.8
Total commercial real estate	<u>13,658</u>	<u>3,587</u>	<u>17,245</u>	<u>100.0 %</u>
<b>Consumer</b>				
Arizona	\$ 1,444	\$ 1,250	\$ 2,694	10.3 %
California	3,711	1,972	5,683	21.8
Colorado	1,392	1,031	2,423	9.3
Nevada	1,340	927	2,267	8.7
Texas	3,594	1,396	4,990	19.2
Utah/Idaho	3,525	3,328	6,853	26.3
Washington/Oregon	314	116	430	1.7
Other	476	229	705	2.7
Total consumer	<u>15,796</u>	<u>10,249</u>	<u>26,045</u>	<u>100.0 %</u>
Total	<u>\$ 61,312</u>	<u>\$ 30,492</u>	<u>\$ 91,804</u>	

The following schedule presents the distribution of industry or collateral by major types of credit exposure. This includes loans and leases, net of unamortized purchase premiums, discounts, and deferred loan fees and costs, as well as contractual commitments to extend credit and outstanding letters of credit.

**CREDIT EXPOSURE BY INDUSTRY OR COLLATERAL TYPE**

March 31, 2026

<i>(Amounts in millions)</i>	<u>Loans and leases</u>	<u>Unfunded commitments</u>	<u>Total exposure</u>	<u>Percentage of total</u>
<b>Commercial <sup>1</sup></b>				
Real estate, rental, and leasing	\$ 3,443	\$ 1,833	\$ 5,276	10.9 %
Finance and insurance	2,387	1,928	4,315	8.9
Manufacturing	2,626	1,426	4,052	8.3
Wholesale trade	2,215	1,440	3,655	7.5
Retail trade	2,771	854	3,625	7.5
Construction	1,447	1,754	3,201	6.6
Healthcare and social assistance	2,334	611	2,945	6.1
Transportation and warehousing	1,532	912	2,444	5.1
Utilities <sup>2</sup>	1,616	680	2,296	4.7
Mining, quarrying, and oil and gas extraction	1,040	1,062	2,102	4.4
Public administration	1,883	98	1,981	4.1
Hospitality and food services	1,625	316	1,941	4.0
Other Services (except Public administration)	1,226	640	1,866	3.9
Professional, scientific, and technical services	1,087	736	1,823	3.7
Educational services	1,272	191	1,463	3.0
Other	3,354	2,175	5,529	11.3
Total commercial	<u>31,858</u>	<u>16,656</u>	<u>48,514</u>	<u>100.0 %</u>
<b>Commercial real estate</b>				
<b>Commercial property</b>				
Multifamily	\$ 4,091	\$ 1,472	\$ 5,563	32.3 %
Industrial	3,100	688	3,788	21.9
Retail	1,647	207	1,854	10.8
Office	1,595	96	1,691	9.8
Hospitality	673	48	721	4.1
Land	299	64	363	2.1
Other <sup>3</sup>	1,470	169	1,639	9.5
<b>Residential property</b>				
Single family	430	336	766	4.4
Land	115	122	237	1.4
Condo/Townhome	33	27	60	0.4
Other <sup>3</sup>	205	358	563	3.3
Total commercial real estate	<u>13,658</u>	<u>3,587</u>	<u>17,245</u>	<u>100.0 %</u>
<b>Consumer</b>				
Home equity credit line	\$ 3,976	\$ 7,506	\$ 11,482	44.1 %
1-4 family residential	10,406	—	10,406	40.0
Bankcard and other revolving plans	515	2,133	2,648	10.2
Construction and other consumer real estate	786	610	1,396	5.3
Other	113	—	113	0.4
Total consumer	<u>15,796</u>	<u>10,249</u>	<u>26,045</u>	<u>100.0 %</u>
Total	<u>\$ 61,312</u>	<u>\$ 30,492</u>	<u>\$ 91,804</u>	

<sup>1</sup> Industry classification is based on the North American Industry Classification System.

<sup>2</sup> Includes primarily utilities, power, and renewable energy.

<sup>3</sup> Included in the total amount of the "Other" CRE commercial and residential property categories was approximately \$294 million of unsecured loans.

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Our investment securities portfolio includes agency-guaranteed mortgage-backed securities, municipal securities, Small Business Administration (“SBA”) loan-backed securities, agency securities, and other securities. When evaluating credit risk for SBA loan-backed securities, agency-guaranteed mortgage-backed securities, and agency securities, management primarily relies on the explicit guarantees provided by the U.S. federal government or its agencies.

We evaluate the credit risk of our investment securities portfolio using a variety of factors. For more information about these factors, see Note 5 of the Notes to Consolidated Financial Statements in our 2025 Form 10-K. Geography is generally not a primary consideration in the management of our derivatives, securities financings, or investment securities portfolio, with the exception of municipal securities.

The following schedule presents the amortized cost and relative percentage of our total held-to-maturity (“HTM”) and available-for-sale (“AFS”) municipal securities, categorized by major regions of the United States.

**MUNICIPAL SECURITIES BY GEOGRAPHY**

<i>(Amounts in millions)</i>	<b>March 31, 2026</b>	
	<b>Amortized cost</b>	<b>Percentage of total</b>
South	\$ 408	34 %
West	399	34
Midwest	361	31
Northeast	11	1
Total HTM and AFS municipal securities	<u>\$ 1,179</u>	<u>100 %</u>

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

The allowance for credit losses (“ACL”) comprises both the allowance for loan and lease losses (“ALLL”) and the reserve for unfunded lending commitments (“RULC”). The ALLL represents the estimated current expected credit losses related to the loan and lease portfolio as of the balance sheet date. The RULC represents the estimated reserve for current expected credit losses associated with off-balance sheet commitments. To determine the adequacy of the allowance, we segment our loan and lease portfolio based on loan type. The ACL for debt securities is estimated independently from the ACL on loans.

For more information regarding our policies and methodologies used to estimate the ACL, see the “Allowance for Credit Losses” and “Critical Accounting Policies and Significant Estimates” sections of Management’s Discussion and Analysis and Note 6 in our 2025 Form 10-K.

The following schedule presents loans that are past due — both accruing and nonaccruing — as well as loans on nonaccrual, categorized by industry distribution and type of collateral.

**PAST DUE AND NONACCRUAL LOANS BY INDUSTRY OR COLLATERAL TYPE**

	March 31, 2026							
	Past due loans				Nonaccrual loans			
	Accruing loans		Nonaccruing loans		Amortized cost basis		Total amortized cost basis	Related allowance
	30-89 days past due	90+ days past due	30-89 days past due	90+ days past due	with no allowance	with allowance		
<i>(In millions)</i>								
<b>Commercial <sup>1</sup></b>								
Real estate, rental, and leasing	\$ 1	\$ —	\$ —	\$ —	\$ 17	\$ 5	22	\$ 1
Finance and insurance	6	—	—	9	—	9	9	9
Manufacturing	6	—	1	3	—	30	30	4
Retail trade	2	—	—	3	—	6	6	1
Wholesale trade	1	—	—	1	—	1	1	—
Construction	3	—	1	8	5	6	11	3
Healthcare and social assistance	13	—	3	1	2	6	8	1
Transportation and warehousing	2	—	—	4	2	3	5	1
Utilities <sup>2</sup>	—	—	—	—	—	—	—	—
Mining, quarrying, and oil and gas extraction	6	—	—	—	—	—	—	—
Public administration	—	—	—	—	—	—	—	—
Hospitality and food services	2	—	—	1	—	2	2	—
Other services (except Public administration)	2	1	—	2	—	2	2	—
Professional, scientific, and technical services	5	1	1	1	—	2	2	—
Educational services	—	—	—	—	—	—	—	—
Other	1	—	—	12	30	7	37	2
Total commercial	50	2	6	45	56	79	135	22
<b>Commercial real estate</b>								
Commercial property								
Multifamily	—	—	—	—	—	—	—	—
Industrial	3	—	—	—	—	—	—	—
Retail	1	—	—	—	—	—	—	—
Office	—	—	1	17	18	19	37	1
Hospitality	—	—	—	4	4	—	4	—
Land	—	—	—	—	—	—	—	—
Other	1	—	—	—	1	—	1	—
Residential property								
Single family	—	—	—	—	—	—	—	—
Land	—	—	—	—	—	—	—	—
Condo/Townhome	—	—	—	—	—	—	—	—
Other	—	—	—	—	—	—	—	—
Total commercial real estate	5	—	1	21	23	19	42	1
<b>Consumer</b>								
Home equity credit line	9	—	5	9	—	33	33	9
1-4 family residential	14	—	12	27	14	54	68	6
Bankcard and other revolving plans	3	1	—	—	—	1	1	1
Construction and other consumer real estate	—	—	—	—	—	—	—	—
Other	1	—	—	—	—	—	—	—
Total consumer	27	1	17	36	14	88	102	16
Total	\$ 82	\$ 3	\$ 24	\$ 102	\$ 93	\$ 186	\$ 279	\$ 39

<sup>1</sup> Industry classification is based on the North American Industry Classification System.

<sup>2</sup> Includes primarily utilities, power, and renewable energy.

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In addition to industry classification and collateral type, we consider the geography of the borrower’s business, or the property location for real estate-secured loans, along with other key risk characteristics, to estimate the likelihood of default and the severity of loss in the event of default. The following schedule presents geographic details of past due and nonaccrual loans.

**PAST DUE AND NONACCRUAL LOANS BY GEOGRAPHY**

	March 31, 2026							
	Past due loans				Nonaccrual loans			
	Accruing loans		Nonaccruing loans		Amortized cost basis			Related allowance
	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	
<i>(In millions)</i>								
<b>Commercial</b>								
Arizona	\$ 2	\$ —	\$ —	\$ 3	\$ —	\$ 6	\$ 6	\$ 1
California	13	—	1	15	37	32	69	11
Colorado	2	—	—	1	—	2	2	—
Nevada	5	—	1	1	—	2	2	1
Texas	16	1	4	7	1	26	27	8
Utah/Idaho	10	1	—	16	16	5	21	1
Washington/Oregon	2	—	—	—	—	5	5	—
Other	—	—	—	2	2	1	3	—
Total commercial	50	2	6	45	56	79	135	22
<b>Commercial real estate</b>								
Arizona	—	—	—	—	—	—	—	—
California	3	—	—	1	19	2	21	—
Colorado	—	—	—	16	—	16	16	—
Nevada	1	—	—	—	—	—	—	—
Texas	—	—	1	4	3	1	4	1
Utah/Idaho	1	—	—	—	—	—	—	—
Washington/Oregon	—	—	—	—	1	—	1	—
Other	—	—	—	—	—	—	—	—
Total commercial real estate	5	—	1	21	23	19	42	1
<b>Consumer</b>								
Arizona	2	—	1	3	—	7	7	2
California	6	—	1	9	1	16	17	3
Colorado	6	—	3	4	2	10	12	2
Nevada	2	—	3	6	4	10	14	2
Texas	7	1	5	7	2	25	27	4
Utah/Idaho	4	—	3	7	2	18	20	3
Washington/Oregon	—	—	—	—	3	—	3	—
Other	—	—	1	—	—	2	2	—
Total consumer	27	1	17	36	14	88	102	16
Total	\$ 82	\$ 3	\$ 24	\$ 102	\$ 93	\$ 186	\$ 279	\$ 39

**COUNTERPARTY CREDIT RISK-RELATED EXPOSURES**

Exposure to credit risk arises from the potential nonperformance of counterparties, primarily in connection with over-the-counter (“OTC”) derivatives, as well as repurchase agreements, securities lending and borrowing transactions, and similar products and activities. These counterparties are generally well-established and well-capitalized financial institutions. Counterparty exposure is influenced by underlying market factors, such as interest rates and foreign exchange rates, which can be volatile and unpredictable. We manage this credit risk through established credit approval processes, exposure limits, collateral arrangements, and other ongoing monitoring procedures.

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In accordance with the Dodd-Frank Act, all eligible derivatives are centrally cleared through a regulated clearinghouse. Although we have not experienced significant losses on derivative instruments due to counterparty nonperformance, we continue to evaluate, monitor, and measure the related credit risk as appropriate.

### **Collateral**

Credit risk associated with derivative instruments arises from the potential nonperformance of counterparties. We mitigate this risk by centrally clearing eligible derivatives and transacting with well-capitalized financial institutions. For non-cleared derivatives, we use International Swaps and Derivatives Association, Inc. (“ISDA”) Master Agreements with Credit Support Annexes (“CSA”) that define eligible collateral types and margin requirements. Collateral and exposure levels are monitored daily. For more information on our credit risk management of derivatives, see Note 7 in our 2025 Form 10-K.

Certain derivative contracts contain credit risk-related contingent features, such as minimum credit rating requirements. If these features were triggered, we may be required to post additional collateral; however, counterparties have not historically exercised their rights to demand additional collateral in all instances when permitted. If our credit rating had been downgraded by one notch by Standard and Poor’s (“S&P”) or Moody’s at March 31, 2026, we do not believe that additional collateral would have been required to be pledged. For more information on derivatives, see Note 7 in our 2025 Form 10-K.

Eligible collateral types are defined within the CSA to the ISDA Master Agreement and are governed by our internal credit policies. Our valuation haircut framework is designed to capture potential declines in collateral value that may occur between the time collateral is called and the point of liquidation or enforcement. For credit risk mitigation purposes, collateral posted under CSAs is predominantly held in the form of cash.

The following schedule presents the fair value of our contracts, collateral held for risk mitigation, and net credit exposure.

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

<i>(In millions)</i>	<u>March 31, 2026</u>
<b>Derivatives:</b>	
Gross positive fair value <sup>1</sup>	\$ 484
Netting benefit	(298)
Net derivatives credit exposure	<u>\$ 186</u>
<b>Securities financing transactions:</b>	
Gross positive fair value	\$ 1,109
Less: Collateral held for risk mitigation	1,182
Excess collateral	<u>73</u>
Net securities financing transactions exposure	<u>\$ —</u>

<sup>1</sup> The derivatives gross positive fair value excludes \$178 million in derivative receivables cleared through the CME and LCH with our Futures Commission Merchant.

### **CREDIT RISK MITIGATION**

#### **Credit Risk Framework**

Our approach to credit risk management is supported by formal credit policies and standards, risk management practices, and independent credit examination functions that together establish a consistent framework for sound underwriting and credit decision-making across our local banking affiliates. We emphasize strong underwriting standards and the early identification of potential problem credits to facilitate timely corrective actions and mitigate potential losses. Our credit policies and practices are designed to mitigate key risks inherent in our lending activities, including risks related to borrower creditworthiness, cash flow volatility, collateral protection and valuation, concentrations of credit exposure, and external factors that may affect borrower performance or collateral values.

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In addition, our internal credit examination department, which is independent of lending operations, conducts periodic reviews of lending departments and credit activities. These examinations assess credit quality, documentation adequacy, administration of loan risk grades, and compliance with established credit policies.

For more information about the credit risk associated with guarantors and derivative counterparties, along with their creditworthiness, see Note 7 in our 2025 Form 10-K. Credit risk related to securities is discussed in Note 5 in our 2025 Form 10-K. For the location of other off-balance sheet credit risk disclosures, refer to the Appendix.

For more information on credit risk associated with our loan portfolio, commitments, and guarantors, see “Credit Risk Management” in Management’s Discussion and Analysis in our 2025 Form 10-K.

**Credit Risk Exposures**

The following schedules present details of our credit risk exposures that are covered by eligible financial collateral, guarantees, or credit derivatives. These schedules exclude derivative receivables, as most such receivables arise from loan customers whose credit risk is aggregated and managed together with their related loan exposures. Because the collateral supporting these customers applies to both the swap and the loan—and is not considered eligible financial collateral for regulatory purposes—these derivatives are excluded from exposures benefiting from collateral-based credit risk mitigation.

**CREDIT EXPOSURE COVERED BY ELIGIBLE FINANCIAL COLLATERAL**

<i>(In millions)</i>	Collateral type(s)	March 31, 2026	
		Exposure covered by eligible collateral	Exposure after collateral
Securities financing transactions	U.S. Treasuries and Agencies	\$ 1,109	\$ —
Loans and leases, net <sup>1</sup>	Cash, U.S. Treasuries	113	—
Unfunded lending commitments	Cash, U.S. Treasuries	101	—
Total		<u>\$ 1,323</u>	<u>\$ —</u>

<sup>1</sup> Net of unamortized purchase premiums, discounts, and deferred loan fees and costs.

The following schedule presents our credit exposure covered by guarantees and/or credit derivatives, along with the associated risk-weighted asset amount.

**CREDIT EXPOSURE COVERED BY GUARANTEES OR CREDIT DERIVATIVES**

<i>(In millions)</i>	March 31, 2026	
	Exposure covered by guarantees/credit derivatives	Risk-weighted assets
Investment securities <sup>1</sup>	\$ 17,867	\$ 2,316
Securities financing transactions	1,109	—
Loans and leases, net <sup>2</sup>	635	127
Unfunded lending commitments	54	5
Total	<u>\$ 19,665</u>	<u>\$ 2,448</u>

<sup>1</sup> Exposures are covered by the guarantee of the U.S. federal government or its agencies.

<sup>2</sup> Amount includes loans held for sale.

**SECURITIZATION**

Our securitization-related activities have primarily consisted of investments in securitized products issued by third parties, as we do not currently originate or sponsor securitizations. We apply the Basel III framework to determine which positions qualify as securitization exposures. Currently, our exposure to securitizations is not significant. For more information regarding the securities we hold, see Note 5 in our 2025 Form 10-K.

## EQUITY SECURITIES NOT SUBJECT TO THE MARKET RISK RULE

At March 31, 2026, our total equity exposure was approximately \$451 million, which is not subject to the Market Risk Rule. This exposure includes shares in the FRB, Federal Home Loan Bank (“FHLB”), and Federal Agricultural Mortgage Corporation (“Farmer Mac”), held for specific business purposes. Additionally, our equity exposure includes investments in Small Business Investment Company (“SBIC”), private equity investment funds, separate account bank-owned life insurance (“BOLI”), and other investments. These equity exposures are included in “Other noninterest-bearing investments” and “Other assets” on the Consolidated Balance Sheet in our 2025 Form 10-K.

### Accounting and Valuation of Equity Investments

Investments in companies where we have significant influence over operating and financing decisions, but do not own a majority of voting equity interests, are accounted for using the equity method of accounting. This method requires us to recognize our proportionate share of the entity’s net earnings. Conversely, investments in companies where we do not have significant influence and do not hold a majority voting interest are measured either at fair value or at cost plus observable price changes in orderly transactions for an identical or similar investment of the same issuer, and are subject to impairment.

At March 31, 2026, we held approximately \$273 million in SBIC investments and \$48 million in non-SBIC investments, with the majority measured at fair value. During the first quarter of 2026, we recorded \$1 million in mark-to-market adjustments related to our SBIC investments, as well as net realized gains from sales, liquidations, or distributions of other equity securities.

The following schedule presents the carrying value and fair value of equity investment securities that are not subject to the Market Risk Rule, along with associated gains or losses, categorized by the type and nature of the investment.

## EQUITY SECURITIES NOT SUBJECT TO THE MARKET RISK RULE

(In millions)	March 31, 2026		
	Nonpublic	Public	Total
Carrying value	\$ 414	\$ 37	\$ 451
Latent revaluations gains (losses) <sup>1</sup>	—	6	6
Fair value	\$ 414	\$ 43	\$ 457
Unrealized gains (losses) included in risk-based capital	\$ —	\$ —	\$ —

<sup>1</sup> Represents unrealized gains (losses) on our equity investment in Farmer Mac stock, which is publicly traded but not marked-to-market as it is accounted for under the equity method. The unrealized gains (losses) are not recognized in the balance sheet or through earnings.

The following schedule presents capital requirements of equity securities by risk-weighted groupings.

## CAPITAL REQUIREMENTS OF EQUITY SECURITIES

(In millions)	March 31, 2026	
	Exposure	Risk-weighted assets
0%	\$ 54	\$ —
20%	43	9
100%	321	321
Full look-through approach	33	8
Total capital requirements for equity securities	\$ 451	\$ 338

**APPENDIX – BASEL III REGULATORY CAPITAL DISCLOSURES MATRIX**

Table	Disclosure Requirement	Disclosure Location	Disclosure Page(s)
<b>§63 Disclosures by the bank holding company described in §61</b>			
<b>§63(b)</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 (1Q 2026) MD&A - Capital Management	pg. 34
		Call Report Schedule RC-R – Regulatory Capital, Part I	pg. 51
		Basel III Regulatory Capital Disclosures	
		Capital Structure Capital Adequacy	pg. 3 pg. 4
<b>1. Scope of Application – General Disclosures</b>			
<b>Qualitative: (a)</b>	The name of the top corporate entity in the group to which subpart D of this part applies.	2025 Form 10-K Item 1 – Business (Description) Basel III Regulatory Capital Disclosures Overview	pg. 5  pg. 3
<b>(b)</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. 3
<b>(c)</b>	Any restrictions, or other major impediments, on transfer of funds or total capital within the group.	Basel III Regulatory Capital Disclosures Overview	pg. 3
<b>Quantitative: (d)</b>	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. 3
<b>(e)</b>	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
<b>2. Capital Structure</b>			
<b>Qualitative: (a)</b>	Summary information on the terms and conditions of the main features of all regulatory capital instruments.	Form 10-Q (1Q 2026) Note 13 – Long-Term Debt Note 14 – Shareholders’ Equity	pg. 134 pg. 135
<b>Quantitative: (b)</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 (1Q 2026) Consolidated Balance Sheet MD&A - Capital Management MD&A - Non-GAAP Financial Measures	pg. 39 pg. 34 pg. 37
		Call Report Schedule RC-R – Regulatory Capital, Part I	pg. 51
		Basel III Regulatory Capital Disclosures	
		Capital Structure	pg. 3
<b>(c)</b>	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	pg. 51  pg. 3

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(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.	<p><u>Call Report</u></p> <p>Schedule RC-R – Regulatory Capital, Part I pg. 51</p> <p><u>Basel III Regulatory Capital Disclosures</u></p> <p>Capital Structure pg. 3</p>
<b>3. Capital Adequacy</b>		
<b>Qualitative:</b> (a)	A summary discussion of the Bank’s approach to assessing the adequacy of its capital to support current and future activities.	<p><u>Form 10-Q (1Q 2026)</u></p> <p>MD&amp;A - Capital Management pg. 34</p> <p><u>Basel III Regulatory Capital Disclosures</u></p> <p>Capital Adequacy pg. 4</p>
<b>Quantitative:</b> (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.	<p><u>Basel III Regulatory Capital Disclosures</u></p> <p>Capital Adequacy pg. 4</p>
(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.	<p><u>Form 10-Q (1Q 2026)</u></p> <p>MD&amp;A - Capital Management pg. 34</p> <p><u>Call Report</u></p> <p>Schedule RC-R – Regulatory Capital, Part I, lines 41-43 pg. 53</p>
(e)	Total standardized risk-weighted assets.	<p><u>Call Report</u></p> <p>Schedule RC-R – Regulatory Capital, Part I and Part II pg. 51</p> <p><u>Basel III Regulatory Capital Disclosures</u></p> <p>Capital Adequacy pg. 4</p>
<b>4. Capital Conservation Buffer</b>		
<b>Quantitative:</b> (a)	At least quarterly, the Bank must calculate and publicly disclose the capital conservation buffer as described under § __.11.	<p><u>Basel III Regulatory Capital Disclosures</u></p> <p>Capital Conservation Buffer pg. 5</p>
(b)	At least quarterly, the Bank must calculate and publicly disclose the eligible retained income* of the Bank, as described under § __.11.	<p><u>Basel III Regulatory Capital Disclosures</u></p> <p>Capital Conservation Buffer pg. 5</p>
(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.	<p><u>Basel III Regulatory Capital Disclosures</u></p> <p>Capital Conservation Buffer pg. 5</p>
<b>General Qualitative Disclosure Requirement</b>		

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	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 (1Q 2026) MD&A – Loan and Lease Portfolio pg. 17 MD&A – Risk Management pg. 19 MD&A – Interest Rate and Market Risk Management pg. 30 MD&A – Liquidity Risk Management pg. 32 MD&A – Capital Management pg. 34 Note 5 – Investments pg. 51 Note 6 – Loans and Allowance For Credit Losses pg. 55 Note 4 – Derivatives Instruments and Hedging Activities pg. 48 Note 9 – Commitments, Guarantees, and Contingent Liabilities pg. 72
<b>5. Credit Risk – General Disclosures</b>		
<b>Qualitative:</b> <b>(a)</b>	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 (1Q 2026) MD&A –Credit Risk Management pg. 19 Note 6 – Loans and Allowance For Credit Losses pg. 55  <u>Basel III Regulatory Capital Disclosures</u> Credit Risk: General Disclosures pg. 6
<b>Quantitative:</b> <b>(b)</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 those 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.	<u>Basel III Regulatory Capital Disclosures</u> Total Credit Risk Exposure pg. 6
<b>(c)</b>	Geographic distribution of exposures, categorized in significant areas by major types of credit exposure.	<u>Basel III Regulatory Capital Disclosures</u> Credit Exposure by Geography pg. 7 Municipal Securities by Geography pg. 9
<b>(d)</b>	Industry or counterparty type distribution of exposures, categorized by major types of credit exposure.	<u>Basel III Regulatory Capital Disclosures</u> Credit Exposure by Industry pg. 8
<b>(e)</b>	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 (1Q 2026) MD&A – Credit Quality pg. 27 Note 6 – Loans and Allowance For Credit Losses pg. 55  <u>Basel III Regulatory Capital Disclosures</u> Past Due and Nonaccrual Loans by Industry pg. 10
<b>(f)</b>	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.	<u>Basel III Regulatory Capital Disclosures</u> Past Due and Nonaccrual Loans by Geography pg. 11
<b>(g)</b>	Reconciliation of changes in the ALLL.	Form 10-Q (1Q 2026) Note 6 – Loans and Allowance For Credit Losses pg. 55

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(h)	Remaining contractual maturity delineation (for example, one year or less) of the whole portfolio, categorized by major types of credit exposure.	<a href="#">Basel III Regulatory Capital Disclosures</a> Total Credit Risk Exposure	pg. 6
<b>6. Counterparty Credit Risk-Related – General Disclosure</b>			
<b>Qualitative:</b> (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.	<a href="#">Form 10-Q (1Q 2026)</a> Note 4 – Derivatives Instruments and Hedging Activities	pg. 48
<b>Quantitative:</b> (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.	<a href="#">Basel III Regulatory Capital Disclosures</a> Counterparty Credit Risk-Related Exposures	pg. 11
(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.	Note 4 – Derivatives Instruments and Hedging Activities	pg. 48
<b>7. Credit Risk Mitigation – General Disclosure</b>			
<b>Qualitative:</b> (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.	<a href="#">Form 10-Q (1Q 2026)</a> Note 4 – Derivatives Instruments and Hedging Activities  <a href="#">Basel III Regulatory Capital Disclosures</a> Credit Risk Mitigation	pg. 48  pg. 12
<b>Quantitative:</b> (b)	For each separately disclosed credit risk portfolio, the total exposure that is covered by eligible financial collateral, and after the application of haircuts.	<a href="#">Basel III Regulatory Capital Disclosures</a> Credit Risk Mitigation - Credit Exposures	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.	<a href="#">Basel III Regulatory Capital Disclosures</a> Credit Risk Mitigation - Credit Exposures	pg. 13
<b>8. Securitization</b>			
<b>Qualitative:</b> (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; <sup>1</sup> (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 <sup>2</sup> 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. <sup>3</sup>	N/A	N/A

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(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
<b>Quantitative:</b> (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. <sup>4</sup>	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; <sup>5</sup> and (2) Losses recognized by the Bank during the current period categorized by exposure type. <sup>6</sup>	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
<b>9. Equities Not Subject to Subpart F</b>			
<b>Qualitative:</b> (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 (1Q 2026)	
		MD&A – Interest Rate and Market Risk Management pg. 30 Note 3 – Fair Value pg. 45	
<b>Quantitative:</b> (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.	<u>Basel III Regulatory Capital Disclosures</u>	
		Equities not Subject to the Market Risk Rule pg. 14	
(c)	The types and nature of investments, including the amount that is: (1) Publicly traded; and (2) Non publicly traded.	<u>Basel III Regulatory Capital Disclosures</u>	
		Equities not Subject to the Market Risk Rule pg. 14	
(d)	The cumulative realized gains (losses) arising from sales and liquidations in the reporting period.	<u>Basel III Regulatory Capital Disclosures</u>	
		Equities not Subject to the Market Risk Rule pg. 14	

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(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.	<u>Basel III Regulatory Capital Disclosures</u> Equities not Subject to the Market Risk Rule pg. 14
(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.	<u>Basel III Regulatory Capital Disclosures</u> Equities not Subject to the Market Risk Rule pg. 14
<b>10. Interest Rate Risk for Non-Trading Activities</b>		
<b>Qualitative:</b> (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.	<u>Form 10-Q (1Q 2026)</u> MD&A – Interest Rate and Market Risk Management pg. 30
<b>Quantitative:</b> (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).	<u>Form 10-Q (1Q 2026)</u> MD&A – Interest Rate and Market Risk Management pg. 30