ZIONS BANCORPORATION

A COLLECTION OF GREAT BANKS

Zions Bancorporation

Basel III Regulatory Capital Disclosures

For the quarter ended December 31, 2016

Table of Contents

Forward-Looking Information 1

Background 2

Overview 2

Capital Structure 3

Capital Adequacy 4

Capital Conservation Buffer 5

Credit Risk: General Disclosures 5

Counterparty Credit Risk-Related Exposures 13

Credit Risk Mitigation 14

Securitization 15

Equities Not Subject to the Market Risk Rule 15

Appendix A – Disclosure Matrix 17

FORWARD-LOOKING INFORMATION

Statements in this Regulatory Capital Disclosures document that are based on other than historical data are forward-looking within the meaning of the Private Securities Litigation Reform Act of 1995. Forward-looking statements provide current expectations or forecasts of future events and 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 ("the Parent") and its subsidiaries (collectively "the Company," "Zions," "we," "our," "us"); and
- statements preceded by, followed by, or that include the words "may," "could," "should," "would," "believe," "anticipate," "estimate," "expect," "intend," "target," "commit," "design," "plan," "projects," or similar expressions.

These forward-looking statements are not guarantees of future performance, nor should they be relied upon as representing management's views as of any subsequent date. Forward-looking statements involve significant risks and uncertainties and actual results may differ materially from those presented, either expressed or implied, including, but not limited to, those presented in Management's Discussion and Analysis. Factors that might cause such differences include, but are not limited to:

- the Company's ability to successfully execute its business plans, manage its risks, and achieve its objectives, including its restructuring and efficiency initiatives and its capital plan;
- changes in local, national and international political and economic conditions and increased political uncertainty, including without limitation the possibility of substantial changes to tax, international trade, immigration and other policies in the United States and Europe, the political and economic effects of the recent economic crisis, continued sluggish recovery from that crisis, economic and fiscal imbalances in the United States and other countries, potential or actual downgrades in ratings of sovereign debt issued by the United States and other countries, and other major developments, including wars, military actions, and terrorist attacks;
- changes in financial and commodity market prices and conditions, either internationally, nationally or locally in areas in which the Company conducts its operations, including without limitation rates of business formation and growth, commercial and residential real estate development, real estate prices, and oil and gas-related commodity prices;
- changes in markets for equity, fixed income, commercial paper and other securities, including availability, market liquidity levels, and pricing, including the actual amount and duration of declines in the price of oil and gas;
- any impairment of our goodwill or other intangibles, or any adjustment of valuation allowances on our deferred tax assets due to adverse changes in the economic environment, declining operations of the reporting unit, or other factors;
- changes in markets for debt, equity, and securities, including availability, market liquidity levels, and pricing;
- changes in interest rates, the quality and composition of the loan and securities portfolios, demand for loan products, deposit flows and competition;
- acquisitions and integration of acquired businesses;
- increases in the levels of losses, customer bankruptcies, bank failures, claims, and assessments;
- changes in fiscal, monetary, regulatory, trade and tax policies and laws, and regulatory assessments and fees, including policies of the U.S. Department of Treasury, the OCC, the Board of Governors of the Federal Reserve Board System, the FDIC, the SEC, and the CFPB, and uncertainty about the timing and scope of any such changes;
- the impact of executive compensation rules under the Dodd-Frank Act and banking regulations which may impact the ability of the Company and other American financial institutions to retain and recruit executives and other personnel necessary for their businesses and competitiveness;
- the impact of the Dodd-Frank Act and Basel III, and rules and regulations thereunder, on our required regulatory capital and liquidity levels, governmental assessments on us (including, but not limited to, the Federal Reserve

reviews of our annual capital plan), the scope of business activities in which we may engage, the manner in which we engage in such activities, the fees we may charge for certain products and services, and other matters affected by the Dodd-Frank Act and these international standards;

- continuing consolidation in the financial services industry;
- new legal claims against the Company, including litigation, arbitration and proceedings brought by governmental or self-regulatory agencies, or changes in existing legal matters;
- success in gaining regulatory approvals, when required;
- changes in consumer spending and savings habits;
- increased competitive challenges and expanding product and pricing pressures among financial institutions;
- inflation and deflation;
- technological changes and the Company's implementation of new technologies;
- the Company's ability to develop and maintain secure and reliable information technology systems;
- legislation or regulatory changes which adversely affect the Company's operations or business;
- the Company's ability to comply with applicable laws and regulations;
- changes in accounting policies or procedures as may be required by the FASB or regulatory agencies; and
- costs of deposit insurance and changes with respect to FDIC insurance coverage levels.

Except to the extent required by law, the Company specifically disclaims any obligation to update any factors or to publicly announce the result of revisions to any of the forward-looking statements included herein to reflect future events or developments.

BACKGROUND

In 2013, U.S. banking regulators published the final U.S. capital requirements of the third Capital Accord of the Basel Committee ("Basel III" or the "Rule") establishing a new comprehensive capital framework for U.S. banking organizations. The Rule implements aspects of the Dodd-Frank Act, such as redefining regulatory capital elements and minimum capital ratios, establishing a new Common Equity Tier 1 ("CET1") ratio, revising the rules for calculating risk-weighted assets ("RWA"), and establishing certain regulatory capital disclosures. Basel III includes two comprehensive methodologies for calculating risk-weighted assets: a general standardized approach and a more risk-sensitive advanced approach. Effectively, the "standardized approach" of Basel III replaced Basel I, and the "advanced approach" of Basel III replaced Basel II. Effective March 31, 2015, Zions Bancorporation is considered a standardized approach institution and is in scope for the regulatory capital disclosures for standardized approach institutions in accordance with Basel III. This document, and certain public filings of Zions Bancorporation and its subsidiaries, presents the Regulatory Capital Disclosures in compliance with Basel III as described in Sections 61-63 "Disclosures" for certain standardized approach institutions in the Rule.

These Basel III Regulatory Capital Disclosures should be read in conjunction with the Company's 2016 Annual Report on Form 10-K ("Annual Report" or "Form 10-K"), the Company's most recent Quarterly Report on Form 10-Q ("Form 10-Q"), the Consolidated Financial Statements for Bank Holding Companies – FR Y-9C ("FR Y-9C"), and the Call Report for the Company's subsidiary bank. The Company's Regulatory Capital Disclosures Matrix (see Appendix A) specifies where all disclosures required by the Rule are located in the aforementioned documents. The Basel III Regulatory Capital Disclosures have not been audited by the Company's external auditors.

OVERVIEW

Zions Bancorporation is a financial holding company organized under the laws of the State of Utah in 1955, and registered under the Bank Holding Company Act, as amended. The Parent and its subsidiaries own and operate one commercial bank with a total of 436 domestic branches at December 31, 2016. The Company provides a full range of banking and related services through its banking and other subsidiaries, primarily in Arizona, California, Colorado, Idaho, Nevada, New Mexico, Oregon, Texas, Utah, Washington, and Wyoming.

On June 1, 2015, the Company announced certain efficiency and restructuring initiatives that included, among other things, the merger of its seven subsidiary banks into a single national charter, ZB, National Association ("ZB, N.A."). Regional brand names according to geographic location will continue to be used. The Company completed the merger on December 31, 2015.

The Company's Annual Report filed with the Securities and Exchange Commission contains management's discussion of the overall corporate risk profile of the Company and related management strategies. The basis of consolidation used for regulatory reporting is consistent with that used under U.S. Generally Accepted Accounting Principles ("GAAP").

The Rule applies only to the consolidated Company, with the exception that every depository subsidiary must disclose capital ratios. Restrictions imposed by U.S. federal law prohibit Zions Bancorporation and certain of its affiliates from borrowing from subsidiary banks unless the loans are secured in specified amounts. Such secured loans to the Company or to other affiliates are generally limited to 10% of the subsidiary bank's total capital, as determined by the risk-based capital guidelines; the aggregate amount of all such loans is limited to 20% of the subsidiary bank's total capital.

Dividends declared by our subsidiary bank in any calendar year may not, without the approval of the appropriate federal regulators, exceed specified criteria. Most capital actions, including for example, payment of dividends and repurchasing shares, are subject to non-objection by the Federal Reserve to a capital plan based on both the qualitative and quantitative assessments of the plan. Following the close of business on December 31, 2015, we completed the merger of our subsidiary banks, resulting in one bank with a legal name of ZB, N.A. At December 31, 2016, ZB, N.A. had approximately $626 million available for the payment of dividends to the Parent under current capital regulations. The dividends that ZB, N.A. can pay to the Parent are restricted by current and historical earning levels, retained earnings, and risk-based and other regulatory capital requirements and limitations.

CAPITAL STRUCTURE – QUALITATIVE

Basel III, among other things, introduced a new capital measure, Common Equity Tier 1, and as of January 1, 2015 established the following minimum capital ratios:

- 4.5% CET1 to risk-weighted assets;
- 6.0% Tier 1 capital (i.e., CET1 plus additional Tier 1 capital) 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 as reported on consolidated financial statements (known as the "leverage ratio").

CAPITAL STRUCTURE – QUANTITATIVE

As of December 31, 2016, Zions Bancorporation and its subsidiary bank met all the capital requirements to which each was subject. The Company does not have any insurance subsidiaries, as defined by the Dodd-Frank Act, included in the total capital of the consolidated group.

Schedule 1 provides a reconciliation of total shareholders' equity to Basel III standardized CET1 capital, Tier 1 capital, Tier 2 capital, and Total Capital. For more information regarding the Company's regulatory ratios and risk-weighted assets see the Company's FR Y-9C.

Schedule 1

Risk-Based Capital Components and Assets

(In millions)	December 31, 2016 Basel III standardized
Total shareholders' equity	**$ 7,634**
Less: preferred shares	(710)
Common shareholders' equity	**6,924**
Less: Goodwill	(1,014)
Less: Other intangible assets	(5)
Other CET1 capital adjustments	123
CET1 capital	**6,028**
Preferred shares	710
Trust preferred securities	—
Less: other Tier 1 adjustments	—
Tier 1 capital	**6,738**
Long-term debt and other instruments qualifying as Tier 2 capital	247
Qualifying allowance for credit losses	624
Other	—
Tier 2 capital	**871**
Total capital (Tier 1 + Tier 2)	**$ 7,609**
Total risk-weighted assets	**$ 49,937**

CAPITAL ADEQUACY – QUALITATIVE

The Board of Directors ("the Board") is responsible for approving the policies associated with capital management. The Board has established the Capital Management Committee ("CMC") which is comprised of management of the Company and whose primary responsibility is to recommend and administer the approved capital policies that govern the capital management of the Company and its subsidiary bank. Other major CMC responsibilities include:

- Setting overall capital targets within the Board-approved capital policy, monitoring performance compared to the Company's capital policy limits, and recommending changes to capital including dividends, common stock repurchases, subordinated debt, and changes in major strategies to maintain the Company and its subsidiary bank at well capitalized levels.
- Maintaining an adequate capital cushion to withstand adverse stress events while continuing to meet the lending needs of its customers, and to provide reasonable assurance of continued access to wholesale funding, consistent with fiduciary responsibilities to depositors and bondholders.
- Reviewing agency ratings of the Company and establishing target ratings.

For more information regarding the Company's capital management see the "Capital Management" section of Management's Discussion and Analysis of the Company's Annual Report.

CAPITAL ADEQUACY – QUANTITATIVE

Schedule 2
Basel III Risk-Weighted Assets by Risk Type

(In millions)	December 31, 2016
On-balance sheet	
Exposures to sovereign entities	$ 1,243
Exposures to certain supranational entities and multilateral development banks	—
Exposures to depository institutions, foreign banks, and credit unions	47
Exposures to public sector entities	1,179
Corporate exposures	31,028
Residential mortgage exposures	5,340
Statutory multifamily mortgages and pre-sold construction loans	191
High volatility commercial real estate (“HVCRE”) loans	884
Past due loans	786
Other assets	2,574
Cleared transactions	—
Default fund contributions	—
Unsettled transactions	—
Securitization exposures	—
Equity exposures	162
Off-balance sheet	
Financial standby letters of credit	429
Performance standby letters of credit	78
Commercial and similar letters of credit with an original maturity of one year or less	11
Unused commitments with an original maturity of one year or less	362
Unused commitments with an original maturity exceeding one year	5,422
All other off-balance sheet liabilities	209
Total risk-weighted assets before excess allowance	49,945
Less: Excess allowance for loan and lease losses	(8)
Total risk-weighted assets	$ 49,937

CAPITAL CONSERVATION BUFFER

When fully phased in on January 1, 2019, the Basel III Capital Rules will also require the Company and its subsidiary bank to maintain a 2.5% “capital conservation buffer,” designed to absorb losses during periods of economic stress, composed entirely of CET1, on top of the minimum risk-weighted asset ratios, effectively resulting in minimum ratios of (i) CET1 to risk-weighted assets of at least 7.0%, (ii) Tier 1 capital to risk-weighted assets of at least 8.5%, and (iii) Total capital to risk-weighted assets of at least 10.5%. Banking institutions with a ratio of CET1 to risk-weighted assets above the minimum but below the capital conservation buffer will face constraints on dividends, equity repurchases, and compensation. The constraints will vary based on the amount of the shortfall. The implementation of the capital conservation buffer began on January 1, 2016 at the 0.625% level and will increase by 0.625% on each subsequent January 1, until it reaches 2.5% on January 1, 2019. Based on capital levels held by the Company during periods of both baseline and stress conditions, the Company is already in compliance with these standards. As a result, no additional actions were taken in order to comply with the capital conservation buffer prior to January 1, 2016.

CREDIT RISK: GENERAL DISCLOSURES – QUALITATIVE

Since risk is inherent in substantially all of the Company’s operations, management of risk is an integral part of its operations and is also a key determinant of its overall performance. The Board of Directors has appointed a Risk Oversight Committee (“ROC”) that consists of appointed Board members who oversee the Company’s risk management processes. The ROC meets on a regular basis to monitor and review Enterprise Risk Management

("ERM") activities. As required by its charter, the ROC performs oversight for various ERM activities and approves ERM policies and activities as detailed in the ROC charter.

Management applies various strategies to reduce the risks to which the Company's operations are exposed, including credit, interest rate and market, liquidity, and operational risks. These risks are overseen by the various management committees of which the Enterprise Risk Management Committee ("ERMC") is the focal point for the monitoring and review of enterprise risk.

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.

The Board of Directors, through the ROC, is responsible for approving the overall credit policies relating to the management of the credit risk of the Company. In addition, the ROC oversees and monitors adherence to key credit policies and the credit risk appetite as defined in the Risk Appetite Framework. Additionally, the Board has established the Credit Administration Committee, chaired by the Chief Credit Officer and consisting of members of management, to which it has delegated the responsibility for managing credit risk for the Company and approving changes to the Company's credit policies.

Centralized oversight of credit risk is provided through credit policies, credit risk management, and credit examination functions. We separate the lending function from the credit risk management function, which strengthens control over, and the independent evaluation of, credit activities. Formal credit policies and procedures provide the Company with a framework for consistent underwriting and a basis for sound credit decisions at the local banking affiliate level. In addition, we have a well-defined set of standards for evaluating our loan portfolio, and we utilize a comprehensive loan risk grading system to determine the risk potential in the portfolio. Furthermore, the internal credit examination department periodically conducts examinations of the Company's lending departments and credit activities. These examinations are designed to review credit quality, adequacy of documentation, appropriate loan risk grading administration, and compliance with credit policies. New, expanded, or modified products and services, as well as new lines of business, are approved by the New Initiative Review Committee.

Both the credit policy and the credit examination functions are managed centrally. Emphasis is placed on strong underwriting standards and early detection of potential problem credits in order to develop and implement action plans on a timely basis to mitigate any potential losses.

Our credit risk management strategy includes diversification of our loan portfolio. We attempt to avoid the risk of an undue concentration of credits in a particular collateral type or with an individual customer or counterparty. Generally, our loan portfolio is well diversified; however, due to the nature of our geographical footprint, there are certain significant concentrations primarily in CRE and oil and gas-related lending. We have adopted and adhere to concentration limits on various types of CRE lending, particularly construction and land development lending, leveraged lending, municipal lending, and oil and gas-related lending. All of these limits are continually monitored and revised as necessary. The recent growth in construction and land development loan commitments is within the established concentration limits. Our business activity is primarily with customers located within the geographical footprint of our banking affiliates.

For further information on our general credit risk management strategy, policies, and the methodologies used to estimate the allowance for credit losses, see the "Credit Risk Management" section of Management's Discussion and Analysis and Note 6 of the Notes to Consolidated Financial Statements in the Annual Report.

CREDIT RISK: GENERAL DISCLOSURES – QUANTITATIVE

Disclosures included in this Credit Risk: General Disclosures – Quantitative section are presented under the interpretation that the Rule's definition of major types of credit exposures corresponds to the definition in the Company's Annual Report. As a result, the schedules report balance sheet classifications consistent with the Annual Report. Schedule 3 presents the Company's total credit risk exposure, average credit risk exposure, and provides a remaining contractual maturity distribution according to credit risk exposure categories for the current period presented.

Schedule 3
Total Credit Risk Exposure

	Amortized cost		December 31, 2016 Remaining contractual maturity			
(In millions)	December 31, 2016	4Q 2016 average [1]	One year or less	One year through five years	Over five years	Total
Investment securities with government/ agency guarantees	$ 12,129	$ 10,798	$ 3	$ 482	$ 11,644	$ 12,129
Investment securities without government/ agency guarantees	2,074	1,792	206	606	1,262	2,074
Derivative receivables [2]	33	64	1	9	23	33
Securities financing transactions	346	1,156	346	—	—	346
Loans and leases, net [3]	42,649	42,595	11,362	11,041	20,246	42,649
Unfunded lending commitments	19,301	19,223	6,563	7,885	4,853	19,301
Total	$ 76,532	$ 75,628	$ 18,481	$ 20,023	$ 38,028	$ 76,532

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

[2] *The derivatives gross positive fair value does not include $18 million of derivative receivables that are cleared through the Chicago Mercantile Exchange ("CME") and LCH.Clearnet ("LCH") with the Company's Futures Commission Merchant.*

[3] *Net of unearned income and fees.*

Credit Disclosures by Geography and Industry

The following schedules provide the Company's total credit exposures by geography and industry. Geographies are presented following the manner in which we manage our credit exposure within our footprint. 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 4 provides the geographic distribution by major types of credit exposure. The credit exposure includes loans, net of unearned income and fees, and contractual commitments to extend credit and letters of credit.

Schedule 4
Credit Exposure by Geography

(Amounts in millions)	December 31, 2016			
	Loans and leases	Unfunded lending commitments	Total	Percentage of total
Commercial				
Arizona	$ 1,646	$ 646	$ 2,292	6.9 %
California	5,005	2,042	7,047	21.4
Colorado	1,217	748	1,965	6.0
Nevada	893	352	1,245	3.8
Texas	5,241	3,923	9,164	27.8
Utah/Idaho	4,747	2,381	7,128	21.6
Washington	627	335	962	2.9
Other	2,239	925	3,164	9.6
Total commercial	21,615	11,352	32,967	100.0 %
Commercial real estate				
Arizona	1,312	215	1,527	10.9 %
California	3,685	971	4,656	33.2
Colorado	554	185	739	5.3
Nevada	725	83	808	5.7
Texas	2,442	657	3,099	22.1
Utah/Idaho	1,572	285	1,857	13.2
Washington	381	149	530	3.8
Other	670	147	817	5.8
Total commercial real estate	11,341	2,692	14,033	100.0 %
Consumer				
Arizona	$ 964	$ 590	$ 1,554	10.4 %
California	1,833	636	2,469	16.5
Colorado	811	500	1,311	8.8
Nevada	928	473	1,401	9.4
Texas	2,643	704	3,347	22.4
Utah/Idaho	2,210	2,192	4,402	29.4
Washington	84	42	126	0.8
Other	220	120	340	2.3
Total consumer	9,693	5,257	14,950	100.0 %
Total	$ 42,649	$ 19,301	$ 61,950	

Schedule 5 provides the industry distribution by major types of credit exposure. The credit exposure includes loans, net of unearned income and fees, and contractual commitments to extend credit and letters of credit. Various industries represented in Schedule 5, including mining, quarrying and oil and gas extraction; manufacturing; and transportation and warehousing, contain certain loans we have categorized as oil and gas-related. For further information regarding our oil and gas-related exposure see the “Risk Elements” section of Management’s Discussion and Analysis in the Company’s Annual Report.

Schedule 5

Credit Exposure by Industry

(Amounts in millions)	December 31, 2016			
	Loans and leases	Unfunded lending commitments	Total	Percentage of total
Commercial				
Real estate, rental and leasing	2,624	1,112	3,736	11.3 %
Manufacturing	2,161	1,287	3,448	10.5
Retail trade	2,145	605	2,750	8.3
Healthcare and social assistance	1,538	516	2,054	6.2
Finance and insurance	1,462	1,405	2,867	8.7
Wholesale trade	1,444	1,005	2,449	7.4
Mining, quarrying, and oil and gas extraction	1,403	934	2,337	7.1
Transportation and warehousing	1,300	523	1,823	5.5
Construction	1,076	1,053	2,129	6.5
Accommodation and food services	925	233	1,158	3.5
Other Services (except Public Administration)	881	241	1,122	3.4
Professional, scientific, and technical services	875	598	1,473	4.5
Utilities	783	495	1,278	3.9
Other [1]	2,998	1,345	4,343	13.2
Total commercial	21,615	11,352	32,967	100.0 %
Commercial real estate				
Commercial property				
Multi-family	2,282	1,010	3,292	23.5 %
Office	2,221	342	2,563	18.3
Retail	1,884	131	2,015	14.4
Industrial	1,390	212	1,602	11.4
Hospitality	814	63	877	6.2
Land	267	45	312	2.2
Other	1,731	268	1,999	14.2
Residential property				
Single family	500	417	917	6.5
Land	136	64	200	1.4
Condo/townhome	43	49	92	0.7
Other	73	91	164	1.2
Total commercial real estate	11,341	2,692	14,033	100.0 %
Consumer				
Home equity credit line	2,645	3,190	5,835	39.0 %
1-4 family residential	5,891	—	5,891	39.4
Construction and other consumer real estate	486	492	978	6.5
Bankcard and other revolving plans	481	1,575	2,056	13.8
Other	190	—	190	1.3
Total consumer	9,693	5,257	14,950	100.0 %
Total	$ 42,649	$ 19,301	$ 61,950	

[1] *No other industry group exceeds 3%.*

Our investment securities portfolio includes Small Business Administration ("SBA") loan-backed securities, agency guaranteed mortgage-backed securities, agency securities, municipal 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 the rest of the securities portfolio using a variety of factors. Refer to Note 5 of the Notes to Consolidated Financial Statements in the Annual Report 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 6 presents the geographic distribution of our municipal securities throughout the major regions of the United States.

Schedule 6
Municipal Securities by Geography

	December 31, 2016	
(Amounts in millions)	Amortized cost	Percentage of total
Northeast	$ 108	5%
Midwest	318	16
South	560	27
West	1,063	52
Total municipal securities	$ 2,049	100%

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

The allowance for credit losses ("ACL") consists of the allowance for loan and lease losses ("ALLL") and the reserve for unfunded lending commitments ("RULC").

Several factors are considered when evaluating our allowance for credit losses, including the risk profile of our loan portfolios, net loan charge-offs during the period, the level of nonperforming lending-related assets, and the amount of loans past due, delinquent, or otherwise considered impaired. Management also considers the uncertainty related to certain industry sectors, geographic regions, and the extent of credit exposure to specific borrowers within the portfolio. In addition, concentration risks associated with commercial real estate and oil and gas-related lending are evaluated. We also consider current national and regional economic conditions that might impact the portfolio. We determine the RULC using the same procedures and methodologies that we use for the ALLL. The loss factors used in the RULC are the same as the loss factors used in the ALLL, and the qualitative adjustments used in the RULC are the same as the qualitative adjustments used in the ALLL.

Management determines the allowance that is required for specific loan categories based on relative risk characteristics of the loan portfolio. Management continually evaluates its methods for determining the allowance for each element of the portfolio and makes any necessary and appropriate enhancements. Refer to the "Allowance and Reserve for Credit Losses" section of Management's Discussion and Analysis and Note 6 of the Notes to Consolidated Financial Statements in the Annual Report for further discussion on the evaluation of the allowance for credit losses.

Schedule 7 provides detail of the loans past due (accruing and nonaccruing) and impaired by industry distribution and major type of credit exposure.

Schedule 7
Past Due and Impaired Loans by Industry

	December 31, 2016							
	Past due loans				Impaired loans			
	Accruing loans		Nonaccrual loans		Recorded investment			
(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 recorded investment	Related allowance
Commercial								
Real estate, rental and leasing	5	4	—	—	10	4	14	1
Manufacturing	13	—	2	17	19	36	55	4
Retail trade	9	1	—	5	10	11	21	2
Healthcare and social assistance	5	—	3	10	7	7	14	1
Finance and insurance	—	—	—	2	2	7	9	—
Wholesale trade	7	1	1	3	1	19	20	4
Mining, quarrying, and oil and gas extraction	4	5	1	27	51	195	246	35
Transportation and warehousing	10	—	—	8	—	9	9	2
Construction	10	2	1	1	2	31	33	3
Accommodation and food services	1	—	5	2	6	5	11	1
Other Services (except Public Administration)	2	—	—	3	16	9	25	1
Professional, scientific, and technical services	4	3	—	3	3	2	5	—
Utilities	—	—	—	—	9	—	9	—
Other	28	2	1	3	18	6	24	1
Total commercial	98	18	14	84	154	341	495	55
Commercial real estate								
Commercial property								
Multi-family	—	1	5	1	9	5	14	—
Office	1	8	—	—	12	3	15	1
Retail	2	1	—	1	3	2	5	—
Industrial	—	—	—	—	3	1	4	—
Hospitality	—	2	—	6	16	—	16	—
Land	—	1	—	2	2	6	8	—
Other	6	—	—	2	15	6	21	1
Residential property								
Single family	1	—	—	—	—	—	—	—
Land	1	—	—	—	—	—	—	—
Condo/townhome	—	—	—	—	—	—	—	—
Other	—	—	—	—	—	—	—	—
Total commercial real estate	11	13	5	12	60	23	83	2
Consumer								
Home equity credit line	2	1	2	4	16	7	23	—
1-4 family residential	9	—	3	21	27	28	55	6
Construction and other consumer real estate	3	3	—	2	1	2	3	—
Bankcard and other revolving plans	2	1	—	—	—	—	—	—
Other	1	—	—	—	1	—	1	—
Total consumer	17	5	5	27	45	37	82	6
Total	$ 126	$ 36	$ 24	$ 123	$ 259	$ 401	$ 660	$ 63

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 8 provides geographic detail on past due and impaired loans.

Schedule 8
Past Due and Impaired Loans by Geography

	December 31, 2016							
	Past due loans				Impaired loans			
	Accruing loans		Nonaccrual loans		Recorded investment			
(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 recorded investment	Related allowance
Commercial								
Arizona	$ 3	$ —	$ 1	$ 2	$ 4	$ 6	$ 10	$ 1
California	23	7	3	8	46	36	82	3
Colorado	2	—	2	—	15	7	22	—
Nevada	4	—	—	2	6	6	12	1
Texas	23	2	2	48	63	188	251	34
Utah/Idaho	31	7	6	12	13	42	55	4
Washington	4	1	—	6	—	6	6	1
Other	8	1	—	6	7	50	57	11
Total commercial	98	18	14	84	154	341	495	55
Commercial real estate								
Arizona	1	—	—	2	8	3	11	—
California	1	11	—	2	30	11	41	—
Colorado	—	—	—	—	—	2	2	—
Nevada	5	—	—	—	2	1	3	—
Texas	1	—	—	2	5	3	8	1
Utah/Idaho	1	2	5	—	9	2	11	1
Washington	1	—	—	—	—	—	—	—
Other	1	—	—	6	6	1	7	—
Total commercial real estate	11	13	5	12	60	23	83	2
Consumer								
Arizona	3	—	1	5	8	3	11	1
California	3	2	1	5	14	11	25	1
Colorado	—	—	—	1	3	2	5	—
Nevada	2	—	1	4	8	3	11	—
Texas	5	3	1	5	1	5	6	1
Utah/Idaho	3	—	1	7	10	13	23	3
Washington	—	—	—	—	—	—	—	—
Other	1	—	—	—	1	—	1	—
Total consumer	17	5	5	27	45	37	82	6
Total	$ 126	$ 36	$ 24	$ 123	$ 259	$ 401	$ 660	$ 63

COUNTERPARTY CREDIT RISK-RELATED EXPOSURES – GENERAL QUALITATIVE

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 the value of underlying market factors (e.g., interest rates and foreign exchange rates). The path of these factors can be volatile and uncertain in nature. We control this credit risk through credit approvals, limits, pledges of collateral, and monitoring procedures. Additionally, since June 2013, as required by the Dodd-Frank Act, all new 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 of the Company's Annual Report.

Our derivative contracts require us to pledge collateral for derivatives that are in a net liability position at a given date. Certain of these 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 the Company may be required to pledge under certain events, see Note 7 of the Company's Annual Report.

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. In practice, all of our collateral held as credit risk mitigation under a CSA is cash.

COUNTERPARTY CREDIT RISK-RELATED EXPOSURES – QUANTITATIVE

Schedule 9

Gross Positive Fair Value of Contracts, Collateral Held, and Net Unsecured Credit Exposure

(In millions)	**December 31, 2016**
Derivatives:	
Gross positive fair value [1]	$ 33
Netting benefit	—
Net derivatives credit exposure	$ 33
Securities financing transactions:	
Gross positive fair value	$ 346
Less: Collateral held for risk mitigation	370
Excess collateral	24
Net securities financing transactions exposure	$ —

[1] *The derivatives gross positive fair value does not include $18 million of derivative receivables that are cleared through the CME and LCH with the Company's Futures Commission Merchant.*

CREDIT RISK MITIGATION – GENERAL QUALITATIVE

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. The 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 rating system, is subject to an independent review function to ensure that control mechanisms are operating as intended. For further detail on the Company's general credit risk management, see the "Risk Elements" section of Management's Discussion and Analysis in the Company's Annual Report.

Credit risk associated with guarantors and derivative counterparties and their creditworthiness are presented in Note 7 and Note 17 of the Company's Annual Report Credit risk associated with securities is discussed in Note 5 of the Company's Annual Report. See Appendix A for the location of other off-balance sheet credit risk disclosures.

For information regarding the Company's credit risk associated with its loan portfolio, commitments, and guarantors, see "Risk Elements" in Management's Discussion and Analysis in the Company's Annual Report.

CREDIT RISK MITIGATION – QUANTITATIVE

The following tables provide information regarding our credit risk exposures that are covered by eligible financial collateral, guarantees, or credit derivatives. Schedule 10 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 10
Credit Exposure Covered by Eligible Financial Collateral

		December 31, 2016	
(In millions)	Collateral type(s)	Exposure covered by eligible collateral	Exposure after haircut
Securities financing transactions	U.S. Treasuries and Agencies	$ 346	$ —
Loans and leases, net [1]	Cash, U.S. Treasuries	40	—
Unfunded lending commitments	Cash, U.S. Treasuries	377	—
Total		$ 763	$ —

[1]*Net of unearned income and fees.*

Schedule 11
Credit Exposure Covered by Guarantees or Credit Derivatives

	December 31, 2016	
(In millions)	Exposure covered by guarantees/ credit derivatives	Risk-weighted assets
Investment securities [1]	$ 12,129	$ —
Securities financing transactions	346	—
Loans and leases, net [2]	423	85
Unfunded lending commitments	76	7
Total	$ 12,974	$ 92

[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 typically 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. The amount of securitization exposure that we currently hold is not material. See Note 5 of the Notes to Consolidated Financial Statements in the Annual Report for information regarding the securities that the Company holds.

EQUITY SECURITIES NOT SUBJECT TO THE MARKET RISK RULE – GENERAL QUALITATIVE

At December 31, 2016, we have total equity exposure of approximately $419 million that is not subject to the market risk rule. Our equity exposure includes shares of the Federal Reserve Board (“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 reflected in “Other noninterest-bearing investments” and “Other assets” in the Company’s Consolidated Financial Statements in the Company’s Annual Report.

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 that 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 cost or at fair value. We have various policies, processes, and controls in place to ensure that fair values are reasonably developed, reviewed, and approved for use. See Note 20 of the Notes to Consolidated Financial Statements in the Company’s Annual Report.

We have approximately $124 million of exposure to SBIC investments and approximately $15 million in non-SBIC venture capital funds at December 31, 2016 The majority of these investments are carried at fair value.

EQUITY SECURITIES NOT SUBJECT TO THE MARKET RISK RULE – QUANTITATIVE

Schedule 12
Equity Securities Not Subject to the Market Risk Rule

(In millions)	December 31, 2016 Nonpublic	Public [1]	Total
Carrying value	$ 381	$ 38	$ 419
Unrealized gains (losses)		13	13
Latent revaluations gains (losses) [2]		30	$ 30
Fair value	$ 381	$ 81	$ 462
Unrealized gains (losses) included in risk-based capital	$ —	$ —	$ —

[1] *Includes the equity investment in Farmer Mac shares.*
[2] *Represents unrealized gains (losses) on equity securities. The unrealized gains (losses) are not recognized either in the balance sheet or through earnings.*

Schedule 13
Capital Requirements of Equity Securities

(In millions)	December 31, 2016 Exposure	Risk-weighted assets
0%	$ 181	$ —
20%	64	12
100%	142	142
Full look-through approach	32	8
Total capital requirements for equity securities	$ 419	$ 162

During the three months ended December 31, 2016, the Company recognized $2.4 million of loss from sales, liquidations, and distributions of equity securities.

APPENDIX A – 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.	2016 Form 10-K MD&A - Capital Management FR Y-9C Schedule HC-R – Regulatory Capital, Part I Basel III Regulatory Capital Disclosures Capital Structure – Schedule 1 Capital Adequacy – Schedule 2	2016 Form 10-K pg 78-81 FR Y-9C pg 30-31 Basel III Regulatory Capital Disclosures pg 4-5
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.	2016 Form 10-K Item 1 – Business (Description) Basel III Regulatory Capital Disclosures Overview	2016 Form 10-K pg 5 Basel III Regulatory Capital Disclosures pg 2-3
(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	Basel III Regulatory Capital Disclosures pg 2-3
(c)	Any restrictions, or other major impediments, on transfer of funds or total capital within the group.	Basel III Regulatory Capital Disclosures Overview	Basel III Regulatory Capital Disclosures pg 2-3
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	Basel III Regulatory Capital Disclosures pg 2-3
(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	Basel III Regulatory Capital Disclosures pg 3
2. Capital Structure			
Qualitative: (a)	Summary information on the terms and conditions of the main features of all regulatory capital instruments.	2016 Form 10-K Note 12 – Long-Term Debt Note 13 – Shareholders' Equity	2016 Form 10-K pg 127-129 pg 129-132
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.	2016 Form 10-K Consolidated Balance Sheet MD&A - Capital Management MD&A - GAAP to Non-GAAP reconciliations FR Y-9C Schedule HC-R – Regulatory Capital, Part I Basel III Regulatory Capital Disclosures Capital Structure – Schedule 1	2016 Form 10-K pg 88 pg 78-81 pg 28-30 FR Y-9C pg 30-31 Basel III Regulatory Capital Disclosures pg 4

(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.	FR Y-9C Schedule HC-R – Regulatory Capital, Part I Basel III Regulatory Capital Disclosures Capital Structure – Schedule 1	FR Y-9C pg 30-31 Basel III Regulatory Capital Disclosures pg 4
(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.	FR Y-9C Schedule HC-R – Regulatory Capital, Part I Basel III Regulatory Capital Disclosures Capital Structure – Schedule 1	FR Y-9C pg 30-31 Basel III Regulatory Capital Disclosures pg 4
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.	2016 Form 10-K MD&A - Capital Management Basel III Regulatory Capital Disclosures Capital Adequacy	2016 Form 10-K pg 78-81 Basel III Regulatory Capital Disclosure 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	Basel III Regulatory Capital Disclosures pg 5
(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.	2016 Form 10-K MD&A - Capital Management FR Y-9C Schedule HC-R – Regulatory Capital, Part I, lines 41-43 Call Report for ZB, N.A. Schedule RC-R – Regulatory Capital, Part I	2016 Form 10-K pg 78-81 FR Y-9C pg 31 Call Report for ZB, N.A. pg 62-75
(e)	Total standardized risk-weighted assets.	FR Y-9C Schedule HC-R – Regulatory Capital, Part I and Part II Basel III Regulatory Capital Disclosures Capital Adequacy – Schedule 2	FR Y-9C pg 30-42 Basel III Regulatory Capital Disclosures pg 5
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	Basel III Regulatory Capital Disclosures 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	Basel III Regulatory Capital Disclosures 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	Basel III Regulatory Capital Disclosures 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.	2015 Form 10-K MD&A – Loan Portfolio MD&A – Risk Elements MD&A – Interest Rate and Market Risk Management MD&A – Liquidity Risk MD&A – Capital Management Note 5 – Investments Note 6 – Loans and Allowance For Credit Losses Note 7 – Derivatives Instruments and Hedging Activities Note 17 – Commitments, Guarantees, Contingent Liabilities, and Related Parties	2016 Form 10-K pg 52-54 pg 55-68 pg 68-72 pg 72-77 pg 78-84 pg 101-105 pg 106-121 pg 121-124 pg 138-141
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	2015 Form 10-K MD&A – Credit Risk Management Note 6 – Loans and Allowance For Credit Losses Basel III Regulatory Capital Disclosures Credit Risk: General Disclosures	2016 Form 10-K pg 55 pg 106-121 Basel III Regulatory Capital Disclosures pg 5-6
Quantitative: (b)	Total credit risk exposures and average credit risk exposures, after accounting offsets in accordance with GAAP, without taking into account 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 3	Basel III Regulatory Capital Disclosures pg 7
(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 4, Schedule 6	Basel III Regulatory Capital Disclosures pg 8, 10
(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 5	Basel III Regulatory Capital Disclosures pg 9

(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.	2016 Form 10-K MD&A – Nonperforming Assets Note 6 – Loans and Allowance For Credit Losses Basel III Regulatory Capital Disclosures Past Due and Impaired Loans by Industry – Schedule 7	2016 Form 10-K pg 64-65 pg 106-121 Basel III Regulatory Capital Disclosures pg 11
(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 8	Basel III Regulatory Capital Disclosures pg 12
(g)	Reconciliation of changes in the ALLL.	2016 Form 10-K Note 6 – Loans and Allowance For Credit Losses	2016 Form 10-K pg 106-121
(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 3	Basel III Regulatory Capital Disclosures pg 7
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.	2016 Form 10-K Note 4 – Offsetting Assets and Liabilities Note 7 – Derivative Instruments and Hedging Activities	2016 Form 10-K pg 100-101 pg 121-124
Quantitative: (b)	Gross positive fair value of contracts, collateral held (including type, for example, cash, government securities), and net unsecured credit exposure.1 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 9	Basel III Regulatory Capital Disclosures pg 13
(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.	2016 Form 10-K Note 4 – Offsetting Assets and Liabilities Note 7 – Derivative Instruments and Hedging Activities Basel III Regulatory Capital Disclosures Credit Risk Mitigation	2016 Form 10-K pg 100-101 pg 121-124 Basel III Regulatory Capital Disclosures pg 14
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 10	Basel III Regulatory Capital Disclosures pg 14

(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 11	Basel III Regulatory Capital Disclosures pg 15
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.	2016 Form 10-K MD&A – Interest Rate and Market Risk Management Note 20 – Fair Value Basel III Regulatory Capital Disclosures Equities not Subject to the Market Risk Rule	2016 Form 10-K pg 68-72 pg 148-156 Basel III Regulatory Capital Disclosures pg 15
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 12	Basel III Regulatory Capital Disclosures pg 16
(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 12	Basel III Regulatory Capital Disclosures pg 16
(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	Basel III Regulatory Capital Disclosures pg 15-16
(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 12	Basel III Regulatory Capital Disclosures pg 16
(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 13	Basel III Regulatory Capital Disclosures pg 16
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.	2016 Form 10-K MD&A – Interest Rate and Market Risk Management	2016 Form 10-K pg 68-72
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).	2016 Form 10-K MD&A – Interest Rate and Market Risk Management	2016 Form 10-K pg 68-72