ZIONS BANCORPORATION
A COLLECTION OF GREAT BANKS

Zions Bancorporation, National Association

Basel III Regulatory Capital Disclosures

For the quarter ended June 30, 2019

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FORWARD-LOOKING INFORMATION

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

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

Zions Bancorporation, National Association is the successor to Zions Bancorporation by merger of Zions Bancorporation into ZB, N.A. on September 30, 2018. References to "Zions Bancorporation, N.A.," "the Bank," "we," "our," and "us" are intended to refer to Zions Bancorporation and its subsidiaries for periods prior to the merger and to Zions Bancorporation, National Association, and its subsidiaries for periods on and after the merger.

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 by their nature address matters that are, to different degrees, uncertain, such as statements about future financial and operating results. Actual results and outcomes may differ materially from those presented, either expressed or implied. Important risk factors that may cause such material differences include, but are not limited to:

- the Bank's ability to successfully execute its business plans, manage its risks, and achieve its objectives, including its operating leverage;
- the impact of acquisitions, dispositions, and corporate restructurings;
- increases in the levels of losses, customer bankruptcies, bank failures, claims, and assessments;
- the ability of the Bank to retain and recruit executives and other personnel necessary for their businesses and competitiveness;
- changes in local, national and international political and economic conditions, including without limitation the political and economic effects of the fiscal imbalance in the United States ("U.S.") 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 Bank conducts its operations, including without limitation rates of business formation and growth, commercial and residential real estate development, real estate prices, agricultural-related commodity prices, and oil and gas-related commodity prices;
- changes in markets for equity, fixed income, commercial paper and other securities, commodities, 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;
- uncertainty regarding the future of the London Interbank Offered Rate ("LIBOR"), and the potential transition away from LIBOR toward new interest rate benchmarks;
- the rate of change of the Bank's interest-sensitive assets and liabilities relative to changes in benchmark interest rates;
- 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 Office of the Comptroller of the Currency ("OCC"),

the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation ("FDIC"), the Securities and Exchange Commission ("SEC"), and the Consumer Financial Protection Bureau ("CFPB");
- changes in consumer spending and savings habits;
- inflation and deflation;
- increased competitive challenges and expanding product and pricing pressures among financial institutions;
- legislation or regulatory changes which adversely affect the Bank's operations or business;
- the Bank's ability to comply with applicable laws and regulations;
- costs of deposit insurance and changes with respect to FDIC insurance coverage levels;
- any impairment of our goodwill or other intangibles, or any adjustment of valuation allowances on our deferred tax assets ("DTAs") due to adverse changes in the economic environment, declining operations of the reporting unit, or a change to the corporate statutory tax rate or other similar changes if and as implemented by local and national governments, or other factors;
- the impact of rules and regulations on our required regulatory capital and liquidity levels, governmental assessments on us, the scope of business activities in which we may engage, the manner in which we engage in such activities, and the fees we may charge for certain products and services;
- uncertainties related to the application of the National Bank Act of 1863, 12 U.S.C. 38 (the "National Bank Act") and OCC regulations to the Bank's corporate affairs as more fully described under "*Risk Factors*" in our 2018 Annual Report on Form 10-K;
- changes in accounting policies or procedures as may be required by the Financial Accounting Standards Board ("FASB") or regulatory agencies;
- risks and uncertainties related to the ability to obtain shareholder and regulatory approvals when required, or the possibility that such approvals may be delayed;
- new legal claims against the Bank, including litigation, arbitration and proceedings brought by governmental or self-regulatory agencies, or changes in existing legal matters;
- economies of scale attendant to the development of digital and other technologies by much larger bank and non-bank competitors, and the possible entry of technology "platform" companies into the financial services business;
- the Bank's ability to develop and maintain secure and reliable information technology systems, including as necessary to guard against fraud, cybersecurity and privacy risks; and
- the Bank's implementation of new technologies.

Except to the extent required by law, the Bank 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, N.A. is considered a standardized approach institution and is in scope for the regulatory capital disclosures for standardized approach institutions in accordance with Basel III. In November 2017, the Federal Reserve Board, Federal Deposit Insurance Corporation and Office of the Comptroller of the Currency (the OCC) published a final rule that extended the 2017 transition provisions for certain U.S. Basel III capital rules for non-advanced approaches banks, such as the Bank. Effective January 1, 2018, the final rule retains the 2017 Basel III transitional treatment of certain deferred tax assets (DTAs) and mortgage servicing assets, among others. As a result, since January 1, 2018, the Bank's DTAs and mortgage servicing assets retained their 2017 risk weight treatment until the federal banking regulators revise the extended transitional treatment under the November 2017 transitional rule.

These Basel III Regulatory Capital Disclosures should be read in conjunction with the Bank's most recent Annual Report on Form 10-K ("Annual Report" or "Form 10-K"), the Bank's most recent Quarterly Report on Form 10-Q ("Form 10-Q"), and the Call Report for the Bank. The Bank'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 Bank's external auditors.

OVERVIEW

On September 30, 2018, the Bank completed the merger of Zions Bancorporation, its former bank holding company, with, and into its subsidiary bank, formerly known as ZB, N.A. in order to further reduce organizational complexity. The restructuring eliminated the bank holding company structure and associated regulatory framework, and resulted in ZB, N.A. being renamed Zions Bancorporation, National Association and becoming the top-level entity within our corporate structure. The merger is expected to result in the elimination of duplicative regulatory efforts, leaving the OCC as the Bank's primary federal banking regulator. As a result of the Financial Stability Oversight Council's action on September 12, 2018, the Bank is no longer considered a systemically important financial institution under the Dodd-Frank Act.

The Bank is a commercial bank and 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.

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

CAPITAL STRUCTURE – 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 June 30, 2019, Zions Bancorporation, N.A. met all the capital requirements to which it was subject. The Bank 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.

Schedule 1

Risk-Based Capital Components and Assets

(In millions)	June 30, 2019 Basel III standardized
Total shareholders' equity	**$ 7,599**
Less: preferred equity	(566)
Common shareholders' equity	**7,033**
Less: Goodwill	(1,014)
Less: Other intangible assets	—
Other CET1 capital adjustments	(32)
CET1 capital	**5,987**
Preferred equity	566
Trust preferred securities	—
Less: other Tier 1 adjustments	—
Tier 1 capital	**6,553**
Long-term debt and other instruments qualifying as Tier 2 capital	87
Qualifying allowance for credit losses	563
Other	—
Tier 2 capital	**650**
Total capital (Tier 1 + Tier 2)	**7,203**
Total risk-weighted assets	**$ 55,499**

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 Bank and whose primary responsibility is to recommend and administer the approved capital policies that govern the capital management of the Bank. Other major CMC responsibilities include:

- Setting overall capital targets within the Board-approved capital policy, monitoring performance compared to the Bank's capital policy limits, and recommending changes to capital including dividends, common stock issuances and repurchases, subordinated debt, and changes in major strategies to maintain the 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 Bank.

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

CAPITAL ADEQUACY – QUANTITATIVE

Schedule 2

Basel III Risk-Weighted Assets by Risk Type

(In millions)	June 30, 2019
On-balance sheet	
Exposures to sovereign entities	$ 1,274
Exposures to certain supranational entities and multilateral development banks	—
Exposures to depository institutions, foreign banks, and credit unions	56
Exposures to public sector entities	1,760
Corporate exposures	34,948
Residential mortgage exposures	6,293
Statutory multifamily mortgages and pre-sold construction loans	183
High volatility commercial real estate (“HVCRE”) loans	139
Past due loans	274
Other assets	2,956
Cleared transactions	—
Default fund contributions	—
Unsettled transactions	—
Securitization exposures	—
Equity exposures	8
Off-balance sheet	
Financial standby letters of credit	391
Performance standby letters of credit	82
Commercial and similar letters of credit with an original maturity of one year or less	2
Unused commitments with an original maturity of one year or less	246
Unused commitments with an original maturity exceeding one year	6,617
All other off-balance sheet liabilities	270
Total risk-weighted assets before excess allowance	55,499
Less: Excess allowance for loan and lease losses	—
Total risk-weighted assets	$ 55,499

CAPITAL CONSERVATION BUFFER

As of January 1, 2019, the Basel III capital rules require the 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 face constraints on dividends, equity repurchases, and compensation based on the amount of the shortfall. The severity of the constraint depends on the amount of the shortfall and the institution’s eligible retained income (that is, four quarter trailing net income, net of distributions and tax effects not reflected in net income).

Capital conservation buffer calculations for Zions Bancorporation, N.A. are shown in the table below.

Schedule 3
Capital Conservation Buffer

	June 30, 2019			
	Capital Ratio	Minimum Capital Requirement	Minimum Capital Conservation Buffer Requirement	Capital in Excess of Minimum Capital Requirement plus Minimum Capital Conservation Buffer Requirement
Common Equity Tier 1 Capital	10.79%	4.50%	2.50%	3.79%
Tier 1 Risk-Based Capital	11.81%	6.00%	2.50%	3.31%
Total Risk-Based Capital	12.98%	8.00%	2.50%	2.48%

CREDIT RISK: GENERAL DISCLOSURES – QUALITATIVE

Since risk is inherent in substantially all of the Bank'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 Bank'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 Bank'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.

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 Bank's Annual Report. As a result, the schedules report balance sheet classifications consistent with the Annual Report. Schedule 4 presents the Bank'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 4

Total Credit Risk Exposure

	Amortized cost		June 30, 2019 Remaining contractual maturity			
(In millions)	June 30, 2019	2Q 2019 average 1	One year or less	One year through five years	Over five years	Total
Investment securities with government/ agency guarantees	$ 13,312	$ 13,531	$ 111	$ 155	$ 13,046	$ 13,312
Investment securities without government/ agency guarantees	2,041	2,050	204	735	1,103	2,042
Derivative receivables [2]	165	122	—	53	112	165
Securities financing transactions	813	717	813	—	—	813
Loans and leases, net [3]	48,617	48,112	6,372	17,057	25,188	48,617
Unfunded lending commitments	23,264	22,832	6,873	10,192	6,199	23,264
Total	$ 88,212	$ 87,364	$ 14,373	$ 28,192	$ 45,648	$ 88,213

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

[2] *The derivatives gross positive fair value does not include $54 million of derivative receivables that are cleared through the Chicago Mercantile Exchange (“CME”) and LCH.Clearnet (“LCH”) with the Bank’s Futures Commission Merchant.*

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

Credit Disclosures by Geography and Industry

The following schedules provide the Bank’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 5 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 5

Credit Exposure by Geography

	June 30, 2019			
(Amounts in millions)	Loans and leases	Unfunded lending commitments	Total	Percentage of total
Commercial				
Arizona	$ 1,699	$ 612	$ 2,311	6.1 %
California	5,314	2,546	7,860	20.5
Colorado	1,449	846	2,295	6.0
Nevada	1,240	521	1,761	4.6
Texas	6,109	4,560	10,669	27.9
Utah/Idaho	5,279	2,368	7,647	20.0
Washington/Oregon	673	106	779	2.0
Other	3,344	1,599	4,943	12.9
Total commercial	25,107	13,158	38,265	100.0 %
Commercial real estate				
Arizona	$ 1,415	$ 335	$ 1,750	11.5 %
California	3,624	790	4,414	29.1
Colorado	760	229	989	6.5
Nevada	690	133	823	5.4
Texas	2,222	1,001	3,223	21.3
Utah/Idaho	1,879	450	2,329	15.4
Washington/Oregon	616	228	844	5.6
Other	621	170	791	5.2
Total commercial real estate	11,827	3,336	15,163	100.0 %
Consumer				
Arizona	$ 1,087	$ 824	$ 1,911	10.4 %
California	2,091	1,019	3,110	16.8
Colorado	962	667	1,629	8.8
Nevada	1,008	613	1,621	8.8
Texas	3,719	945	4,664	25.3
Utah/Idaho	2,431	2,493	4,924	26.7
Washington/Oregon	96	35	131	0.7
Other	289	174	463	2.5
Total consumer	11,683	6,770	18,453	100.0 %
Total	$ 48,617	$ 23,264	$ 71,881	

Schedule 6 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.

Schedule 6

Credit Exposure by Industry

(Amounts in millions)	June 30, 2019			
	Loans and leases	Unfunded lending commitments	Total	Percentage of total
Commercial				
Real estate, rental and leasing	$ 2,707	$ 1,206	$ 3,913	10.2 %
Retail trade	2,540	674	3,214	8.4
Manufacturing	2,227	1,305	3,532	9.2
Finance and insurance	1,813	1,740	3,553	9.3
Healthcare and social assistance	1,799	567	2,366	6.2
Wholesale trade	1,597	1,012	2,609	6.8
Utilities	1,424	640	2,064	5.4
Transportation and warehousing	1,416	652	2,068	5.4
Mining, quarrying, and oil and gas extraction	1,242	1,157	2,399	6.3
Construction	1,217	1,422	2,639	6.9
Public Administration	989	123	1,112	2.9
Hospitality and food services	986	215	1,201	3.1
Professional, scientific, and technical services	943	546	1,489	3.9
Other Services (except Public Administration)	854	417	1,271	3.3
Other	3,353	1,482	4,835	12.7
Total commercial	25,107	13,158	38,265	100.0 %
Commercial real estate				
Commercial property				
Multi-family	$ 2,766	$ 1,247	$ 4,013	26.5 %
Office	2,240	305	2,545	16.8
Retail	1,837	165	2,002	13.2
Industrial	1,413	444	1,857	12.3
Hospitality	731	72	803	5.3
Land	239	47	286	1.9
Other	1,886	471	2,357	15.5
Residential property				
Single family	533	337	870	5.7
Land	92	76	168	1.1
Condo/Townhome	16	33	49	0.3
Other	74	139	213	1.4
Total commercial real estate	11,827	3,336	15,163	100.0 %
Consumer				
Home equity credit line	$ 2,929	$ 4,395	$ 7,324	39.7 %
1-4 family residential	7,440	—	7,440	40.3
Construction and other consumer real estate	644	562	1,206	6.5
Bankcard and other revolving plans	502	1,813	2,315	12.6
Other	168	—	168	0.9
Total consumer	11,683	6,770	18,453	100.0 %
Total	$ 48,617	$ 23,264	$ 71,881	

[1] *No other industry group exceeds 3.4%.*

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 7 presents the geographic distribution of our municipal securities throughout the major regions of the United States.

Schedule 7

Municipal Securities by Geography

	June 30, 2019	
(Amounts in millions)	Amortized cost	Percentage of total
Northeast	$ 75	4 %
Midwest	322	16
South	606	30
West	1,014	50
Total municipal securities	$ 2,017	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 8 provides detail of the loans past due (accruing and nonaccruing) and impaired by industry distribution and major type of credit exposure.

Schedule 8

Past Due and Impaired Loans by Industry

	June 30, 2019							
	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	$ 4	$ 6	$ —	$ —	$ 2	$ 1	$ 3	$ —
Retail trade	3	—	1	2	1	2	3	—
Manufacturing	13	—	2	9	13	20	33	2
Finance and insurance	1	—	5	6	—	10	10	1
Healthcare and social assistance	5	—	—	3	1	4	5	—
Wholesale trade	4	1	—	1	1	1	2	—
Utilities	—	—	—	—	—	—	—	—
Transportation and warehousing	1	—	—	1	1	—	1	—
Mining, quarrying, and oil and gas extraction	—	—	1	1	—	3	3	1
Construction	3	1	1	5	19	9	28	3
Public Administration	—	—	—	—	—	—	—	—
Hospitality and food services	4	—	—	1	11	1	12	—
Professional, scientific, and technical services	7	1	1	1	10	1	11	—
Other Services (except Public	2	—	—	1	4	3	7	—
Other	9	1	2	11	18	18	36	4
Total commercial	56	10	13	42	81	73	154	11
Commercial real estate								
Commercial property								
Multi-family	$ 22	$ —	$ —	$ 3	$ 7	$ 1	$ 8	$ —
Office	1	—	—	—	—	—	—	—
Retail	4	—	1	1	11	1	12	—
Industrial	—	—	—	2	4	—	4	—
Hospitality	—	—	—	—	4	—	4	—
Land	1	—	—	—	—	—	—	—
Other	5	5	—	1	6	—	6	—
Residential property								
Single family	—	—	—	—	—	—	—	—
Land	—	—	—	—	—	—	—	—
Condo/Townhome	—	—	—	—	—	—	—	—
Other	—	—	—	—	—	—	—	—
Total commercial real estate	33	5	1	7	32	2	34	—
Consumer								
Home equity credit line	$ 4	$ —	$ 1	$ 4	$ 12	$ 2	$ 14	$ —
1-4 family residential	2	—	6	21	29	23	52	2
Construction and other consumer real estate	—	—	1	3	1	2	3	—
Bankcard and other revolving plans	3	2	—	—	—	—	—	—
Other	1	—	—	—	—	—	—	—
Total consumer	10	2	8	28	42	27	69	2
Total	$ 99	$ 17	$ 22	$ 77	$ 155	$ 102	$ 257	$ 13

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

Schedule 9

Past Due and Impaired Loans by Geography

	June 30, 2019							
	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	$ 2	$ —	$ —	$ 2	$ 8	$ 1	$ 9	$ —
California	13	7	1	3	13	12	25	4
Colorado	6	—	—	2	13	11	24	3
Nevada	1	—	1	2	12	5	17	1
Texas	13	—	7	5	6	17	23	1
Utah/Idaho	21	2	1	19	22	5	27	—
Washington/Oregon	—	1	2	3	6	2	8	—
Other	—	—	1	6	1	20	21	2
Total commercial	56	10	13	42	81	73	154	11
Commercial real estate								
Arizona	$ 3	$ —	$ —	$ —	$ 2	$ —	$ 2	$ —
California	12	—	—	3	4	—	4	—
Colorado	—	—	—	—	2	—	2	—
Nevada	—	—	—	—	—	1	1	—
Texas	—	—	—	2	5	1	6	—
Utah/Idaho	3	5	1	2	5	—	5	—
Washington/Oregon	13	—	—	—	—	—	—	—
Other	2	—	—	—	14	—	14	—
Total commercial real estate	33	5	1	7	32	2	34	—
Consumer								
Arizona	$ 1	$ —	$ 2	$ 2	$ 7	$ 1	$ 8	$ —
California	1	—	2	10	10	6	16	—
Colorado	2	—	—	1	3	1	4	—
Nevada	1	—	2	2	6	2	8	—
Texas	2	1	1	8	8	10	18	1
Utah/Idaho	3	1	1	3	8	5	13	1
Washington/Oregon	—	—	—	—	—	—	—	—
Other	—	—	—	2	—	2	2	—
Total consumer	10	2	8	28	42	27	69	2
Total	$ 99	$ 17	$ 22	$ 77	$ 155	$ 102	$ 257	$ 13

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

Collateral

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

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

(In millions)	June 30, 2019
Derivatives:	
Gross positive fair value [1]	$ 165
Netting benefit	—
Net derivatives credit exposure	$ 165
Securities financing transactions:	
Gross positive fair value	$ 813
Less: Collateral held for risk mitigation	838
Excess collateral	25
Net securities financing transactions exposure	$ —

[1] *The derivatives gross positive fair value does not include $54 million of derivative receivables that are cleared through the CME and LCH with the Bank'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 Bank's general credit risk management, see the "Risk Elements" section of Management's Discussion and Analysis in the Bank's Annual Report.

Credit risk associated with guarantors and derivative counterparties and their creditworthiness are presented in Note 7 and Note 18 of the Bank's Annual Report. Credit risk associated with securities is discussed in Note 5 of the Bank's Annual Report. See Appendix A for the location of other off-balance sheet credit risk disclosures.

For information regarding the Bank's credit risk associated with its loan portfolio, commitments, and guarantors, see "Risk Elements" in Management's Discussion and Analysis in the Bank'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 11 does not include any derivative receivables because substantially all of the derivative receivables are from loan customers whose credit risk is aggregated and managed with their loans. Because the collateral applies to both the swap and the loan, and is not eligible financial collateral, these derivatives are not included among those exposures with credit mitigation from collateral.

Schedule 11

Credit Exposure Covered by Eligible Financial Collateral

		June 30, 2019	
(In millions)	Collateral type(s)	Exposure covered by eligible collateral	Exposure after haircut
Securities financing transactions	U.S. Treasuries and Agencies	$ 813	$ —
Loans and leases, net [1]	Cash, U.S. Treasuries	40	—
Unfunded lending commitments	Cash, U.S. Treasuries	146	—
Total		$ 999	$ —

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

Schedule 12

Credit Exposure Covered by Guarantees or Credit Derivatives

	June 30, 2019	
(In millions)	Exposure covered by guarantees/ credit derivatives	Risk-weighted assets
Investment securities [1]	$ 13,312	$ —
Securities financing transactions	813	—
Loans and leases, net [2]	431	86
Unfunded lending commitments	1,209	35
Total	$ 15,765	$ 121

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 Bank holds.

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

At June 30, 2019, we have total equity exposure of approximately $568 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 Bank's Consolidated Financial Statements in the Bank'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 3 of the Notes to Consolidated Financial Statements in the Bank's Annual Report.

We have approximately $139 million of exposure to SBIC investments and approximately $10 million in non-SBIC venture capital funds at June 30, 2019. The majority of these investments are carried at fair value.

EQUITY SECURITIES NOT SUBJECT TO THE MARKET RISK RULE – QUANTITATIVE

Schedule 13

Equity Securities Not Subject to the Market Risk Rule

	June 30, 2019		
(In millions)	Nonpublic	Public [1]	Total
Carrying value	$ 516	$ 52	$ 568
Latent revaluations gains (losses) [2]	—	30	30
Fair value	$ 516	$ 82	$ 598
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 14

Capital Requirements of Equity Securities

	June 30, 2019	
(In millions)	Exposure	Risk-weighted assets
0%	$ —	$ —
20%	—	—
100%	—	—
Full look-through approach	33	8
Total capital requirements for equity securities	$ 33	$ 8

During the three months ended June 30, 2019 the Bank had $3 million of unrealized losses related to its equity investments, and recognized no gains or losses 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.	Form 10-Q (2Q 2019) MD&A - Capital Management Call Report Schedule RC-R – Regulatory Capital, Part I Basel III Regulatory Capital Disclosures Capital Structure – Schedule 1 Capital Adequacy – Schedule 2	 pg 32-34 pg 49-51 pg 4 pg 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.	2018 Form 10-K Item 1 – Business (Description) Basel III Regulatory Capital Disclosures Overview	 pg 6-7 pg 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	 pg 3
(c)	Any restrictions, or other major impediments, on transfer of funds or total capital within the group.	Basel III Regulatory Capital Disclosures Overview	 pg 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	 pg 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	 pg 3
2. Capital Structure			
Qualitative: (a)	Summary information on the terms and conditions of the main features of all regulatory capital instruments.	Form 10-Q (2Q 2019) Note 9 - Debt and Shareholders' Equity 2018 Form 10-K Note 12 – Long-Term Debt Note 13 – Shareholders' Equity	 pg 69 pg 121-122 pg 122-124
Quantitative: (b)	The amount of common equity Tier 1 capital, with separate disclosure of: (1) Common stock and related surplus; (2) Retained earnings; (3) Common equity minority interest; (4) AOCI; and (5) Regulatory adjustments and deductions made to common equity Tier 1 capital.	Form 10-Q (2Q 2019) Consolidated Balance Sheet MD&A - Capital Management MD&A - GAAP to Non-GAAP Reconciliations 2018 Form 10-K Consolidated Balance Sheet MD&A - Capital Management MD&A - GAAP to Non-GAAP Reconciliations Call Report Schedule RC-R – Regulatory Capital, Part I Basel III Regulatory Capital Disclosures Capital Structure – Schedule 1	 pg 35 pg 32-34 pg 6-8 pg 79 pg 69-72 pg 27-28 pg 49-51 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.	Call Report Schedule RC-R – Regulatory Capital, Part I Basel III Regulatory Capital Disclosures Capital Structure – Schedule 1	 pg 49-51 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.	Call Report Schedule RC-R – Regulatory Capital, Part I Basel III Regulatory Capital Disclosures Capital Structure – Schedule 1	 pg 49-51 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.	Form 10-Q (2Q 2019) MD&A - Capital Management 2018 Form 10-K MD&A - Capital Management Basel III Regulatory Capital Disclosures Capital Adequacy	 pg 32-34 pg 69-72 pg 4
Quantitative: (b)	Risk-weighted assets for: (1) Exposures to sovereign entities; (2) Exposures to certain supranational entities and MDBs; (3) Exposures to depository institutions, foreign banks, and credit unions; (4) Exposures to PSEs; (5) Corporate exposures; (6) Residential mortgage exposures; (7) Statutory multifamily mortgages and pre-sold construction loans; (8) HVCRE loans; (9) Past due loans; (10) Other assets; (11) Cleared transactions; (12) Default fund contributions; (13) Unsettled transactions; (14) Securitization exposures; and (15) Equity exposures.	Basel III Regulatory Capital Disclosures Capital Adequacy – Schedule 2	 pg 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.	Form 10-Q (2Q 2019) MD&A - Capital Management 2018 Form 10-K MD&A - Capital Management Call Report Schedule RC-R – Regulatory Capital, Part I, lines 41-43	 pg 32-34 pg 69-72 pg 51
(e)	Total standardized risk-weighted assets.	Call Report Schedule RC-R – Regulatory Capital, Part I and Part II Basel III Regulatory Capital Disclosures Capital Adequacy – Schedule 2	 pg 49-61 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	 pg 5
(b)	At least quarterly, the [BANK] must calculate and publicly disclose the eligible retained income* of the [BANK], as described under §___.11.	Basel III Regulatory Capital Disclosures Capital Conservation Buffer	 pg 5
(c)	At least quarterly, the [BANK] must calculate and publicly disclose any limitations it has on distributions and discretionary bonus payments resulting from the capital conservation buffer framework described under §___.11, including the maximum payout amount for the quarter.	Basel III Regulatory Capital Disclosures Capital Conservation Buffer Capital Conservation Buffer – Schedule 3	 pg 5 pg 6
General Qualitative Disclosure Requirement			

	For each separate risk area described in tables 5 through 10, the bank holding company must describe its risk management objectives and policies, including: (1) Strategies and processes; (2) The structure and organization of the relevant risk management function; (3) the scope and nature of risk reporting and/or measurement systems; and (4) policies for hedging and/or mitigating risk and strategies and processes for monitoring the continuing effectiveness of hedges/mitigants.	Form 10-Q (2Q 2019) MD&A – Loan Portfolio MD&A – Risk Elements MD&A – Interest Rate and Market Risk Management MD&A – Liquidity Risk Management MD&A – Capital Management Note 5 – Investments Note 6 – Loans and Allowance For Credit Losses Note 7 – Derivatives Instruments and Hedging Activities Note 10 – Commitments, Guarantees, Contingent Liabilities, 2018 Form 10-K MD&A – Loan Portfolio MD&A – Risk Elements MD&A – Interest Rate and Market Risk Management MD&A – Liquidity Risk Management MD&A – Capital Management Note 5 – Investments Note 6 – Loans and Allowance For Credit Losses Note 7 – Derivatives Instruments and Hedging Activities Note 15 – Commitments, Guarantees, Contingent Liabilities,	 pg 19 pg 21 pg 27 pg 30 pg 32 pg 48 pg 51 pg 62 pg 70 pg 50 pg 52-54 pg 62-65 pg 65-69 pg 69-72 pg 98-102 pg 102-114 pg 115-118 pg 126-129
5. Credit Risk – General Disclosures			
Qualitative: (a)	The general qualitative disclosure requirement with respect to credit risk (excluding counterparty credit risk disclosed in accordance with Table 6) including: (1) Policy for determining past due or delinquency status; (2) Policy for placing loans on nonaccrual; (3) Policy for returning loans to accrual status; (4) Definition of and policy for identifying impaired loans (for financial accounting purposes). (5) Description of the methodology that the entity uses to estimate its allowance for loan and lease losses, including statistical methods used where applicable; (6) Policy for charging-off uncollectible amounts; and (7) Discussion of the bank's credit risk management policy	Form 10-Q (2Q 2019) MD&A –Credit Risk Management Note 6 – Loans and Allowance For Credit Losses 2018 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	 pg 21 pg 51 pg 52-53 pg 102-114 pg 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:	Basel III Regulatory Capital Disclosures Total Credit Risk Exposure – Schedule 4	 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 5 Municipal Securities by Geography – Schedule 7	 pg 8 pg 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 6	 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.	Form 10-Q (2Q 2019) MD&A – Nonperforming Assets Note 6 – Loans and Allowance For Credit Losses 2018 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 8	 pg 24 pg 51 pg 58-62 pg 102-114 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 9	 pg 12
(g)	Reconciliation of changes in the ALLL.	Form 10-Q (2Q 2019) Note 6 – Loans and Allowance For Credit Losses 2018 Form 10-K Note 6 – Loans and Allowance For Credit Losses	 pg 51 pg 102-114
(h)	Remaining contractual maturity delineation (for example, one year or less) of the whole portfolio, categorized by major types of credit exposure.	Basel III Regulatory Capital Disclosures Total Credit Risk Exposure – Schedule 4	 pg 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.	Form 10-Q (2Q 2019) Note 4 – Offsetting Assets and Liabilities Note 7 – Derivatives Instruments and Hedging Activities 2018 Form 10-K Note 4 – Offsetting Assets and Liabilities Note 6 – Loans and Allowance For Credit Losses	 pg 47 pg 62 pg 98 pg 102-114
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 10	 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.	Form 10-Q (2Q 2019) Note 4 – Offsetting Assets and Liabilities Note 7 – Derivatives Instruments and Hedging Activities 2018 Form 10-K Note 4 – Offsetting Assets and Liabilities Note 7 – Derivatives Instruments and Hedging Activities Basel III Regulatory Capital Disclosures Credit Risk Mitigation	 pg 47 pg 62 pg 98 pg 115-118 pg 13-14

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 11 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 12 pg 14

8. Securitization			
Qualitative: (a)	The general qualitative disclosure requirement with respect to a securitization (including synthetic securitizations), including a discussion of: (1) The [BANK]'s objectives for securitizing assets, including the extent to which these activities transfer credit risk of the underlying exposures away from the [BANK] to other entities and including the type of risks assumed and retained with resecuritization activity;[1] (2) The nature of the risks (e.g. liquidity risk) inherent in the securitized assets; (3) The roles played by the [BANK] in the securitization process[2] and an indication of the extent of the [BANK]'s involvement in each of them; (4) The processes in place to monitor changes in the credit and market risk of securitization exposures including how those processes differ for resecuritization exposures; (5) The [BANK]'s policy for mitigating the credit risk retained through securitization and resecuritization exposures; and (6) The risk-based capital approaches that the [BANK] follows for its securitization exposures including the type of securitization exposure to which each approach applies.	N/A	N/A
(b)	A list of: (1) The type of securitization SPEs that the [BANK], as sponsor, uses to securitize third-party exposures. The [BANK] must indicate whether it has exposure to these SPEs, either on- or off- balance sheet; and (2) Affiliated entities: (i) That the [BANK] manages or advises; and (ii) That invest either in the securitization exposures that the [BANK] has securitized or in securitization SPEs that the [BANK] sponsors.[3]	N/A	N/A
(c)	Summary of the [BANK]'s accounting policies for securitization activities, including: (1) Whether the transactions are treated as sales or financings; (2) Recognition of gain-on-sale; (3) Methods and key assumptions applied in valuing retained or purchased interests; (4) Changes in methods and key assumptions from the previous period for valuing retained interests and impact of the changes; (5) Treatment of synthetic securitizations; (6) How exposures intended to be securitized are valued and whether they are recorded under subpart D of this part; and (7) Policies for recognizing liabilities on the balance sheet for arrangements that could require the [BANK] to provide financial support for securitized assets.	N/A	N/A
(d)	An explanation of significant changes to any quantitative information since the last reporting period.	N/A	N/A
Quantitative: (e)	The total outstanding exposures securitized by the [BANK] in securitizations that meet the operational criteria provided in §___.41 (categorized into traditional and synthetic securitizations), by exposure type, separately for securitizations of third-party exposures for which the bank acts only as sponsor.[4]	N/A	N/A
(f)	For exposures securitized by the [BANK] in securitizations that meet the operational criteria in §___.41: (1) Amount of securitized assets that are impaired/past due categorized by exposure type;5 and (2) Losses recognized by the [BANK] during the current period categorized by exposure type.6	N/A	N/A
(g)	The total amount of outstanding exposures intended to be securitized categorized by exposure type.	N/A	N/A
(h)	Aggregate amount of: (1) On-balance sheet securitization exposures retained or purchased categorized by exposure type; and (2) Off-balance sheet securitization exposures categorized by exposure type.	N/A	N/A

(i)	(1) Aggregate amount of securitization exposures retained or purchased and the associated capital requirements for these exposures, categorized between securitization and resecuritization exposures, further categorized into a meaningful number of risk weight bands and by risk-based capital approach (e.g., SSFA); and (2) Exposures that have been deducted entirely from Tier 1 capital, CEIOs deducted from total capital (as described in §___.42(a)(1), and other exposures deducted from total capital should be disclosed separately by exposure type.	N/A	N/A
(j)	Summary of current year's securitization activity, including the amount of exposures securitized (by exposure type), and recognized gain or loss on sale by exposure type.	N/A	N/A
(k)	Aggregate amount of resecuritization exposures retained or purchased categorized according to: (1) Exposures to which credit risk mitigation is applied and those not applied; and (2) Exposures to guarantors categorized according to guarantor creditworthiness categories or guarantor name.	N/A	N/A
9. Equities Not Subject to Subpart F			
Qualitative: (a)	The general qualitative disclosure requirement with respect to equity risk for equities not subject to subpart F of this part, including: (1) Differentiation between holdings on which capital gains are expected and those taken under other objectives including for relationship and strategic reasons; and (2) Discussion of important policies covering the valuation of and accounting for equity holdings not subject to subpart F of this part. This includes the accounting techniques and valuation methodologies used, including key assumptions and practices affecting valuation as well as significant changes in these practices.	Form 10-Q (2Q 2019) MD&A – Interest Rate and Market Risk Management Note 3 – Fair Value 2018 Form 10-K MD&A – Interest Rate and Market Risk Management Note 3 – Fair Value Basel III Regulatory Capital Disclosures Equities not Subject to the Market Risk Rule	 pg 27 pg 44 pg 62-65 pg 91-97 pg 14-15
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 13	 pg 15
(c)	The types and nature of investments, including the amount that is: (1) Publicly traded; and (2) Non publicly traded.	Basel III Regulatory Capital Disclosures Equities not Subject to the Market Risk Rule – Schedule 13	 pg 15
(d)	The cumulative realized gains (losses) arising from sales and liquidations in the reporting period.	Basel III Regulatory Capital Disclosures Equities not Subject to the Market Risk Rule	 pg 14-15
(e)	(1) Total unrealized gains (losses) (2) Total latent revaluation gains (losses). (3) Any amounts of the above included in Tier 1 or Tier 2 capital.	Basel III Regulatory Capital Disclosures Equities not Subject to the Market Risk Rule – Schedule 13	 pg 15
(f)	Capital requirements categorized by appropriate equity groupings, consistent with the [BANK]'s methodology, as well as the aggregate amounts and the type of equity investments subject to any supervisory transition regarding regulatory capital requirements.	Basel III Regulatory Capital Disclosures Equities not Subject to the Market Risk Rule – Schedule 14	 pg 15
10. Interest Rate Risk for Non-Trading Activities			
Qualitative: (a)	The general qualitative disclosure requirement, including the nature of interest rate risk for non-trading activities and key assumptions, including assumptions regarding loan prepayments and behavior of non-maturity deposits, and frequency of measurement of interest rate risk for non-trading activities.	Form 10-Q (2Q 2019) MD&A – Interest Rate and Market Risk Management 2018 Form 10-K MD&A – Interest Rate and Market Risk Management	 pg 27 pg 62-65
Quantitative: (b)	The increase (decline) in earnings or economic value (or relevant measure used by management) for upward and downward rate shocks according to management's method for measuring interest rate risk for non-trading activities, categorized by currency (as appropriate).	Form 10-Q (2Q 2019) MD&A – Interest Rate and Market Risk Management 2018 Form 10-K MD&A – Interest Rate and Market Risk Management	 pg 27 pg 62-65