



Fifth Third Bancorp

**Basel III Pillar 3 Regulatory Capital
Disclosure Report**

December 31, 2024



FIFTH THIRD

Table of Contents

Glossary	2
Introduction	3
Capital Structure	4
Capital Adequacy	6
Capital Conservation Buffer and Stress Capital Buffer	7
Credit Risk: General Disclosures	8
Counterparty Credit Risk-Related Exposures	11
Credit Risk Mitigation	12
Securitizations	12
Equities Not Subject to Market Risk Rule	14
Interest Rate and Price Risk for Non-Trading Activities	15
Appendix A – Disclosure Index	16

FORWARD-LOOKING STATEMENTS

This report contains statements that we believe are “forward-looking statements” within the meaning of Section 27A of the Securities Act of 1933, as amended, and Rule 175 promulgated thereunder, and Section 21E of the Securities Exchange Act of 1934, as amended, and Rule 3b-6 promulgated thereunder. All statements other than statements of historical fact are forward-looking statements. These statements relate to our financial condition, results of operations, plans, objectives, future performance, capital actions or business. They usually can be identified by the use of forward-looking language such as “will likely result,” “may,” “are expected to,” “is anticipated,” “potential,” “estimate,” “forecast,” “projected,” “intends to,” or may include other similar words or phrases such as “believes,” “plans,” “trend,” “objective,” “continue,” “remain,” or similar expressions, or future or conditional verbs such as “will,” “would,” “should,” “could,” “might,” “can,” or similar verbs. You should not place undue reliance on these statements, as they are subject to risks and uncertainties, including but not limited to the risk factors set forth in the Risk Factors section in Item 1A in our most recent Annual Report on Form 10-K. Moreover, you should treat these statements as speaking only as of the date they are made and based only on information then actually known to us. There are a number of important factors that could cause future results to differ materially from historical performance and these forward-looking statements. Factors that might cause such a difference include, but are not limited to: (1) deteriorating credit quality; (2) loan concentration by location or industry of borrowers or collateral; (3) problems encountered by other financial institutions; (4) inadequate sources of funding or liquidity; (5) unfavorable actions of rating agencies; (6) inability to maintain or grow deposits; (7) limitations on the ability to receive dividends from subsidiaries; (8) cyber-security risks; (9) Fifth Third’s ability to secure confidential information and deliver products and services through the use of computer systems and telecommunications networks; (10) failures by third-party service providers; (11) inability to manage strategic initiatives and/or organizational changes; (12) inability to implement technology system enhancements, including the use of artificial intelligence; (13) failure of internal controls and other risk management programs; (14) losses related to fraud, theft, misappropriation or violence; (15) inability to attract and retain skilled personnel; (16) adverse impacts of government regulation; (17) governmental or regulatory changes or other actions; (18) failures to meet applicable capital requirements; (19) regulatory objections to Fifth Third’s capital plan; (20) regulation of Fifth Third’s derivatives activities; (21) deposit insurance premiums; (22) assessments for the orderly liquidation fund; (23) weakness in the national or local economies; (24) global political and economic uncertainty or negative actions; (25) changes in interest rates and the effects of inflation; (26) changes and trends in capital markets; (27) fluctuation of Fifth Third’s stock price; (28) volatility in mortgage banking revenue; (29) litigation, investigations, and enforcement proceedings by governmental authorities; (30) breaches of contractual covenants, representations and warranties; (31) competition and changes in the financial services industry; (32) potential impacts of the adoption of real-time payment networks; (33) changing retail distribution strategies, customer preferences and behavior; (34) difficulties in identifying, acquiring or integrating suitable strategic partnerships, investments or acquisitions; (35) potential dilution from future acquisitions; (36) loss of income and/or difficulties encountered in the sale and separation of businesses, investments or other assets; (37) results of investments or acquired entities; (38) changes in accounting standards or interpretation or declines in the value of Fifth Third’s goodwill or other intangible assets; (39) inaccuracies or other failures from the use of models; (40) effects of critical accounting policies and judgments or the use of inaccurate estimates; (41) weather-related events, other natural disasters, or health emergencies (including pandemics); (42) the impact of reputational risk created by these or other developments on such matters as business generation and retention, funding and liquidity; (43) changes in law or requirements imposed by Fifth Third’s regulators impacting our capital actions, including dividend payments and stock repurchases; and (44) Fifth Third’s ability to meet its environmental and/or social targets, goals and commitments. We expressly disclaim any obligation or undertaking to release publicly any updates or revisions to any forward-looking statements contained herein to reflect any change in our expectations or any changes in events, conditions or circumstances on which any such statement is based, except as may be required by law, and we claim the protection of the safe harbor for forward-looking statements contained in the Private Securities Litigation Reform Act of 1995. The information contained herein is intended to be reviewed in its totality, and any stipulations, conditions or provisos that apply to a given piece of information in one part of this report should be read as applying mutatis mutandis to every other instance of such information appearing herein.

Glossary of Abbreviations and Acronyms

Fifth Third Bancorp provides the following list of abbreviations and acronyms that are used in this report as a tool for the reader.

ACL: Allowance for Credit Losses	ICAP: Internal Capital Adequacy Process
AOCI: Accumulated Other Comprehensive Income (Loss)	LLC: Limited Liability Company
BHC: Bank Holding Company	MD&A: Management's Discussion and Analysis of Financial Condition and Results of Operations
BOLI: Bank Owned Life Insurance	N.A.: National Association
bps: Basis Points	NII: Net Interest Income
CECL: Current Expected Credit Loss	OCC: Office of the Comptroller of the Currency
CEE: Credit Equivalent Exposure	OTC: Over-the-Counter
CET1: Common Equity Tier 1	RWA: Risk-Weighted Assets
DTCC: Depository Trust & Clearing Corporation	SEC: United States Securities and Exchange Commission
FHLB: Federal Home Loan Bank	SRWA: Simple Risk-Weight Approach
FLTA: Full Look-Through Approach	SSFA: Simplified Supervisory Formula Approach
FR Y-9C: Consolidated Financial Statements for Holding Companies	U.S.: United States of America
FRB: Federal Reserve Bank	VIE: Variable Interest Entity
HVCRE: High Volatility Commercial Real Estate	

Fifth Third Bancorp

Basel III Pillar 3 Regulatory Capital Disclosures as of December 31, 2024

INTRODUCTION

Fifth Third Bancorp (the “Bancorp” or “Fifth Third”) is a diversified financial services company headquartered in Cincinnati, Ohio. At December 31, 2024 the Bancorp had \$213 billion in assets, \$167 billion in deposits and \$20 billion in total equity. The Board of Governors of the Federal Reserve System is the primary regulator of the Bancorp, a financial holding company. The Bancorp’s principal bank subsidiary is Fifth Third Bank, National Association (the “Bank”), a nationally chartered bank with banking centers in the U.S. along with foreign offices located in Toronto, Canada and London, United Kingdom. The Bank’s subsidiaries include Fifth Third Securities, Inc., which provides retail brokerage services and broker-dealer services, and Fifth Third Insurance Agency, Inc., among others. The Bancorp has several nonbank subsidiaries including Fifth Third Community Development Corporation and Fifth Third Community Development Company, LLC, which invest in projects to create affordable housing and revitalize business and residential areas.

The Consolidated Financial Statements include the accounts of the Bancorp and its majority-owned subsidiaries and VIEs in which the Bancorp has been determined to be the primary beneficiary. Other entities, including certain joint ventures in which the Bancorp has the ability to exercise significant influence over operating and financial policies of the investee, but upon which the Bancorp does not possess control, are accounted for by the equity method and not consolidated. The investments in those entities in which the Bancorp does not have the ability to exercise significant influence are generally carried at fair value unless the investment does not have a readily determinable fair value. The Bancorp accounts for equity investments without a readily determinable fair value using the measurement alternative to fair value, representing the cost of the investment minus any impairment recorded and plus or minus changes resulting from observable price changes in orderly transactions for an identical or a similar investment of the same issuer. Intercompany transactions and balances among consolidated entities have been eliminated.

Section 121 of the Gramm-Leach-Bliley Act allows national banks and insured state banks to establish entities known as financial subsidiaries. One of the statutory requirements for establishing a financial subsidiary is that a national bank or insured state bank must deduct any investment in a financial subsidiary from the bank’s assets and tangible equity in calculating the regulatory capital ratios. Therefore, under the Basel III regulatory capital rules, a bank must deduct the aggregate amount of its outstanding equity investment in a financial subsidiary, including the retained earnings of the financial subsidiary, from its CET1 capital. In addition, the assets and liabilities of the financial subsidiary may not be consolidated with those of the parent bank for regulatory capital purposes. Therefore, in the calculation of the capital ratios for the Bank, the equity investments in the Bank’s financial subsidiaries have been deducted from capital and the assets of these entities are excluded from the assets subject to risk-weighting.

Basel III Overview

In December of 2010, and revised in June of 2011, the Basel Committee on Banking Supervision issued Basel III, a global regulatory framework, to enhance international capital standards. Basel III is designed to materially improve the quality of regulatory capital and introduces a new minimum common equity requirement. Basel III also raises the minimum capital requirements and introduces capital conservation and counter cyclical buffers to induce banking organizations to hold capital in excess of regulatory minimums.

In July of 2013, U.S. banking regulators approved the final enhanced regulatory capital rules, which implemented Basel III in the U.S. The rules substantially revised the risk-based capital requirements applicable to BHCs and their depository institution subsidiaries as compared to the previous U.S. risk-based capital and leverage ratio rules, and thereby implemented certain provisions of the Dodd-Frank Wall Street Reform & Consumer Protection Act.

Basel III has three components (Pillars) including minimum capital requirements, a supervisory review process and market discipline:

Pillar 1 – Minimum capital requirements: Establishes the rules by which regulatory capital can be calculated, including defining eligible capital instruments and calculating risk-weighted assets.

Pillar 2 – Supervisory review process: Addresses bank-wide governance and risk management, in addition to requiring banks to have an Internal Capital Adequacy Assessment Process.

Pillar 3 – Market discipline: Establishes regulatory disclosure requirements, which are designed to allow market participants to assess the risk and capital profiles of banks.

BHCs, such as the Bancorp, with consolidated assets greater than \$50 billion but less than \$250 billion were required to develop the systems, processes and controls to report capital ratios under the Basel III Standardized Approach, effective January 1, 2015.

Basel III Reporting

This Basel III Pillar 3 Regulatory Capital Disclosure Report (Basel III Report) provides the Bancorp’s disclosures regarding its capital structure, capital adequacy, risk exposures and RWA as required by the Basel III Pillar 3 provisions. The required disclosures apply to the Bancorp, with the exception that each depository subsidiary must also disclose capital ratios.

Fifth Third Bancorp**Basel III Pillar 3 Regulatory Capital Disclosures as of December 31, 2024**

This Basel III Report should be read in conjunction with the Bancorp's Annual Report on Form 10-K for the year ended December 31, 2024 (2024 Form 10-K) as filed with the SEC as well as the Consolidated Financial Statements for Holding Companies (FR Y-9C) for the period ended December 31, 2024 as filed with the FRB. This Basel III Report has not been audited by the Bancorp's external auditors. The Disclosure Index (Appendix A) specifies where all required disclosures are referenced.

Capital in the Bancorp's Subsidiaries

The aggregate amount of surplus capital in the Bancorp's insurance subsidiaries was \$81 million at December 31, 2024. Additionally, as of December 31, 2024, the Bancorp did not have any active subsidiaries whose regulatory capital was less than the minimum total capital requirement.

Restrictions on Transfer of Funds and Capital

Dividends paid by the Bank are subject to regulations and limitations prescribed by the OCC. In addition, the Bank is subject to certain restrictions imposed by federal law on extensions of credit to, and certain other transactions with, the Bancorp and certain other affiliates, and on investments in stock or securities of the Bancorp and those affiliates. For further information on restrictions on transfers of funds and capital, refer to Note 3 in the Notes to the Consolidated Financial Statements in the 2024 Form 10-K. The Bancorp is also subject to the stress capital buffer requirement and must maintain capital ratios above its buffered minimum (regulatory minimum plus stress capital buffer of 3.2%) in order to avoid certain limitations on capital distributions and discretionary bonuses to executive officers. Refer to the Capital Conservation Buffer and Stress Capital Buffer section of this report for additional information.

CAPITAL STRUCTURE**Capital Instruments**

The Bancorp's regulatory capital structure includes common stock, preferred shares, trust preferred securities and qualifying subordinated debt. The terms and conditions of the Bancorp's capital instruments are described in Notes 17 and 24 in the Notes to the Consolidated Financial Statements in the 2024 Form 10-K.

ASU 2016-13

The Bancorp adopted ASU 2016-13 on January 1, 2020 and elected the five-year transition phase-in option for the impact of CECL on regulatory capital with its regulatory filings as of March 31, 2020. The Bancorp's modified CECL transition amount began phasing out on January 1, 2022, and will be fully phased-out by January 1, 2025. The impact of the modified CECL transition amount on the Bancorp's regulatory capital at December 31, 2024 was an increase in capital of approximately \$124 million. On a fully phased-in basis, the Bancorp's CET1 capital ratio would be reduced by 7 bps as of December 31, 2024. Refer to the 2024 Form 10-K for further information on the CECL transition.

Regulatory Capital, Risk-Weighted Assets and Capital Ratios

The following table summarizes the Basel III minimum and well-capitalized regulatory capital ratios as of December 31, 2024.

Minimum and Well-Capitalized Regulatory Capital Ratios

	Minimum	Well-Capitalized
CET1 capital:		
Fifth Third Bancorp	4.50 %	N/A
Fifth Third Bank, National Association	4.50	6.50
Tier 1 risk-based capital:		
Fifth Third Bancorp	6.00	6.00
Fifth Third Bank, National Association	6.00	8.00
Total risk-based capital:		
Fifth Third Bancorp	8.00	10.00
Fifth Third Bank, National Association	8.00	10.00
Leverage:		
Fifth Third Bancorp	4.00	N/A
Fifth Third Bank, National Association	4.00	5.00

Basel III establishes two comprehensive methodologies for calculating RWA, a Standardized Approach and an Advanced Approach. The Bancorp is subject to the Basel III Standardized Approach for determining risk-weighted assets which applies to bank holding companies with total consolidated assets over \$50 billion that are not subject to the Advanced Approach.

At December 31, 2024, the Bancorp and Fifth Third Bank, National Association were both well-capitalized under Basel III capital standards.

Fifth Third Bancorp**Basel III Pillar 3 Regulatory Capital Disclosures as of December 31, 2024**

A reconciliation of regulatory capital elements as they relate to the Bancorp's Consolidated Financial Statements presented in the 2024 Form 10-K, in addition to information regarding the components of capital used in calculating CET1 capital, Tier 1 capital, Tier 2 capital and Total regulatory capital under Basel III and CECL transitional requirements for the Bancorp at December 31, 2024 are presented in the following table:

Reconciliation of Regulatory Capital Elements

(\$ in millions)	
Common stock	\$ 2,051
Capital surplus	3,804
Treasury stock	(7,840)
Common stock and related surplus, net of treasury stock	(1,985)
Retained earnings	24,150
AOCI	(4,636)
Preferred stock	2,116
Total Bancorp shareholders' equity	19,645
Modified CECL transition amount	124
Less: AOCI-related adjustments	(4,634)
Less: Preferred stock	2,116
Less: Adjustments and deductions	4,948
CET1 capital	17,339
Preferred stock	2,116
Tier 1 capital	19,455
Tier 2 capital instruments plus related surplus	1,103
Total capital minority interest that is not included in Tier 1 capital	150
Allowance for loan and lease losses includable in Tier 2 capital	2,038
Total regulatory capital	\$ 22,746

CAPITAL ADEQUACY**Internal Capital Adequacy Process**

The ICAP is a set of integrated risk practices organized around ensuring that Fifth Third can maintain robust capital and liquidity at a high level of confidence. This involves mechanisms to identify, assess, manage, monitor and report risks across the Bancorp; to ensure that the risk organization informs and guides the Bancorp's risk decisions from a position of independence; and that senior leadership incorporates risk principles into its measurement, decisions and compensation.

Sound risk management processes are necessary to support supervisory and management's confidence in assessments of risk profiles and internal capital adequacy assessments. The Bancorp recognizes that an appropriate level of capital should exceed the minimum requirement so that all risks of the Bancorp, both on- and off-balance sheet, are adequately covered, even during stress events.

In addition to consideration of stress events, the excess capital ("buffer") above the minimum requirements is held to account for uncertainty in risk identification, risk mitigation or control and risk quantification (model risk). Based on the environment at the time of the assessment, sophistication of measurements and tools employed, key assumptions and desired solvency level, the Capital Committee reviews capital calculations and analyses and recommends a capital buffer to be held at a specific solvency standard. The recommendation is taken up through the governance structure, ultimately to be approved by the Risk and Compliance Committee of the Board of Directors.

The Bancorp's ICAP is an ongoing process assessing capital adequacy relative to risk profile and risk appetite. Stress testing is intended to capture a variety of potential unfavorable scenarios that are applied across business areas, risk types and risk events.

Fifth Third's capital planning process assesses both the risks to which the Bancorp is exposed and the risk management processes in place to manage and mitigate those risks. The Bancorp evaluates its capital adequacy relative to its risks and considers the potential impact on earnings and capital from economic downturns. The process also incorporates rigorous, forward-looking stress testing.

Fifth Third Bancorp**Basel III Pillar 3 Regulatory Capital Disclosures as of December 31, 2024**

In addition to capital as a buffer against risk, the Bancorp also carefully manages its liquidity and has in place a comprehensive system of measures and practices to guard against a lack of liquidity.

Fifth Third's Board of Directors is responsible for setting the risk appetite of the Bancorp through its review and approval of the Bancorp's Enterprise Risk Management Framework and ensuring that its capital and risk capacity is sufficient to cover all risk exposures under normal and stressed conditions. The Board of Directors is also responsible for reviewing and challenging management's methodologies that are utilized to measure, monitor and manage risk exposures and capital needs; for approving all policies that govern the capital management process at the Bancorp; and for approving management's capital action plans and recommendations, including potential dividend payments, share repurchases and redemptions.

Capital Planning

The Bancorp maintains a comprehensive process for managing capital that considers the current and forward-looking macroeconomic and regulatory environments and makes capital distributions that are consistent with FRB requirements and the Bancorp's stress capital buffer requirement. Under the Enhanced Prudential Standards tailoring rules, the Bancorp is subject to Category IV standards, under which the Bancorp is required to develop and maintain a capital plan approved by the Board of Directors on an annual basis. The Bancorp is also subject to the FRB's supervisory stress tests every two years. The Bancorp was subject to the 2024 supervisory stress test conducted by the FRB and submitted its Board-approved capital plan and information contained in Schedule C - Regulatory Capital Instruments, as required, by the April 5, 2024 deadline.

The following tables present information on the RWA components included within the regulatory capital ratios under the Standardized Approach for Fifth Third Bancorp and the capital ratios for Fifth Third Bancorp and Fifth Third Bank, National Association at December 31, 2024.

Risk-Weighted Assets

(\$ in millions)

On-Balance Sheet

Exposures to sovereign entities ^(a)	\$	—
Exposures to depository institutions, foreign banks and credit unions		620
Exposures to public sector entities		6,096
Corporate exposures		66,837
Residential mortgage exposures ^(b)		12,563
Consumer loan exposure		24,804
HVCRE loans ^(b)		324
Past due loans		984
Other assets		13,749
Securitization exposures		2,984
Equity exposures		4,010
Excess allowance for credit losses		(286)

Off-Balance Sheet and Market Risk

Letters of credit		1,358
Unused commitments, excluding asset-backed commercial paper conduits:		
Original maturity of one year or less		2,014
Original maturity greater than one year		24,733
Centrally cleared derivatives		10
All other off-balance sheet items ^(c)		1,932
Market-risk-weighted assets		1,370
Total risk-weighted assets	\$	164,102

(a) Exposures to, and portions of exposures that are directly and unconditionally guaranteed by, the U.S. government, its agencies and the Federal Reserve Board receive 0% risk-weight.

(b) Includes related exposures that are 90 days or more past due or on nonaccrual.

(c) Includes over-the-counter derivatives, repo-style transactions and other off-balance sheet items.

Fifth Third Bancorp**Basel III Pillar 3 Regulatory Capital Disclosures as of December 31, 2024****Regulatory Capital Ratios**

	Fifth Third Bancorp	Fifth Third Bank, N.A.
CET1 capital	10.57 %	12.86 %
Tier 1 risk-based capital	11.86	12.86
Total risk-based capital	13.86	14.19
Leverage	9.22	10.02

CAPITAL CONSERVATION BUFFER AND STRESS CAPITAL BUFFER

The Bancorp is subject to the stress capital buffer requirement and must maintain capital ratios above its buffered minimum (regulatory minimum plus stress capital buffer) in order to avoid certain limitations on capital distributions and discretionary bonuses to executive officers. The FRB uses the supervisory stress test to determine the Bancorp's stress capital buffer, subject to a floor of 2.5%. As of December 31, 2024, the Bancorp's stress capital buffer requirement was 3.2%. The Bancorp's capital ratios exceeded the stress capital buffer requirement at December 31, 2024.

The Bancorp's capital conservation buffer is the lowest of the following ratios:

- (i) the banking organization's common equity tier 1 capital ratio minus its minimum common equity tier 1 capital ratio of 4.5%;
- (ii) the banking organization's tier 1 capital ratio minus its minimum tier 1 capital ratio of 6.0%; and
- (iii) the banking organization's total capital ratio minus its minimum total capital ratio of 8.0%.

If the Bancorp's common equity tier 1, tier 1 or total capital ratios are less than or equal to their respective minimums, then the Bancorp's capital conservation buffer would be zero.

The Bancorp is not subject to any limitations on its capital distributions or discretionary bonus payments to executive officers because capital levels exceed the defined minimum levels, inclusive of the capital conservation buffer.

The maximum dollar amount that a banking organization could pay out in the form of capital distributions or discretionary bonus payments during the current calendar quarter would be equal to the maximum payout ratio, multiplied by the banking organization's eligible retained income. Basel III defines eligible retained income as the greater of a banking organization's net income (as reported in the banking organization's quarterly regulatory reports) for the four calendar quarters preceding the current calendar quarter, net of any capital distributions and associated tax effects not already reflected in net income or the average of the most recent four quarters' net income. The Bancorp had \$579 million of eligible retained income at December 31, 2024.

Capital Conservation Buffer

December 31, 2024	Fifth Third Bancorp	Minimum Ratio	Buffer
CET1 capital	10.57 %	4.50 %	6.07 %
Tier 1 risk-based capital	11.86	6.00	5.86
Total risk-based capital	13.86	8.00	5.86
Required buffer			3.20
Capital conservation buffer			5.86 %

CREDIT RISK: GENERAL DISCLOSURES**Enterprise Risk Management**

Managing risk is an essential component of successfully operating a financial services company. The Bancorp's risk management approach includes processes for identifying, assessing, managing, monitoring and reporting risks. The Enterprise Risk Management division, led by the Bancorp's Chief Risk Officer, ensures the consistency and adequacy of the Bancorp's risk management approach within the structure of the Bancorp's operating model. In addition, the Internal Audit division provides an independent assessment of the Bancorp's internal control structure and related systems and processes.

The assumption of risk requires robust and active risk management practices that comprise an integrated and comprehensive set of activities, measures and strategies that apply to the entire organization. The Bancorp has established an Enterprise Risk Management Framework, approved by the Board of Directors, that provides the foundations for enterprise risk capacity, risk appetite and risk tolerances. The Bancorp's risk capacity is represented by its available financial resources. Risk capacity sets an absolute limit on risk-assumption in the Bancorp's annual and strategic plans. The Bancorp understands that not all financial resources may persist as viable loss buffers over time. Further, consideration must be given to regulatory capital buffers required per capital policy targets that would reduce risk capacity. Those factors take the form of capacity adjustments to arrive at an operating risk capacity which represents the operating risk level the Bancorp can assume while maintaining its solvency standard.

Fifth Third Bancorp**Basel III Pillar 3 Regulatory Capital Disclosures as of December 31, 2024****Credit Risk Management**

The objective of the Bancorp's credit risk management strategy is to quantify and manage credit risk on an aggregate portfolio basis, as well as to limit the risk of loss resulting from the failure of a borrower or counterparty to honor its financial or contractual obligations to the Bancorp. The Bancorp's credit risk management strategy is based on three core principles: conservatism, diversification and monitoring. The Bancorp believes that effective credit risk management begins with conservative lending practices which are described below. These practices include the use of intentional risk-based limits for single name exposures and counterparty selection criteria designed to reduce or eliminate exposure to borrowers who have higher than average default risk and defined weaknesses in financial performance. The Bancorp carefully designs and monitors underwriting, documentation and collection standards. The Bancorp's credit risk management strategy also emphasizes diversification on a geographic, industry, product and customer level as well as ongoing portfolio monitoring and timely management reviews of large credit exposures and credits experiencing deterioration of credit quality. Credit officers with the authority to extend credit are delegated specific authority based on risk and exposure amount, the use of which is closely monitored. Underwriting activities are centrally managed, and Credit Risk Management manages the policy and the authority delegation process directly. The Credit Risk Review function provides independent and objective assessments of the quality of underwriting and documentation, the accuracy of risk ratings and the charge-off, nonaccrual and reserve analysis process. The Bancorp's credit review process and overall assessment of the adequacy of the ACL is based on quarterly assessments of the estimated losses expected in the loan and lease portfolio. The Bancorp uses these assessments to maintain an adequate ACL and record any necessary charge-offs. Certain loans and leases with probable or observed credit weaknesses receive enhanced monitoring and undergo a periodic review. Refer to Note 6 of the Notes to Consolidated Financial Statements presented in the 2024 Form 10-K for further information on the Bancorp's credit rating categories, which are derived from standard regulatory rating definitions. In addition, stress testing is performed on various commercial and consumer portfolios utilizing various models. For certain portfolios, such as real estate and leveraged lending, stress testing is performed at the individual loan level during credit underwriting.

For further information related to credit risk management and practices, accounting policies and current exposures as reported under U.S. GAAP, refer to the 2024 Form 10-K. See the Disclosure Index (Appendix A) for specific references.

The following table summarizes remaining maturities by credit exposure (including scheduled repayments) for portfolio loans and leases and unused commitments. The contractual amounts of commitments to extend credit represent the Bancorp's maximum exposure to credit loss, in the event of default by the borrower if the borrower were to fully draw against the commitment. The Bancorp manages this credit risk by using the same credit policies it applies to loans. Management assesses the borrower's credit worthiness to determine the necessary collateral, which may include marketable securities, receivables, inventory, equipment and real estate.

Credit Exposure by Contractual Maturity

	Portfolio Loans and Leases		Unused Commitments	
	Less Than 1 Year	Greater Than 1 Year	Less Than 1 Year ^(a)	Greater Than 1 Year
December 31, 2024 (\$ in millions)				
Commercial	\$ 18,295	54,998	11,176	50,665
Consumer	7,481	39,017	16,799	2,259
Total	25,776	94,015	27,975	52,924

(a) Includes \$19.4 billion of unconditionally cancellable commitments which are not subject to risk-weighting per the regulatory capital rules.

Fifth Third Bancorp

Basel III Pillar 3 Regulatory Capital Disclosures as of December 31, 2024

The following table provides the geographic distribution of major types of portfolio retail credit exposure as of December 31, 2024. Refer to the Credit Risk Management section of the MD&A in the 2024 Form 10-K for the geographic and industry distribution of major types of commercial credit exposures as well as the geographic distribution of solar energy installation loans.

Portfolio Retail Credit Exposure by Geography

(\$ in millions)	Total Exposure ^(a)	Percent of Total
Home equity		
Ohio	\$ 3,650	30.2 %
Michigan	1,917	15.9
Illinois	1,542	12.7
Florida	1,346	11.1
Indiana	1,138	9.4
Kentucky	974	8.0
North Carolina	690	5.7
Tennessee	437	3.6
Other	414	3.4
Total home equity	\$ 12,108	100.0 %

(\$ in millions)	Total Outstanding	Percent of Total
Residential mortgage loans		
Ohio	\$ 3,708	21.1 %
Illinois	2,929	16.7
Florida	2,711	15.5
Michigan	1,850	10.5
North Carolina	1,158	6.6
Indiana	1,118	6.4
Kentucky	905	5.2
Georgia	597	3.4
Tennessee	581	3.3
Other	1,986	11.3
Total residential mortgage loans	\$ 17,543	100.0 %

(\$ in millions)	Total Outstanding	Percent of Total
Indirect secured consumer loans		
Ohio	\$ 2,407	14.7 %
Florida	1,677	10.3
Texas	1,520	9.3
Georgia	796	4.9
Minnesota	757	4.6
North Carolina	696	4.3
Michigan	547	3.4
Illinois	510	3.1
Other ^(b)	7,403	45.4
Total indirect secured consumer loans	\$ 16,313	100.0 %

(a) Total exposure includes loans and contractual commitments to extend credit.

(b) Fifth Third's indirect secured consumer loan portfolio has a nearly national distribution profile. Further breakdown of the other category results in a widespread distribution across a large number of additional states.

COUNTERPARTY CREDIT RISK-RELATED EXPOSURES

Counterparty credit exposure arises from the risk that a counterparty is unable to meet its payment obligations to the Bancorp under certain financial contracts and such failure results in the termination or replacement of the transaction at a loss to Fifth Third. Such exposures arise primarily in relation to OTC derivatives, repo-style transactions and transactions cleared through a central counterparty or exchange. OTC derivatives are traded directly between two parties without the use of a clearing exchange. Centrally cleared derivatives are entered into by two parties where the transaction is cleared through a central counterparty or exchange that acts as the counterparty to both parties to the derivative. Centrally cleared derivatives receive favorable capital treatment in comparison to OTC derivatives due to their lower inherent risk with the involvement of the central counterparty.

The majority of Fifth Third's counterparty credit risk exposure is incurred in transactions designed to help commercial customers manage their interest rate, currency and other risks and in the associated hedging of those transactions. The Bancorp economically hedges significant exposures related to these free-standing derivatives by entering into offsetting third-party contracts with approved, reputable and independent counterparties with substantially matching terms and currencies. Credit risk is minimized through credit approvals, limits, counterparty collateral and monitoring procedures.

Credit Approvals and Limits

Customer derivative hedging contract exposure is aggregated with direct credit exposure for purposes of credit approval. Credit limits dictate the amount of customer derivative exposure that the Bancorp can have at a given time. Traders must also adhere to customer and counterparty credit limits. Each derivative customer must have a Counterparty CEE Limit, approved by a credit officer with the appropriate approval authority as specified in the Commercial Loan Policy and documented in the Authorities Review System. All exceptions must be approved by an employee with proper credit authority. CEE limits are approved by the Market Risk Management Committee, which monitors and reports to senior management, and the Board of Directors significant market risk exposures, concentrations of positions, risk limit changes and material breaches to market risk policies.

Counterparty Collateral and Monitoring

The Bancorp's derivative assets include certain contractual features in which the Bancorp requires the counterparties to provide collateral in the form of cash and securities to offset changes in the fair value of the derivatives, including changes in the fair value due to credit risk of the counterparty. The majority of the collateral received and posted typically consists of cash and instruments issued or backed by the U.S. government or government sponsored entities.

Derivative contracts with commercial customers are generally cross-collateralized with the Bancorp's underlying credit or loan and security agreements and attendant guaranty, if applicable. To the extent that the Bancorp requires collateral as a condition of financing, the collateral supporting the customer's debt obligations will also support the derivative contract obligations via cross-default provisions and the incorporation of "rate management obligations" as a defined term in the credit or loan and security agreements. The Bancorp's policy prescribes the frequency of the valuation based on the volatility of the collateral. Valuation methods range from the use of market indices to third-party appraisals. For further discussion on the valuation of real estate collateral, refer to the Credit Risk Management section of the MD&A in the 2024 Form 10-K.

The Bancorp's Collateral Management team is responsible for consistently analyzing, evaluating and monitoring eligible collateral and optimizing existing pledged collateral in efforts to fulfill collateral requirements. Collateral held and posted is revalued each day. Prices and factors are updated daily based on the prior business day's closing prices and factors. Additionally, credit ratings are updated daily and are imported into the collateral management system via Bloomberg. Once revalued, all collateral positions are inspected for possible under or over-collateralization, taking into account applicable terms of the Credit Support Annex including thresholds, haircuts and other applicable items. The Risk department is then provided with a summary of the positions which allows them to perform an assessment of the Bancorp's risk as it relates to exposures and credit limits.

The table below shows derivatives by underlying exposure type and segregates derivative activity between contracts traded on OTC markets from those cleared through a central counterparty or exchange. Notional amounts are used in the calculation of the potential future exposure add-on which is the product of the notional amount of a derivative contract and prescribed conversion factors. The current credit exposure represents the gross positive fair value attributed to derivatives before the mitigating effects of counterparty collateral.

Fifth Third Bancorp

Basel III Pillar 3 Regulatory Capital Disclosures as of December 31, 2024

Derivative Exposure

December 31, 2024 (\$ in millions)	Notional Amount ^(a)	Current Exposure ^(b)
OTC Derivatives		
Interest rate contracts	\$ 71,179	642
Foreign exchange contracts	28,142	194
Commodity and other contracts	11,100	238
Equity derivative contracts	2,465	—
Total OTC derivatives	\$ 112,886	1,074
Centrally-Cleared Derivatives		
Interest rate contracts	\$ 30,796	2
Commodity contracts	2,375	18
Total centrally-cleared derivatives	\$ 33,171	20

(a) Excludes written options and spot derivatives.

(b) Excludes spot derivatives.

The table below displays a breakout of collateral by type which has been received by the Bancorp as of December 31, 2024 as part of derivative and repo-style transactions.

Collateral Type

(\$ in millions)	Centrally-Cleared		
	OTC Derivatives	Derivatives	Repo-Style Transactions
Cash	\$ 733	47	273
Other	167	—	—
Total collateral	\$ 900	47	273

CREDIT RISK MITIGATION

Fifth Third uses various strategies to mitigate credit risk in its portfolios, including establishing credit risk appetite measures and limits that define acceptable levels of total borrower exposure and transferring loans in securitization transactions. As described within the Counterparty Credit Risk-Related Exposures section of this Basel III Report, the Bancorp may also obtain collateral from counterparties to manage overall credit risk.

A bank may recognize the credit risk mitigation benefits of an eligible guarantee or eligible credit derivative by substituting the risk-weight associated with the protection provider for the risk-weight assigned to the exposure.

SECURITIZATIONS

The disclosures in this section refer to securitizations held in the banking book and the regulatory capital on these exposures calculated in accordance with the Standardized Approach. Basel III defines a securitization exposure as follows:

- All or a portion of the credit risk of one or more underlying exposures is transferred to one or more third parties other than through the use of credit derivatives or guarantees;
- The credit risk associated with the underlying exposures has been separated into at least two tranches reflecting different levels of seniority;
- Performance of the securitization exposures depends upon the performance of the underlying exposures;
- All or substantially all of the underlying exposures are financial exposures (such as loans, commitments, credit derivatives, guarantees, receivables, asset-backed securities, mortgage-backed securities, other debt securities or equity securities);
- The underlying exposures are not owned by an operating company; and
- The underlying exposures are not owned by a small business investment company or related community development investment.

The Bancorp is an investor in products created by third parties, which are primarily secured lending and investment positions that meet the definition of a securitization exposure. These securities consist of asset-backed securities, with mainly automobile and student loans as the underlying assets, in addition to commercial mortgage-backed securities. The Bancorp also has certain commercial loans in its portfolio that are considered securitization exposures. Fifth Third's objective, in relation to the securitization activities described above, is to enhance return on assets metrics, to manage balance sheet risk exposures and to achieve asset diversification.

Fifth Third Bancorp

Basel III Pillar 3 Regulatory Capital Disclosures as of December 31, 2024

Securitization transactions can involve a number of risks including portfolio risk, seller’s risk and liquidity risk. Portfolio risk arises from the performance of the underlying asset pool (i.e. payment rates, dilution, write-offs/losses). Seller’s risk represents the portion of the unsecured credit exposure in a transaction with the seller. This exposure principally arises from recourse for losses, dilution of yield, lack of cash control, a first priority perfected security interest or potential declines in the amount of securitized asset collateral between settlement periods.

The Bancorp’s due diligence process is designed to provide an understanding of the features that may materially affect the performance of a securitization. These procedures include analyzing and monitoring the quality of the positions, including information regarding performance of the underlying credit exposures and relevant market data and the structural and other enhancement features that may affect the credit quality of a securitization. The Bancorp evaluates, reviews and updates the ongoing understanding of each securitization position at least quarterly.

The Asset Securitization Group, within the Commercial line of business, and the appropriate relationship manager or credit officer reviews each commercial loan securitization exposure on a quarterly basis. Each review includes a discussion of the Bancorp’s total exposure, the availability on the facility, the servicer’s financial statements, the net pool balance and pool concentrations and compliance with portfolio triggers and servicer financial covenants.

The Bancorp is not applying any credit risk mitigation to its securitization exposures and does not have exposure to securitization guarantors.

The Bancorp calculates the regulatory capital requirement for securitization exposures in accordance with the hierarchy of approaches outlined under the Standardized Approach Framework. The Bancorp utilizes the SSFA to determine the RWA for substantially all of its securitization exposures.

The Bancorp does not have any synthetic securitization exposures nor any resecuritizations under Basel III; therefore, the following tables relate to the Bancorp as an investor. As the Bancorp has made the AOCI opt-out election, the available-for-sale securitization exposure amounts for purposes of risk-weighting is the carrying value of the security less any unrealized gain on the exposure plus any unrealized loss on the exposure included in AOCI.

The Bancorp’s securitization exposures are summarized in the following tables:

Exposure Type

December 31, 2024 (\$ in millions)	Exposure ^(a)	RWA	Capital Requirement ^(b)
Commercial loans meeting definition of a securitization exposure:			
Funded	\$ 4,760	946	76
Unfunded	1,524	305	24
Commercial mortgage-backed securities	4,167	926	74
Asset-backed securities, student loans	2,153	469	38
Asset-backed securities, automobile loans	842	171	14
Asset-backed securities, other	732	167	13
Total	\$ 14,178	2,984	239

(a) All securitization exposures are on-balance sheet except the unfunded portion of commercial loans meeting definition of a securitization exposure.

(b) Capital requirement is calculated as 8% of risk-weighted assets.

Risk-Weight Band

December 31, 2024 (\$ in millions)	Exposure	RWA
Risk-Weight Range		
20% - 25%	\$ 13,871	2,858
26% - 50%	246	86
51% - 75%	50	26
76% - 100%	3	3
101% - 500%	8	11
Total	\$ 14,178	2,984

Fifth Third Bancorp

Basel III Pillar 3 Regulatory Capital Disclosures as of December 31, 2024

EQUITIES NOT SUBJECT TO MARKET RISK RULE

Equity investments include investments in unconsolidated subsidiaries, equity and other investments classified within other assets and fund investments that, in each case, are not a covered position for purposes of the Market Risk Rule nor a securitization exposure. The Bancorp uses the SRWA and the FLTA to measure equity exposures for regulatory purposes.

The SRWA is used for all types of equity exposures that are not equity exposures to a mutual fund or other investment fund. Under the SRWA, the RWA for each equity exposure is calculated by multiplying the adjusted carrying value of the equity exposure by the applicable prescribed regulatory risk-weight. Under the SRWA, the aggregate carrying value of the exposures that are less than 10% of total regulatory capital is risk-weighted at 100% as non-significant equity exposures. To utilize this risk-weight, the Bancorp aggregates the following equity exposures: unconsolidated small business investment companies; publicly traded; and non-publicly traded equity exposures. As of December 31, 2024, the Bancorp did not have aggregate equity exposures that exceeded the 10% threshold. Fifth Third's equity exposures subject to SRWA include FRB, FHLB and DTCC stock, equity securities, private equity investments and the community development investments made by Fifth Third Community Development Corporation and Fifth Third Community Development Company, LLC.

The Bancorp uses the FLTA to determine the RWA for certain equity exposures to mutual funds and other investment funds. Under the FLTA, risk-weights are applied on a proportional share basis to each underlying equity investment held by an investment fund.

The FRB, FHLB and DTCC restricted stock holdings are statutory investments required by regulation in order for the Bank to be a member in those organizations. Equity investments made for strategic purposes and for maintaining relationships include the community development investments and separate and hybrid separate account BOLI investments. The private equity investments are held for capital gains purposes and also to provide strategic opportunities in certain cases.

Refer to the 2024 Form 10-K for further information on the valuation methodologies and accounting policies used to account for the Bancorp's equity investments. See specific references in the Disclosure Index (Appendix A).

Latent revaluation gains and losses are unrealized gains and losses on nonpublic equity securities recorded at cost, which are not recognized in the Bancorp's Consolidated Balance Sheets or Consolidated Statements of Income.

Equity Exposure by Type

December 31, 2024 (\$ in millions)	Exposure	Risk-Weight	RWA	Capital Requirement ^(a)
Using SRWA:				
FRB stock ^(b)	\$ 500	0 %	\$ —	—
FHLB stock ^(b)	276	20	55	4
DTCC stock ^(b)	2	100	2	—
Community development and other equity investments ^(b)	2,657	100	2,657	213
Equity securities ^(c)	35	100	35	3
Using FLTA:				
Separate and hybrid separate account BOLI investments ^(b)	1,546	81	1,247	100
Trading securities ^(c)	55	20	11	1
Equity securities ^(c)	16	19	3	—
Total	\$ 5,087		\$ 4,010	321

(a) Capital requirement is calculated as 8% of risk-weighted assets.

(b) Equity exposures are non-publicly traded.

(c) Equity exposures are publicly traded.

INTEREST RATE AND PRICE RISK FOR NON-TRADING ACTIVITIES

Interest rate risk is the risk to earnings or capital arising from movement of interest rates. This risk primarily impacts the Bancorp's income categories through changes in interest income on earning assets and the cost of interest-bearing liabilities, and through fee items that are related to interest sensitive activities such as mortgage origination and servicing income and through earnings credits earned on commercial deposits that offset commercial deposit fees. Price risk is the risk to earnings or capital arising from changes in the value of financial instruments and portfolios due to movements in interest rates, volatilities, foreign exchange rates, equity prices and commodity prices. Management considers interest rate risk a prominent market risk in terms of its potential impact on earnings. Interest rate risk may occur for any one or more of the following reasons:

- Assets and liabilities mature or reprice at different times;
- Short-term and long-term market interest rates change by different amounts; or
- The expected maturities of various assets or liabilities shorten or lengthen as interest rates change.

In addition to the direct impact of interest rate changes on NII and interest-sensitive fees, interest rates can impact earnings through their effect on loan and deposit demand, credit losses, mortgage origination volumes, the value of servicing rights and other sources of the Bancorp's earnings. Changes in interest rates and other market factors can impact earnings through changes in the value of portfolios, if not appropriately hedged. Stability of the Bancorp's net income is largely dependent upon the effective management of interest rate risk and to a lesser extent price risk.

Management continually reviews the Bancorp's on- and off-balance sheet composition, earnings flows, and hedging strategies and models interest rate risk and price risk exposures, and possible actions to manage these risks, given numerous possible future interest rate and market factor scenarios. A series of Policy Limits and Key Risk Indicators are employed to ensure that risks are managed within the Bancorp's risk tolerance for interest rate risk and price risk.

For further information on interest rate and price risk, including a net interest income sensitivity analysis, refer to the Interest Rate and Price Risk Management section of MD&A of the 2024 Form 10-K.

APPENDIX A - DISCLOSURE INDEX

	Description	Page References		
		Basel III Report	FR Y-9C for December 31, 2024	Form 10-K for December 31, 2024
TABLE 1 - SCOPE OF APPLICATION				
Qualitative Disclosures				
(a)	The name of the top corporate entity in the group to which subpart D of this part applies.	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).	N/A: The Bancorp has no differences in the basis for consolidating entities.		
(c)	Any restrictions, or other major impediments, on transfer of funds or total capital within the group.	4		126
Quantitative Disclosures				
(d)	The aggregate amount of surplus capital of insurance subsidiaries included in the total capital of the consolidated group.	4		
(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.	4		
TABLE 2 - CAPITAL STRUCTURE				
Qualitative Disclosures				
(a)	Summary information on the terms and conditions of the main features of all regulatory capital instruments.	4		163-166, 181-182
Quantitative Disclosures				
(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.	5	49-50	
(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.	5	51	
(d)	The amount of total capital, with separate disclosure of: (1) Tier II capital elements, including tier II capital instruments and total capital minority interest not included in tier 1 capital; and (2) Regulatory adjustments and deductions made to total capital.	5	52-53	

APPENDIX A - DISCLOSURE INDEX

Description	Page References		
	Basel III Report	FR Y-9C for December 31, 2024	Form 10-K for December 31, 2024

TABLE 3 - CAPITAL ADEQUACY

Qualitative Disclosures

(a)	A summary discussion of the bank holding company’s approach to assessing the adequacy of its capital to support current and future activities.	5-6		104
-----	--	-----	--	-----

Quantitative Disclosures

(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.	6		
(c)	Standardized market risk-weighted assets as calculated under subpart F of this part.	6	66	
(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.	7	53	195
(e)	Total standardized risk-weighted assets.	6	55-66	

TABLE 4 - CAPITAL CONSERVATION BUFFER

Quantitative Disclosures

(a)	At least quarterly, the bank holding company must calculate and publicly disclose the capital conservation buffer as described under §.11.	7	54	
(b)	At least quarterly, the bank holding company must calculate and publicly disclose the eligible retained income of the bank holding company, as described under §.11.	7	54	
(c)	At least quarterly, the bank holding company 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.	N/A	54	

APPENDIX A - DISCLOSURE INDEX

Description	Page References		
	Basel III Report	FR Y-9C for December 31, 2024	Form 10-K for December 31, 2024
TABLE 5 - CREDIT RISK: GENERAL DISCLOSURES			
Qualitative Disclosures			
(a)	The general qualitative disclosure requirement with respect to credit risk (excluding counterparty credit risk disclosed in accordance with Table 6), including the: (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 bank holding company 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 holding company’s credit risk management policy.	7-8	53-54, 77-93, 113-117, 133-144
Quantitative Disclosures			
(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, bank holding companies 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.	N/A	20-21, 23-24, 37
(c)	Geographic distribution of exposures, categorized in significant areas by major types of credit exposure.	9	79
(d)	Industry or counterparty type distribution of exposures, categorized by major types of credit exposure.	N/A	79
(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 entity’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.	N/A	130-144

APPENDIX A - DISCLOSURE INDEX

	Description	Page References		
		Basel III Report	FR Y-9C for December 31, 2024	Form 10-K for December 31, 2024
(f)	Amount of past due 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.	Allowance by geography is not practical or meaningful to disclose as management doesn't use this information to allocate general or specific allowance components.		79-93, 131-140
(g)	Reconciliation of changes in ALLL.	N/A		132
(h)	Remaining contractual maturity delineation (for example, one year or less) of the whole portfolio, categorized by credit exposure.	8	21, 35	167

TABLE 6 - GENERAL DISCLOSURE FOR COUNTERPARTY CREDIT RISK-RELATED EXPOSURES

Qualitative Disclosures

(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 (4) The impact of the amount of collateral the bank holding company would have to provide given a deterioration in the bank holding company's own creditworthiness.	10		155-156
-----	--	----	--	---------

Quantitative Disclosures

(b)	Gross positive fair value of contracts, collateral held (including type, for example, cash, government securities), and net unsecured credit exposure. A bank holding company must also disclose the notional value of credit derivative hedges purchased for counterparty credit risk protection and the distribution of current credit exposure by exposure type.	11	35-37, 67	
(c)	Notional amount of purchased and sold credit derivatives, segregated between use for the bank holding company'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.	N/A	35	

APPENDIX A - DISCLOSURE INDEX

Description	Page References			
	Basel III Report	FR Y-9C for December 31, 2024	Form 10-K for December 31, 2024	
TABLE 7 - CREDIT RISK MITIGATION				
Qualitative Disclosures				
(a)	The name of the top corporate entity in the group to which subpart D of this part applies.	3		
Quantitative Disclosures				
(b)	For each separately disclosed credit risk portfolio, the total exposure that is covered by eligible financial collateral, and after the application of haircuts.	11		
(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.	11		
TABLE 8 - SECURITIZATION				
Qualitative Disclosures				
(a)	The general qualitative disclosure requirement with respect to a securitization (including synthetic securitizations), including a discussion of: (1) The bank holding company’s objectives for securitizing assets, including the extent to which these activities transfer credit risk of the underlying exposures away from the bank holding company to other entities and including the type of risks assumed and retained with resecuritization activity; (2) The nature of the risks (e.g. liquidity risk) inherent in the securitized assets; (3) The roles played by the bank holding company in the securitization process and an indication of the extent of the bank holding company’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 holding company’s policy for mitigating the credit risk retained through securitization and resecuritization exposures; and (6) The risk-based capital approaches that the bank holding company follows for its securitization exposures including the type of securitization exposure to which each approach applies.	11-12		
(b)	A list of: (1) The type of securitization SPEs that the bank holding company, as sponsor, uses to securitize third-party exposures. The bank holding company must indicate whether it has exposure to these SPEs, either on- or off- balance sheet; and (2) Affiliated entities: (i) That the bank holding company manages or advises; and (ii) That invest either in the securitization exposures that the bank holding company has securitized or in securitization SPEs that the bank holding company sponsors.	N/A		

APPENDIX A - DISCLOSURE INDEX

	Description	Page References		
		Basel III Report	FR Y-9C for December 31, 2024	Form 10-K for December 31, 2024
(c)	Summary of bank holding company'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 holding company to provide financial support for securitized assets.	11-12		118-119
(d)	An explanation of significant changes to any quantitative information since the last reporting period.	N/A		

Quantitative Disclosures

(e)	The total outstanding exposures securitized by the bank holding company 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.	12		
(f)	For exposures securitized by the bank holding company in securitizations that meet the operational criteria in § __.41: (1) Amount of securitized assets that are impaired/past due categorized by exposure type; and (2) Losses recognized by the bank holding company during the current period categorized by exposure type.	12		
(g)	The total amount of outstanding exposures intended to be securitized categorized by exposure type.	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.	12		
(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.	12		
(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		
(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.	12		

APPENDIX A - DISCLOSURE INDEX

Description	Page References		
	Basel III Report	FR Y-9C for December 31, 2024	Form 10-K for December 31, 2024

TABLE 9 - EQUITIES NOT SUBJECT TO SUBPART F OF THIS PART (Market Risk Rule)

Qualitative Disclosures

(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.	13		149-152, 187-194
-----	---	----	--	---------------------

Quantitative Disclosures

(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.	13		
(c)	The types and nature of investments, including the amount that is: (1) Publicly traded; and (2) Non publicly traded.	13		
(d)	The cumulative realized gains (losses) arising from sales and liquidations in the reporting period.	N/A		
(e)	(1) Total unrealized gains (losses). (2) Total latent revaluation gains (losses). (3) Any amounts of the above included in tier 1 or tier II capital.	13		
(f)	Capital requirements categorized by appropriate equity groupings, consistent with the bank holding company’s methodology, as well as the aggregate amounts and the type of equity investments subject to any supervisory transition regarding regulatory capital requirements.	13		

TABLE 10 - INTEREST RATE RISK FOR NON-TRADING ACTIVITIES

Qualitative Disclosures

(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.	14		94-99
-----	---	----	--	-------

Quantitative Disclosures

(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).	14		94-99
-----	---	----	--	-------