



# **Huntington Bancshares Incorporated**

Basel III Regulatory Capital Disclosures

September 30, 2019

## Glossary of Acronyms

<b>Acronym</b>	<b>Description</b>
AFS	Available For Sale
ALLL	Allowance for Loan and Lease Losses
C&I	Commercial and Industrial
CAP	Capital Adequacy Process
CRE	Commercial Real Estate
EAD	Exposure At Default
GAAP	Generally Accepted Accounting Principles in the United States
HTM	Held to Maturity
HVCRE	High Volatility Commercial Real Estate
ISDA	International Swaps and Derivatives Association
MD&A	Management Discussion and Analysis
MDB	Multilateral Development Bank
OTC	Over-The-Counter
PFE	Potential Future Exposure
PSE	Public Sector Entity
RWA	Risk Weighted Assets
SPE	Special Purpose Entity
SSFA	Simplified Supervisory Formula Approach
T-Bill	Treasury Bill
T-Bond	Treasury Bond
T-Note	Treasury Note
VIE	Variable Interest Entity

***Introduction***

**Company Overview**

Huntington Bancshares Incorporated (Huntington or HBI) is a multi-state diversified regional bank holding company organized under Maryland law in 1966 and headquartered in Columbus, Ohio. Huntington has 15,659 average full-time equivalent employees. Through its bank subsidiary, The Huntington National Bank (the Bank), HBI has over 150 years of serving the financial needs of our customers. Through its subsidiaries, including the Bank, Huntington provides full-service commercial and consumer banking services, mortgage banking services, automobile financing, recreational vehicle and marine financing, equipment financing, investment management, trust services, brokerage services, insurance products and services, and other financial products and services. The Bank, organized in 1866, is our only banking subsidiary. Huntington’s banking offices are located in Ohio, Illinois, Indiana, Kentucky, Michigan, Pennsylvania, and West Virginia. As of September 30, 2019, the Bank had 868 full-service branches and private client group offices.

Select financial services and other activities are also conducted in various other states. International banking services are available through the headquarters office in Columbus, Ohio. Our foreign banking activities, in total or with any individual country, are not significant.

When we refer to “we,” “our,” and “us” in this report, we mean Huntington Bancshares Incorporated and our consolidated subsidiaries. When we refer to the “Bank” in this report, we mean our only bank subsidiary, The Huntington National Bank, and its subsidiaries.

The Board of Governors of the Federal Reserve System (Federal Reserve Board) is the primary regulator of HBI, a bank holding company under the Bank Holding Company Act of 1956 (BHC Act). As a bank holding company, HBI is subject to consolidated risk-based regulatory capital requirements which are computed in accordance with the applicable risk-based capital regulations of the Federal Reserve Board. These capital requirements are expressed as capital ratios that compare measures of regulatory capital to risk-weighted assets (RWA). Capital levels are subject to qualitative judgments by the regulators on capital components, risk weightings and other factors. In addition, we are subject to requirements with respect to leverage.

**Regulatory Capital and Capital Ratios**

In 2013, the Federal Reserve voted to adopt final capital rules implementing Basel III requirements for U.S. Banking organizations. The final rules establish an integrated regulatory capital framework and implement in the United States the Basel III regulatory capital reforms from the Basel Committee on Banking Supervision and certain changes required by the Dodd-Frank Act. Under the final rule, minimum requirements increase for both the quantity and quality of capital held by banking organizations. Consistent with the international Basel framework, the final rule includes a new minimum ratio of common equity Tier 1 capital to risk-weighted assets and a common equity Tier 1 capital conservation buffer of 2.5% of risk-weighted assets. The rule also raises the minimum ratio of Tier 1 capital to risk-weighted assets and includes a minimum leverage ratio of 4%. These minimum capital ratios were effective for us on January 1, 2015, and were fully phased-in on January 1, 2019. We are subject to the standardized approach for calculating risk-weighted assets in accordance with subpart D of the final rule.

The following are the minimum Basel III regulatory capital levels, including a capital conservation buffer beginning in 2016, which we must satisfy to avoid limitations on capital distributions and discretionary bonus payments during the applicable transition period, from January 1, 2015, until January 1, 2019:

	<b>Basel III Regulatory Capital Levels</b>				
	January 1, 2015	January 1, 2016	January 1, 2017	January 1, 2018	January 1, 2019
Common equity tier 1 risk-based capital ratio	4.5 %	5.125 %	5.75 %	6.375 %	7.0 %
Tier 1 risk-based capital ratio	6.0 %	6.625 %	7.25 %	7.875 %	8.5 %
Total risk-based capital ratio	8.0 %	8.625 %	9.25 %	9.875 %	10.5 %

The final rule emphasizes common equity Tier 1 capital, the most loss-absorbing form of capital, and implements strict eligibility criteria for regulatory capital instruments. The final rule also modifies the methodology for calculating risk-weighted assets to enhance risk sensitivity. Banks and regulators use risk weighting to assign different levels of risk to different classes of assets.

### ***Scope of Application***

The Basel III Regulatory Capital Disclosures and HBI's regulatory capital ratio calculations are prepared on a fully consolidated basis. The consolidated financial statements are prepared in accordance with GAAP and include the accounts of HBI and its majority-owned subsidiaries. All intercompany transactions and balances have been eliminated in consolidation. HBI is subject to the standardized approach for calculating risk-weighted assets.

### **Restrictions on the Transfer of Funds or Regulatory Capital within HBI**

Dividends from the Bank to HBI are the primary source of funds for payment of dividends to our shareholders. However, there are statutory limits on the amount of dividends that the Bank can pay to HBI. Regulatory approval is required prior to the declaration of any dividends in an amount greater than its undivided profits or if the total of all dividends declared in a calendar year would exceed the total of its net income for the year combined with its retained net income for the two preceding years, less any required transfers to surplus or common stock. The Bank is currently able to pay dividends to HBI subject to these limitations.

### **Compliance with Capital Requirements**

As of September 30, 2019, HBI had capital levels above the minimum regulatory capital requirements, as well as the well-capitalized standards established for prompt corrective action. For further detail on capital ratios, see Table 19 – Regulatory Capital Data in the 2019 Third Quarter Report on Form 10-Q. Also, the aggregate amount of surplus capital in our insurance subsidiaries included in HBI consolidated total capital as of September 30, 2019 was \$16 million. No subsidiary had a capital shortfall relative to its minimum regulatory capital requirements as of this reporting date.

***Capital Structure***

Common equity (i.e., common stock, capital surplus, and retained earnings) is the primary component of our capital structure. Common equity allows for the absorption of losses on an ongoing basis and is permanently available for this purpose. Further, common equity allows for the conservation of resources during stress, as it provides HBI with full discretion on the amount and timing of dividends and other distributions.

However, regulators and rating agencies include other non-common forms of capital (e.g., subordinated debt and preferred stock) in their calculations of capital adequacy. Accordingly, Huntington allows for the inclusion of these alternative forms of capital in its metrics for the Tier 1 risk based capital and total risk based capital ratios.

The terms and conditions of HBI's capital instruments are described in the 2018 Annual Report on Form 10-K and 2019 Third Quarter Report on Form 10-Q as follows:

- Common stock terms and conditions are described on the Balance Sheet in HBI's Consolidated Financial Statements.
- Preferred stock terms and conditions are described in Note 11 - Shareholders' Equity in the 2018 Annual Report on Form 10-K.
- Trust preferred securities terms and conditions are described in Note 13 - VIEs in the 2019 Third Quarter Report on Form 10-Q.
- Subordinated debt terms and conditions are described in Note 9 - Long-Term Debt in the 2018 Annual Report on Form 10-K.

The components of HBI's capital structure are disclosed in the table below:

<b>Capital Components</b>	September 30, 2019
<i>(in millions)</i>	
Common equity Tier 1 risk-based capital:	
Common stock plus related surplus	\$ 8,931
Retained Earnings	1,946
Goodwill and other intangibles, net of related taxes	(2,162)
Deferred tax assets that arise from tax loss and credit carryforwards	(30)
Common equity Tier 1 capital	8,685
Additional Tier 1 capital:	
Shareholders' preferred equity	1,208
Tier 1 capital	9,893
Tier 2 capital instruments plus related surplus	452
Total capital minority interest that is not included in Tier 1 capital	298
Qualifying allowance for loan and lease losses	884
Tier 2 capital	1,634
Total risk-based capital	\$ 11,527

### ***Capital Adequacy***

We utilize a capital adequacy process (CAP) which, at a minimum, addresses requirements set forth in the Federal Reserve's *Seven Principles of an Effective Capital Adequacy Process*:

1. Sound foundational risk management
2. Effective loss estimation methodologies
3. Solid resource estimation methodologies
4. Sufficient capital adequacy impact assessment
5. Comprehensive capital policy and planning
6. Robust internal controls
7. Effective governance

Huntington's CAP objectives are to assure that capital levels are considered strong, to support underlying risk positions, and allow it to continue its operations as a credit intermediary. To do so, the CAP assesses both point-in-time and forecasted capital ratios. Huntington understands that the appropriate level of capital cannot be determined solely through the application of quantitative criteria for "adequate" and "well-capitalized" levels. Huntington is independently responsible for assessing its own capital adequacy based on its risk profile and business model.

In building the CAP, Risk Management and Finance establish working groups to facilitate day-to-day work and resolve and/or recommend solutions to challenges that arise as a result of CAP enhancements. Recommendations and updates from working groups are reported to the Capital Management Committee and, as applicable, to the Risk Oversight Committee of the Board of Directors.

Risk-weighted assets represent an institution's on-balance sheet assets and off-balance sheet exposures, weighted according to the risk associated with each exposure category. The risk-weighted asset calculation is used in determining the institution's capital requirement.

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The following table shows risk-weighted assets by exposure types:

<b>Risk Weighted Assets</b>	September 30, 2019	
<i>(dollar amounts (in millions))</i>		
<b>On-balance sheet assets:</b>		
Exposure to sovereign entities <sup>(1)</sup>	\$	1,309
Exposures to certain supranational entities and MDBs		—
Exposure to depository institutions, foreign banks and credit unions		245
Exposures to public sector entities (PSE)		1,478
Corporate exposures		35,270
Other loans		17,747
Residential mortgage exposures		14,902
Statutory multifamily mortgages and pre-sold construction loans		—
High volatility commercial real estate (HVCRE) loans		200
Past due exposures		525
Default fund contributions		—
Securitization exposures		—
Equity exposures		928
Trading & Other Assets		4,428
<b>Off-balance sheet:</b>		
Commitments		7,771
OTC Derivatives		1,345
Cleared transactions		11
Securitization Exposures		—
Letters of credit		546
Unsettled transactions		—
Other Off Balance Sheet Items		14
<b>Total Standardized Risk Weighted Assets</b>	<b>\$</b>	<b>86,719</b>
<b>Common Equity Tier 1 Capital Ratio</b>		
Huntington Bancshares Incorporated		10.02%
Huntington National Bank		11.05
<b>Tier 1 Risk-Based Capital Ratio</b>		
Huntington Bancshares Incorporated		11.41
Huntington National Bank		12.05
<b>Total Risk-Based Capital Ratio</b>		
Huntington Bancshares Incorporated		13.29
Huntington National Bank		13.50
<b>Tier 1 Leverage Ratio</b>		
Huntington Bancshares Incorporated		9.34
Huntington National Bank		9.88

(1) HBI's sovereign exposure is predominantly to the U.S. government and its agencies.

**Note:** Huntington is not subject to the Market Risk requirements under subpart F of the final rule.

***Capital Conservation Buffer***

The capital conservation buffer is mandatory regulatory capital that financial institutions are required to hold in addition to the other minimum capital requirements. Basel III guidelines state a banking organization would need to hold a capital conservation buffer in an amount greater than 2.5% of total risk-weighted assets over the regulatory “well-capitalized” minimums to avoid limitations on capital distributions and discretionary bonus payments to executive officers. HBI is subject to the capital conservation buffer requirements, which have been phased-in, as detailed below:

	2016	2017	2018	2019
Capital conservation buffer	0.63%	1.25%	1.88%	2.5%

The capital conservation buffer of a banking organization is the lowest of the following three ratios: the common equity Tier 1 capital ratio less its minimum common equity Tier 1 capital ratio; the Tier 1 capital ratio less its minimum Tier 1 capital ratio or the total capital ratio less its minimum total capital ratio. The capital conservation buffer calculations for Huntington Bancshares Incorporated and Huntington National Bank are shown in the tables below. The capital conservation buffers were 5.29% and 5.50%, respectively. As a result of the calculations for both organizations, there are no limitations on distributions and discretionary bonus payments under the capital conservation buffer framework. The disclosure requirements of the Capital Conservation Buffer are available in Huntington's FR Y-9C Schedule HC-R Part I and Call Report Schedule RC-R Part I.

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	Capital Ratio	Minimum Capital Requirement	Capital Conservation Buffer	Minimum Capital Conservation Buffer Requirement
Common Equity Tier 1 Capital	10.02%	4.50%	5.52%	2.50%
Tier 1 Capital	11.41%	6.00%	5.41%	2.50%
Total Capital	13.29%	8.00%	5.29%	2.50%

**Huntington National Bank**

September 30, 2019

	Capital Ratio	Minimum Capital Requirement	Capital Conservation Buffer	Minimum Capital Conservation Buffer Requirement
Common Equity Tier 1 Capital	11.05%	4.50%	6.55%	2.50%
Tier 1 Capital	12.05%	6.00%	6.05%	2.50%
Total Capital	13.50%	8.00%	5.50%	2.50%



***Credit Risk: General Disclosures***

The following credit risk policies are described in Note 1 to the Consolidated Financial Statements included in our 2018 Annual Report on Form 10-K:

- a. Policy for determining past due or delinquency status
- b. Policy for placing loans on nonaccrual status
- c. Policy for returning loans to accrual status
- d. Definition of and policy for identifying impaired loans
- e. Description of the methodology that HBI uses to estimate its allowance for loan and lease losses
- f. Policy for charging-off uncollectible amounts.

Discussion of HBI's credit risk management process is presented in the 2018 Annual Report on Form 10-K in the Credit Risk section of MD&A.

**Total Credit Risk Exposures**

<i>(in millions)</i>	Credit Exposure			
	September 30, 2019			
	Loans	Unused Commitments <sup>(1)</sup>	Total	Average Balance
C&I	\$ 30,434	\$ 18,979	\$ 49,413	\$ 49,205
CRE	6,856	1,410	8,266	8,287
Automobile	12,292	—	12,292	12,232
Home equity	9,300	11,133	20,433	20,443
Residential mortgage	12,210	166	12,376	12,241
RV and marine finance	3,553	—	3,553	3,522
Other consumer	1,311	3,455	4,766	4,977
<b>Total loans and commitments credit exposures</b>	<b>\$ 75,956</b>	<b>\$ 35,143</b>	<b>\$ 111,099</b>	<b>\$ 110,907</b>

(1) Unused commitments include unused loan commitments and letters of credit.

<i>(in millions)</i>	Derivatives Credit Exposure	
	September 30, 2019	Average Balance
Interest rate	\$ 980	\$ 873
Foreign exchange	136	116
Commodities	270	304
Equities	74	71
<b>Total derivatives credit exposures</b>	<b>\$ 1,460</b>	<b>\$ 1,364</b>

Disclosure of Debt Securities exposure is described in Note 4 - Investment Securities and Other Securities in the 2019 Third Quarter Report on Form 10-Q.

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**Geographic Distribution of Credit Exposures**

		Loans and Commitments Credit Exposure by State							
		September 30, 2019							
<i>(in millions)</i>		C&I	CRE	Automobile	Home equity	Residential mortgage	RV and marine	Other consumer	Total
Ohio	\$	15,196	\$ 3,108	\$ 3,733	\$ 11,520	\$ 4,023	\$ 270	\$ 2,745	\$ 40,595
Michigan		7,407	1,406	700	4,393	2,129	161	1,004	17,200
Pennsylvania		3,514	452	906	1,165	722	107	208	7,074
Indiana		2,060	315	1,217	1,165	714	122	199	5,792
Illinois		2,914	412	609	911	993	203	65	6,107
Kentucky		758	162	1,244	378	152	99	49	2,842
West Virginia		663	36	443	564	261	17	101	2,085
Wisconsin		504	23	366	19	136	101	33	1,182
Other		16,397	2,352	3,074	318	3,246	2,473	362	28,222
<b>Total</b>	<b>\$</b>	<b>49,413</b>	<b>\$ 8,266</b>	<b>\$ 12,292</b>	<b>\$ 20,433</b>	<b>\$ 12,376</b>	<b>\$ 3,553</b>	<b>\$ 4,766</b>	<b>\$ 111,099</b>

		Derivative Credit Exposure by Country				
		September 30, 2019				
<i>(in millions)</i>		Interest Rate Derivatives	Foreign Exchange	Commodities	Equities	Total Exposure
United States	\$	953	\$ 108	\$ 256	\$ 68	\$ 1,385
Non-United States		27	28	14	6	75
<b>Total derivatives credit exposure</b>	<b>\$</b>	<b>980</b>	<b>\$ 136</b>	<b>\$ 270</b>	<b>\$ 74</b>	<b>\$ 1,460</b>

Disclosure of Debt Securities exposure is presented in Note 4 - Investment Securities and Other Securities in the 2019 Third Quarter Report on Form 10-Q. Non-United States debt securities exposure is not material.

**Distribution of Exposures by Industry Type, Categorized by Major Types of Credit Exposures**

<i>(in millions)</i>	Credit Exposure by Industry Category			
	September 30, 2019			
	Loans	Unused Commitments	Derivatives	Total
Real estate and rental and leasing	\$ 6,826	\$ 1,994	\$ 414	\$ 9,234
Manufacturing	5,141	3,619	410	9,170
Retail trade	5,031	2,360	—	7,391
Finance and insurance	3,308	2,862	423	6,593
Health care and social assistance	2,604	1,122	21	3,747
Wholesale trade	2,449	1,630	—	4,079
Mining, quarrying, and oil and gas extraction	1,375	921	151	2,447
Professional, scientific and technical services	1,347	1,278	—	2,625
Transportation and warehousing	1,242	519	—	1,761
Accommodation and food services	2,008	315	—	2,323
Construction	973	885	—	1,858
Other services	1,324	548	31	1,903
Utilities	419	705	—	1,124
Educational services	467	204	—	671
Arts, entertainment and recreation	654	193	—	847
Information	619	279	—	898
Admin., support, waste mgmt., and remediation services	687	285	—	972
Public administration	237	28	4	269
Agriculture, forestry, fishing and hunting	172	79	—	251
Management of companies and enterprises	112	43	—	155
Unclassified, other	295	520	6	821
<b>Total commercial credit exposure by industry category</b>	<b>37,290</b>	<b>20,389</b>	<b>1,460</b>	<b>59,139</b>
Automobile	12,292	—	—	12,292
Home Equity	9,300	11,133	—	20,433
Residential mortgage	12,210	166	—	12,376
RV and marine finance	3,553	—	—	3,553
Other consumer loans	1,311	3,455	—	4,766
<b>Total Loans, commitments, and derivatives credit exposures</b>	<b>\$ 75,956</b>	<b>\$ 35,143</b>	<b>\$ 1,460</b>	<b>\$ 112,559</b>

Disclosure of Debt Securities exposure by type is presented in Note 4 - Investment Securities and Other Securities in the 2019 Third Quarter Report on Form 10-Q.

**Impaired or Past Due Loans by Major Industry or Counterparty Type and Charge-off Information**

Disclosures of amounts of impaired loans for which there was a related allowance under GAAP, amounts of impaired loans for which there was no related allowance under GAAP, and the balance of allowance for loan losses disaggregated on the basis of the impairment method are presented in Note 3 – Loans / Leases and Allowance for Credit Losses in the 2019 Third Quarter Report on Form 10-Q.

Discussion of HBI's charge-offs during the period is presented in MD&A Table 14 – Quarterly Net Charge-Off Analysis in the 2019 Third Quarter Report on Form 10-Q.

Disclosures on the amount of loans past due 90 days and on nonaccrual, and loans past due 90 days and still accruing are presented in Note 3 – Loans / Leases and Allowance for Credit Losses in the 2019 Third Quarter Report on Form 10-Q.

**Impaired Loans by Geographic Distribution**

<i>(in millions)</i>	Impaired loans with no related allowance recorded							
	September 30, 2019							
	C&I	CRE	Automobile	Home Equity	Residential mortgage	RV and marine	Other consumer	Total
<b>State:</b>								
Illinois	\$ 35	\$ 8	\$ —	\$ —	\$ —	\$ —	\$ —	\$ 43
Indiana	3	—	—	—	—	—	—	3
Kentucky	—	—	—	—	—	—	—	—
Michigan	56	2	—	—	—	—	—	58
Ohio	35	17	—	—	—	—	—	52
Pennsylvania	11	2	—	—	—	—	—	13
West Virginia	1	—	—	—	—	—	—	1
Wisconsin	—	—	—	—	—	—	—	—
Other <sup>(1)</sup>	64	2	—	—	—	—	—	66
<b>Total</b>	<b>\$ 205</b>	<b>\$ 31</b>	<b>\$ —</b>	<b>\$ —</b>	<b>\$ —</b>	<b>\$ —</b>	<b>\$ —</b>	<b>\$ 236</b>

<i>(in millions)</i>	Impaired loans with related allowance recorded							
	September 30, 2019							
	C&I	CRE	Automobile	Home Equity	Residential mortgage	RV and marine	Other consumer	Total
<b>State:</b>								
Illinois	\$ 46	\$ 1	\$ 2	\$ 8	\$ 3	\$ —	\$ —	\$ 60
Indiana	13	2	4	17	24	—	1	61
Kentucky	1	—	4	5	5	—	—	15
Michigan	67	10	2	62	49	—	2	192
Ohio	110	9	13	158	143	1	6	440
Pennsylvania	28	1	4	18	14	—	—	65
West Virginia	5	1	2	12	8	—	—	28
Wisconsin	16	—	2	1	2	—	—	21
Other	28	—	9	11	42	3	1	94
<b>Total</b>	<b>\$ 314</b>	<b>\$ 24</b>	<b>\$ 42</b>	<b>\$ 292</b>	<b>\$ 290</b>	<b>\$ 4</b>	<b>\$ 10</b>	<b>\$ 976</b>

(1) Includes purchase credit impaired loans

**Reconciliation of Changes in ALLL**

Reconciliation of changes in the Allowance for Loan and Lease Losses is presented in Note 3 – Loans / Leases and Allowance for Credit Losses in the 2019 Third Quarter Report on Form 10-Q.

**Remaining Contractual Portfolio Maturity, Categorized by Credit Exposure**

<i>(in millions)</i>	Credit Exposure by Maturity			
	September 30, 2019			
	1 Year or Less	Over 1 Year To 5 Years	Over 5 Years	Total
Loans and commitments				
C&I	\$ 17,737	\$ 27,099	\$ 4,577	\$ 49,413
CRE	1,013	5,583	1,670	8,266
Automobile	168	8,014	4,110	12,292
Home equity	81	829	19,523	20,433
Residential mortgage	1,121	58	11,197	12,376
RV and marine finance	2	83	3,468	3,553
Other consumer	942	3,437	387	4,766
Total loans and commitments	21,064	45,103	44,932	111,099
Debt securities	289	1,092	21,334	22,715
Derivatives	174	953	333	1,460
Total credit exposure by maturity	\$ 21,527	\$ 47,148	\$ 66,599	\$ 135,274

For additional information on credit exposures, see the 2019 Third Quarter FR Y-9C, and Note 3 – Loans / Leases and Allowance for Credit Losses and Note 12 – Derivative Financial Instruments in the 2019 Third Quarter Report on Form 10-Q.

**General Disclosure for Counterparty Credit Risk-Related Exposures**

We offer risk management products that enable customers to hedge various forms of financial risks including interest rate risk, foreign currency translation risk and commodity price risk. Huntington’s product suite enables customers to better control business risk and deepens relationships.

Prior to executing an OTC transaction, the financial strength of a potential counterparty is established using a risk rating methodology approved by the Credit Policy and Strategy Committee. The methodology is the same as that used to make lending decisions for commercial customers and similar for financial institution counterparties. Credit ratings are developed and exposure limits are established no less than annually that reflects our assessment of the financial strength of the counterparty.

The Bank uses an internal model to determine the potential future exposure (PFE) of OTC derivatives which is used to calculate the total credit exposure. As Huntington is subject to the Standardized Approach, RWA for OTC derivatives are determined using the methodology prescribed in the Final Rule for calculating PFE, and not our internal model.

To mitigate our exposure, collateral agreements are required for financial institution counterparties. These agreements consist of industry standard contracts (ISDA and Credit Support Annex agreements) that detail such terms as collateral requirements, acceptable collateral types, an unambiguous method for valuing collateral, as well as ‘haircuts.’ Daily collateral management activities are performed by a specialized Corporate Treasury team according to the legally enforceable contracts. The primary types of collateral taken in these contracts include cash, U.S. T-Bill, U.S. T-Note, U.S. T-Bond, and U.S. Government Agency Securities.

Collateral agreements are not dependent on the credit ratings of the Bank or its counterparties. Rather, existing collateral agreements require Huntington and counterparty institutions to maintain ‘well-capitalized’ status (by regulatory standards). Failure to maintain ‘well-capitalized’ status is considered an early termination event and will likely result in a termination of the relationship.

Consistent with GAAP, an allowance is established to reflect the potential for losses associated with customer’s unrealized losses on OTC contracts. A two-year cumulative probability of default metric is multiplied by unrealized customer losses to reflect a loss emergence period of two years.

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<i>(in millions)</i>	September 30, 2019
<b>OTC Derivatives</b>	
Gross Positive Fair Value	\$ 772
Net Unsecured Credit Exposure <sup>(1)</sup>	1,398
Collateral Held:	
Cash	\$ 134
Securities	70
Credit Equivalent Amount	1,411
<hr/>	
<b>Notional Amount of Credit Derivatives <sup>(2)</sup></b>	
Purchased Protection	\$ 1,981
Sold Protection	846
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<b>Total Notional of Credit Derivatives</b>	<b>\$ 2,827</b>

(1) Represents the amount of credit exposure, calculated using internal models, that is reduced due to the netting of offsetting positive and negative exposures where a valid master netting agreement exists, and collateral held.

(2) Includes Credit Participation Swaps.

The Bank periodically enters into credit participation swaps to transfer counterparty credit risk related to interest rate swaps to and from other financial institutions. Under the terms of these agreements, the “participating bank” receives a fee from the “lead bank” in exchange for the guarantee of reimbursements if the customer defaults on an interest rate swap. The interest rate swap is transacted such that any and all exchanges of interest payments (favorable and unfavorable) are made between the lead bank and the customer. In the event of an early termination of the swap and the customer is unable to make the required close out payment, the participating bank assumes that obligation and is required to make this payment.

***Credit Risk Mitigation***

Discussion of HBI's credit risk mitigation policies and processes is presented in the Credit Risk section of MD&A in the 2018 Annual Report on Form 10-K.

**Exposures covered by eligible financial collateral after application of haircuts:**

<i>(in millions)</i>	September 30, 2019	
Exposure Type		
Loans and leases <sup>(1)</sup>	\$	1,345
Derivatives <sup>(2)</sup>		204
Repo-style transactions		176
Letters of Credit		46
<b>Total</b>	<b>\$</b>	<b>1,771</b>

(1) Includes all financial collateral held against loans and leases, without consideration of whether the financial collateral is recognized for the purpose of reducing capital requirements.

(2) Includes Derivatives, Investing, and Trading Activities

**Exposures covered by guarantees and credit derivatives with associated risk weighted amount:**

<i>(in millions)</i>	September 30, 2019		
Exposure Type	Exposure Amount		Risk Weighted Asset Amount
AFS/HTM Securities <sup>(1)</sup>	\$ 18,812	\$	1,309
Loans	1,225		187
Letters of Credit	38		8
Other <sup>(2)</sup>	83		83
<b>Total</b>	<b>\$ 20,158</b>	<b>\$</b>	<b>1,587</b>

(1) Includes U.S. Government Agencies and Government Sponsored Entity Securities.

(2) Includes Credit Participation Swaps Sold.

***Securitizations***

In the past, Huntington has utilized automobile loan securitizations primarily to manage its aggregate concentration in originated indirect automobile loans as well as for diversifying its liquidity sources. Our risk management organization plays an active role in the review and oversight of this exposure which includes on-balance sheet portfolio loans, off-balance sheet auto loans due to sales or securitizations which we continue to service, and on-balance sheet investments in automobile loan asset-backed securities. We do not engage in synthetic or re-securitization activities. As of September 30, 2019, Huntington has no material securitization exposures remaining.

***Equities not Subject to Market Risk Capital Rules***

Equity investments held at HBI include marketable equity securities, private equity investments, and other equity investments classified within other assets.

Non-marketable equity securities are recorded at historical cost, and marketable equity securities are carried at fair value with unrealized net gains or losses reported within income. Low Income Housing Tax Credit investments are included in other assets and the majority of these investments are accounted for using the proportional amortization method. Investments that do not meet the requirements of the proportional amortization method and other miscellaneous equity investments are generally accounted for using the equity method.

**Summary of Equity Investment Exposures**

Huntington's equity exposures not subject to the Market Risk rule include the following investments:

- Low Income Housing Tax Credit Investments - see Note 13 - VIEs in our 2019 Third Quarter Report on Form 10-Q for additional information on affordable housing tax credit investments.
- Other Miscellaneous Equity Investments - New Market Tax Credit Investments, Historic Tax Credit Investments, Small Business Investment Companies, Rural Business Investment Companies, certain equity method investments and other miscellaneous investments.
- Federal Reserve Bank and Federal Home Loan Bank stock, which are considered equity exposures under the regulatory capital framework.

**Equity Securities Not Subject to Market Risk Rule:**

<i>(in millions)</i>	September 30, 2019		
	Nonpublic	Publicly Traded	Total
Amortized cost	\$ 1,307	\$ 1	\$ 1,308
Unrealized gains/losses	—	1	1
Latent revaluation gains/losses <sup>(1)</sup>	—	—	—
Fair value	\$ 1,307	\$ 2	\$ 1,309

(1) The unrealized gains/(losses) not recognized either in the balance sheet or through earnings.

There were no net realized gains or losses arising from sales and liquidations of equity investments for the quarter ended September 30, 2019.

**Capital Requirements for Equity Securities Not Subject to Market Risk Rule:**

<i>(in millions)</i>	September 30, 2019	
	Exposure	Risk Weighted Assets
0%	\$ 297	\$ —
20%	104	21
100%	907	907
Full look-through approach	—	—
Total	\$ 1,308	\$ 928

***Interest Rate Risk for Non-Trading Activities***

Disclosure is presented in the Interest Rate Risk portion of the Market Risk section of MD&A in the 2018 Annual Report on Form 10-K and the 2019 Third Quarter Report on Form 10-Q.



*Appendix A*  
**Huntington Bancshares Incorporated**  
 Basel III Regulatory Capital Disclosures  
 September 30, 2019

Table	Disclosure Requirement	Disclosure Location
<b>1. Scope of Application</b>		
<b>Qualitative</b>		
A	The name of the top corporate entity in the group to which the Risk Based Capital Standards apply.	Basel III Regulatory Capital Disclosures: Introduction and Scope of Application
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).	Not applicable. HBI does not have differences in the basis of consolidation for accounting and regulatory purposes.
C	Any restrictions, or other major impediments, on transfer of funds or total capital within the group.	Basel III Regulatory Capital Disclosures: Scope of Application
<b>Quantitative</b>		
D	The aggregate amount of surplus capital of insurance subsidiaries included in the total capital of the consolidated group.	Basel III Regulatory Capital Disclosures: Scope of Application
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: Scope of Application
<b>2. Capital Structure</b>		
<b>Qualitative</b>		
A	Summary information on the terms and conditions of the main features of all regulatory capital instruments.	Basel III Regulatory Capital Disclosures: Capital Structure 2018 Annual Report on Form 10-K (1) Note 9 - Long-term Debt (2) Note 11 - Shareholders' Equity
<b>Quantitative</b>		
B	The amount of common equity Tier 1 capital, with separate disclosure of: (1) Common stock and related surplus; (2) Retained earnings; (3) Common equity minority interest; (4) AOCI; and (5) Regulatory adjustments and deductions made to common equity Tier 1 capital	Basel III Regulatory Capital Disclosures: Capital Structure
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.	Basel III Regulatory Capital Disclosures: Capital Structure
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.	Basel III Regulatory Capital Disclosures: Capital Structure

Table	Disclosure Requirement	Disclosure Location
<b>3. Capital Adequacy</b>		
<b>Qualitative</b>		
A	A summary discussion of the bank holding company's approach to assessing the adequacy of its capital to support current and future activities.	Basel III Regulatory Capital Disclosures: Capital Adequacy
<b>Quantitative</b>		
B	Risk-weighted assets for: <ol style="list-style-type: none"> <li>(1) Exposures to sovereign entities;</li> <li>(2) Exposures to certain supranational entities and MDBs;</li> <li>(3) Exposures to depository institutions, foreign banks, and credit unions;</li> <li>(4) Exposures to PSEs;</li> <li>(5) Corporate exposures;</li> <li>(6) Residential mortgage exposures;</li> <li>(7) Statutory multifamily mortgages and pre-sold construction loans;</li> <li>(8) HVCRE loans;</li> <li>(9) Past due loans;</li> <li>(10) Other assets;</li> <li>(11) Cleared transactions;</li> <li>(12) Default fund contributions;</li> <li>(13) Unsettled transactions;</li> <li>(14) Securitization exposures; and</li> <li>(15) Equity exposures</li> </ol>	Basel III Regulatory Capital Disclosures: Capital Adequacy
C	Standardized market risk-weighted assets as calculated under subpart F	Not applicable. HBI is not subject to the Market Risk requirements
D	Common equity Tier 1, Tier 1 and total risk-based capital ratios: <ol style="list-style-type: none"> <li>(1) For the top consolidated group; and</li> <li>(2) For each depository institution subsidiary.</li> </ol>	Basel III Regulatory Capital Disclosures: Capital Adequacy
E	Total standardized risk-weighted assets.	Basel III Regulatory Capital Disclosures: Capital Adequacy
<b>4. Capital Conservation Buffer</b>		
<b>Qualitative</b>		
A	At least quarterly, the bank holding company must calculate and publicly disclose the capital conservation buffer as described under §1.11.	Basel III Regulatory Capital Disclosures: Capital Conservation Buffer
<b>Quantitative</b>		
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 §1.11.	Basel III Regulatory Capital Disclosures: Capital Conservation Buffer
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 §1.11, including the maximum payout amount for the quarter.	Basel III Regulatory Capital Disclosures: Capital Conservation Buffer
<b>5. Credit Risk: General Disclosures</b>		
<b>Qualitative</b>		
A	The general qualitative disclosure requirement with respect to credit risk (excluding counterparty credit risk disclosed in accordance with Table 6), including the:	Basel III Regulatory Capital Disclosures: Credit Risk - General Discussions

Table	Disclosure Requirement	Disclosure Location
<b>5. Credit Risk: General Disclosures, continued</b>		
	(1) Policy for determining past due or delinquency status;	2018 Annual Report on Form 10-K
	(2) Policy for placing loans on nonaccrual;	(1) Note 1 - Significant Accounting Policies
	(3) Policy for returning loans to accrual status;	(2) Risk Management and Capital section of MD&A
	(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.	
<b>Quantitative</b>		
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, banks could use categories similar to that used for financial statement purposes. Such categories might include, for instance:	Basel III Regulatory Capital Disclosures: Credit Risk - General Discussions
	(1) Loans, off-balance sheet commitments, and other non-derivative off-balance sheet exposures;	2019 Third Quarter Report on Form 10-Q
	(2) Debt securities; and	(1) Note 4 - Investment Securities and Other Securities
	(3) OTC derivatives	
C	Geographic distribution of exposures, categorized in significant areas by major types of credit exposure.	Basel III Regulatory Capital Disclosures: Credit Risk - General Discussions 2019 Third Quarter Report on Form 10-Q (1) Note 4 - Investment Securities and Other Securities
D	Industry or counterparty type distribution of exposures, categorized by major types of credit exposure.	Basel III Regulatory Capital Disclosures: Credit Risk - General Discussions 2019 Third Quarter Report on Form 10-Q (1) Note 4 - Investment Securities and Other Securities
E	By major industry or counterparty type:	Basel III Regulatory Capital Disclosures: Credit Risk - General Discussions
	(1) Amount of impaired loans for which there was a related allowance under GAAP;	2019 Third Quarter Report on Form 10-Q
	(2) Amount of impaired loans for which there was no related allowance under GAAP;	(1) Note 3 - Loans / Leases and Allowance for Credit Losses
	(3) Amount of loans past due 90 days and on nonaccrual;	(2) Table 14 - Quarterly Net Charge-off Analysis
	(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.	
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: Credit Risk - General Discussions

**Huntington Bancshares Incorporated**  
**Basel III Regulatory Capital Disclosures**

<b>Table</b>	<b>Disclosure Requirement</b>	<b>Disclosure Location</b>
<b>5. Credit Risk: General Disclosures, continued</b>		
G	Reconciliation of changes in ALLL.	2019 Third Quarter Report on Form 10-Q (1) Note 3 - Loans / Leases and Allowance for Credit Losses
H	Remaining contractual maturity delineation (for example, one year or less) of the whole portfolio, categorized by credit exposure.	Basel III Regulatory Capital Disclosures: Credit Risk - General Discussions
<b>6. General Disclosure for Counterparty Credit Risk-Related Exposures</b>		
<b>Qualitative</b>		
A	The general qualitative disclosure requirement with respect to OTC derivatives, eligible margin loans, and repo-style transactions, including a discussion of: (1) The methodology used to assign credit limits for counterparty credit exposures; (2) Policies for securing collateral, valuing and managing collateral, and establishing credit reserves; (3) The primary types of collateral taken; and (4) The impact of the amount of collateral the bank would have to provide given a deterioration in the bank holding company's own creditworthiness.	Basel III Regulatory Capital Disclosures: General Disclosure for Counterparty Credit Risk-Related Exposures
<b>Quantitative</b>		
B	Gross positive fair value of contracts, collateral held (including type, for example, cash, government securities), and net unsecured credit exposure. A bank also must disclose the notional value of credit derivative hedges purchased for counterparty credit risk protection and the distribution of current credit exposure by exposure type.	Basel III Regulatory Capital Disclosures: General Disclosure for Counterparty Credit Risk-Related Exposures
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.	Basel III Regulatory Capital Disclosures: General Disclosure for Counterparty Credit Risk-Related Exposures
<b>7. Credit Risk Mitigation</b>		
<b>Qualitative</b>		
A	The general qualitative disclosure requirement with respect to credit risk mitigation, including: (1) Policies and processes for collateral valuation and management; (2) A description of the main types of collateral taken by the bank; (3) The main types of guarantors/credit derivative counterparties and their creditworthiness; and (4) Information about (market or credit) risk concentrations with respect to credit risk mitigation.	2018 Annual Report on Form 10-K  (1) Note 1 - Significant Accounting Policies (2) Risk Management and Capital section of MD&A
<b>Quantitative</b>		
B	For each separately disclosed credit risk portfolio, the total exposure that is covered by eligible financial collateral, and after the application of haircuts.	Basel III Regulatory Capital Disclosures: Credit Risk Mitigation
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

Table	Disclosure Requirement	Disclosure Location
<b>8. Securitizations</b>		
<b>Qualitative</b>		
A	The general qualitative disclosure requirement with respect to a securitization (including synthetic securitizations), including a discussion of: <ol style="list-style-type: none"> <li>(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;</li> <li>(2) The nature of the risks (e.g. liquidity risk) inherent in the securitized assets;</li> <li>(3) The roles played by the bank in the securitization process and an indication of the extent of the bank's involvement in each of them;</li> <li>(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;</li> <li>(5) The bank's policy for mitigating the credit risk retained through securitization and resecuritization exposures; and</li> <li>(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.</li> </ol>	Basel III Regulatory Capital Disclosures: Securitization  2018 Annual Report on Form 10-K (1) Note 1 - Significant Accounting Policies  2019 Third Quarter Report on Form 10-Q (1) Note 13 - VIEs
B	A list of: <ol style="list-style-type: none"> <li>(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</li> <li>(2) Affiliated entities:                             <ol style="list-style-type: none"> <li>(i) That the bank manages or advises; and</li> <li>(ii) That invest either in the securitization exposures that the bank has securitized or in securitization SPEs that the bank sponsors.</li> </ol> </li> </ol>	Basel III Regulatory Capital Disclosures: Securitization  2019 Third Quarter Report on Form 10-Q (1) Note 13 - VIEs
C	Summary of the bank's accounting policies for securitization activities, including: <ol style="list-style-type: none"> <li>(1) Whether the transactions are treated as sales or financings;</li> <li>(2) Recognition of gain-on-sale;</li> <li>(3) Methods and key assumptions applied in valuing retained or purchased interests;</li> <li>(4) Changes in methods and key assumptions from the previous period for valuing retained interests and impact of the changes;</li> <li>(5) Treatment of synthetic securitizations;</li> <li>(6) How exposures intended to be securitized are valued and whether they are recorded under subpart D of this part; and</li> <li>(7) Policies for recognizing liabilities on the balance sheet for arrangements that could require the bank to provide financial support for securitized assets.</li> </ol>	Basel III Regulatory Capital Disclosures: Securitization  2018 Annual Report on Form 10-K (1) Note 1 - Significant Accounting Policies  2019 Third Quarter Report on Form 10-Q (1) Note 13 - VIEs
D	An explanation of significant changes to any quantitative information since the last reporting period.	Not applicable. No changes since last reporting period.
<b>Quantitative</b>		
E	The total outstanding exposures securitized by the bank in securitizations that meet the operational criteria provided in § .141 (categorized into traditional and synthetic securitizations), by exposure type, separately for securitizations of third-party exposures for which the bank acts only as sponsor.	Basel III Regulatory Capital Disclosures: Securitization. No material exposures.

Table	Disclosure Requirement	Disclosure Location
<b>8. Securitizations, continued</b>		
F	For exposures securitized by the bank in securitizations that meet the operational criteria in §.141: (1) Amount of securitized assets that are impaired/past due categorized by exposure type; and (2) Losses recognized by the bank during the current period categorized by exposure type.	Basel III Regulatory Capital Disclosures: Securitization. No material exposures.
G	The total amount of outstanding exposures intended to be securitized categorized by exposure type.	Not applicable.
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.	Basel III Regulatory Capital Disclosures: Securitization, No material exposure.
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 §1.42(a)(1), and other exposures deducted from total capital should be disclosed separately by exposure type.	Basel III Regulatory Capital Disclosures: Securitization, No material exposure.
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.	Not applicable.
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.	Not applicable. HBI does not have any resecuritization exposures.
<b>9. Equities not Subject to the Market Risk Rules</b>		
<b>Qualitative</b>		
A	The general qualitative disclosure requirement with respect to equity risk for equities not subject to the market risk rules, 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.	Basel III Regulatory Capital Disclosures: Equities not Subject to Market Risk Capital Rules
<b>Quantitative</b>		
B	Value disclosed on the balance sheet of investments, as well as the fair value of those investments; for securities that are publicly traded, a comparison to publicly-quoted share values where the share price is materially different from fair value.	Basel III Regulatory Capital Disclosures: Equities not Subject to Market Risk Capital Rules
C	The types and nature of investments, including the amount that is: (1) Publicly traded. (2) Non-publicly traded.	Basel III Regulatory Capital Disclosures: Equities not Subject to Market Risk Capital Rules

**Huntington Bancshares Incorporated**  
**Basel III Regulatory Capital Disclosures**

<b>Table</b>	<b>Disclosure Requirement</b>	<b>Disclosure Location</b>
<b>9. Equities not Subject to the Market Risk Rules, continued</b>		
D	The cumulative realized gains (losses) arising from sales and liquidations in the reporting period.	Basel III Regulatory Capital Disclosures: Equities not Subject to Market Risk Capital Rules
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 Market Risk Capital Rules
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 no Subject to Market Risk Capital Rules
<b>10. Interest Rate Risk for Non-Trading Activities</b>		
<b>Qualitative</b>		
A	The general qualitative disclosure requirement, including the nature of interest rate risk for non-trading activities and key assumptions, including assumptions regarding loan prepayments and behavior of non-maturity deposits, and frequency of measurement of interest rate risk for non-trading activities.	2018 Annual Report on Form 10-K (1) Interest Rate Risk portion of the Market Risk section of MD&A
<b>Quantitative</b>		
B	The increase (decline) in earnings or economic value (or relevant measure used by management) for upward and downward rate shocks according to management's method for measuring interest rate risk for non-trading activities, categorized by currency (as appropriate).	2018 Annual Report on Form 10-K (1) Interest Rate Risk portion of the Market Risk section of MD&A