SYNCHRONY FINANCIAL

Basel III Pillar 3 Regulatory Capital Disclosure Report

December 31, 2017

Synchrony Financial
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Certain defined terms:

Except as the context may otherwise require in this report, references to:

- “we,” “us,” “our” and the “Company” are to SYNCHRONY FINANCIAL and its subsidiaries;
- “Synchrony” are to SYNCHRONY FINANCIAL only;
- “Bank” are to SYNCHRONY BANK; and
- the “Board of Directors” are to Synchrony's board of directors.

Cautionary Note Regarding Forward-Looking Statements:

Various statements in this report may contain “forward-looking statements” as defined in Section 27A of the Securities Act of 1933, as amended, and Section 21E of the Securities Exchange Act of 1934, as amended (the “Exchange Act”), which are subject to the “safe harbor” created by those sections. Forward-looking statements may be identified by words such as “expects,” “intends,” “anticipates,” “plans,” “believes,” “seeks,” “targets,” “outlook,” “estimates,” “will,” “should,” “may” or words of similar meaning, but these words are not the exclusive means of identifying forward-looking statements.

Forward-looking statements are based on management’s current expectations and assumptions, and are subject to inherent uncertainties, risks and changes in circumstances that are difficult to predict. As a result, actual results could differ materially from those indicated in these forward-looking statements. Factors that could cause actual results to differ materially include global political, economic, business, competitive, market, regulatory and other factors and risks, such as: the impact of macroeconomic conditions and whether industry trends we have identified develop as anticipated; retaining existing partners and attracting new partners, concentration of our revenue in a small number of Retail Card partners, promotion and support of our products by our partners, and financial performance of our partners; cyber-attacks or other security breaches; higher borrowing costs and adverse financial market conditions impacting our funding and liquidity, and any reduction in our credit ratings; our ability to grow our deposits in the future; our ability to securitize our loan receivables, occurrence of an early amortization of our securitization facilities, loss of the right to service or subservice our securitized loan receivables, and lower payment rates on our securitized loan receivables; changes in market interest rates and the impact of any margin compression; effectiveness of our risk management processes and procedures, reliance on models which may be inaccurate or misinterpreted, our ability to manage our credit risk, the sufficiency of our allowance for loan losses and the accuracy of the assumptions or estimates used in preparing our financial statements; our ability to offset increases in our costs in retailer share arrangements; competition in the consumer finance industry; our concentration in the U.S. consumer credit market; our ability to successfully develop and commercialize new or enhanced products and services; our ability to realize the value of acquisitions and strategic investments; reductions in interchange fees; fraudulent activity; failure of third parties to provide various services that are important to our operations; disruptions in the operations of our computer systems and data centers; international risks and compliance and regulatory risks and costs associated with international operations; alleged infringement of intellectual property rights of others and our ability to protect our intellectual property; litigation and regulatory actions; damage to our reputation; our ability to attract, retain and motivate key officers and employees; tax legislation initiatives or challenges to our tax positions and/or interpretations, and state sales tax rules and regulations; a material indemnification obligation to General Electric Company ("GE") under the Tax Sharing and Separation Agreement with GE (the "TSSA") if we cause the split-off from GE or certain preliminary transactions to fail to qualify for tax-free treatment or in the case of certain significant transfers of our stock following the split-off; regulation, supervision, examination and enforcement of our business by governmental authorities, the impact of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”) and the impact of the Consumer Financial Protection Bureau’s (the “CFPB”) regulation of our business; impact of capital adequacy rules and liquidity requirements; restrictions that limit our ability to pay dividends and repurchase our common stock, and restrictions that limit the Bank’s ability to pay dividends to Synchrony; regulations relating to privacy, information security and data protection; use of third-party vendors and ongoing third-party business relationships; and failure to comply with anti-money laundering and anti-terrorism financing laws.

For the reasons described above, we caution you against relying on any forward-looking statements in this report, and you should refer to our periodic and current reports filed with the Securities and Exchange Commission, or “SEC,” for further information or other factors, which could cause actual results to be significantly different from those expressed or implied by any forward-looking statements herein.

Introduction

We are one of the premier consumer financial services companies in the United States. Our roots in consumer finance trace back to 1932, and today we are the largest provider of private label credit cards in the United States based on purchase volume and receivables. We provide a range of credit products through programs we have established with a diverse group of national and regional retailers, local merchants, manufacturers, buying groups, industry associations and healthcare service providers, which we refer to as our "partners." Through our partners' over 380,000 locations across the United States and Canada, and their websites and mobile applications, we offer their customers a variety of credit products to finance the purchase of goods and services.

Basis of Consolidation

The Company's financial statements have been prepared on a consolidated basis. Under this basis of presentation, our financial statements consolidate all of our subsidiaries – i.e., entities in which we have a controlling financial interest, most often because we hold a majority voting interest.

To determine if we hold a controlling financial interest in an entity, we first evaluate if we are required to apply the variable interest entity ("VIE") model to the entity, otherwise the entity is evaluated under the voting interest model. Where we hold current or potential rights that give us the power to direct the activities of a VIE that most significantly impact the VIE's economic performance ("power") combined with a variable interest that gives us the right to receive potentially significant benefits or the obligation to absorb potentially significant losses ("significant economics"), we have a controlling financial interest in that VIE. Rights held by others to remove the party with power over the VIE are not considered unless one party can exercise those rights unilaterally. We consolidate certain securitization entities under the VIE model because we have both power and significant economics.

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 capital requirement. Basel III also raises the minimum capital requirements and introduces capital conservation and countercyclical 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. These rules substantially revise the risk-based capital requirements applicable to bank holding companies and their depository institution subsidiaries as compared to the previous U.S. risk-based capital and leverage ratio rules, and thereby implement certain provisions of the Dodd-Frank Wall Street Reform & Consumer Protection Act. These rules also apply to top-tier savings and loan holding companies, such as Synchrony, and their insured depository institution subsidiaries.

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.

Top-tier savings and loan holding companies with total 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. Synchrony became subject to these requirements on November 17, 2015, upon its separation from GE and thereby becoming a top-tier savings and loan holding company. Certain requirements of Basel III that are applicable to Synchrony are subject to phase-in periods extending through 2019. The amounts in this report represent Synchrony's regulatory capital and risk-weighted assets (RWA) based upon the transition capital provisions.

Basel III Reporting

This Basel III Pillar 3 Regulatory Capital Disclosure Report (the "Basel III Report") provides Synchrony'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 Synchrony, with the exception that capital ratios for the Bank must also be disclosed.

The Basel III Report should be read in conjunction with Synchrony's filings with the U.S. Securities and Exchange Commission (SEC) - Annual Report on Form 10-K for the year ended December 31, 2017 ("2017 Form 10-K"). The Basel III Report has not been audited by Synchrony's external auditors. The Basel III Disclosure Index (Appendix A) specifies where all required disclosures are made.

Restrictions on Transfer of Funds and Capital

Synchrony is limited in its ability to pay dividends or repurchase its stock by the Board of Governors of the Federal Reserve System (the "Federal Reserve Board"), including on the basis that doing so would be an unsafe or unsound banking practice. Where Synchrony intends to declare or pay a dividend, Synchrony generally will be required to inform and consult with the Federal Reserve Board in advance to ensure that such dividend does not raise supervisory concerns. It is the policy of the Federal Reserve Board that a savings and loan holding company like Synchrony should generally pay dividends on common stock only out of earnings, and only if prospective earnings retention is consistent with the company's capital needs and overall current and prospective financial condition.

According to guidance from the Federal Reserve Board, Synchrony's dividend policies will be assessed against, among other things, its ability to achieve applicable Basel III capital ratio requirements. If Synchrony does not achieve applicable Basel III capital ratio requirements when they are fully phased-in, Synchrony may not be able to pay dividends. Although Synchrony currently expects to meet the applicable final Basel III capital ratio requirements, inclusive of any applicable capital conservation buffer, when they are fully phased-in by the Federal Reserve Board, it cannot be sure that it will do so or even if it does, it will be able to pay dividends. Synchrony also will be required to inform and consult with the Federal Reserve Board in advance of redeeming or repurchasing its stock if the result will be a net reduction in Synchrony equity compared to its equity as of the beginning of the quarter in which the redemption or repurchase occurs. In evaluating the appropriateness of a proposed redemption or repurchase of stock, the Federal Reserve Board will consider, among other things, the potential loss that Synchrony may suffer from the prospective need to increase reserves and write down assets as a result of continued asset deterioration, and Synchrony's ability to raise additional common equity and other capital to replace the stock that will be redeemed or repurchased. The Federal Reserve Board also will consider the potential negative effects on Synchrony's capital structure of replacing common stock with any lower-tier form of regulatory capital issued.

Further, limitations on the Bank's payments of dividends and other distributions and payments that Synchrony receives from the Bank could limit Synchrony's ability to pay dividends or repurchase its stock. The Bank must obtain the approval of the Office of the Comptroller of the Currency ("OCC") or give the OCC prior notice before making a capital distribution in certain circumstances, including if the Bank proposes to make a capital distribution when it does not meet certain capital requirements (or will not do so as a result of the proposed capital distribution) or certain net income requirements. In addition, the Bank must file a prior written notice of a planned or declared dividend or other distribution with the Federal Reserve Board. The Federal Reserve Board or the OCC may object to a capital distribution if, among other things, (i) the Bank is, or as a result of such distribution would be, undercapitalized, significantly undercapitalized, or critically undercapitalized, (ii) the regulators have safety and soundness concerns or (iii) the distribution violates a prohibition in a statute, regulation, agreement between the Bank and the OCC, or a condition imposed on the Bank in an application or notice approved by the OCC.

For further information on restrictions on transfers of funds and capital, refer to "*Item 1. Business - Regulation - Savings and Loan Holding Company Regulation - Dividends and Stock Repurchases*" in the 2017 Form 10-K.

Capital Structure

Capital Instruments

Synchrony's regulatory capital structure primarily consists of common stock. For additional information, refer to the Company's Consolidated Statement of Financial Position in the 2017 Form 10-K.

Regulatory Capital, Risk-Weighted Assets and Capital Ratio Requirements

The following table summarizes the Basel III minimum and well-capitalized regulatory capital ratio requirements at December 31, 2017.

Minimum and Well-Capitalized Capital Ratio Requirements

Ratio[(a)]	Minimum[(b)]	Well-Capitalized[(c)]
Common equity Tier 1 capital	4.5%	6.5%
Tier 1 risk-based capital	6.0%	8.0%
Total risk-based capital	8.0%	10.0%
Tier 1 leverage	4.0%	5.0%

(a) Tier 1 leverage ratio represents Tier 1 capital as a percentage of total average assets, after certain adjustments. All other ratios presented above represent the applicable capital measure as a percentage of risk-weighted assets.

(b) At December 31, 2017, Synchrony also must maintain a capital conservation buffer of common equity Tier 1 capital in excess of minimum risk-based capital ratios by at least 1.25 percent to avoid limits on capital distributions and certain discretionary bonus payments to executive officers and similar employees.

(c) Applies to the Bank only. For Synchrony to be a well-capitalized savings and loan holding company, the Bank must be well-capitalized and Synchrony must not be subject to any written agreement, order, capital directive, or prompt corrective action directive issued by the Federal Reserve Board to meet and maintain a specific capital level for any capital measure.

Basel III establishes two comprehensive methodologies for calculating RWA, a Standardized Approach and an Advanced Approach. Synchrony is subject to the Basel III Standardized Approach for determining risk-weighted assets.

A reconciliation of regulatory capital elements as they relate to Synchrony's Consolidated Financial Statements presented in the 2017 Form 10-K, in addition to information regarding the components of capital used in calculating common equity Tier 1 ("CET1") capital, Tier 1 capital, Tier 2 capital and Total regulatory capital under Basel III transitional requirements for Synchrony at December 31, 2017, are presented in the table below.

Reconciliation of Capital Elements

($ in millions)	December 31, 2017
Common stock	$ 1
Capital surplus	9,445
Retained earnings	6,809
Accumulated other comprehensive income (AOCI)	(64)
Treasury stock	(1,957)
Total shareholders' equity (Consolidated Financial Statements)	**14,234**
Less: AOCI (opt-out election)	(47)
Less: Adjustments and deductions	1,391
CET1 capital	**12,890**
Other Tier 1 capital adjustments	—
Tier 1 capital	**12,890**
Qualifying subordinated debt	—
Other Tier 2 capital adjustments	1,064
Total regulatory capital	**$ 13,954**

Capital Adequacy

As a savings and loan holding company and financial holding company, Synchrony is subject to regulation, supervision and examination by the Federal Reserve Board. The Bank is a federally chartered savings association. As such, the Bank is subject to regulation, supervision and examination by the OCC, which is its primary regulator, and by the CFPB with respect to consumer financial matters. In addition, the Bank, as an insured depository institution, is supervised by the Federal Deposit Insurance Corporation.

Synchrony is subject to the capital requirements as prescribed by Basel III capital rules and the requirements of the Dodd-Frank Act.

Synchrony and the Bank are required to conduct stress tests on an annual basis. Under the OCC's and the Federal Reserve Board's stress test regulations, the Bank and Synchrony are required to use stress-testing methodologies providing for results under various economic and financial market stress. In addition, while as a savings and loan holding company, Synchrony is currently not subject to the Federal Reserve Board's capital planning rule, Synchrony submitted a capital plan to the Federal Reserve Board in April 2017.

Failure to meet minimum capital requirements can initiate certain mandatory and, possibly, additional discretionary actions by regulators that, if undertaken, could limit our business activities and have a material adverse effect on our consolidated financial statements. Under capital adequacy guidelines, we must meet specific capital guidelines that involve quantitative measures of our assets, liabilities and certain off-balance-sheet items as calculated under regulatory accounting practices. The capital amounts and classifications are also subject to qualitative judgments by the regulators about components, risk weightings and other factors.

For Synchrony to be a well-capitalized savings and loan holding company, the Bank must be well-capitalized and Synchrony must not be subject to any written agreement, order, capital directive, or prompt corrective action directive issued by the Federal Reserve Board to meet and maintain a specific capital level for any capital measure. At December 31, 2017, Synchrony met all applicable requirements to be deemed well-capitalized pursuant to Federal Reserve Board regulations.

At December 31, 2017, the Bank met all applicable requirements to be deemed “well-capitalized” pursuant to OCC regulations and for purposes of the Federal Deposit Insurance Act.

Synchrony’s capital management objectives are to maintain adequate levels of capital generated through earnings and other sources to ensure viability and flexibility of Synchrony and its subsidiaries. The level, composition and utilization of capital are influenced by changes in the economic environment, strategic initiatives, and legislative and regulatory developments. Within these constraints, Synchrony is focused on deploying capital in a manner that will provide attractive returns to its shareholders.

The Company's Internal Capital Adequacy Assessment Process (“ICAAP”) is designed to enhance the understanding of the Company’s exposure to material risks and the capital resources available to absorb those risks. The Company uses both quantitative and qualitative methods to translate risk measures including proprietary econometric forecasting models coupled with management judgment to estimate exposure to material risks.

The Capital Management Committee is the primary committee overseeing capital management activities including, but not limited to, monitoring and reporting regulatory capital, executing the ICAAP, conducting supervisory and internal stress testing including Dodd-Frank Act Stress Testing (“DFAST”), recommending shareholder dividends and other capital actions, and formulating recommended Capital Contingency Plans, as applicable. The Risk Committee of the Board of Directors is responsible for reviewing risk exposures and ensuring sufficient capital capacity to cover these risk exposures. The Risk Committee is responsible for holding management accountable for providing sufficient information on Synchrony’s material risks and exposures to inform decisions on capital adequacy and actions, including capital distribution.

The following tables present information on the RWA components included within the regulatory capital ratios under the Standardized Approach with transitional requirements for Synchrony and the capital ratios for Synchrony and the Bank at December 31, 2017.

Risk-Weighted Assets (Transitional Requirements)

($ in millions)	December 31, 2017
On-Balance Sheet	
Exposures to sovereign entities	$ —
Exposures to certain supranational entities and MDBs	—
Exposures to depository institutions, foreign banks and credit unions	306
Exposures to public sector entities	114
Corporate exposures	2
Residential mortgage exposures	—
Loan exposure[(a)]	75,043
High volatility commercial real estate (HVCRE) loans	—
Past due loans	2,803
Other Assets	1,877
Cleared transactions	—
Default fund contributions	—
Unsettled transactions	—
Securitization exposures	156
Equity exposures	252
Off-Balance Sheet and Market Risk	
Letters of credit	—
Unused commitments:	
Original maturity of one year or less, excluding asset-backed commercial paper conduits	—
Original maturity greater than one year	87
Centrally cleared derivatives	—
All other off-balance sheet items	29
Market-risk-weighted assets	—
Total Risk-Weighted Assets (Transitional Requirements)	**$ 80,669**

(a) Includes credit card and other loans that do not fall under residential mortgages.

Regulatory Capital Ratios

	Basel III Transitional	
December 31, 2017	Synchrony	Bank
CET1 capital	16.0%	14.9%
Tier 1 risk-based capital	16.0%	14.9%
Total risk-based capital	17.3%	16.2%
Tier 1 leverage	13.8%	12.9%

Capital Conservation Buffer

Effective January 1, 2016, Synchrony is subject to a capital conservation buffer. Under this requirement, Synchrony could be subject to limitations on its ability to make distributions of capital or make discretionary bonus payments unless it maintains a buffer of capital, composed solely of CET1, sufficient to exceed each of the minimum regulatory capital ratios applicable to the institution. The capital conservation buffer is being phased-in from 2016 through 2019 with an initial buffer of 0.625%, increasing annually in increments of 0.625% until it reaches the fully phased-in amount of 2.5% on January 1, 2019. The capital conservation buffer requirement for 2017 is 1.25%.

At December 31, 2017, Synchrony's capital conservation buffer was 9.3%, which is above the 1.25% minimum and its eligible retained income was $387 million. Synchrony does not currently have a payout ratio limitation on distributions and discretionary bonus payments as Synchrony meets the capital conservation buffer requirements.

Credit Risk: General Disclosures

Enterprise Risk Management

Strong risk management is at the core of the Company's business strategy and we have developed processes to manage the major categories of risk, namely credit, market, liquidity, operational (including compliance) and strategic risk. Historically, the risk for substantially all operations has been managed through the risk management function.

We manage enterprise risk using an integrated Risk Management Framework that includes board-level oversight, administration by a group of cross-functional management committees, and day-to-day implementation by a dedicated risk management team led by the Chief Risk Officer. We also utilize the "Three Lines of Defense" risk management model to demonstrate and structure the roles, responsibilities and accountabilities in the organization for taking and managing risk. The Risk Committee of the Board of Directors has responsibility for the oversight of the risk management program. Several management committees and subcommittees have important roles and responsibilities in administering the risk management program, including the Enterprise Risk Management Committee (the "ERMC"), the Management Committee (the "MC"), the Asset and Liability Committee (the "ALCO"), and the Capital Management Committee (the "CMC"). This committee-focused governance structure provides a forum through which risk expertise is applied cross-functionally to all major decisions, including development of policies, processes and controls used by the Chief Risk Officer and risk management team to execute the risk management philosophy.

The enterprise risk management philosophy is to ensure that all relevant risks are appropriately identified, measured, monitored and controlled. The approach in executing this philosophy focuses on leveraging risk expertise to drive enterprise risk management using a strong governance framework structure, a comprehensive enterprise risk assessment program and an effective risk appetite framework. The corporate culture and values in conjunction with the risk management accountability incorporated into the integrated Risk Management Framework, which includes the governance structure and three distinct Lines of Defense, has facilitated, and will continue to facilitate, the evolution of an effective risk presence across the Company.

The "First Line of Defense" is comprised of the business areas whose day-to-day activities involve decision-making and associated risk-taking for the Company. As the business owner, the first line is responsible for identifying, assessing, managing and controlling that risk, and for mitigating overall risk exposure. The first line formulates strategy and operates within the risk appetite and framework. The "Second Line of Defense," also known as the Independent Risk Management Organization, provides oversight of first line risk taking and management. The second line assists in determining risk capacity, risk appetite, and the strategies, policies and structure for managing risks. The second line owns the risk governance framework. The "Third Line of Defense" is comprised of Internal Audit. The third line provides independent and objective assurance to senior management and to the Board of Directors and Audit Committee that the first and second line risk management and internal control systems and its governance processes are well-designed and working as intended.

Responsibility and accountability for risk management flows to individuals and entities throughout the Company, including the Board of Directors, various board and management committees, senior management, and members of each "Line of Defense". For example:

- The **Chief Executive Officer** has ultimate responsibility for ensuring the management of the Company's risk in accordance with the Company's approved risk appetite statement, including through her role as chairperson of the MC. The Chief Executive Officer also provides leadership in communicating the risk appetite to internal and external stakeholders to help embed appropriate risk taking into the overall corporate culture of the Company.

- The **Chief Risk Officer** manages the risk management team and, as chairperson of the ERMC, is responsible for establishing and implementing standards for the identification, management, measurement, monitoring and reporting of risk on an enterprise-wide basis. In collaboration with the Chief Executive Officer and the Chief Financial Officer, the Chief Risk Officer has responsibility for developing an appropriate risk appetite with corresponding limits that aligns with supervisory expectations, and this risk appetite statement has been approved by the Board of Directors. The Chief Risk Officer regularly reports to the Board of Directors and the Risk Committee on risk management matters.

- The **senior executive officers** who serve as leaders in the "First Line of Defense", are responsible for ensuring that their respective functions operate within established risk limits, in accordance with the Company's enterprise risk management policy. As members of the ERMC and the MC, they are also responsible for identifying risks, considering risk when developing strategic plans, budgets and new products and implementing appropriate risk controls when pursuing business strategies and objectives. In addition, senior executive officers are responsible for deploying sufficient financial resources and qualified personnel to manage the risks inherent in the Company's business activities.

- The **risk management team,** including compliance, led by the Chief Risk Officer, provides oversight of the Company's risk profile and is responsible for maintaining a compliance program that includes compliance risk assessment, policy development, testing and reporting activities. This team effectively serves in a "Second Line of Defense" role by overseeing the operating activities of the "First Line of Defense".

- The **internal audit team** is responsible for performing periodic, independent reviews and testing of compliance with the Company's and the Bank's risk management policies and standards, as well as with regulatory guidance and industry best practices. The internal audit team also assesses the design of the Company's and the Bank's policies and standards and validates the effectiveness of risk management controls, and reports the results of such reviews to the Audit Committee. The internal audit team effectively serves as the "Third Line of Defense" for the Company.

The Company's Enterprise Risk Management oversight tools, which are an integral component of the integrated Risk Management Framework that is used to help the Company manage risk within its approved risk appetite, are applied to the Company's strategy setting process as well as its operational delivery mechanisms to identify potential events that may impact the Company. To achieve its risk appetite objective, the Company must identify, manage, monitor, control and report on current and emerging risks in a consistent, timely, and understandable manner across the organization. Three examples of the oversight tools that help the Company identify its risks are the Risk Appetite Statement, the Enterprise Risk Assessment process, and stress testing activities.

The Company operates in accordance with a Risk Appetite Statement setting forth its objectives, plans and limits, and expressing its preferences with respect to risk-taking activities in the context of overall business goals. The Risk Appetite Statement is approved annually by the ERMC and the Board of Directors, with delegated authority to the Chief Risk Officer for implementation throughout the Company. The risk appetite statement serves as a tool to preclude activities that are inconsistent with the business and risk strategy.

The Enterprise Risk Assessment process (the "ERA") is a top-down process designed to identify, assess and quantify risk across the Company's primary risk categories and serves as a basis to determine the Company's risk profile. Enterprise risk assessments play an important role in directing the risk management activities by helping prioritize initiatives and focus resources on the most appropriate risks. The ERA is performed annually and refreshed periodically, and is the basis of the Material Risk Inventory used in the strategic and capital planning processes.

Stress testing activities provide a forward-looking assessment of risks and losses. Stress Testing is integrated into the strategic, capital and liquidity planning processes, and the results are used to identify portfolio vulnerabilities and develop risk mitigation strategies or contingency plans across a range of stressed conditions. See "*Item 1. Business - Risk Management*" in the 2017 Form 10-K for more information regarding the Company's risk management processes.

Credit Risk Management

Credit risk is the risk of loss that arises when an obligor fails to meet the terms of an obligation. Credit risk includes exposure to consumer credit risk from customer loans as well as institutional credit risk, principally from our partners. Consumer credit risk is one of the most significant risks that we face. As a result, credit risk management is a critical component of our management and growth strategy. Our credit risk arising from credit products is generally highly diversified across over 130 million open accounts at December 31, 2017, without significant individual exposures. We manage credit risk primarily according to customer segments and product types.

The credit risk management philosophy is to establish an appropriate framework that effectively aligns with and embodies the limits contained in the Risk Appetite Statement, and this framework is approved annually by the Risk Committee. Under the auspices of the Risk Appetite Statement, credit decision guidelines have been developed for our partners' programs that address each of the critical points along the account lifecycle including new customer account acquisition, on-going customer account management, fraud prevention and delinquent account collections.

The customer account acquisition process occurs through a variety of channels (e.g., in-store, mail, internet, mobile). However, regardless of the channel, in making the initial credit approval decision to open a credit card or other account or otherwise grant credit, we follow a series of credit risk and underwriting procedures. In most cases, when applications are made in-store or by internet or mobile, the process is fully automated and applicants are notified of our credit decision almost immediately. We generally obtain certain information provided by the applicant and obtain a credit bureau report from one of the major credit bureaus. The credit report information we obtain is electronically transmitted into industry scoring models and our proprietary scoring models developed to calculate a credit score. The Credit team determines the qualifying credit scores in advance and initial credit line assignments for each portfolio and product type. Periodic analysis of performance trends on accounts originated at different score levels is conducted as compared to projected performance, and adjust the minimum score or the opening credit limit to manage risk. Different scoring models may be used depending upon bureau type and account source.

The Company regularly assesses the credit risk exposure of customer accounts through the customer account management process. This ongoing assessment includes information relating to the customer's account performance, as well as information from credit bureaus relating to the customer's broader credit performance. To monitor and control the quality of our loan portfolio, behavioral scoring models, developed internally, are used to score each active account on its monthly cycle date. Depending on the duration of the customer's account, risk profile and other performance metrics, the account may be subject to a range of account actions, including limits on transaction authorization and increases or decreases in purchase and cash credit limits. See "*Item 1. Business - Credit Risk Management*" in the 2017 Form 10-K for more information regarding credit risk.

Responsibility and accountability for credit risk management primarily resides with the Chief Credit & Capital Management Officer and is overseen by the Chief Credit Risk Officer, the Chief Risk Officer, and governance committees. For example:

- The **Chief Credit & Capital Management Officer**, as a member of the "First Line of Defense", manages the credit and fraud strategy implementation, capital management, and reserves and loss forecasting teams. The Chief Credit & Capital Management Officer is responsible for delivering credit management, capital management and loss reserve strategies that drive portfolio performance outcomes that align with the Risk Appetite Statement as well as the Strategic Plan.

- The **Chief Credit Risk Officer**, as a member of the "Second Line of Defense", is responsible for overseeing the activities of the "First Line of Defense" team under the leadership of the Chief Credit & Capital Management Officer in order to confirm that they are consistently complying with the Risk Appetite Statement and all applicable credit risk related policies.

For further information related to credit risk management and practices, accounting policies and current exposures as reported under U.S. GAAP refer to the 2017 Form 10-K. See Appendix A for specific references.

The following table summarizes remaining maturities by credit exposure for loans and leases and unused commitments. The contractual amounts of commitments to extend credit represent the Company'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 Company manages this credit risk by using the same credit policies it applies to loans.

Credit Exposure by Type and Contractual Maturity

	Loans		Unused Commitments		
December 31, 2017 *($ in millions)*	Less than 1 Year	Greater Than 1 Year	Less than 1 Year[a]	Greater Than 1 Year	Total
Credit cards	$ 78,340	$ 686	$ 359,870	$ —	$ 438,896
Consumer installment loans	17	1,561	—	—	1,578
Commercial credit products	1,300	3	10,030	—	11,333
Other	18	22	9	165	214
Total	$ 79,675	$ 2,272	$ 369,909	$ 165	$ 452,021

(a) Includes $370 billion of unconditionally cancelable commitments which are not subject to risk-weighting per the regulatory capital rules.

Credit Exposure of Loan Receivables Portfolio by Geography

December 31, 2017 ($ in millions)	Total Exposure	Percent of Total
Texas	$ 8,335	10%
California	8,302	10%
Florida	6,733	8%
New York	4,621	6%
Pennsylvania	3,452	4%
Other[a]	50,504	62%
Total	$ 81,947	100%

(a) The Company's loan portfolio has a national distribution profile, further breakdown of the other category results in a widespread distribution across a large number of additional states.

For additional quantitative information on allowance for loan losses, charge-offs, loans past due and impaired loans, see Note 4. *Loan Receivables* to our Consolidated Financial Statements in the 2017 Form 10-K.

Credit Risk Mitigation

As part of its risk management activities, the Company uses various risk mitigants to manage portions of the credit risk in its portfolios. Credit risk mitigation is important to the Company in the effective management of its credit risk exposures. A majority of the Company's assets are comprised of credit card receivables, with unfunded commitments that are unconditionally cancelable. At December 31, 2017, the Company had no asset category that benefited from financial collateral as defined in the U.S. Basel III rules, and the Company did not utilize credit derivatives as a risk mitigation tool.

There are certain exposures related to our investment in residential mortgage-backed securities which are held to comply with the Community Reinvestment Act and are issued by government-sponsored entities. All of these residential mortgage-backed securities are pledged by the Bank as collateral to the Federal Reserve to secure Federal Reserve Discount Window advances. Exposures related to these residential mortgage-backed securities are covered by guarantees and are set forth below with associated risk-weighted amounts:

Exposure Type

December 31, 2017 ($ in millions)	Exposure Amount	Risk-Weighted Asset Amount
GNMA mortgage-backed securities	$ 798	$ —
FNMA & FHLMC mortgage-backed securities	460	92
Total	$ 1,258	$ 92

Securitizations

The Company engages in credit card securitization activities, primarily as originator and sponsor. The Company's securitizations are accounted for as secured borrowings and the trusts are treated as consolidated subsidiaries of the Company. The assets of the Company's consolidated variable interest entities ("VIEs") are restricted from being sold or pledged as collateral for other borrowings and the cash flows from these restricted assets may be used only to pay obligations of the trusts. The related debt issued by all securitization trusts is reported in long-term borrowings. The Company issues asset-backed securities in both public transactions and private transactions through the Synchrony Credit Card Master Note Trust ("SYNCT") and issues asset-backed securities in private transactions through the Synchrony Sales Finance Master Trust (“SFT”) and the Synchrony Card Issuance Trust (“SYNIT”). SYNCT, SFT and SYNIT are Delaware statutory trusts that acquire credit card receivables originated by Synchrony Bank through bankruptcy remote special purpose entities referred to as RFS Holding, L.L.C., Synchrony Sales Finance Holding, LLC and Synchrony Card Funding, LLC, respectively.

See Note 5. *Variable Interest Entities* to our Consolidated Financial Statements in the 2017 Form 10-K for more information on the Company's credit card securitization activities.

None of the assets securitized by the Company meet the operational criteria for securitizations as defined in the U.S. Basel III rules. The underlying assets are consolidated on the balance sheet and accordingly risk-weighted based on their balance sheet classification for Basel III purposes.

See Note 2. *Basis of Presentation and Summary of Significant Accounting Policies* to our Consolidated and Combined Financial Statements in the 2017 Form 10-K for information on the Company’s accounting policies relevant to its securitization activities.

In addition to its activities as an originator and sponsor, the Company also is an investor in securities created by third parties that meet the definition of a securitization exposure. These securities consist of asset-backed securities secured by credit card receivables. The Company calculates the regulatory capital requirement for securitization exposures in accordance with the hierarchy of approaches outlined under the Standardized Approach framework. The Company utilizes the Simplified Supervisory Formula Approach (“SSFA”) to determine RWAs for all of its securitization exposures.

At December 31, 2017 the Company had on-balance sheet securitization exposure related to these asset-backed securities of $781 million and a RWA amount of $156 million, or 20%, calculated using the SSFA. The Company does not have any synthetic securitization exposures nor any resecuritizations under Basel III.

Additionally, the Company invests in residential mortgage-backed securities issued by government agencies and government-sponsored entities and are collateralized by U.S. mortgages. At December 31, 2017, $344 million is pledged by the Bank as collateral to the Federal Reserve to secure Federal Reserve Discount Window advances. These residential mortgage-backed securities are not considered “securitizations” under regulatory guidance.

Equities Not Subject To Market Risk Rule

Equity investments held by the Company include available-for-sale equity securities and fund exposures, and non-publicly traded equity investments classified within other assets. Available-for-sale equity securities are carried at fair value with unrealized net gains or losses reported within other comprehensive income (loss) in shareholders' equity. Other equity investments primarily include Low Income Housing Tax Credit investments, which are recorded at historical cost.

The Company uses both the Full Look Through Approach ("FLTA") and the Simple Risk-Weight Approach ("SRWA") to measure equity exposures for regulatory purposes. The FLTA is used to determine RWAs for exposure to investment funds. Under the FLTA, the Company calculates the aggregate risk-weighted asset amounts of the carrying value of the exposures held by the fund as if they were held directly by the Company multiplied by the Company's proportional ownership share of the fund. The minimum RWA using the FLTA is 20%. The company uses the SRWA to determine RWAs for direct equity exposures and community development exposures. 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 equity exposures that are less than 10% of total regulatory capital is risk-weighted at 100% as non-significant equity exposures. At December 31, 2017, the Company did not have aggregate equity exposures that exceeded the 10% threshold.

Equity Exposure By Type

December 31, 2017 *($ in millions)*	Exposure / Carrying Value[(a)]	RWA	Capital Requirement
Using FLTA			
Publicly traded available-for-sale fund exposures	$ 57	$ 11	$ 1
Using SRWA			
Publicly traded available-for-sale equity securities	15	15	2
Non-publicly traded community development exposures	203	203	20
Non-publicly traded other miscellaneous equity investments	23	23	2
Total	$ 298	$ 252	$ 25

(a) Carrying value approximates fair value for all equity exposures held at December 31, 2017.

Capital Requirements for Equity Securities not subject to Market Risk Rule

December 31, 2017 *($ in millions)*	Exposure	RWA	Capital Requirement
100%	$ 241	$ 241	$ 24
FLTA	57	11	1
Total	$ 298	$ 252	$ 25

We had no net realized gains or losses arising from sales and liquidations of equity investments for the quarter ended December 31, 2017.

Interest Rate Risk for Non-Trading Activities

We borrow money from a variety of depositors and institutions in order to provide loans to our customers. Changes in market interest rates cause our net interest income to increase or decrease, as certain of our assets and liabilities carry interest rates that fluctuate with market benchmarks. The interest rate benchmark for our floating rate assets is generally the prime rate, and the interest rate benchmark for our floating rate liabilities is generally either LIBOR or the federal funds rate. The prime rate and the LIBOR or federal funds rate could reset at different times or could diverge, leading to mismatches in the interest rates on our floating rate assets and floating rate liabilities.

Management continually reviews the Company's balance sheet composition and earnings flows and models the interest rate risk, and possible actions to reduce this risk, given numerous possible future interest rate scenarios. We assess our interest rate risk by estimating the effect of various interest rate scenarios on our net interest income.

For further information on interest rate risk, including a net interest income sensitivity analysis, refer to "*Item 7A, Quantitative and Qualitative Disclosures About Market Risk*" in the 2017 Form 10-K.

Appendix A - Disclosure Index

	Description	Page References: Basel III Report	Page References: Form 10-K for December 31, 2017

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.	4	
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 Company 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.	5	

Quantitative Disclosures

d	The aggregate amount of surplus capital of insurance subsidiaries included in the total capital of the consolidated group.	N/A: The Company has no insurance subsidiaries	
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.	N/A	

Table 2 - Capital Structure

Qualitative Disclosures

a	Summary information on the terms and conditions of the main features of all regulatory capital instruments.	6-7	115, 137-138

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.	7	
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.	7	
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.	7	

	Description	Page References: Basel III Report	Page References: Form 10-K for December 31, 2017

Table 3 - Capital Adequacy

Qualitative Disclosures

a	A summary discussion of the savings and loan holding company's approach to assessing the adequacy of its capital to support current and future activities.	8	101, 137

Quantitative Disclosures

b	Risk-weighted assets for credit risk from: (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.	9	
c	Standardized market risk-weighted assets as calculated under subpart F of this part.	9	
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.	9	137-138
e	Total standardized risk-weighted assets.	9	103

Table 4 - Capital Conservation Buffer

Quantitative Disclosures

a	At least quarterly, the savings and loan holding company must calculate and publicly disclose the capital conservation buffer as described under §___.11 of subpart B.	10	138
b	At least quarterly, the savings and loan holding company must calculate and publicly disclose the eligible retained income of the savings and loan holding company, as described under §___.11 of subpart B.	10	
c	At least quarterly, the savings and loan 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 of subpart B, including the maximum payout amount for the quarter.	10	

	Description	Page References: Basel III Report	Page References: Form 10-K for December 31, 2017

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: (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 savings and loan 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 savings and loan holding company's credit risk management policy	10-13	20-22; 25-30; 117-126

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, savings and loan 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.	13	128-131
c	Geographic distribution of exposures, categorized in significant areas by major types of credit exposure.	13	93
d	Industry or counterparty type distribution of exposures, categorized by major types of credit exposure.	13	128
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.		128-131
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.	Information by geography is not practical or meaningful to disclose. Management does not use this information to allocate general or specific allowance components	
g	Reconciliation of changes in ALLL.		128
h	Remaining contractual maturity delineation (for example, one year or less) of the whole portfolio, categorized by credit exposure.	13	93

	Description	Page References: Basel III Report	Page References: Form 10-K for December 31, 2017

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: (1) Discussion of methodology used to assign economic capital and credit limits for counterparty credit exposures; (2) Discussion of policies for securing collateral, valuing and managing collateral, and establishing credit reserves; (3) Discussion of the primary types of collateral taken; (4) Discussion of the impact of the amount of collateral the savings and loan holding company would have to provide given a deterioration in the savings and loan holding company's own creditworthiness.	N/A: The Company has no OTC derivatives, eligible margin loans, or repo-style transaction exposures	

Quantitative Disclosures

b	Gross positive fair value of contracts, collateral held (including type, for example, cash, government securities), and net unsecured credit exposure. A savings and loan holding company 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.	N/A	
c	Notional amount of purchased and sold credit derivatives, segregated between use for the savings and loan holding company’s own credit portfolio and for 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	

Table 7 - Credit Risk Mitigation

Qualitative Disclosures

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 savings and loan holding company; (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.	14	

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.	N/A	
c	For each separately disclosed credit risk portfolio, the total exposure that is covered by guarantees/credit derivatives and the risk-weighted asset amount associated with that exposure.	14	

	Description	Page References: Basel III Report	Page References: Form 10-K for December 31, 2017

Table 8 - Securitization

Qualitative Disclosures

a	The general qualitative disclosure requirement with respect to securitization (including synthetic securitizations), including a discussion of: (1) The savings and loan holding company's objectives for securitizing assets, including the extent to which these activities transfer credit risk of the underlying exposures away from the savings and loan 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 savings and loan holding company in the securitization process and an indication of the extent of the savings and loan 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 savings and loan holding company’s policy for mitigating the credit risk retained through securitization and resecuritization exposures; and (6) The risk-based capital approaches that the savings and loan holding company follows for its securitization exposures including the type of securitization exposure to which each approach applies.	15	132-133
b	A list of: (1) The type of securitization SPEs that the savings and loan holding company, as sponsor, uses to securitize third-party exposures. The savings and loan holding company must indicate whether it has exposure to these SPEs , either on- or off- balance sheet; and (2) Affiliated entities: (i) That the savings and loan holding company manages or advises; and (ii) That invest either in the securitization exposures that the savings and loan holding company has securitized or in securitization SPEs that the savings and loan holding company sponsors	15	132-133
c	Summary of the savings and loan 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 and inputs applied in valuing retained or purchased interests; (4) Changes in methods and key assumptions and inputs 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 savings and loan holding company to provide financial support for securitized assets.		132-133
d	An explanation of significant changes to any of the quantitative information set forth below since the last reporting period.	N/A	

	Description	Page References: Basel III Report	Page References: Form 10-K for December 31, 2017

Quantitative Disclosures

e	The total outstanding exposures securitized by the savings and loan holding company in securitizations that meet the operational criteria in §___.41 (categorized into traditional/synthetic), by underlying exposure type separately for securitizations of third-party exposures for which the bank acts only as sponsor.	N/A	
f	For exposures securitized by the savings and loan 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 savings and loan holding company during the current period categorized by exposure type	N/A	
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.	15	133
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). (2) Exposures that have been deducted entirely from tier 1 capital, credit enhancing I/Os deducted from total capital (as described in §___.42(a)(1), and other exposures deducted from total capital should be disclosed separately by exposure type.	15	
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 asset 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.	N/A	

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 the equity risk of equity holdings not subject to subpart F of this part, including: (1) Differentiation between holdings on which capital gains are expected and those held for 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.	16	

	Description	Page References: Basel III Report	Page References: Form 10-K for December 31, 2017

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 than fair value.	16	
c	The types and nature of investments, including the amount that is: (1) Publicly traded; and (2) Non-publicly traded.	16	
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 and/or tier 2 capital.	16	
f	Capital requirements categorized by appropriate equity groupings, consistent with the savings and loan holding company's methodology, as well as the aggregate amounts and the type of equity investments subject to any supervisory transition regarding total capital requirements.	16	

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.	17	108-109

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).	17	109