Regulatory Capital
Pillar 3 Disclosures
Standardized Approach

December 31, 2019

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BACKGROUND

Basel III regulatory capital rules for large and internationally active banks established the definition of regulatory capital elements and minimum capital ratios, regulatory capital buffers above those minimums, a common equity tier 1 ratio, a supplementary leverage ratio and the rules for calculating risk-weighted assets. Basel III includes two comprehensive methodologies for calculating risk-weighted assets: a general standardized approach and more risk-sensitive advanced approaches. With the passing of the "Prudential Standards for Large Bank Holding Companies, Savings and Loan Holding Companies, and Foreign Banking Organizations" rule, effective December 31, 2019, the Company will be classified as a Category III banking organization and will no longer be subject to Advanced Approaches capital calculations and related reporting. The regulatory capital requirements effective for U.S. Bancorp (the "Company") follow the general standardized approach.

OVERVIEW

U.S.Bancorp (the "Company") based in Minneapolis, is one of the largest commercial banks in the United States and provides a comprehensive line of banking, investment, mortgage, trust and payment services products to consumers, businesses, and institutions.

This document, and certain of the Company's public filings, present the Pillar 3 Disclosures in compliance with Basel III as described in Subsections 61-63 of the: Capital Adequacy—Basel III Final Rule (the "Rule"). The Company's 2019 Annual Report on Form 10-K ("Annual Report") filed with the Securities and Exchange Commission contains management's discussion of the overall corporate risk profile of the Company and related management strategies. These Pillar 3 Disclosures should be read in conjunction with the Annual Report, the Consolidated Financial Statements for Bank Holding Companies - FR Y-9C. The Company's Pillar 3 Disclosures Matrix (see Appendix A) specifies where all disclosures required by the Rule are located. The Pillar 3 Disclosures have not been audited by the Company's external auditors.

The Rule applies only to the consolidated Company, with the exception that every depository subsidiary must disclose capital ratios.

CORPORATE GOVERNANCE

Managing risks is an essential part of successfully operating a financial services company. The Company's Board of Directors has approved a risk management framework which establishes governance and risk management requirements for all risk-taking activities. This framework includes Company and business line risk appetite statements which set boundaries for the types and amount of risk that may be undertaken in pursuing business objectives and initiatives. The Board of Directors, through its Risk Management and Capital Planning Committees, oversees performance relative to the risk management framework, risk appetite statements, and other policy requirements including an annual review of the effectiveness of the Basel Program.

The Executive Risk Committee ("ERC"), which is chaired by the Chief Risk Officer and includes the Chief Executive Officer and other members of the executive management team, oversees execution against the risk management framework and risk appetite statements. The ERC focuses on current and emerging risks, including strategic and reputational risks, by directing timely and comprehensive actions. Senior operating committees have also been established, each responsible for overseeing a specified category of risk.

The Company's most prominent risk exposures are credit, interest rate, market, liquidity, operational, compliance, strategic, and reputational risk. Credit risk is the risk of not collecting the interest and/or the principal balance of a loan, investment or derivative contract when it is due. Interest rate risk is the potential reduction of net interest income or market valuations as a result of changes in interest rates. Market risk arises from fluctuations in interest rates, foreign exchange rates, and security prices that may result in changes in the values of financial instruments, such as trading and available-for-sale securities, mortgage loans held for sale, mortgage servicing rights ("MSRs") and derivatives that are accounted for on a fair value basis. Liquidity risk is the possible inability to fund obligations or new business at a reasonable cost and in a timely manner. Operational risk is the risk of loss arising from inadequate or failed internal processes, or systems, people, or from adverse external events including the risk of loss resulting from breaches in data security. Operational risk can also include the risk of loss due to failures by third parties with which the Company does business. Compliance risk is the risk that customers may suffer economic loss or other injury, or the risk that the Company may suffer legal or regulatory sanctions, material financial loss, or loss to reputation through failure to comply with laws, regulations, rules, standards of good practice, and codes of conduct. Strategic risk is the risk to current or projected financial condition and resilience arising from adverse business decisions, poor implementation of business decisions, or lack of responsiveness to changes in the banking industry and operating environment. Reputation risk is the risk to current or anticipated earnings, capital, or franchise or enterprise value arising from negative public opinion. This risk may impair the Company's competitiveness by affecting its ability to establish new relationships or services or continue servicing existing relationships. In addition to the risks identified above, other risk factors exist that may impact the Company. Refer to "Risk Factors" in the Annual Report for a detailed discussion of these factors.

The Company's Board of Directors and management-level governance committees are supported by a "three lines of defense" model for establishing effective checks and balances. The first line of defense, the business lines, manages risks in conformity with established limits and policy requirements. In turn, business leaders and their risk officers establish programs to ensure conformity with these limits and policy requirements. The second line of defense, which is primarily aligned to the Chief Risk Officer's organization but also includes policy and oversight activities of corporate support functions, translates risk appetite and strategy into actionable risk limits and policies. The second line of defense monitors first line of defense conformity with limits and policies and provides reporting and escalation of emerging risks and other concerns to senior management and the Risk Management Committee of the Board of Directors. The third line of defense, internal audit, is responsible for providing the Audit Committee of the Board of Directors and senior management with independent assessment and assurance regarding the effectiveness of the Company's governance, risk management, and control processes.

INTERNAL CAPITAL ADEQUACY ASSESSMENT PROCESS (ICAAP)

The Company's ICAAP is a component of its Basel Program. The Company manages its capital to multiple minimum thresholds and measures that are consistent with the Company's strategic objectives, business model and capital plan. Expectations of internal and external stakeholders are integral, and the capital goals and targets are calibrated considering internally-developed models that ensure adequate coverage for all material quantitative and qualitative risks, minimum regulatory requirements, supervisory stress testing expectations and rating agency and counterparty perspectives.

The Company is committed to managing capital to maintain strong protection for depositors and creditors, and for maximum shareholder benefit in order to achieve the Company's broader goals, which are as follows:

- Ensure the Company's safety and soundness;
- Maintain access to the debt and capital markets so the Company may continue to provide exceptional service to its customers and fulfill, without interruption, its obligations as a credit intermediary;
- Serve as a source of managerial and financial strength to its subsidiaries; and
- Ensure that the Company continues to be in a position to conduct its business in an environment of economic or financial stress.

The Company's ICAAP, the identification of material risks and how those material risks inform capital adequacy, is conducted via the Company's stress testing program. Through this process the Company's material risks, informed by the risk identification process, are critical to the scenario design process and the development of the Company's internal stress scenario. The results of these forward-looking scenarios inform the Company's regulatory and internally defined capital adequacy relative to the Company's risk profile and risk appetite.

REGULATORY CAPITAL ADEQUACY RATIOS

The Company also manages its capital to exceed regulatory capital requirements for well-capitalized financial institutions. The Company's applicable capital requirement for regulatory and supervisory purposes is based upon the ratios determined under the standardized approach.

Banking regulators define capital requirements for banks and financial services holding companies expressed in the form of a common equity tier 1 capital ratio, a tier 1 capital ratio, a total risk-based capital ratio, a leverage ratio and for banking organizations with total assets greater than $250 billion, a supplementary leverage ratio. The current minimum required levels including the 2.5 percent capital buffer for these ratios are 7.0 percent, 8.5 percent, 10.5 percent, 4.0 percent and 3.0 percent, respectively, while the requirements for an insured depository institution to be considered "well-capitalized" are 6.5 percent, 8.0 percent, 10.0 percent, 5.0 percent and 3.0 percent, respectively. Using the standardized approach rule the common equity tier 1 ratio was 9.6 percent at December 31, 2019 — above the Company's targeted ratio of 8.5 percent.

A summary of the capital ratios under the standardized is shown in Table 1.

Table 1 Regulatory Capital Ratios

	U.S. Bancorp		U.S. Bank National Association	
(Dollars in Millions, Unaudited)	December 31, 2019	December 31, 2018	December 31, 2019	December 31, 2018
U.S. Bancorp				
Common Equity Tier 1 capital	$35,713	$34,724	$39,114	$38,318
Tier 1 capital	41,721	40,741	39,138	38,351
Total risk-based capital	49,744	48,178	46,994	45,960
Common Equity Tier 1 capital as a percent of risk-weighted assets	9.1 %	9.1 %	10.2 %	10.2 %
Tier 1 capital as a percent of risk-weighted assets	10.7 %	10.7 %	10.2 %	10.2 %
Tier 1 risk-based capital as a percent of adjusted quarterly average assets (leverage ratio)	8.8 %	9.0 %	8.4	8.6 %
Tier 1 risk-based capital as a percent of total on and off balance sheet average exposures (supplementary leverage ratio)	7.0	7.2	6.7 %	6.9 %
Total risk-based capital as a percent of risk-weighted assets	12.7 %	12.6 %	12.3 %	12.3 %
Risk-Weighted Assets	$391,269	$381,661	$383,560	$374,299

The Company's total shareholders' equity was $51.9 billion at December 31, 2019, compared with $51.0 billion at December 31, 2018. The increase was primarily the result of corporate earnings and a change in unrealized gains and losses on available-for-sale investment securities included in other comprehensive income, partially offset by dividends and common share repurchases. In compliance with the Rule, the Company reviewed the aggregate amount of surplus capital of insurance subsidiaries included in the regulatory capital of the consolidated group and has determined that it was not material. Refer to "Management's Discussion and Analysis—Capital Management" in the Annual Report for further discussion on capital management.

In addition to capital ratios defined by banking regulators, the Company considers various other measures when evaluating capital utilization and adequacy. These measures are viewed by management as useful additional methods of reflecting the level of capital available to withstand unexpected market or economic conditions. Additionally, presentation of these measures allows investors, analysts and banking regulators to assess the Company's capital position relative to other financial services companies. These measures differ from the currently effective capital ratios defined by current banking regulations principally in that the numerator excludes trust preferred securities and preferred stock, the nature and extent of which varies among different financial services companies. These measures are not defined in generally accepted accounting principles ("GAAP") or are not currently effective or defined in federal banking regulations. As a result, these measures disclosed by the Company may be considered non-GAAP financial measures.

Capital Conservation Buffer

Basel III established a capital conservation buffer applicable to U.S. banking. The calculation of the capital conservation buffer is based on a comparison of each of the following three risk-based capital ratios and the stated minimum required ratios for each, with the reportable capital conservation buffer being the smallest of the three differences:

- common equity tier 1 capital ratio minus the minimum common equity tier 1 capital ratio;
- tier 1 capital ratio minus the minimum tier 1 capital ratio; and
- total capital ratio minus the minimum total capital ratio.

The capital conservation buffer minimum ratio for 2019 is 2.50 percent. At December 31, 2019, the Company has a common equity tier one capital conservation buffer ratio of 4.6 percent which is above the minimum and has retained income eligible for distribution of $1.5 billion; therefore, the Company would not be subject to any limitations on distributions and discretionary bonus payments.

In addition, Basel III also introduced a potential countercyclical capital buffer of up to 2.5 percent. A countercyclical capital buffer would be invoked upon a determination by the U.S. banking agencies and would be in addition to the capital conservation buffer. Currently, the countercyclical capital buffer amount for banks domiciled in the United States is zero.

Table 2 Non-GAAP Capital Ratios

(Unaudited)	December 31, 2019	December 31, 2018
Tangible common equity to tangible assets	7.5 %	7.8 %
Tangible common equity to risk-weighted assets	9.3	9.4

Refer to "Management's Discussion and Analysis—Non-GAAP Financial Measures" in the Annual Report for further discussion on the non-GAAP capital ratios.

Table 3 Supplementary Leverage Ratio

Advanced approaches banks are required to report the Supplementary Leverage Ratio (SLR) defined as tier 1 capital divided by the total leverage exposure which includes both on- and off-balance sheet exposures. The Company is required to meet a 3.0 percent SLR requirement. At December 31, 2019, the Company's and subsidiary bank's SLR exceeded the requirement with ratios of 7.0 percent and 6.7 percent, respectively. This is compared to 7.2 percent and 6.9 percent, respectively, at December 31, 2018.

	US Bancorp	US Bank NA
(Dollars in millions, Unaudited)	December 31, 2019	December 31, 2019
Summary Comparison of Accounting Assets and Total Leverage Exposure		
Total Consolidated Assets as reported in published financial statements	$485,437	$475,557
Adjustment for investments in banking, financial, insurance or commercial entities that are consolidated for accounting purposes but outside the scope of regulatory consideration	-	-
Adjustments for fiduciary assets recognized on balance sheet but excluded from total leverage exposure	-	-
Adjustment for derivative exposures	14,222	14,052
Adjustment for repo-style transactions	2,557	611
Adjustment for off-balance sheet exposures (credit equivalent)	107,114	107,091
Other adjustments	(13,451)	(11,038)
Total Leverage Exposure	595,879	586,273
Supplementary Leverage Ratio		
On-balance sheet exposures		
On-balance sheet assets (excluding on-balance sheet assets for repo-style transactions and derivative exposures, but including cash collateral received in derivative transactions)	482,188	474,039
LESS: Deductions from common equity tier 1 capital and additional tier 1 capital (report as a positive value)	10,202	9,520
Total on-balance sheet exposures	471,986	464,519
Derivative exposures		
Replacement cost for derivative exposures (net of cash variation margin)	2,121	2,111
Add-on amounts for potential future exposure (PFE) for derivatives exposures	6,039	5,878
Gross-up for cash collateral posted if deducted from the on-balance sheet assets, except for cash variation margin	11	11
LESS: Deductions of receivable assets for cash variation margin posted in derivatives transactions, if included in on-balance sheet assets (report as a positive value)	-	-
LESS: Exempted CCP leg of client-cleared transactions (report as a positive value)	-	-
Effective notional principal amount of sold credit protection	7,163	7,163
LESS: Effective notional principal amount offsets and PFE adjustments for sold credit protection (report as a positive value)	1,112	1,111
Total derivative exposures	14,222	14,052
Repo-style transactions		
On-balance sheet assets for repo-style transactions, include the gross value of receivables for reverse repurchase transactions	2,509	611
LESS: Reduction of the gross value of receivables in reverse repurchase transactions by cash payables in repurchase transactions under netting agreements (report as a positive value)	-	-
Counterparty credit risk for all repo-style transactions	48	-
Exposure for repo-style transactions where a banking organization acts as an agent	-	-
Total exposures for repo-style transactions	2,557	611
Other off-balance sheet exposures		
Off-balance sheet exposures at gross notional amounts	342,390	342,367
LESS: Adjustments for conversion to credit equivalent amounts	235,276	235,276
Off-balance sheet exposures	107,114	107,091
Capital and total leverage exposures		
Tier 1 Capital	41,721	39,138
Total leverage exposure	$595,879	$586,273
Supplementary Leverage Ratio		
Supplementary Leverage Ratio	7.0%	6.7%

STANDARDIZED APPROACH RISK-WEIGHTED ASSETS

Risk-weighted assets represent an institution's 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.

The standardized approach assigns each credit exposure category to a predefined risk weight classification.

Standardized approach risk-weighted assets were $391.3 billion at December 31, 2019, compared with $381.7 billion at December 31, 2018. The increase in risk weighted assets on the wholesale exposures was attributable to increases in banking and foreign exposures, as well as increases in domestic derivatives related to the changing rate environment. The increase in retail exposures was due to increases in auto loans and other installment loans along with increases in some of the procurement card exposures.

Table 4 Risk-Weighted Assets

(Dollars in Millions, Unaudited)	December 31, 2019	December 31, 2018	$ Change	Percent Change
Credit risk				
Exposures to Soveriegn Entities (a)	$ -	$ -	$ -	0.0 %
Exposures to Depository Entities Foreign Banks	691	798	(107)	(13.4)
PSE Exposures	13,436	12,815	621	4.8
Corporate Exposures	120,977	119,957	1,020	0.9
Residential Mortgage Exposures	51,912	49,957	1,955	3.9
HVCRE loans	5,124	6,255	(1,131)	(18.1)
Past Due Loans	1,052	1,091	(39)	(3.6)
Other Assets	101,970	98,000	3,970	4.1
Cleared Transactions	-	-	-	0.0
Default Fund Contributions	3	4	(1)	(25.0)
Unsettled Transactions	-	2	(2)	(100.0)
Securitization Exposures	690	417	273	65.5
Equity Exposures	10,071	9,619	452	4.7
Off Balance Sheet Exposures				
Letters of Credit	7,615	8,474	(859)	(10.1)
Off Balance seeth commitments	71,450	70,215	1,235	1.8
Derivatives	3,645	2,055	1,590	77.4
Securitizations	161	62	99	159.7
Other Off Balance Sheet Exposures	186	171	15	8.8
Market risk	2,286	1,769	517	29.2
Total risk-weighted assets.	$391,269	$381,661	$9,608	2.5 %

(a) Exposures to and portions of exposures that are unconditionally guaranteed by, the U.S. Government, its agencies and tehr federal reserve receive 0% risk weight.

Credit Risk Mitigation The Company's approach in underwriting is to grant credit on the basis of capacity to repay rather than place primary reliance on credit risk mitigation. Mitigation is nevertheless an important aspect of effective risk management. Various risk mitigation techniques are used by the Company, including collateral, guarantees and, to a limited extent, credit derivatives.

The Company has a process that takes into account the risk-reducing effects of collateral in support of exposures. Examples of collateral that impact the Company's estimate include, but are not limited to, cash, working capital, depreciable assets and real estate. Unsecured exposures generally result in larger losses and secured exposures generally result in smaller losses.

The Company may use credit default swaps ("CDS") to manage the credit risk of certain large wholesale loan exposures, with the goal of reducing concentrations in individual names. CDS are subject to credit risk associated with counterparties to the contracts.

Credit risk mitigants are valued to monitor and ensure that they will continue to provide the secure repayment source anticipated at the time they were taken. Company policy prescribes the frequency of valuation based on the volatility of the collateral. Valuation methods range from the use of market indices to individual professional inspection.

Counterparty Credit Risk of OTC Derivative Contracts, Repo-Style Transactions and Eligible Margin Loans
Counterparty exposure arises from OTC derivatives, repurchase agreements, securities lending and borrowing and other similar products and activities. The amount of this exposure depends on the value of underlying market factors (e.g. interest rates and foreign exchange rates), which can be volatile and uncertain in nature.

The Company reduces its counterparty exposure related to derivative contracts by centrally clearing all eligible derivatives. All other credit exposure is approved either on a transaction level basis, or under credit limits supporting bilateral trades governed by appropriate master trading agreements. The primary element of the credit approval process is a detailed risk assessment of every credit exposure associated with a counterparty. The Company's risk assessment procedures consider both the credit worthiness of the counterparty and the risks related to the specific type of credit facility or exposure. The Company manages the credit risk of its derivative positions by diversifying its positions among various counterparties, entering into master netting arrangements where possible with its counterparties, requiring collateral and, in certain cases, though insignificant, transferring the counterparty credit risk related to interest rate swaps to third parties through the use of risk participation arrangements. Credit exposures are monitored daily for counterparties with an established Credit Support Annex ("CSA"), to assure collateral levels are appropriately sized to cover risk, and prior to execution of an initial trade for any counterparty to ensure it does not exceed the approved credit limit for each counterparty.

The Company uses the current exposure to calculate exposure at default (EAD) and determine risk-weighted assets and capital requirements for counterparty risk. EAD is calculated for each counterparty that has an International Swaps and Derivatives Association ("ISDA") Master Agreement with the Company using the collateral haircut approach in the current exposure methodology.

For further information on counterparty credit risk, refer to the "Use of Derivatives to Manage Interest Rate and Other Risks" subsection in the "Management's Discussion and Analysis" section of the Annual Report.

Collateral To calculate a counterparty's net risk position for counterparty credit risk, the Company revalues all financial instruments and associated collateral positions on a daily basis. Collateral positions are monitored by a dedicated group that manages a process to ensure that calls for collateral and exposure reductions are made promptly. Processes exist for the resolution of trades where the level of collateral is disputed, or the collateral sought is not received.

Eligible collateral types are documented by a CSA to the ISDA Master Agreement and are controlled under the Company's general credit policies. A valuation haircut policy reflects the fact that collateral may fall in value between the date the collateral is called and the date of liquidation or enforcement. In practice, most of the Company's collateral held as credit risk mitigation under a CSA is either cash or U.S. government securities.

Credit ratings downgrade Certain credit support annexes to master arrangements provide for rating dependent triggers, where additional collateral has to be pledged if a party's rating is downgraded. The Company also enters into master arrangements that provide for an additional termination event upon a party's rating downgrade.

The Company analyzes and monitors its potential contingent payment obligations resulting from a rating downgrade in its stress testing approach for liquidity risk on an ongoing basis. At December 31, 2019, the additional collateral required to be posted for a three-notch downgrade of U.S. Bank National Association would be $64.8 million. No additional collateral would be required for a three-notch downgrade of its parent company, U.S. Bancorp.

The following table summarizes the netting and collateral positions of the Company's derivatives and securities financing transactions ("SFT") using the Current Exposure Method. As defined by the Rule, the gross current credit exposure is calculated as the greater of the positive mark-to-market of the derivative or zero (asset derivatives).

Table 5 General Disclosure for Counterparty Credit Risk of OTC Derivative Contracts, Repo-Style Transactions, and Eligible Margin Loans

(Dollars in Millions, Unaudited)	December 31, 2019	December 31, 2018
Derivatives		
Gross positive fair value	$2,897	$2,010
Netting benefit (a)	(982)	(942)
Net derivatives credit exposure	$1,915	$1,068
Securities financing transactions		
Gross positive fair value	$7,146	$4,900
Collateral held for risk mitigation (b)	(4,564)	(3,666)
Excess collateral (c)	96	65
Net SFT credit exposure	$2,678	$1,299

(a) Represents netting of derivative asset and liability balances, and related collateral, with the same counterparty subject to master netting agreements.
(b) All collateral is either cash or money market investments.
(c) Certain counterparties have provided collateral in excess of the fair value of the related contracts.

The distribution of gross current credit exposure is shown below:

(Dollars in Millions, Unaudited)	December 31, 2019		December 31, 2018	
Derivatives	Gross Current Credit Exposure	Exposure at Default (a)	Gross Current Credit Exposure	Exposure at Default (a)
Credit derivatives (b)	$1	$721	$1	$479
Derivatives	2,066	7,366	1,225	4,649
Foreign exchange forwards and options	767	1,761	739	1,487
Mortgage derivatives	63	58	45	62
Total derivative gross current credit exposure (c)	$2,897	$9,906	$2,010	$6,677
Securities financing transactions				
Repo-Style Transactions	$7,125	$624	$4,873	$476
Eligible margin loans	21	21	27	27
Total SFT gross current credit exposure (c)	$7,146	$645	$4,900	$503

(a) In addition to the current fair value for asset derivatives, EAD includes amounts for the potential future exposure which is calculated on both asset and liability derivatives.
(b) Credit derivatives have a notional amount of $2.9 billion for asset derivatives and $7.5 billion for liability derivatives at December 31, 2019, and $2.3 billion for asset derivatives and $4.9 billion for liability derivatives at December 31, 2018.
(c) The gross positive fair value of derivative contracts averaged $2.2 billion for the fourth quarter of 2019 and $1.9 billion for the fourth quarter of 2018. The gross positive fair value of SFT contracts averaged $4.5 billion for the fourth quarter of 2019 and $3.6 billion for the fourth quarter of 2018.

Securitization The disclosures in this section refer to securitizations held in the banking book and the regulatory capital on these exposures calculated according to the Rule. A participant in the securitization market is typically an originator, investor, or sponsor. The Company's primary securitization-related activity is investing in products created by third parties and entering into secured lending transactions with clients. Securitization exposures held in the banking book include traditional non-government or non-agency guaranteed ABS and MBS securitizations, loans, lines of credit, and liquidity facilities. The Company is not applying any credit risk mitigation to its securitization exposures and doesn't have exposure to securitization guarantors. The Company does not have any synthetic securitization exposure and does not act as a sponsor.

The Company calculates the regulatory capital requirement for securitization exposures in accordance with the hierarchy of approaches prescribed in the Rule. The Company utilizes the Simplified Supervisory Formula Approach ("SSFA") to determine risk-weighted assets for the majority of its securitization exposures. The SSFA framework considers the Company's seniority in the securitization structure and risk factors inherent in the underlying assets.

As presented in Table 6 below, the Company's total securitization exposures at December 31, 2019, were $3.7 billion compared to $0.9 billion at December 31, 2018.

Table 6 Securitizations
Securitizations by exposure type are shown below (a):

	December 31, 2019			December 31, 2018		
(Dollars in Millions, Unaudited)	On Balance Sheet Exposure	Off Balance Sheet Exposure	Total Exposure	On Balance Sheet Exposure	Off Balance Sheet Exposure	Total Exposure
Mortgage-backed securities	$ -	$ -	$ -	$ -	$ -	$ -
Asset-backed securities	383	-	383	410	-	410
Other (b)	1,869	1,470	3,339	300	225	525
Total securitization exposure	$2,252	$1,470	$3,722	$710	$225	$935

Securitizations by capital treatment and underlying exposure type are shown below (a):

	December 31, 2019			December 31, 2018		
(Dollars in Millions, Unaudited)	Notional Amount	SSFA Risk Weighted Assets	1250% Risk Weighted	Notional Amount	SSFA Risk Weighted Assets	1250% Risk Weighted
Mortgage-backed securities	$ -	$ -	$ -	$ -	$ -	$ -
Asset-backed securities	383	84	-	410	90	-
Other (b)	3,339	707	127	525	126	149
Total securitization exposure	$3,722	$791	$127	$935	$216	$149

Securitizations by capital treatment and risk-weight bands are summarized below (a):

	December 31, 2019				December 31, 2018			
(Dollars in Millions, Unaudited)	Notional Amount	SSFA Risk Weighted Assets	1250% Risk Weighted	Capital impact of RWA (c)	Notional Amount	SSFA Risk Weighted Assets	1250% Risk Weighted	Capital impact of RWA (c)
Securitizations								
Zero to 250% risk weighting	$3,707	$782	$ -	$63	$920	$206	$ -	$16
251% to 500% risk weighting	3	7	-	1	3	8	-	1
501% to 1250% risk weighting	12	2	127	10	12	2	149	12
Resecuritizations								
Zero to 250% risk weighting	-	-	-	-	-	-	-	-
251% to 500% risk weighting	-	-	-	-	-	-	-	-
501% to 1250% risk weighting	-	-	-	-	-	-	-	-
Total securitization exposures	$3,722	$791	$127	$74	$935	$216	$149	$29

(a) Table related to the Company as an investor/originator in the securitization.
(b) Includes loans, lines of credit, and liquidity facilities.
(c) The capital impact of RWA is calculated by multiplying risk weighted assets by the minimum total risk-based capital ratio of 8%.

Equity Securities Not Subject to Market Risk Rule The Company has total equity exposures of approximately $16.0 billion, with $10.6 billion in individual equities and $5.4 billion in equity funds at December 31, 2019. The majority of the individual investments are related to the Company's community reinvestment activities, including tax-advantaged investments made through U.S. Bancorp Community Development Corporation. The Company uses the Simple Risk-Weight Approach for its individual equity securities.

Equity exposures in investment funds consist of Bank Owned Life Insurance ("BOLI"), private equity, money market and other equity funds. The Company uses the Full Look-Through Approach for BOLI assets in separate and hybrid accounts. Investment guidelines specify objectives and constraints for separate and hybrid account BOLI investment funds, requirements and duration parameters. In compliance with these guidelines, underlying investment exposures include Treasury, agency, asset-backed, and mortgage-backed securities and corporate notes and bonds.

Non-marketable equity securities are generally recorded either at historical cost or using the equity method. Details of the Company's accounting policy for equity investments and the valuation of financial instruments are provided in Note 1—Significant Accounting Policies in the Annual Report.

Marketable equity securities are generally recorded as available-for-sale and carried at fair value with unrealized net gains or losses reported within other comprehensive income (loss) in shareholders' equity. For regulatory capital purposes unrealized gains are excluded from tier 1 capital.

Equity securities maintained in the trading account are reported at fair value. At December 31, 2019, the Company does not have material equity exposure in the trading account. Changes in fair value are recorded in earnings.

Realized gains arising from the sales and liquidations of equity securities were $342.9 million for the year ended December 31, 2019.

Table 7 summarizes the Company's equity securities not subject to the market risk rule. Latent revaluation gains/losses are unrealized gains/losses on nonpublic equity securities recorded at cost; these latent revaluation gains/losses are not recognized in the Company's financial statements. Latent revaluation gains of $274.1 million and $463.5 million at December 31, 2019 and December 31, 2018, respectively.

Table 7 Equity Securities Not Subject to Market Risk Rule

	December 31, 2019			December 31, 2018		
(Dollars In Millions, Unaudited)	Nonpublic	Public	Total	Nonpublic	Public	Total
Amortized cost	$15,960	$38	$15,998	$15,607	$36	$15,643
Unrealized gains/losses	-	-	-	-	-	-
Latent revaluation gains/losses (a)	274	-	274	464	-	464
Fair value	$16,234	$38	$16,272	$16,071	$36	$16,107
Unrealized gains/losses included in risk-based capital	$ -	$ -	$ -	$ -	$ -	$ -

(a) Represents unrealized gains (losses) on nonpublic equity securities recorded at cost. The unrealized gains (losses) are not recognized either in the balance sheet or through earnings.

The capital requirements of equity securities are shown below:

	December 31, 2019			December 31, 2018		
(Dollars In Millions, Unaudited)	Exposure	Risk Weighted Assets	Capital impact of RWA	Exposure	Risk Weighted Assets	Capital impact of RWA
0%	$443	$ -	$ -	$443	$ -	$ -
20%	491	98	8	805	161	13
100%	9,688	9,688	775	9,084	9,084	727
250%	2	5	-	2	5	-
Full look-through approach	5,375	280	22	5,309	402	32
Total capital requirements for equity securities	$15,999	$10,071	$805	$15,643	$9,652	$772

MARKET RISK

In addition to interest rate risk, the Company is exposed to other forms of market risk, including: 1) trading activities which support customers' strategies to manage their own foreign currency, interest rate risk and funding activities; 2) hedging activities related to mortgage loans held for sale and MSRs; and 3) valuation of the Company's investment portfolio. Market risk risk-weighted assets for trading activities increased slightly to $2.3 billion at December 31, 2019 compared to $1.8 billion at December 31, 2018. Refer to the "Market Risk Management" section of the "Management's Discussion and Analysis" section of the Annual Report for further discussion of market risk associated with client related trading and mortgage hedging.

CREDIT RISK: GENERAL DISCLOSURES

The Company's strategy for credit risk management includes well-defined, centralized credit policies, uniform underwriting criteria, and ongoing risk monitoring and review processes for all commercial and consumer credit exposures. The strategy also emphasizes diversification on an industry, geographic and customer level, regular credit examinations and management reviews of loans exhibiting deterioration of credit quality. The Company's credit risk management strategy, including its rating system, is subject to an independent review function to ensure the control mechanisms are operating as intended. For further detail on the Company's general credit risk management, see the "Credit Risk Management" section of "Management's Discussion and Analysis" in the Annual Report.

Disclosures included in this Credit Risk: General Disclosures are presented under the interpretation that the Rule's definition of "major types of credit exposures" corresponds to the definition in the Company's Annual Report. The tables report balance sheet classifications consistent with the Annual Report. Credit risk associated with loans, debt securities, commitments to extend credit and letters of credit are presented in this section. Credit risk associated with other off-balance sheet commitments and OTC derivatives are presented in other tables which is consistent with the Company's disclosures in the Annual Report. See the Company's Pillar 3 Disclosures Matrix for the location of other off-balance sheet credit risk disclosures.

The Company categorizes its loan portfolio into three segments, which is the level at which it develops and documents a systematic methodology to determine the allowance for credit losses. The Company's loan portfolio segments are commercial lending and consumer lending. The Company further disaggregates its loans into various classes based on their underlying risk characteristics. The two classes within the commercial lending segment are commercial and commercial real estate loans. The three classes within the consumer lending segment are residential mortgages, credit card loans and other retail loans. Trends in delinquency and nonperforming ratios are an indicator, among other considerations, of credit risk within the Company's loan portfolios.

Table 8 provides industry distribution by major types of credit exposure. The credit exposure includes loans, contractual commitments to extend credit and letters of credit. This differs from the industry distribution by major types of credit exposure disclosed in the Company's Annual Report, which includes only loans.

Table 8 Credit Exposure by Industry (a)

	December 31, 2019		December 31, 2018	
(Dollars in Millions, Unaudited)	Total Commitments	Percent of Total	Total Commitments	Percent of Total
Commercial				
Manufacturing	$45,301	16.7 %	$44,090	16.7 %
Finance and insurance	34,939	12.9	31,737	12.1
Real estate, rental and leasing	26,186	9.6	24,381	9.3
Retail trade	19,350	7.1	19,765	7.5
Wholesale trade	18,811	6.9	18,681	7.1
Public administration	12,254	4.5	12,026	4.6
Health care and social assistance	10,740	3.9	11,223	4.3
Utilities	10,481	3.9	11,364	4.3
Transport and storage	9,067	3.3	9,384	3.6
Information	9,626	3.5	8,859	3.4
Professional, scientific and technical services	9,148	3.4	8,437	3.2
Mining	6,069	2.2	6,015	2.3
Educational services	5,899	2.2	6,361	2.4
Arts, entertainment and recreation	6,262	2.3	7,565	2.9
Other services	2,912	1.1	2,899	1.1
Agriculture, forestry, fishing and hunting	2,168	.8	2,230	.8
Other	42,817	15.7	38,299	14.4
Total commercial	272,030	100.0	263,316	100.0
Commercial real estate				
Business owner occupied	9,784	19.2	10,407	20.9
Commercial property				
Industrial	3,441	6.7	2,341	4.7
Office	7,344	14.4	6,559	13.2
Retail	4,253	8.3	4,466	9.0
Other commercial	4,732	9.3	4,419	8.9
Multi-family	11,891	23.3	11,942	23.9
Hotel/motel	3,876	7.6	4,086	8.2
Residential Development	5,382	10.5	5,312	10.6
Health care facilities	335	.7	303	.6
Total commercial real estate	51,038	100.0	49,835	100.0
Residential mortgages	71,003	100.0	65,248	100.0
Credit card	136,562	100.0	134,070	100.0
Other retail				
Retail leasing	8,490	9.0	8,546	9.1
Home equity and second mortgages	38,242	40.7	39,345	41.8
Other retail	47,183	50.3	46,296	49.1
Total other retail	93,915	100.0	94,187	100.0
Total commitments	$624,548	100.0 %	$606,656	100.0 %

(a) Net of participations sold.

Table 9 provides the geographic distribution of major types of credit exposure. The credit exposure includes loans, contractual commitments to extend credit and letters of credit. This differs from the geographic distribution by major types of credit exposure disclosed in the Company's Annual Report, which includes only loans.

Table 9 Credit Exposure by Geography (a)

	December 31, 2019		December 31, 2018	
(Dollars in Millions, Unaudited)	Total Commitments	Percent of Total	Total Commitments	Percent of Total
Commercial				
California	$32,245	11.9 %	$32,614	12.4 %
Colorado	9,035	3.3	8,825	3.3
Illinois	14,374	5.3	13,442	5.1
Minnesota	17,358	6.4	17,340	6.6
Missouri	9,680	3.6	8,890	3.4
Ohio	11,843	4.4	11,353	4.3
Oregon	5,140	1.9	5,426	2.1
Washington	9,874	3.6	9,386	3.5
Wisconsin	9,596	3.5	9,306	3.5
Iowa, Kansas, Nebraska, North Dakota, South Dakota	11,902	4.4	12,369	4.7
Arkansas, Indiana, Kentucky, North Carolina, Tennessee	18,131	6.7	17,135	6.5
Idaho, Montana, Wyoming	2,991	1.1	3,125	1.2
Arizona, Nevada, New Mexico, Utah	9,565	3.4	9,114	3.5
Total banking region	161,734	59.5	158,325	60.1
Outside the Company's banking region				
Florida, Michigan, New York, Pennsylvania, Texas	56,876	20.9	52,282	19.9
All other states	53,420	19.6	52,709	20.0
Total outside the Company's banking region	110,296	40.5	104,991	39.9
Total commercial	272,030	100.0	263,316	100.0
Commercial real estate				
California	12,748	25.0	12,462	25.0
Colorado	2,255	4.4	2,526	5.1
Illinois	1,651	3.2	1,736	3.5
Minnesota	2,382	4.7	2,323	4.7
Missouri	1,246	2.4	1,342	2.7
Ohio	1,496	2.9	1,410	2.8
Oregon	2,066	4.0	2,099	4.2
Washington	4,215	8.3	3,932	7.9
Wisconsin	1,843	3.6	2,071	4.2
Iowa, Kansas, Nebraska, North Dakota, South Dakota	2,290	4.5	2,314	4.6
Arkansas, Indiana, Kentucky, North Carolina, Tennessee	4,032	7.9	3,768	7.5
Idaho, Montana, Wyoming	1,179	2.3	1,131	2.3
Arizona, Nevada, New Mexico, Utah	4,109	8.1	4,101	8.2
Total banking region	41,512	81.3	41,215	82.7
Outside the Company's banking region				
Florida, Michigan, New York, Pennsylvania, Texas	5,782	11.4	5,229	10.5
All other states	3,744	7.3	3,391	6.8
Total outside the Company's banking region	9,526	18.7	8,620	17.3
Total commercial real estate	$51,038	100.0 %	$49,835	100.0 %

(a) Net of participations sold.

Table 9 Credit Exposure by Geography Continued (a)

(Dollars in Millions, Unaudited)	December 31, 2019 Total Commitments	December 31, 2019 Percent of Total	December 31, 2018 Total Commitments	December 31, 2018 Percent of Total
Residential mortgages				
California	$22,945	32.4 %	$20,177	30.9 %
Colorado	3,864	5.4	3,587	5.5
Illinois	3,488	4.9	3,301	5.1
Minnesota	4,359	6.1	4,322	6.6
Missouri	1,704	2.4	1,710	2.6
Ohio	2,017	2.8	2,062	3.2
Oregon	2,485	3.5	2,427	3.7
Washington	4,075	5.7	3,702	5.7
Wisconsin	1,503	2.1	1,527	2.3
Iowa, Kansas, Nebraska, North Dakota, South Dakota	1,970	2.8	2,055	3.2
Arkansas, Indiana, Kentucky, North Carolina, Tennessee	3,921	5.5	3,799	5.8
Idaho, Montana, Wyoming	1,354	1.9	1,326	2.0
Arizona, Nevada, New Mexico, Utah	5,229	7.4	4,851	7.4
Total banking region	58,914	82.9	54,846	84.0
Outside the Company's banking region				
Florida, Michigan, New York, Pennsylvania, Texas	5,162	7.3	4,744	7.3
All other states	6,927	9.8	5,658	8.7
Total outside the Company's banking region	12,089	17.1	10,402	16.0
Total residential mortgages	71,003	100.0	65,248	100.0
Credit card				
California	14,428	10.6	14,569	10.9
Colorado	5,092	3.7	5,012	3.7
Illinois	6,697	4.9	6,797	5.1
Minnesota	7,511	5.5	7,407	5.5
Missouri	3,937	2.9	3,979	3.0
Ohio	6,609	4.8	6,517	4.8
Oregon	4,112	3.0	4,113	3.1
Washington	5,237	3.8	5,203	3.9
Wisconsin	7,033	5.2	7,039	5.2
Iowa, Kansas, Nebraska, North Dakota, South Dakota	6,433	4.7	6,543	4.9
Arkansas, Indiana, Kentucky, North Carolina, Tennessee	11,373	8.3	11,068	8.3
Idaho, Montana, Wyoming	2,308	1.7	2,285	1.7
Arizona, Nevada, New Mexico, Utah	6,872	5.1	6,292	4.7
Total banking region	87,642	64.2	86,824	64.8
Outside the Company's banking region				
Florida, Michigan, New York, Pennsylvania, Texas	26,226	19.2	25,684	19.1
All other states	22,694	16.6	21,562	16.1
Total outside the Company's banking region	48,920	35.8	47,246	35.2
Total credit card	136,562	100.0	134,070	100.0
Retail loans				
California	17,376	18.5	17,611	18.7
Colorado	4,920	5.2	5,125	5.4
Illinois	4,861	5.2	5,125	5.4
Minnesota	8,138	8.7	8,513	9.0
Missouri	3,502	3.7	3,726	4.0
Ohio	4,223	4.5	4,315	4.6
Oregon	3,853	4.1	3,887	4.1
Washington	4,446	4.7	4,513	4.8
Wisconsin	2,651	2.8	2,753	2.9
Iowa, Kansas, Nebraska, North Dakota, South Dakota	4,181	4.5	4,336	4.6
Arkansas, Indiana, Kentucky, North Carolina, Tennessee	5,488	5.8	5,515	5.9
Idaho, Montana, Wyoming	2,243	2.4	2,208	2.4
Arizona, Nevada, New Mexico, Utah	4,887	5.2	4,695	5.0
Total banking region	70,769	75.3	72,322	76.8
Outside the Company's banking region				
Florida, Michigan, New York, Pennsylvania, Texas	13,432	14.4	12,572	13.3
All other states	9,714	10.3	9,293	9.9
Total outside the Company's banking region	23,146	24.7	21,865	24.3
Total retail loans	93,915	100.0	94,187	100.0
Total commitments	$624,548	100.0 %	$606,656	100.0 %

(a) Net of participations sold.

The Company’s investment securities portfolio includes U.S. Treasury and agencies, agency mortgage-backed securities, and obligations of state and political subdivisions (municipal securities). The most important feature management relies on when assessing credit risk for U.S. Treasury and agencies and agency mortgage-backed securities is the guarantee of the federal government or its agencies. Geography is one of the factors the Company considers in managing its investment in municipal securities. Table 10 shows that the Company’s municipal securities are distributed throughout the major regions of the United States.

Table 10 Municipal Securities by Geography

(Dollars in Millions, Unaudited)	December 31, 2019 Amount	December 31, 2019 Percent of Total	December 31, 2018 Amount	December 31, 2018 Percent of Total
Municipal securities				
Southeast	$1,792	26.3 %	$1,818	27.1 %
West	1,738	25.5	1,684	25.1
Northeast	1,580	23.2	1,557	23.2
Southwest	996	14.6	931	13.9
Midwest	708	10.4	717	10.7
Multi-state	-	-	-	-
Total municipal securities	$6,814	100.0 %	$6,707	100.0 %

Table 11 provides a maturity distribution by loan category for loans, contractual commitments to extend credit and letters of credit. The contractual amounts of commitments to extend credit and letters of 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. Management assesses the borrower’s credit worthiness to determine the necessary collateral, which may include marketable securities, receivables, inventory, equipment and real estate. Refer to the Annual Report for further details.

Table 11 Credit Risk and Maturity by Exposure Type

Loan maturity distribution by loan category:

	December 31, 2019				December 31, 2018			
(Dollars in Millions, Unaudited)	One Year or Less	Over One Through Five Years	Over Five Years	Total	One Year or Less	Over One Through Five Years	Over Five Years	Total
Commercial	$40,211	$59,926	$3,726	$103,863	$34,858	$57,132	$5,571	$97,561
Commercial real estate	10,322	22,029	7,395	39,746	11,402	22,117	6,944	40,463
Residential mortgages	2,490	9,041	59,055	70,586	2,578	8,670	48,535	59,783
Retail credit card	24,789	-	-	24,789	22,180	-	-	22,180
Other Retail	10,830	24,741	21,547	57,118	10,529	32,285	14,510	57,324
Covered	-	-	-	-	373	470	2,278	3,121
Total loans	$88,642	$115,737	$91,723	$296,102	$81,920	$120,674	$77,838	$280,432

The ending and average contract (notional) amounts of unfunded commitments to extend credit and letters of credit, excluding those commitments considered derivatives, are shown below. Since the Company expects many of the commitments to expire without being drawn, total commitment amounts do not necessarily represent the Company’s future liquidity requirements.

Unfunded Commitment maturity distribution by loan category:

(Dollars in Millions, Unaudited)	December 31, 2019 Ending Balance One Year or Less	December 31, 2019 Ending Balance Greater Than One Year	December 31, 2019 Ending Balance Total	December 31, 2019 Average Balance	December 31, 2018 Ending Balance One Year or Less	December 31, 2018 Ending Balance Greater Than One Year	December 31, 2018 Ending Balance Total	December 31, 2018 Average Balance
Unfunded commitments to extend credit (a)								
Commercial and commercial real estate	$31,235	$108,303	$139,538	$139,475	$28,903	$100,648	$129,551	$128,310
Corporate and purchasing cards (b)	29,296	-	29,296	28,767	26,002	-	26,002	25,465
Residential mortgages	416	1	417	505	216	3	219	268
Retail credit card (b)	111,773	-	111,773	111,834	106,285	-	106,285	106,473
Other retail	12,614	24,183	36,797	36,894	13,707	23,600	37,307	37,384
Covered	-	-	-	-	-	126	126	138
Total unused loan commitments	185,334	132,487	317,821	317,475	175,113	124,377	299,490	298,038
Other non-loan related unused commitments	6,325	-	6,325	6,316	5,672	-	5,672	5,731
Total commitments to extend credit	$191,659	$132,487	$324,146	$323,791	$180,785	$124,377	$305,162	$303,769
Letters of credit (a)								
Standby	$4,676	$5,582	$10,258	$10,358	$4,891	$5,966	$10,857	$10,860
Commercial	339	28	367	339	398	24	422	404

(a) Net of participations sold.
(b) Primarily cancelable at the Company's discretion.

Table 12 provides industry detail of the past due and nonperforming loans for each class within the commercial lending segment and further loan type breakout within the other retail class. The Company has continued to see improvement in past due and nonperforming loans across most loan classes. Refer to the Annual Report for further details.

Table 12 Past Due and Nonperforming Loans by Industry

	December 31, 2019									
	Accruing Loans				Nonaccrual Loans					
	30-89 Days Past Due		90 or More Days Past Due		Less than 90 Days Past Due		90 or More Days Past Due		Total Nonaccrual	
Industry Group (Dollars in Millions, Unaudited)	Amount	As a Percent of Ending Loans	Amount	As a Percent of Ending Loans	Amount	As a Percent of Ending Loans	Amount	As a Percent of Ending Loans	Amount	As a Percent of Ending Loans
Commercial										
Manufacturing	$40	.27 %	$1	.01 %	$32	.22 %	$5	.03 %	$37	.25 %
Finance and insurance	7	.06	-	-	4	.03	-	-	4	.03
Real estate, rental and leasing	5	.04	-	-	13	.10	1	.01	14	.11
Retail trade	7	.09	1	.01	32	.42	1	.01	33	.43
Wholesale trade	6	.07	-	-	3	.04	2	.02	5	.06
Public administration	52	1.22	11	.26	1	.02	-	-	1	.02
Health care and social assistance	26	.50	-	-	10	.19	3	.06	13	.25
Utilities	1	.05	-	-	-	-	-	-	-	-
Information	4	.11	-	-	1	.03	-	-	1	.03
Transport and storage	12	.28	-	-	3	.07	2	.05	5	.12
Professional, scientific and technical services	21	.53	1	.03	5	.13	2	.05	7	.18
Arts, entertainment and recreation	2	.06	-	-	2	.06	-	-	2	.06
Educational services	12	.43	-	-	15	.54	1	.04	16	.58
Mining	-	-	-	-	12	.56	-	-	12	.56
Other services	7	.41	-	-	3	.17	1	.06	4	.23
Agriculture, forestry, fishing and hunting	2	.17	-	-	20	1.72	3	.26	23	1.98
Other	103	.73	65	.46	24	.17	3	.02	27	.19
Total commercial	**307**	**.30**	**79**	**.08**	**180**	**.18**	**24**	**.02**	**204**	**.20**
Commercial real estate										
Business owner occupied	13	.14	-	-	43	.47	3	.03	46	.50
Commercial property										
Industrial	1	.04	-	-	1	.04	-	-	1	.04
Office	5	.09	-	-	1	.01	1	.02	2	.03
Retail	7	.18	3	.08	8	.20	5	.13	13	.33
Other	1	.03	-	-	4	.11	-	-	4	.11
Residential Development	1	.03	-	-	-	-	1	.03	1	.03
Multi-family	6	.07	-	-	3	.04	-	-	3	.04
Hotel/motel	-	-	-	-	1	.03	9	.29	10	.32
Healthcare	-	-	-	-	2	.77	-	-	2	.77
Total commercial real estate	**34**	**.09**	**3**	**.01**	**63**	**.16**	**19**	**.05**	**82**	**.21**
Residential mortgages	**154**	**.22**	**120**	**.17**	**76**	**.11**	**165**	**.23**	**241**	**.34**
Credit card	**321**	**1.30**	**306**	**1.23**	**-**	**-**	**-**	**-**	**-**	**-**
Other retail										
Retail leasing	45	.53	4	.05	12	.14	1	.01	13	.15
Home equity and second mortgages	77	.51	48	.32	29	.19	87	.58	116	.77
Other retail	271	.81	45	.13	33	.10	3	.01	36	.11
Total other retail	**393**	**.69**	**97**	**.17**	**74**	**.13**	**91**	**.16**	**165**	**.29**
Total	**$1,209**	**.41 %**	**$605**	**.20 %**	**$393**	**.13 %**	**$299**	**.10 %**	**$692**	**.23 %**

Table 12 Past Due and Nonperforming Loans by Industry Continued

	December 31, 2018									
	Accruing Loans				Nonaccrual Loans					
	30-89 Days Past Due		90 or More Days Past Due		Less than 90 Days Past Due		90 or More Days Past Due		Total Nonaccrual	
Industry Group (Dollars in Millions, Unaudited)	Amount	As a Percent of Ending Loans	Amount	As a Percent of Ending Loans	Amount	As a Percent of Ending Loans	Amount	As a Percent of Ending Loans	Amount	As a Percent of Ending Loans
Commercial										
Manufacturing	$39	.26 %	$2	.01 %	$43	.29 %	$15	.10 %	$58	.39 %
Finance and insurance	13	.13	-	-	4	.04	1	.01	5	.05
Wholesale trade	6	.05	-	-	2	.02	-	-	2	.02
Retail trade	5	.06	1	.01	5	.06	1	.01	6	.07
Real estate, rental and leasing	17	.20	-	-	10	.12	1	.01	11	.13
Public administration	70	1.47	5	.10	1	.02	-	-	1	.02
Health care and social assistance	24	.42	-	-	8	.14	3	.05	11	.19
Utilities	1	.04	-	-	-	-	-	-	-	-
Mining	8	.22	-	-	6	.17	1	.03	7	.20
Information	14	.42	1	.03	3	.09	2	.06	5	.15
Professional, scientific and technical services	6	.17	-	-	13	.36	1	.03	14	.39
Transport and storage	-	-	-	-	64	3.91	-	-	64	3.91
Educational services	9	.29	-	-	2	.06	-	-	2	.06
Arts, entertainment and recreation	2	.05	-	-	1	.02	-	-	1	.02
Other services	6	.35	-	-	3	.18	2	.12	5	.30
Agriculture, forestry, fishing and hunting	6	.49	-	-	2	.16	3	.24	5	.40
Other	96	.76	60	.47	9	.07	3	.02	12	.09
Total commercial	**322**	**.31**	**69**	**.07**	**176**	**.17**	**33**	**.03**	**209**	**.20**
Commercial real estate										
Business owner occupied	24	.25	-	-	42	.43	7	.07	49	.50
Commercial property										
Industrial	1	.06	-	-	1	.06	-	-	1	.06
Office	4	.07	-	-	2	.04	-	-	2	.04
Retail	22	.53	-	-	6	.14	-	-	6	.14
Other	5	.15	-	-	2	.06	2	.06	4	.12
Residential Development	-	-	-	-	-	-	-	-	-	-
Multi-family	4	.05	-	-	45	.52	5	.06	50	.58
Hotel/motel	10	.28	-	-	1	.03	-	-	1	.03
Healthcare	-	-	-	-	2	.67	-	-	2	.67
Total commercial real estate	**70**	**.18**	**0**	**-**	**101**	**.25**	**14**	**.04**	**115**	**.29**
Residential mortgages	**181**	**.27**	**114**	**.18**	**106**	**.17**	**190**	**.29**	**296**	**.46**
Credit card	**324**	**1.39**	**293**	**1.25**	**0**	**-**	**0**	**-**	**0**	**-**
Other retail										
Retail leasing	37	.43	3	.04	12	.14	-	-	12	.14
Home equity and second mortgages	90	.56	57	.35	51	.32	94	.58	145	.90
Other retail	276	.87	48	.15	37	.12	3	.01	40	.13
Total other retail	**403**	**.71**	**108**	**.19**	**100**	**.18**	**97**	**.17**	**197**	**.35**
Total, excluding covered	**1,300**	**.45 %**	**584**	**.20 %**	**483**	**.16 %**	**334**	**.12 %**	**817**	**.28 %**
Covered	0	-	0	-	0	-	0	-	0	-
Total	**$1,300**	**.45 %**	**$584**	**.20 %**	**$483**	**.16 %**	**$334**	**.12 %**	**$817**	**.28 %**

Impaired loans include all nonaccrual and troubled debt restructured ("TDR") loans. The past due and nonperforming loan tables include $305 million of TDRs that are not performing in accordance with the modified terms in nonperforming loans. In addition, performing TDRs that are past due are reported according to contractual delinquency. Performing TDRs of $89 million are included in 90 days past due and performing TDRs of $92 million are included in 30-89 days past due. The past due and nonperforming loan tables above exclude approximately $1.9 billion of TDRs that are considered current with the modified terms. See the Company's Annual Report for more information on TDRs and nonperforming loans.

In addition to industry, the Company uses the geography of the borrower's business or property location in the case of real estate secured loans, among other key risk characteristics, to determine estimates about the likelihood of default by the borrowers and the severity of loss in the event of default. Table 13 provides geographic detail on past due and nonperforming loans.

Table 13 Past Due and Nonperforming Loans by Geography

	December 31, 2019									
	Accruing Loans				Nonaccrual Loans					
	30-89 Days Past Due		90 or More Days Past Due		Less Than 90 Days Past Due		90 or More Days Past Due		Total Nonaccrual	
(Dollars in Millions, Unaudited)	Amount	As a Percent of Ending Loans	Amount	As a Percent of Ending Loans	Amount	As a Percent of Ending Loans	Amount	As a Percent of Ending Loans	Amount	As a Percent of Ending Loans
California	$180	.31 %	$89	.15 %	$58	.10 %	$44	.08 %	$102	.18 %
Colorado	36	.29	20	.16	7	.06	8	.06	15	.12
Illinois	84	.58	55	.38	51	.35	31	.22	82	.57
Minnesota	44	.24	25	.14	13	.07	13	.07	26	.14
Missouri	35	.38	22	.24	37	.40	12	.13	49	.53
Ohio	51	.43	27	.23	15	.13	16	.13	31	.26
Oregon	28	.33	16	.19	8	.09	10	.12	18	.21
Washington	30	.21	18	.13	24	.17	10	.07	34	.24
Wisconsin	29	.30	18	.19	17	.18	17	.18	34	.36
Iowa, Kansas, Nebraska North Dakota, South Dakota	68	.57	23	.19	12	.10	13	.11	25	.21
Arkansas, Indiana, Kentucky, North Carolina, Tennessee	99	.51	49	.25	45	.24	33	.17	78	.41
Idaho, Montana, Wyoming	15	.31	9	.19	3	.06	4	.08	7	.14
Arizona, Nevada, New Mexico, Utah	70	.42	46	.27	13	.07	13	.08	26	.15
Total banking region	769	.37	417	.20	303	.14	224	.11	$527	.25
Outside the Company's banking region										
Florida, Michigan, New York, Pennsylvania, Texas	257	.54	107	.23	60	.12	41	.09	101	.21
All other states	183	.45	81	.20	30	.08	34	.08	64	.16
Total	$1,209	.41 %	$605	.20 %	$393	.13 %	$299	.10 %	$692	.23 %

	December 31, 2018									
	Accruing Loans				Nonaccrual Loans					
	30-89 Days Past Due		90 or More Days Past Due		Less Than 90 Days Past Due		90 or More Days Past Due		Total Nonaccrual	
(Dollars in Millions, Unaudited)	Amount	As a Percent of Ending Loans	Amount	As a Percent of Ending Loans	Amount	As a Percent of Ending Loans	Amount	As a Percent of Ending Loans	Amount	As a Percent of Ending Loans
California	$218	.39 %	$76	.14 %	$45	.09 %	$36	.06 %	$81	.15 %
Colorado	41	.33	21	.17	18	.15	9	.07	27	.22
Illinois	89	.62	40	.28	30	.21	26	.18	56	.39
Minnesota	50	.27	25	.13	16	.08	14	.08	30	.16
Missouri	41	.46	24	.27	24	.28	11	.12	35	.40
Ohio	53	.44	30	.25	18	.15	18	.15	36	.30
Oregon	25	.29	17	.20	17	.20	10	.12	27	.32
Washington	37	.28	17	.13	10	.07	13	.10	23	.17
Wisconsin	35	.37	19	.20	15	.16	21	.22	36	.38
Iowa, Kansas, Nebraska North Dakota, South Dakota	54	.43	34	.27	39	.31	31	.24	70	.55
Arkansas, Indiana, Kentucky, North Carolina, Tennessee	128	.68	54	.29	39	.21	28	.15	67	.36
Idaho, Montana, Wyoming	14	.29	9	.19	3	.07	5	.10	8	.17
Arizona, Nevada, New Mexico, Utah	75	.46	41	.25	16	.09	19	.12	35	.21
Total banking region	860	.41	407	.20	290	.14	241	.12	531	.26
Outside the Company's banking region										
Florida, Michigan, New York, Pennsylvania, Texas	241	.57	104	.24	154	.36	45	.11	199	.47
All other states	199	.52	73	.19	39	.10	48	.13	87	.23
Total	$1,300	.45 %	$584	.20 %	$483	.16 %	$334	.12 %	$817	.28 %

Table 14 shows the amount of the allowance for credit losses by loan portfolio class. Although the Company determines the amount of each element of the allowance separately and considers this process to be an important credit management tool, the entire allowance for credit losses is available for the entire loan portfolio. The actual amount of losses incurred can vary significantly from the estimated amounts.

Several factors are considered when evaluating the Company's allowance for credit losses, including the risk profile of the Company's loan portfolios, loan net charge-offs during the period, the level of nonperforming assets, the amount of accruing loans 90 or more days past due, delinquency ratios and changes in TDR loan balances. Management also considers the uncertainty related to certain industry sectors and the extent of credit exposure to specific borrowers within the portfolio. In addition, concentration risks associated with commercial real estate and the mix of loans, including credit cards and residential mortgage balances, and their relative credit risks, are evaluated. Finally, the Company considers current economic conditions that might impact the portfolio. Management determines the allowance that is required for specific loan categories based on relative risk characteristics of the loan portfolio. On an ongoing basis, management evaluates its methods for determining the allowance for each element of the portfolio and makes enhancements considered appropriate. Refer to "Management's Discussion and Analysis--Analysis and Determination of the Allowance for Credit Losses" in the Annual Report for further discussion on the evaluation of the allowance for credit losses.

Table 14 Elements of the Allowance for Credit Losses

	December 31, 2019		December 31, 2018	
(Dollars in Millions, Unaudited)	Amount	Percent of Ending Loans	Amount	Percent of Ending Loans
Commercial	$1,484	1.43 %	$1,454	1.42 %
Commercial real estate	799	2.01	800	2.02
Residential mortgages	433	.61	455	.70
Credit card	1,128	4.55	1,102	4.72
Other retail	647	1.13	630	1.12
Total allowance for credit losses	$4,491	1.52 %	$4,441	1.55 %

FORWARD-LOOKING STATEMENTS

The following information appears in accordance with the Private Securities Litigation Reform Act of 1995:

This Pillar 3 Disclosures document contains forward-looking statements about the Company. Statements that are not historical or current facts, including statements about beliefs and expectations, are forward-looking statements and are based on the information available to, and assumptions and estimates made by, management as of the date hereof. These forward-looking statements cover, among other things, anticipated future revenue and expenses and the future plans and prospects of the Company.

Forward-looking statements involve inherent risks and uncertainties, and important factors could cause actual results to differ materially from those anticipated. Deterioration in general business and economic conditions or turbulence in domestic or global financial markets could adversely affect the Company's revenues and the values of its assets and liabilities, reduce the availability of funding to certain financial institutions, lead to a tightening of credit and increase stock price volatility. Stress in the commercial real estate markets, as well as a downturn in the residential real estate markets, could cause credit losses and deterioration in asset values. In addition, changes to statutes, regulations, or regulatory policies or practices could affect the Company in substantial and unpredictable ways. The Company's results could also be adversely affected by changes in interest rates; deterioration in the credit quality of its loan portfolios or in the value of the collateral securing those loans; deterioration in the value of its investment securities; legal and regulatory developments; litigation; increased competition from both banks and non-banks; changes in the level of tariffs and other trade policies of the Unites States and its global trading partners; changes in customer behavior and preferences; breaches in data security; failures to safeguard personal information; effects of mergers and acquisitions and related integration; effects of critical accounting policies and judgments; and management's ability to effectively manage credit risk, market risk, operational risk, compliance risk, strategic risk, interest rate risk, liquidity risk and reputational risk.

For discussion of these and other risks that may cause actual results to differ from expectations, refer to the Company's Annual Report for the year ended December 31, 2019, on file with the Securities and Exchange Commission, including the sections entitled "Risk Factors" and "Corporate Risk Profile" contained in Exhibit 13, and all subsequent filings with the Securities and Exchange Commission under Sections 13(a), 13(c), 14 or 15(d) of the Securities Exchange Act of 1934. In addition, factors other than these risks also could adversely affect the Company's results, and the reader should not consider these risks to be a complete set of all potential risks or uncertainties. Forward-looking statements speak only as of the date hereof, and the Company undertakes no obligation to update them in light of new information or future events.

Appendix A

usbancorp

U.S. Bancorp Basel Capital Pillar 3 Disclosures Matrix
As of December 31, 2019

In compliance with the Section-63 Disclosure Requirements by certain institutions with consolidated assets of greater than $50 Billion that are not advanced approaches institutions: In accordance with the rule, U.S. Bancorp the ("Company" or "USB") has provided the following summary of the required disclosure locations. All documents referenced can be found at usbank.com.

Table	Disclosure Requirement	Disclosure Location	Disclosure Page	Source Reference - if applicable
Scope of Application				
Qualitative: (a)	The name of the top corporate entity in the group to which the Risk-Based Capital Standards apply:	***Basel Pillar 3 Disclosures (Unaudited):*** Overview	3	
(b)	A brief description of the differences in the basis for consolidating entities for accounting and regulatory purposes, with a description of those entities: (1) that are fully consolidated; (2) that are deconsolidated and deducted from total capital; (3) for which the total capital requirement is deducted; and (4) that are neither consolidated nor deducted (for example, where the investment in the entity is assigned a risk weight in accordance with this subpart).	Not applicable. The Company does not have differences in the basis of consolidation for accounting and regulatory purposes.	None	None
(c)	Any restrictions, or other major impediments, on transfer of funds or regulatory capital within the group.	***2019 Annual Report (Audited):*** Note 24--U.S. Bancorp (Parent Company) Consolidated Balance Sheet		**2019 Annual Report** pg 138-139
Quantitative: (d)	The aggregate amount of surplus capital of insurance subsidiaries included in the regulatory capital of the consolidated group.	***FR Y9-C*** Schedule HC-R Part I Regulatory Capital Components and Ratios		***FR Y9-C*** Schedule HC-R Part I
(e)	The aggregate amount by which actual regulatory capital is less than the minimum regulatory capital requirement in all subsidiaries with regulatory capital requirements and the name(s) of the subsidiaries with such deficiencies.	None.	None	None
Capital Structure				
Qualitative: (a)	Summary information on the terms and conditions of the main features of all regulatory capital instruments.	***2019 Annual Report (Audited):*** MD&A Capital Management Note 13--Long-Term Debt Note 14--Shareholders' Equity Note 15--Earnings per Share		**2019 Annual Report** pg 55-56 pg 102 pg 103-108 pg 108
Quantitative: (b)	The amount of tier 1 capital, with separate disclosure of: (1) common stock/surplus; (2) retained earnings; (3) Common Equity minority interest (4) AOCI (net of tax) and other reserves (5) Regulatory adjustments and deductions made to common equity tier 1 capital.	***FR Y9-C*** Schedule HC-R Part I Regulatory Capital Components and Ratios		***FR Y9-C*** Schedule HC-R Part I
(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 total capital.	***FR Y9-C*** Schedule HC-R Part I Regulatory Capital Components and Ratios ***2019 Annual Report (Audited):*** Consolidated Balance Sheet		***FR Y9-C*** Schedule HC-R Part I ***2019 Annual Report*** pg 138-139
(d)	The amount of total capital, with separate disclosure of: (1) Tier 2 capital elements, including tier 2 capital instruments and total capital minority interest not included in tier 1 capital; and (2) Regulatory adjustments and deductions made to total capital.	***FR Y9-C*** Schedule HC-R Part I Regulatory Capital Components and Ratios		***FR Y9-C*** Schedule HC-R Part I
Capital Adequacy				
Qualitative: (a)	A summary discussion of the bank holding company's approach to assessing the adequacy of its capital to support current and future activities.	***2019 Annual Report (Audited):*** MD&A Capital Management MD&A Non-GAAP Financial Measures Note 14--Shareholders' Equity ***Basel Pillar 3 Disclosures (Unaudited):*** Internal Capital Adequacy Assessment Process ("ICAAP")	4-5	***2019 Annual Report*** pg 55-56 pg 62-63 pg 103-108
Quantitative: (b)	Risk-weighted assets for credit risk from: Risk-weighted assets for: (1) Exposures to sovereign entities; (2) Exposures to certain supranational entities and MDBs; (3) Exposures to depository institutions, foreign banks, and credit unions; (4) Exposures to PSEs; (5) Corporate exposures; (6) Residential mortgage exposures; (7) Statutory multifamily mortgages and pre-sold construction loans; (8) HVCRE loans; (9) Past due loans; (10) Other assets; (11) Cleared transactions; (12) Default fund contributions; (13) Unsettled transactions; (14) Securitization exposures; and (15) Equity exposures	***FR Y9-C*** Schedule HC-R Part II. Risk Weighted Assets		***FR Y9-C*** Schedule HC-R Part II.
(c)	Standardized market risk-weighted assets as calculated under subpart F of this part:	***FR Y9-C*** Schedule HC-R Part II. Risk Weighted Assets		***FR Y9-C*** Schedule HC-R Part II.
(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.	***FR Y9-C - Consolidated Financial Statement for Holding Companies*** Schedule HC-R Part I Regulatory Capital Components and Ratios U.S. Bancorp ***FFIEC 031-Consolidated Reports of Conditions and Income for a Bank with Domestic and Foreign Offices*** Schedule RC-R Part I Regulatory Capital Components and Ratios U.S. Bank National Association (Cincinnati, OH) ***Basel Pillar 3 Disclosures (Unaudited):*** Table 1-- Regulatory Capital Ratios	5	***FR Y9-C*** Schedule HC-R Part I ***FFIEC 031*** Schedule HC-R Part I

Table	Disclosure Requirement	Disclosure Location	Disclosure Page	Source Reference - if applicable
(e)	Total Standardized Risk Weighted Assets	***FR Y9-C - Consolidated Financial Statement for Holding Companies*** Schedule HC-R ***Basel Pillar 3 Disclosures (Unaudited):*** Table 4 Risk Weighted Assets	7	***FR Y9-C*** Schedule HC-R .
Capital Conservation and Countercyclical Capital Buffers				
Quantitative: (a)	At least quarterly, the bank holding company must calculate and publicly disclose the capital conservation buffer as described under §.11 of subpart B.	***FR Y9-C - Consolidated Financial Statement for Holding Companies*** Schedule HC-R Part I Regulatory Capital Components and Ratios ***Basel Pillar 3 Disclosures (Unaudited):*** Capital Conservation Buffer	5	***FR Y9-C*** Schedule HC-R
(b)	At least quarterly, the bank holding company must calculate and publicly disclose the buffer retained income of the bank holding company.	***Basel Pillar 3 Disclosures (Unaudited):*** Capital Conservation Buffer	5	
(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 and the countercyclical capital buffer framework described under §.11 of subpart B, including the maximum payout amount for the quarter.	***Basel Pillar 3 Disclosures (Unaudited):*** Capital Conservation Buffer	5	
General Qualitative Disclosure Requirement				
	For each separate risk area described in tables 5 through 10, the bank holding company must describe its risk management objectives and policies, including: (1) Strategies and processes; (2) The structure and organization of the relevant risk management function; (3) The scope and nature of risk reporting and/or measurement systems; (4) Policies for hedging and/or mitigating risk and strategies and processes for monitoring the continuing effectiveness of hedges/mitigants.	***2019 Annual Report (Audited):*** • MD&A--Balance Sheet Analysis • MD&A--Corporate Risk Profile • Note 1--Significant Accounting Policies • Note 4--Investment Securities • Note 5--Loans and Allowance for Credit Losses • Note 7--Accounting For Transfers and Servicing of Financial Assets and Variable Interest Entities • Note 19--Derivative Instruments • Note 21--Fair Values of Assets and Liabilities • Note 22--Guarantees and Contingent Liabilities		***2019 Annual Report*** pg 28-36 pg 36-56 pg 77-84 pg 85-87 pg 88-94 pg 96-97 pg 118-122 pg 125-131 pg 131-135
Credit Risk - General Disclosures				
Qualitative: (a)	The general qualitative disclosure requirement with respect to credit risk (excluding counterparty credit risk disclosed in accordance with Table 7) including: (1) Policy for determining past due or delinquency status; (2) Policy for placing loans on nonaccrual; (3) Policy for returning loans to accrual status; (4) Definition of and policy for identifying impaired loans (for financial accounting purposes). (5) Description of the methodology that the entity uses to estimate its allowance for loan and lease losses, including statistical methods used where applicable; (6) Policy for charging-off uncollectible amounts; and (7) Discussion of the bank's credit risk management policy	***2019 Annual Report (Audited):*** • MD&A--Balance Sheet Analysis • MD&A--Corporate Risk Profile • Note 1--Significant Accounting Policies • Note 4--Investment Securities • Note 5--Loans and Allowance for Credit Losses • Note 22--Guarantees and Contingent Liabilities ***Credit Risk: General Disclosures***	11-19	***2019 Annual Report*** pg 228-36 pg 36-56 pg 77-84 pg 85-87 pg 88-94 pg 131-135
Quantitative: (b)	Total credit risk exposures and average credit risk exposures, after accounting offsets in accordance with GAAP, without taking into account the effects of credit risk mitigation techniques (for example, collateral and netting not permitted under GAAP), over the period categorized by major types of credit exposure. For example, bank holding companys 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.	***2019 Annual Report (Audited):*** • Note 5--Loans and Allowance for Credit Losses • Consolidated Daily Average Balance Sheet and Related Yields and Rates ***FR Y-9C (Unaudited):*** • Schedule HC-B - Securities • Schedule HC-L - Derivatives and Off-Balance-Sheet Items ***Basel Pillar 3 Disclosures (Unaudited):*** Table 5--General Disclosure for Counterparty Credit Risk of OTC Derivative Contracts, Repo-Style Transactions, and Eligible Margin Loans Table 11--Credit Risk and Maturity by Exposure Type	9 15-16	***2019 Annual Report*** pg 88-94 pg 144-145 ***FR Y-9C*** pg 16-18 pg 28-31
(c)	Geographic distribution of exposures, categorized in significant areas by major types of credit exposure.	***Basel Pillar 3 Disclosures (Unaudited):*** Table 9--Credit Exposure by Geography Table 10--Municipal Securities by Geography	13-14 15	
(d)	Industry or counterparty type distribution of exposures, broken down by major types of credit exposure.	***FR Y-9C (Unaudited):*** • Schedule HC-B - Securities • Schedule HC-L - Derivatives and Off-Balance-Sheet Items ***Basel Pillar 3 Disclosures (Unaudited):*** Table 8--Credit Exposure by Industry	12	***FR Y9-C*** Schedule HC-B Schedule HC-L
(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;	***2019 Annual Report (Audited):*** • Analysis and Determination of the Allowance for Credit Losses ***Basel Pillar 3 Disclosures (Unaudited):*** Table 12--Past Due and Nonperforming Loan Portfolio By Industry	16-17	***2019 Annual Report*** pg 45-48
	(3) Amount of loans past due 90 days and on nonaccrual; (4) Amount of loans past due 90 days and still accruing;	***Basel Pillar 3 Disclosures (Unaudited):*** Table 12--Past Due and Nonperforming Loan Portfolio By Industry	16-17	
	(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	***Basel Pillar 3 Disclosures (Unaudited):*** Table 14--Elements of the Allowance for Credit Losses	19	
	(6) Charge-offs during the period.	***2019 Annual Report (Audited):*** • Table 18--Summary of Allowance for Credit Losses		***2019 Annual Report*** pg 46
(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 Pillar 3 Disclosures (Unaudited):*** Table 16--Past Due and Nonperforming Loans by Geography Allowance by geography is not practical or meaningful to disclose since management does not use this information to allocate general or specific allowance components.	18	
(g)	Reconciliation of changes in the allowances for loan and lease losses.	***2019 Annual Report (Audited):*** • Table 18--Summary of Allowance for Credit Losses		***2019 Annual Report*** pg 46
(h)	Remaining contractual maturity breakdown (for example, one year or less) of the whole portfolio, broken down by major types of credit exposure.	***FR Y-9C (Unaudited):*** • Schedule HC-B - Securities • Schedule HC-L - Derivatives and Off-Balance-Sheet Items ***Basel Pillar 3 Disclosures (Unaudited):*** Table 11--Credit Risk and Maturity by Exposure Type	15-16	***FR Y-9C*** pg 16-18 pg 28-31
General Disclosure for Counterparty Credit Risk of OTC Derivative Contracts, Repo-Style Transactions, and Eligible Margin Loans				

Table	Disclosure Requirement	Disclosure Location	Disclosure Page	Source Reference - if applicable
Qualitative: (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 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 bank holding company would have to provide given a deterioration in the bank's own creditworthiness.	***2019 Annual Report (Audited):*** • MD&A Use of Derivatives to Manage Interest Rate and Other Risks (Unaudited) • Note 1--Significant Accounting Policies (Audited) • Note 19--Derivative Instruments (Audited) • Note 20--Netting Arrangements for Certina Financial Instruments (Audited) • Note 21--Fair Values of Assets and Liabilities (Audited) ***Basel Pillar 3 Disclosures (Unaudited):*** Counterparty Credit Risk of OTC Derivative Contracts, Repo-Style Transactions, and Eligible Margin Loans	8-9	***2019 Annual Report*** pg 50-51 pg 77-84 pg 118-122 pg 123-125 pg 125-131
Quantitative: (b)	Gross positive fair value of contracts, collateral held (including type, for example, cash, government securities), and net unsecured credit exposure.1 A [BANK] also must disclose the notional value of credit derivative hedges purchased for counterparty credit risk protection and the distribution of current credit exposure by exposure type.2	***Basel Pillar 3 Disclosures (Unaudited):*** Table 5--General Disclosure for Counterparty Credit Risk of OTC Derivative Contracts, Repo-Style Transactions, and Eligible Margin Loans	9	
(c)	Notional amount of purchased and sold credit derivatives, segregated between use for the bank holding company's own credit portfolio and for its intermediation activities, including the distribution of the credit derivative products used, broken down further by protection bought and sold within each product group.	***2019 Annual Report (Audited):*** • Note 19--Derivative Instruments ***FR Y-9C (Unaudited):*** • Schedule HC-L - Derivatives and Off-Balance-Sheet Items		***2019 Annual Report*** pg 118-122 ***FR Y-9C*** pg 28-31
Credit Risk Mitigation				
Qualitative: (a)	The general qualitative disclosure requirement with respect to credit risk mitigation including: (1) policies and processes for, and an indication of the extent to which the bank holding company uses, on-and-off-balance sheet netting; (2) a description of the main types of collateral taken by the bank holding company; (3) the main types of guarantors/credit derivative counterparties and their creditworthiness; and (4) information about (market or credit) risk concentrations within the mitigation taken.	***2019 Annual Report (Audited):*** • MD&A--Corporate Risk Profile • Note 1--Significant Accounting Policies • Note 4--Investment Securities • Note 5--Loans and Allowance for Credit Losses • Note 19--Derivative Instruments • Note 20--Netting Arrangements for Certina Financial Instruments • Note 21--Fair Values of Assets and Liabilities ***Basel Pillar 3 Disclosures (Unaudited):*** Credit Risk Mitigation	7	*2019 Annual Report* pg 36-56 pg 77-84 pg 85-87 pg 88-94 pg 118-122 pg 123-125 pg 125-131
Quantitative: (b)	For each separately disclosed credit risk portfolio, the total exposure that is covered by eligible financial collateral, and after the application of haircuts.	***Basel Pillar 3 Disclosures (Unaudited):*** Credit Risk Mitigation	7	
(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 Pillar 3 Disclosures (Unaudited):*** Credit Risk Mitigation	7	
Securitization				
Qualitative: (a)	The general qualitative disclosure requirement with respect to securitization (including synthetic securitizations), including a discussion of: (1) The bank holding company's objectives for securitizing assets, including the extent to which these activities transfer credit risk of the underlying exposures away from the bank holding company to other entities and including the type of risks assumed and retained with resecuritization activity; (2) The nature of the risks (e.g. liquidity risk) inherent in the securitized assets; (3) The roles played by the bank holding company in the securitization process and an indication of the extent of thebank holding company's involvement in each of them; (4) The processes in place to monitor changes in the credit and market risk of securitization exposures including how those processes differ for resecuritization exposures; (5) The bank holding company's policy for mitigating the credit risk retained through securitization and resecuritization exposures; and (6) The risk-based capital approaches that the bank holding company follows for its securitization exposures including the type of securitization exposure to which each approach applies.	***2019 Annual Report (Audited):*** • MD&A Corporate Risk Profile (Off-Balance Sheet Arrangements) ***Basel Pillar 3 Disclosures (Unaudited):*** Securitization	9-10	***2019 Annual Report*** pg 54-55
(b)	A list of: (1) The type of securitization SPEs that the bank holding company, as sponsor, uses to securitize third-party exposures. The bank holding company must indicate whether it has exposure to these SPEs , either on- or off- balance sheet; and (2) Affiliated entities: (i) That the bank holding company manages or advises; and (ii) That invest either in the securitization exposures that the bank holding company has securitized or in securitization SPEs that the bank holding company sponsors.	***Basel Pillar 3 Disclosures (Unaudited):*** Securitization	9-10	
(c)	Summary of the bank holding company's accounting policies for securitization activities, including: (1) Whether the transactions are treated as sales or financings; (2) Recognition of gain-on-sale; (3) Methods and key assumptions 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 E of this part; and (7) Policies for recognizing liabilities on the balance sheet for arrangements that could require the bank holding company to provide financial support for securitized assets.	***Basel Pillar 3 Disclosures (Unaudited):*** Securitization	9-10	
(d)	An explanation of significant changes to any of the quantitative information set forth below since the last reporting period.	***Basel Pillar 3 Disclosures (Unaudited):*** Securitization	9-10	
Quantitative: (e)	The total outstanding exposures securitized by the bank holding company in securitizations that meet the operational criteria in §.141 (categorized into traditional/synthetic), by underlying exposure type separately for securitizations of third-party exposures for which the bank acts only as sponsor.	***Basel Pillar 3 Disclosures (Unaudited):*** Table 6-- Securitization	10	
(f)	For exposures securitized by the bank holding company 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 holding company during the current period categorized by exposure type.	***Basel Pillar 3 Disclosures (Unaudited):*** Table 6-- Securitization	10	
(g)	The total amount of outstanding exposures intended to be securitized categorized by exposure type.	***Basel Pillar 3 Disclosures (Unaudited):*** Table 6-- Securitization	10	
(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 Pillar 3 Disclosures (Unaudited):*** Table 6-- Securitization	10	

Table	Disclosure Requirement	Disclosure Location	Disclosure Page	Source Reference - if applicable
(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, CEIOs deducted from total capital (as described in §l.42(a)(1), and other exposures deducted from total capital should be disclosed separately by exposure type.	***Basel Pillar 3 Disclosures (Unaudited):*** Table 6-- Securitization	10	
(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.	***Basel Pillar 3 Disclosures (Unaudited):*** Table 6-- Securitization	10	
(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.	***Basel Pillar 3 Disclosures (Unaudited):*** Table 9-- Securitization	10	
Equities Not Subject to Market Risk Rule				
Qualitative: (a)	The general qualitative disclosure requirement with respect to equity risk, 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 in the banking book. This includes the accounting techniques and valuation methodologies used, including key assumptions and practices affecting valuation as well as significant changes in these practices.	***2019 Annual Report (Audited):*** Note 1--Significant Accounting Policies Note 7--Accounting For Transfers and Servicing of Financial Assets and Variable Interest Entities ***Basel Pillar 3 Disclosures (Unaudited):*** Equity Securities Not Subject to Market Risk Rule	10-11	***2019 Annual Report*** pg 77-84 pg 96-97
Quantitative: (b)	Value disclosed on the balance sheet of investments, as well as the fair value of those investments; for securities that are publicly traded, a comparison to publicly-quoted share values where the share price is materially different from fair value.	***Basel Pillar 3 Disclosures (Unaudited):*** Table 7--Equity Securities Not Subject to Market Risk Rule	10-11	
(c)	The types and nature of investments, including the amount that is: (1) Publicly traded; and (2) Non-publicly traded.	***Basel Pillar 3 Disclosures (Unaudited):*** Table 7--Equity Securities Not Subject to Market Risk Rule	10-11	
(d)	The cumulative realized gains (losses) arising from sales and liquidations in the reporting period.	***Basel Pillar 3 Disclosures (Unaudited):*** Table 7--Equity Securities Not Subject to Market Risk Rule	10-11	
(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.	***Basel Pillar 3 Disclosures (Unaudited):*** Table 7--Equity Securities Not Subject to Market Risk Rule	10-11	
(f)	Capital requirements broken down by appropriate equity groupings, consistent with the bank holding company's methodology, as well as the aggregate amounts and the type of equity investments subject to any supervisory transition regarding regulatory capital requirements.	***Basel Pillar 3 Disclosures (Unaudited):*** Table 7--Equity Securities Not Subject to Market Risk Rule	10-11	
Interest Rate Risk for Non-trading Activities				
Qualitative: (a)	The general qualitative disclosure requirement, including the nature of interest rate risk for non-trading activities and key assumptions, including assumptions regarding loan prepayments and behavior of non-maturity deposits, and frequency of measurement of interest rate risk for non-trading activities.	***2019 Annual Report (Audited):*** • MD&A--Interest Rate Risk Management, Net Interest Income Simulation Analysis, and Market Value of Equity Modeling		***2019 Annual Report*** pg 49-50
Quantitative: (b)	The increase (decline) in earnings or economic value (or relevant measure used by management) for upward and downward rate shocks according to management's method for measuring interest rate risk for non-trading activities, broken down by currency (as appropriate).	***2019 Annual Report (Audited):*** • MD&A--Interest Rate Risk Management, Net Interest Income Simulation Analysis, and Market Value of Equity Modeling		***2019 Annual Report*** pg 49-50
Supplementary Leverage Ratio				
Quantitative	(1) Summarize the differences between total consolidated accounting assets and the calculation of total leverage exposure. (2) Provide components of th total leverage exposure	***Basel Pillar 3 Disclosures (Unaudited):*** Table 3-- Supplementary Leverage Ratio	6	