

## 2018 SASB Disclosure

The Sustainability Accounting Standards Board (SASB) is an independent standards-setting organization that supports reporting standards for companies to identify, manage, and communicate financially-material sustainability information to their investors. Regions Financial Corporation supports SASB because it provides a framework for the generation of comparable and reliable information, which is consistent with Regions' commitment to provide transparent, useful, and relevant Environmental, Social and Governance data as it relates to our business, as well as long-term value for our shareowners. This 2018 Report is Regions' first disclosure pursuant to the SASB standards, and as such, our disclosures on these topics will likely evolve over time.

The following are the Financials Sector standards that Regions has identified as being most relevant to its operations and business: Commercial Banks, Consumer Finance, and Mortgage Finance industry standards. All disclosures are based on Version 2018-10 of the SASB standards. Unless otherwise specified, the information is as of year-end 2018, and all data and descriptions are based on our entire operations, not just the businesses that fall under a specific industry category.

Certain information is not disclosed herein because that information (i) is not considered material or is privileged or confidential; (ii) could cause a competitive disadvantage to our business if publicly disseminated; or (iii) is not currently collected in a manner wholly correlative with the related SASB metric.

#### Commercial Banks

#### **Activity Metrics**

SASB Code	Metric
FN-CB-000.A	Number and value of checking and savings accounts by segment: (a) personal and (b) small business Not disclosed - see introduction.
FN-CB-000.B	Number and value of loans by segment: (a) personal, (b) small business, and (c) corporate  Not disclosed - see introduction.

#### **Data Security**

SASB Code	Metric
FN-CB-230a.1	Number of data breaches, percentage involving personally identifiable information (PII), number of account holders affected  Not disclosed - see introduction.
FN-CB-230a.2	Description of approach to identifying and addressing data security risks  See the Information Security and Privacy section of our 2018 ESG Report (pages 16-17); the Cyber and Information Security section of our 2019 Proxy Statement (pages 61-62); the Information Security Risk section of our 2018 Form 10-K (pages 82-83); and both the Raising Issues and Reporting Violations section and the Protecting Confidential and/or Proprietary Information section of our Code of Business Conduct and Ethics (page 4 and page 11, respectively).

## Financial Inclusion & Capacity Building

SASB Code	Metric
FN-CB-240a.1	Number and amount of loans outstanding - small business and community development See Schedule RC-C Part II, Items 3 and 4 of our <u>Call Report</u> for 4Q18.
	<b>Discussion of CRA and Community Development Lending</b> See the Communities section of our <u>2018 ESG Report</u> (pages 36-39) and the Community Engagement section of our <u>2019 Proxy Statement</u> (pages 29-30).
FN-CB-240a.2	Number and amount of past due and nonaccrual loans - small business and community development Not disclosed - see introduction.
FN-CB-240a.3	Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers  Not disclosed - see introduction.
	Description of financial inclusion initiatives that focus on unbanked, underbanked, or underserved customers  See the Expanding Access Through Financial Inclusion section of our 2018 ESG Report (pages 33-35). For more information on our work in financial wellness, see both the Regions Financial Learning Center section and the Regions Next Step section of our website.
FN-CB-240a.4	Number of participants in financial literacy initiatives for unbanked, underbanked, or underserved customers  Not disclosed - see introduction.
	Description of initiatives, programs, and/or financial services that focus on enhancing the financial literacy of unbanked, underbanked, or underserved customers  See the Expanding Access Through Financial Inclusion section of our 2018 ESG Report (pages 33-35). For more information on our work in financial wellness, see both the Regions Financial Learning Center section and the Regions Next Step section of our website.

#### Incorporation of ESG Factors in Credit Analysis

SASB Code	Metric
FN-CB-410a.1	Commercial and industrial credit exposure by industry
	See our Basel III Regulatory Capital Disclosures Report for 4Q18, Table 5b: Loans and Related Commitments
	Exposure by Industry.
FN-CB-410a.2	Description of approach to incorporation of ESG factors in credit analysis
	See the Environmental and Social Risk Management section of our 2018 ESG Report (pages 19-20) and our 2019
	CDP Climate Change Response.

#### **Business Ethics**

SASB Code	Metric
FN-CB-510a.1	Amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti- trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations
	Our material legal proceedings and legal contingencies are disclosed in the Commitments, Contingencies and Guarantees footnote to the Consolidated Financial Statements in our 2018 Form 10-K (pages 162-163). Our professional, legal, and regulatory expenses are disclosed in the Management's Discussion and Analysis of Financial Condition and Results of Operations section of our 2018 Form 10-K (page 54).
FN-CB-510a.2	Description of whistleblower policies and procedures  See the Ethical Business Conduct section of our 2018 ESG Report (pages 13-14); the Respect in the Workplace and No-Harassment Policy section of our 2019 Proxy Statement (pages 26-27); and the Raising Issues and Reporting Violations section of our Code of Business Conduct and Ethics (page 4).

# **Systemic Risk Management**

SASB Code	Metric
FN-CB-550a.1	Global Systemically Important Bank (G-SIB) score, by category
	According to the Basel Committee on Banking Supervision's assessment methodology, Regions is not
	considered to be a Global Systemically Important Bank (G-SIB) and, accordingly, does not have a G-SIB score.
FN-CB-550a.2	Description of approach to incorporation of results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities  Results of Regions' Dodd-Frank Act supervisory stress testing can be found on the Regulatory Disclosures page of our website. Testing results applicable to the year 2018 have also been filed as exhibits to our Form 8-K filings made on June 21, 2018 and October 23, 2018.
	An overview of how this testing influences the Company's capital adequacy assessment is provided in Table 3 Capital Adequacy, of our <u>Basel III Regulatory Capital Disclosures Report</u> for 4Q18.

# **Consumer Finance**

#### **Activity Metrics**

SASB Code	Metric
FN-CF-000.A	Number of unique consumers with an active credit card account and a pre-paid debit card account Not disclosed - see introduction.
FN-CF-000.B	Number of credit card accounts and pre-paid debit card accounts  Not disclosed - see introduction.

#### **Customer Privacy**

SASB Code	Metric
FN-CF-220a.1	Number of account holders whose information is used for secondary purposes 100%.  Description of customer privacy policies and procedures
	Detailed descriptions of how we collect, share, and protect our customers' personal information in accordance with federal law are provided in Regions' <a href="Privacy Pledge">Privacy Pledge</a> , a copy of which is provided to each consumer customer when their relationship with us is established. For information on our associates' obligations surrounding the safeguarding of customers' personal information, see the Protecting Confidential and/or Proprietary Information section of our <a href="Code of Business Conduct and Ethics">Conduct and Ethics</a> (pages 8-11).
	For further information on our privacy policies and procedures, see the Information Security and Privacy section of our 2018 ESG Report (pages 16-17); the Cyber and Information Security section of our 2019 Proxy Statement (pages 61-62); the Information Security Risk section of our 2018 Form 10-K (pages 82-83); and both the Raising Issues and Reporting Violations section and the Protecting Confidential and/or Proprietary Information section of our Code of Business Conduct and Ethics (page 4 and pages 8-11, respectively).
FN-CF-220a.2	Amount of monetary losses as a result of legal proceedings associated with customer privacy  Our material legal proceedings and legal contingencies are disclosed in the Commitments, Contingencies and Guarantees footnote to the Consolidated Financial Statements in our 2018 Form 10-K (pages 162-163). Our professional, legal, and regulatory expenses are disclosed in the Management's Discussion and Analysis of Financial Condition and Results of Operations section of our 2018 Form 10-K (page 54).

#### Data Security

SASB Code	Metric
FN-CF-230a.1	Number of data breaches, percentage involving personally identifiable information (PII), number of account holders affected  Not disclosed - see introduction.
FN-CF-230a.2	Card-related fraud losses from card-not-present fraud and card-present and other fraud Not disclosed - see introduction.
FN-CF-230a.3	Description of approach to identifying and addressing data security risks  See the Information Security and Privacy section of our 2018 ESG Report (pages 16-17); the Cyber and Information Security section of our 2019 Proxy Statement (pages 61-62); the Information Security Risk section of our 2018 Form 10-K (pages 82-83); and both the Raising Issues and Reporting Violations section and the Protecting Confidential and/or Proprietary Information section of our Code of Business Conduct and Ethics (page 4 and pages 8-11, respectively).

#### **Selling Practices**

SASB Code	Metric
FN-CF-270a.1	Percentage of total remuneration for covered employees that is variable and linked to the amount of products and services sold  Not disclosed - see introduction.
	<b>Discussion on how remuneration relates to the terms and conditions of the products and services</b> See the Fair and Responsible Banking section of our 2018 ESG Report (pages 31-33) and both the Relationship of Compensation Policies and Practices to Risk Management section and the Compensation Philosophy and Objectives section of our 2019 Proxy Statement (pages 67-68 and 83-84, respectively). Specific terms of incentive compensation are disclosed through the filing of employee incentive plans as exhibits to our 2018 Form 10-K.
FN-CF-270a.2	Approval rate for (1) credit and (2) pre-paid products for applicants with FICO scores above and below
	See Table 14, Estimated Current FICO Score Ranges, in the Management's Discussion and Analysis of Financial Condition and Results of Operations section of our 2018 Form 10-K (page 63).
FN-CF-270a.3	(1) Average fees from add-on products, (2) average APR, (3) average age of accounts, (4) average number of trade lines, and (5) average annual fees for pre-paid products, for customers with FICO scores above and below 660  See both the general Management's Discussion and Analysis of Financial Condition and Results of Operations section and Table 14, Estimated Current FICO Score Ranges, of our 2018 Form 10-K (page 37 and page 63, respectively).
FN-CF-270a.4	Number of complaints filed with the Consumer Financial Protection Bureau (CFPB), percentage with monetary or non-monetary relief, percentage disputed by consumer, percentage that resulted in investigation by the CFPB  See the CFPB's Consumer Complaint Database. Our material loss contingencies related to regulatory investigations are disclosed in the Commitments, Contingencies and Guarantees footnote to the Consolidated Financial Statements in our 2018 Form 10-K (pages 162-163).
FN-CF-270a.5	Amount of monetary losses as a result of legal proceedings associated with selling and serving of products  Our material legal proceedings and legal contingencies are disclosed in the Commitments, Contingencies and Guarantees footnote to the Consolidated Financial Statements in our 2018 Form 10-K (pages 162-163). Our professional, legal, and regulatory expenses are disclosed in the Management's Discussion and Analysis of Financial Condition and Results of Operations section of our 2018 Form 10-K (page 54).

# Mortgage Finance

#### **Activity Metrics**

SASB Code	Metric
FN-MF-000.A	Number and value of mortgages originated by category: (a) residential and (b) commercial See the Financial Supplement to Fourth Quarter 2018 Earnings Release filed as Exhibit 99.2 to our Form 8-K dated January 18, 2019 for information on residential mortgages originated.
FN-MF-000.B	Number and value of mortgages purchased by category: (a) residential and (b) commercial See the Loans footnote to the Consolidated Financial Statements in our 2018 Form 10-K (page 118).

#### **Lending Practices**

SASB Code	Metric
FN-MF-270a.1	(1) Number and (2) value of residential mortgages of the following types: (a) Hybrid or Option Adjustable- rate Mortgages (ARM), (b) Prepayment Penalty, (c) Higher Rate, and (d) Total, by FICO scores above or below 660
	See Table 14, Estimated Current FICO Score Ranges, in the Management's Discussion and Analysis of Financial
	Condition and Results of Operations section of our 2018 Form 10-K (page 63).
FN-MF-270a.2	(1) Number and (2) value of (a) residential mortgage modifications, (b) foreclosures, and (c) short sales or deeds in lieu of foreclosure, by FICO scores above and below 660
	See Table 17, Estimated Current FICO Score Ranges, in the Management's Discussion and Analysis of Financial
	Condition and Results of Operations section of our 2018 Form 10-K (page 63).
FN-MF-270a.3	Amount of monetary losses as a result of legal proceedings associated with communications to customers or remuneration of loan originators  Our material legal proceedings and legal contingencies are disclosed in the Commitments, Contingencies and Guarantees footnote to the Consolidated Financial Statements in our 2018 Form 10-K (pages 162-163). Our
	professional, legal, and regulatory expenses are disclosed in the Management's Discussion and Analysis of Financial Condition and Results of Operations section of our 2018 Form 10-K (page 54).
FN-MF-270a.4	Description of remuneration structure of loan originators  See the Fair and Responsible Banking section of our 2018 ESG Report (pages 31-33) and both the Relationship of Compensation Policies and Practices to Risk Management section and the Compensation Philosophy and Objectives section of our 2019 Proxy Statement (pages 67-68 and pages 83-84, respectively). Specific terms of incentive compensation are disclosed through the filing of employee incentive plans as exhibits to our 2018 Form 10-K.

# **Discriminatory Lending**

SASB Code	Metric
FN-MF-270b.1	Mortgages issued to minority and all other borrowers by FICO scores above and below 660
	See Table 14, Estimated Current FICO Score Ranges, in the Management's Discussion and Analysis of Financial
	Condition and Results of Operations section of our 2018 Form 10-K (page 63).
FN-MF-270b.2	Amount of monetary losses as a result of legal proceedings associated with discriminatory mortgage
	lending
	Our material legal proceedings and legal contingencies are disclosed in the Commitments, Contingencies and
	Guarantees footnote to the Consolidated Financial Statements in our 2018 Form 10-K (pages 162-163). Our
	professional, legal, and regulatory expenses are disclosed in the Management's Discussion and Analysis of
	Financial Condition and Results of Operations section of our 2018 Form 10-K (page 54).
FN-MF-270b.3	Description of policies and procedures for ensuring nondiscriminatory mortgage origination
	See the Fair and Responsible Banking section of our 2018 ESG Report (pages 31-33) and both the Relationship
	of Compensation Policies and Practices to Risk Management section and the Compensation Philosophy and
	Objectives section of our 2019 Proxy Statement (pages 67-68 and pages 83-84, respectively).

## **Environmental Risk to Mortgaged Properties**

SASB Code	Metric
FN-MF-450a.1	Number and value of mortgage loans in 100-yr flood zones  Not disclosed - see introduction.
FN-MF-450a.2	Total expected loss and Loss Given Default attributable to mortgage loan default and delinquency due to weather-related natural catastrophes, by geographic region  Not disclosed - see introduction.
FN-MF-450a.3	Description of how climate change and other environmental risks are incorporated into mortgage origination and underwriting Information on how Regions incorporates climate change and other environmental risks can be found in our 2019 CDP Climate Change Response.