First Citizens Bank

Covered Insured Depository Institution Resolution Plan: Public Section

July 1, 2025

Resolution Plan Statements

Forward-Looking Statements

This document may contain "forward-looking statements" within the meaning of the Private Securities Litigation Reform Act of 1995 regarding the financial condition, results of operations, business plans, asset quality, future performance and other strategic goals of First Citizens BancShares, Inc. (the "Parent Company" and, when including all of its subsidiaries on a consolidated basis, "BancShares"), the Parent Company of First-Citizens Bank & Trust Company ("FCB"). Words such as "anticipates," "believes," "estimates," "expects," "predicts," "forecasts," "intends," "plans," "projects," "targets," "designed," "could," "may," "should," "will," "potential," "continue," "aims," "strives" or other similar words and expressions are intended to identify these forward-looking statements. These forward-looking statements are based on current expectations of FCB and assumptions regarding FCB's business, the economy, and other future conditions. Because forward-looking statements relate to future results and occurrences, they are subject to inherent risks, uncertainties, changes in circumstances and other factors that are difficult to predict. Many possible events or factors could affect FCB's future financial results and performance and could cause actual results, performance or achievements of FCB to differ materially from any anticipated results expressed or implied by such forward-looking statements.

Except to the extent required by applicable laws or regulations, FCB disclaims any obligation to update forward-looking statements or to publicly announce the results of any revisions to any of the forward-looking statements included herein to reflect future events or developments.

Factors that could cause results to differ materially from those contemplated by such forward-looking statements can be found in the Annual Report on Form 10-K for the year ended December 31, 2024, filed by First Citizens BancShares, Inc. ("BancShares"), FCB's parent holding company, with the Securities and Exchange Commission ("SEC").

Available Information

BancShares makes available on the investor relations website (ir.firstcitizens.com) BancShares' Annual Reports on Form 10-K, Quarterly Reports on Form 10-Q, Current Reports on Form 8-K and amendments to those reports, free of charge, as soon as reasonably practicable after they are electronically filed with or furnished to the SEC. Interested parties may also directly access the SEC's website (www.sec.gov), which contains reports, proxy and information statements and other information electronically filed by BancShares. Except as specifically incorporated by reference into this Public Section, information on those websites is not part of this document.

Further financial details on FCB can be found within Consolidated Reports of Condition and Income for A Bank With Domestic and Foreign Offices - FFIEC 031 ("Call Report"), filed with the Federal Deposit Insurance Corporation ("FDIC") and available on the FDIC's website at (www.fdic.gov).

Table of Contents

1 Introduction

On June 20, 2024, the Federal Deposit Insurance Corporation ("FDIC") adopted a final rule ("CIDI Rule") to strengthen resolution planning for Covered Insured Depository Institutions ("CIDIs") with at least $50 billion in total assets. As a CIDI with total assets of at least $100 billion, FCB must submit a comprehensive full resolution plan that meets these enhanced standards. The CIDI Rule requires that the resolution plan enables the FDIC as receiver to resolve an insured depository institution ("IDI") under the Federal Deposit Insurance Act, in the event of an IDI's insolvency, in a manner that ensures that depositors receive access to their insured deposits in a timely manner and maximizes the net present value return from creditors in the resolution.

This Public Section consists of a summary overview of FCB's full resolution submission ("2025 CIDI Resolution Plan") that describes the business of FCB.

2 Material Entities

As defined by the CIDI Rule, a Material Entity means a *“company, a domestic branch, or a foreign branch as defined in 12 U.S.C. 1813(o) that is significant to the activities of a critical service or core business line, and includes all CIDIs that are subsidiaries or affiliates of the CIDI*”.

FCB established a repeatable process to identify Material Entities using quantitative and qualitative criteria. For the 2025 CIDI Resolution Plan, FCB has identified the following three Material Entities:

- **FCB**, which provides retail, commercial and private banking and wealth management services and products to customers in the U.S., EMEA, Asia and Canada;
- **CIT Equipment Financing, LLC**, a subsidiary of FCB that supports railcar leasing business operations in the U.S.; and
- **FC Global Services India LLC (“FC India”)**, a subsidiary of BancShares that provides Critical Services to FCB.

3 Core Business Lines

As defined by the CIDI Rule, a Core Business Line ("CBL") means "*those business lines of the CIDI, including associated operations, services, functions, and support, that, in the view of the CIDI, upon failure would result in a material loss of revenue, profit, or franchise value of the CIDI*".

FCB has established a repeatable process to identify CBLs using quantitative and qualitative criteria. For the 2025 CIDI Resolution Plan, FCB has identified the following five CBLs: General Bank, Commercial Bank, Silicon Valley Bank ("SVB") Commercial, Rail and Direct Bank.

General Bank

The General Bank CBL delivers products and services to consumers and businesses through its extensive network of branches and various digital channels. It offers a full suite of deposit products, loans (primarily residential mortgages and business and commercial loans), cash management, private banking and wealth management, payment services and treasury services. The CBL offers conforming and jumbo residential mortgage loans throughout the United States that are primarily originated through branches and retail referrals, employee referrals, internet leads, direct marketing and a correspondent lending channel, as well as through its private banking service. Private banking and wealth management offers a customized suite of products and services to individuals and institutional clients, as well as private equity and venture capital professionals and executive leaders of the innovation companies they support, and premium wine clients. The General Bank CBL offers brokerage, investment advisory, private stock loans, other secured and unsecured lending products and vineyard development loans, as well as planning-based financial strategies, family office, financial planning, tax planning and trust services. The General Bank CBL also includes a community association bank channel that supports deposit, cash management and lending to homeowner associations and property management companies.

Revenue is primarily generated from interest earned on loans. Noninterest income is primarily generated from fees for banking and advisory services, including lending-related fees, most of FCB's income related to deposit fees and service charges, cardholder services, along with essentially all of the wealth management services income. The CBL primarily originates loans by utilizing the branch network and industry referrals, as well as direct digital marketing efforts. The CBL derives Small Business Administration ("SBA") loans through a network of SBA originators. The CBL periodically purchases loans on a whole-loan basis. The CBL also invest in community development that supports the construction of affordable housing in its communities in line with Community Reinvestment Act ("CRA") initiatives.

Commercial Bank

The Commercial Bank CBL provides a range of lending, leasing, capital markets, asset management, and other financial and advisory services, primarily to small and middle market companies in a wide range of industries, including energy, healthcare, technology media and telecommunications, asset-backed lending, capital finance, maritime, aerospace and defense, and sponsor finance. Loans offered are primarily senior secured loans collateralized by accounts receivable, inventory, machinery and equipment, transportation equipment, and/or intangibles, and are often used for working capital, plant expansion, acquisitions, or recapitalizations. These loans include revolving lines of credit and term loans and, depending on the nature of the collateral, may be referred to as collateral-backed loans, asset-based loans or cash flow loans. The CBL provides senior secured loans to developers and other commercial real estate professionals. Additionally, the CBL provides small business loans and leases, including both capital and operating leases, through a highly automated credit approval, documentation and funding process.

The CBL provides factoring, receivable management and secured financing to businesses that operate in several industries. These include apparel, textile, furniture, home furnishings, and consumer electronics. Factoring entails the assumption of credit risk with respect to trade accounts receivable arising from the sale of goods from factoring clients to their customers that have been factored (i.e., sold or assigned to the factor). The factoring clients, which are generally manufacturers or importers of goods, are the counterparties on factoring, financing or receivables purchasing agreements to sell trade receivables to us. Factoring clients' customers, which are generally retailers, are the account debtors and obligors on trade accounts receivable that have been factored.

Revenue is primarily generated from interest and fees on loans. Noninterest income is mostly generated from rental income on operating lease equipment, lending-related fees, including most of FCB capital market fees, and other revenue from banking services. Noninterest income also includes all of the commissions earned on factoring-related activities. The CBL derives most of the commercial lending business through direct marketing to borrowers, lessees, manufacturers, vendors, and distributors. The CBL also utilizes referrals as a source for commercial lending business. The CBL may periodically buy participations or syndications of loans and lines of credit and purchase loans on a whole-loan basis.

Operating lease equipment is subject to depreciation expense over the useful life of the small and large ticket equipment, which is generally 3-10 years.

SVB Commercial

The SVB Commercial CBL offers products and services to commercial clients and investors across stages, sectors and regions in the innovation ecosystem, as well as private equity and venture capital firms. The SVB Commercial CBL provides solutions to the financial needs of commercial clients. Loan products consist of capital call lines of credit, investor dependent loans, cash flow dependent loans, and innovation C&I loans made primarily to technology, life science and healthcare companies.

Revenue is primarily generated from interest earned on loans. Noninterest income is mostly generated from fees, including essentially all of client investment fees and most of the international fees, and other revenue from lending-related activities and banking services.

Deposit products include business and analysis checking accounts, money market accounts, multi-currency accounts, bank accounts, sweep accounts, and positive pay services. Services are provided through online and mobile banking platforms as well as branch locations.

Rail

Rail offers customized leasing and financing solutions on a fleet of railcars and locomotives to railroads and shippers throughout North America. Revenue is generated primarily from rental income on operating lease equipment.

Rail offers customized leasing and financing solutions on a fleet of railcars and locomotives to railroads and shippers throughout North America. Railcar types include covered hopper cars used to ship grain and agricultural products, plastic pellets, sand and cement; tank cars for energy products and chemicals; gondolas for coal, steel coil and mill service products; open-top hopper cars for coal and aggregates; boxcars for paper and auto parts; and centerbeams and flat cars for lumber. Revenue is generated primarily from rental income on operating lease equipment. Rental income is generally influenced by the size of the operating lease portfolio, utilization of the railcars, re-pricing of equipment renewed upon lease maturities and pricing on new leases. Re-pricing refers to the rental rate in the renewed equipment contract compared to the prior contract.

Operating lease equipment is subject to depreciation expense over the useful life of the rail equipment, which is generally longer in duration, 40-50 years. Maintenance and other operating lease expenses relate to equipment ownership and leasing costs associated with the railcar portfolio and tend to be variable due to timing and the number of railcars coming on or off lease as well as asset condition.

Direct Bank

Direct Bank CBL provides deposit products on a national basis under the CIT Bank brand. The current digital-only product offering includes savings accounts, money market accounts, CDs and checking accounts.

4 Consolidated Financial Information

Assets and Liabilities

FCB reports its assets and liabilities within the Call Report which is filed with the FDIC. Figure 1 represents FCB’s balance sheet as of December 31, 2024.

Figure 1: Schedule RC - Balance Sheet (Form Type - 031)

Schedule RC - Balance Sheet as of December 31, 2024	$ in thousands
1. Cash and balances due from depository institutions (from Schedule RC-A):	
a. Noninterest-bearing balances and currency and coin[1]	779,000
b. Interest-bearing balances[2]	21,132,000
2. Securities:	
a. Held-to-maturity securities (from Schedule RC-B, column A)[3]	10,237,000
b. Available-for-sale debt securities (from Schedule RC-B, column D)	33,751,000
c. Equity securities with readily determinable fair values not held for trading[4]	2,000
3. Federal funds sold and securities purchased under agreements to resell:	
a. Federal funds sold in domestic offices	—
b. Securities purchased under agreements to resell[5]	158,000
4. Loans and lease financing receivables (from Schedule RC-C):	
a. Loans and leases held for sale	82,000
b. Loans and leases held for investment	140,265,000
c. LESS: Allowance for credit losses on loans and leases	1,675,000
d. Loans and leases held for investment, net of allowance (item 4.b minus 4.c)	138,590,000
5. Trading assets (from Schedule RC-D)	—
6. Premises and fixed assets (including right-of-use assets)[6]	1,738,000
7. Other real estate owned (from Schedule RC-M)	56,000
8. Investments in unconsolidated subsidiaries and associated companies	129,000
9. Direct and indirect investments in real estate ventures	2,381,000
10. Intangible assets (from Schedule RC-M).	581,000
11. Other assets (from Schedule RC-F)	13,927,000
12. Total assets (sum of items 1 through 11)	223,543,000
13. Deposits:	
a. In domestic offices (sum of totals of columns A and C from Schedule RC-E, part I)	155,571,000
1. Noninterest-bearing[7]	38,975,000
2. Interest-bearing	116,596,000
b. In foreign offices, Edge and Agreement subsidiaries, and IBFs (from Schedule RC-E, part II)	1,000
1. Noninterest-bearing	1,000
2. Interest-bearing	—
14. Federal funds purchased and securities sold under agreements to repurchase:	
a. Federal funds purchased in domestic offices[8]	—
b. Securities sold under agreements to repurchase[9]	367,000
15. Trading liabilities (from Schedule RC-D)	—
16. Other borrowed money (includes mortgage indebtedness) (from Schedule RC-M)	36,089,000
17. Not applicable	
18. Not applicable	
19. Subordinated notes and debentures[10]	445,000
20. Other liabilities (from Schedule RC-G)	9,138,000

[1] Includes cash items in process of collection and unposted debits.
[2] Includes time certificates of deposit not held for trading.
[3] Institutions should report in item 2.a, amounts net of any applicable allowance for credit losses, and should equal to Schedule RC-B, item 8, column A less Schedule RI-B, Part II, item 7, column B.
[4] Item 2.c is to be completed by all institutions. See the instructions for this item and the Glossary entry for "Securities Activities" for further detail on accounting for investments in equity securities.
[5] Includes all securities resale agreements, regardless of maturity.
[6] Institutions should report in items 3.b and 11 amounts net of any applicable allowance for credit losses.
[7] Includes noninterest-bearing demand, time, and savings deposits.
[8] Report overnight Federal Home Loan Bank advances in Schedule RC, item 16, "Other borrowed money."
[9] Includes all securities repurchase agreements, regardless of maturity.
[10] Includes limited-life preferred stock and related surplus.

Capital

FCB is subject to regulatory capital requirements under Basel III for the Tier 1 leverage ratio and ratios of qualifying capital to RWA (the "Risk-Based Capital Ratios" and, together with the Tier 1 leverage ratio, the "Regulatory Capital Ratios"). The total risk-based capital, Tier 1 risk-based capital and common equity Tier 1 risk-based capital ("CET1") ratios are the Risk-Based Capital Ratios. CET1 capital is generally common stock, additional paid in capital and retained earnings less applicable capital deductions.

As of December 31, 2024, the Regulatory Capital Ratios of FCB exceeded the applicable Basel III requirements and the PCA well capitalized thresholds. Figure 2 includes FCB's capital ratios and PCA well capitalized thresholds for the Regulatory Capital Ratios. FCB remained well capitalized with a total risk-based capital ratio of 14.66%, a Tier 1 risk-based capital ratio of 13.37%, a CET1 ratio of 13.37% and a Tier 1 leverage ratio of 9.78%.

Figure 2: Capital Ratios

Regulatory Capital Metric	Ratio	"Well Capitalized" Threshold
Common Equity Tier 1 Risk-Based Capital Ratio	13.37%	6.50%
Tier 1 Risk-Based Capital Ratio	13.37%	8.00%
Total Risk-Based Capital Ratio	14.66%	10.00%
Tier 1 Leverage Ratio	9.78%	5.00%

Funding Sources

FCB funds its operations through deposits and borrowings. FCB's deposit base represents the primary source of core funding and balance sheet liquidity. Total deposits at December 31, 2024 were approximately $156 billion.

FCB uses borrowings to diversify the funding of its business operations. The most significant of FCB's borrowings is a five-year long-term senior secured note, that matures in March 2028, of approximately $36 billion (the "Purchase Money Note"), payable to the FDIC in connection with the Silicon Valley Bridge Bank N.A. ("SVBB") Acquisition.

Other key funding sources include the Federal Home Loan Bank ("FHLB") advances and Federal Reserve Bank ("FRB") Discount Window.

- **FHLB Capacity:** A source of available funds is advances from the FHLB of Atlanta. FCB may pledge assets for secured borrowing transactions, which include borrowings from the FHLB and/ or FRB or for other purposes as required or permitted by law. The debt issued in conjunction with these transactions is collateralized by certain discrete receivables, securities, loans, leases and/ or underlying equipment. Certain related cash balances are restricted.

- **FRB Capacity:** Under borrowing arrangements with the FRB, FCB has access to funding on a secured basis. There were no outstanding borrowings with the FRB Discount Window at December 31, 2024.

5 Derivative and Hedging Activities

FCB manages economic risk and exposure to interest rate and foreign currency risk through derivative transactions in over-the-counter markets with other financial institutions. FCB also offers derivative products to its customers in order for them to manage their interest rate and currency risks. FCB does not enter into derivative financial instruments for speculative purposes.

FCB provides interest rate derivative contracts to support the business requirements of its customers. The derivative contracts include interest rate swap agreements and interest rate cap and floor agreements wherein FCB acts as a seller of these derivative contracts to its customers. The carrying amount of these customer derivatives is net of the credit valuation allowance for counterparty credit risk. To mitigate the market risk associated with these customer derivatives, FCB enters into back-to-back positions with other financial institutions.

FCB is exposed to credit risk to the extent that the counterparty fails to perform under the terms of a derivative agreement. FCB manages this credit risk by requiring that all derivative transactions entered into as hedges to be conducted with counterparties rated investment grade at the initial transaction by nationally recognized rating agencies, and by setting limits on the exposure with any individual counterparty. In addition, pursuant to the terms of the agreements between FCB and its counterparties, FCB may be required to post collateral or may be entitled to receive collateral in the form of cash or highly liquid securities depending on the valuation of the derivative instruments as measured on a daily basis.

At inception, FCB documents all relationships between hedging instruments and hedged items, including effectiveness as well as the risk management objectives and strategies for undertaking various hedges. Upon executing a derivative contract, FCB designates the derivative as either a qualifying hedge or nonqualifying hedge. The designation may change based upon management’s reassessment of circumstances. FCB assesses hedge effectiveness at inception and on an ongoing basis.

In order to manage its interest rate exposure, FCB enters into fair value hedges of certain fixed rate debt and deposits. FCB recognizes the changes in the fair values of the hedging instrument and hedged item in interest expense for borrowings and deposits in the Consolidated Statements of Income.

FCB also utilizes floating-rate loan portfolio cash flow hedges. The changes in fair value of the hedging instrument in a cash flow hedge are reported in Accumulated Other Comprehensive Income (AOCI) and subsequently reclassified to earnings during the periods in which the hedged cash flows affect earnings. The recognized gains and losses on loan portfolio cash flow hedges are reported in “interest and fees on loans” on the Consolidated Statements of Income when reclassified from AOCI to earnings.

If an accounting hedge (“qualifying hedge”) subsequently ceases to qualify as an effective hedge or the forecasted cash flows are no longer probable of occurring in a cash flow hedge within the specified period, hedge accounting will be discontinued. Any amounts in AOCI related to a discontinued cash flow hedge will be reclassified to earnings over the same periods in which the hedged cash flows affect earnings. However, if it becomes probable that the forecasted cash flows will not occur within the specified period, any related amounts in AOCI will be reclassified to earnings immediately.

Derivatives not designated as hedging instruments (“nonqualifying hedges”) are presented in the Consolidated Balance Sheets in other assets or other liabilities, with resulting gains or losses and periodic interest settlements and other changes in fair value reported in other noninterest income.

FCB uses foreign currency forward contracts, interest swaps and options to hedge interest rate and foreign currency risks arising from its asset and liability mix. These are treated as economic hedges, which are nonqualifying hedges.

Derivatives not designated as hedging instruments mainly include interest rate and foreign exchange contracts that FCB's customers utilized for their risk management needs. FCB typically manages exposure to these customer derivatives by entering into offsetting or "back-to-back" interest rate and foreign exchange contracts with third-party dealers.

Derivative instruments that are cleared through certain central counterparty clearing houses are settled-to-market and reported net of collateral positions.

6 Payment, Clearing and Settlement Service Providers

FCB uses a broad system of Financial Market Utilities (“FMUs”), Agent Banks, Correspondent Banks and Custodians to support operational back office activities. This network of Payment, Clearing and Settlement (“PCS”) service providers are utilized for several types of activities, including wire payments and transfers, check clearing, as well as Automated Clearing House (“ACH”) payments and settlement.

Below are the five FMUs that FCB uses to support its business activities.

Fedwire Funds

Fedwire Funds Service is provided by the FRB; it is a real-time gross settlement system which allows members to initiate immediate and irreversible fund transfers. It is typically utilized for large-value payments that must be processed on short notice. Fedwire Funds works as a credit transfer service; participants can originate transfers in three ways: online, through a secure electronic message or via telephone.

Federal Reserve Automatic Clearing House (“FedACH”)

FedACH is comprised of a network of depository institutions that engage in credit and debit transfers. It is one of two national ACH operators. Examples of ACH credit transfers include payroll direct deposits, social security benefits and tax refunds, whereas debit transfers are items such as mortgage and utility bills. FedACH services can be used for recurring payments; today it is frequently used for one-time debit transfers as well, which include payments made through the internet or phone.

The Clearing House

The Clearing House provides essential services to banks, including clearing and settlement of interbank payments, operating payment systems like Real Time Payments (“RTP”) and ACH, and offering risk management solutions. Additionally, the Clearing House supports banks in navigating compliance with regulatory requirements, ensuring a safe and efficient payment ecosystem.

FRB Richmond

FRB Richmond plays a crucial role in the U.S. economy by implementing monetary policy, supervising and regulating financial institutions, and providing financial services to banks and the federal government. It conducts economic research to inform policy decisions and offers payment services, including check clearing and electronic funds transfers. Additionally, FRB Richmond engages with the community through outreach programs and educational initiatives, promoting economic understanding and stability in its district.

FedLine Web Check Services

FedLine Web Check Services is a secure online platform provided by the Federal Reserve that enables financial institutions to process check transactions efficiently. It facilitates the electronic exchange of check images and data, streamlining the clearing and settlement process. The service enhances operational efficiency by allowing banks to manage check processing remotely, while also providing tools for tracking and reporting. Additionally, FedLine Web Check Services supports compliance with regulatory requirements, ensuring secure and reliable check processing for financial institutions.

7 Foreign Operations

The vast majority of FCB's structure, operations and financial activity are based within the U.S. However, FCB does rely upon certain non-U.S operations and participate in certain cross-border activities. The majority of these operations and activities were acquired through the CIT Merger, SVBB Acquisition and SVB Global Services India LLP acquisition (the "SVB India Acquisition").

The most operationally significant component of non-U.S. operations is FC India, a subsidiary of BancShares, which was acquired through the SVB India Acquisition. As described Section 2 Material Entities, FC India was determined to be Material Entity because it provides Critical Services to FCB.

The most financially significant component of non-U.S. operations is the Rail business, which was acquired through the CIT Merger. As described in Section 3 Core Business Lines, Rail (U.S. and non U.S.) was determined to be a CBL because of its contributions to the value and revenue of FCB.

As of December 31, 2024, FCB had three foreign regulated subsidiaries and one foreign facility in its structure to support the North American Rail business. FCB's cross-border profile does not consist of any foreign branches.

8 Material Supervisory Authorities

FCB, as a state-chartered bank organization under the laws and regulations of the state of North Carolina, is chartered and regulated by the North Carolina Office of the Commissioner of Banks (“NCCOB”) as well as regulated by the FDIC, which insures its deposits up to applicable limits and serves as FCB’s primary federal banking regulator.

9 Principal Officers

Figure 3 identifies members of FCB's executive officers as of March 18, 2025.

Figure 3: FCB's Executive Officers

Principal Officer	Role
Frank B. Holding, Jr	Chairman and Chief Executive Officer of BancShares and FCB
Hope Holding Bryant	Vice Chairwoman of BancShares and FCB
Peter M. Bristow	President and member of the Board of BancShares and FCB
Craig L. Nix	Chief Financial Officer
Lorie K. Rupp	Chief Risk Officer
Jeffery L. Ward	Chief Strategy Officer
Gregory L. Smith	Chief Information and Operations Officer
Matthew G.T. Martin	Chief Legal Officer and Corporate Secretary
West Ludwig	Chief Human Resources Officer
Andrew Giangrave	Chief Credit Officer - Commercial Bank

10 Resolution Planning Corporate Governance

FCB has established a robust oversight process as its governance structure for resolution planning. This includes periodic updates to governance groups, including the Board of Directors, as well as review and approval by subject matter experts and senior leadership. The bank has formed the Resolution Planning Team, under leadership of the Treasurer, to be primarily responsible and accountable for the development, maintenance and filing of the resolution plan. Effective challenge was provided by Risk Management throughout the process, with Internal Audit reviewing before final submission.

Following the submission of FCB's 2025 CIDI Resolution Plan to the FDIC in July 2025, updates will be provided to governance groups, as appropriate, for continued oversight of resolution planning activities.

11 Material Management Information Systems

FCB maintains a robust network of management information systems ("MIS") to support its business operations, including risk management, accounting and financial and regulatory reporting.

FCB's MIS are utilized in various forms, including desktop, on premise, cloud-managed and third-party hosted, to facilitate daily business functions and are integral to the operations of FCB. FCB's MIS is managed in a central repository of all technical assets across the bank. Through the resolution planning process, FCB has identified the MIS that would be most critical to bank operations in the event of failure.

FCB has standards and procedures in place to establish requirements, processes and responsibilities for tracking, managing and reporting managed assets in support of associated Policies. These documents provide instruction for how FCB's in-scope Information Technology ("IT") assets and configuration items are identified, recorded and maintained in the asset and configuration repositories of record throughout their respective lifecycles. Compliance with the standards helps FCB meet regulatory requirements, contractual requirements and information security standards.

12 Resolution Strategy

FCB identified strategies for the timely and cost-effective resolution of the bank involving (i) the formation and stabilization of a bridge bank and (ii) a weekend sale not involving a bridge bank. FCB believes these strategies would provide timely access to insured deposits, maximize value from the sale or disposition of assets, minimize any losses realized by creditors of FCB in resolution and address potential risk of adverse effects on U.S. economic conditions or financial stability.

- FCB believes that the FDIC could establish and stabilize a bridge bank while marketing FCB's IDI franchise to potential acquirers. FCB's Franchise Components could be offered separately following a short bridge bank period to reduce the size of the IDI franchise so as to increase competitive bidding. The CIDI Rule defines a Franchise Component as a *"business segment, regional Branch Network, major asset, material asset portfolio or other key component of a CIDI's franchise that can be separated or sold and divested."* The FDIC could exit from the bridge bank by selling the remaining IDI franchise to a potential acquirer or through a multiple acquirer exit involving the sale of CBLs or Material Asset Portfolios, followed by the wind-down of remaining bridge bank operations. The CIDI Rule defines a Material Asset Portfolio as a *"pool or portfolio of assets, such as loans, securities, or other assets that may be sold in resolution by the bridge depository institution or the receivership and is significant in terms of income or value to the CIDI"*.

- The FDIC could also sell FCB over a weekend sale, thus eliminating the need for a bridge bank. This strategy provides the most rapid option for the FDIC to sell FCB's assets and liabilities.

Execution of the resolution strategy would require the actions outlined throughout the 2025 CIDI Resolution Plan. FCB believes these resolution strategies represent suitable options for resolution that could reasonably be executed by the FDIC at the time of failure.