



FIFTH THIRD

Fifth Third Bank, N.A.
Insured Depository Institution
Resolution Plan:
Public Section

July 1, 2025

Submitted Pursuant to Federal Regulation 12 CFR Part 360



Forward-Looking Statements

This document contains statements that we believe are “forward-looking statements” within the meaning of Section 27A of the Securities Act of 1933, as amended, and Rule 175 promulgated thereunder, and Section 21E of the Securities Exchange Act of 1934, as amended, and Rule 3b-6 promulgated thereunder. All statements other than statements of historical fact are forward-looking statements. These statements relate to our financial condition, results of operations, plans, objectives, future performance, capital actions or business. They usually can be identified by the use of forward-looking language such as “will likely result,” “may,” “are expected to,” “is anticipated,” “potential,” “estimate,” “forecast,” “projected,” “intends to,” or may include other similar words or phrases such as “believes,” “plans,” “trend,” “objective,” “continue,” “remain,” or similar expressions, or future or conditional verbs such as “will,” “would,” “should,” “could,” “might,” “can,” or similar verbs. You should not place undue reliance on these statements, as they are subject to risks and uncertainties, including but not limited to the risk factors set forth in our most recent Annual Report on Form 10-K as updated by our filings with the U.S. Securities and Exchange Commission (“SEC”).

There are a number of important factors that could cause future results to differ materially from historical performance and these forward-looking statements. Factors that might cause such a difference include, but are not limited to: (1) deteriorating credit quality; (2) loan concentration by location or industry of borrowers or collateral; (3) problems encountered by other financial institutions; (4) inadequate sources of funding or liquidity; (5) unfavorable actions of rating agencies; (6) inability to maintain or grow deposits; (7) limitations on the ability to receive dividends from subsidiaries; (8) cyber-security risks; (9) Fifth Third’s ability to secure confidential information and deliver products and services through the use of computer systems and telecommunications networks; (10) failures by third-party service providers; (11) inability to manage strategic initiatives and/or organizational changes; (12) inability to implement technology system enhancements, including the use of artificial intelligence; (13) failure of internal controls and other risk management programs; (14) losses related to fraud, theft, misappropriation or violence; (15) inability to attract and retain skilled personnel; (16) adverse impacts of government regulation; (17) governmental or regulatory changes or other actions; (18) failures to meet applicable capital requirements; (19) regulatory objections to Fifth Third’s capital plan; (20) regulation of Fifth Third’s derivatives activities; (21) deposit insurance premiums; (22) assessments for the orderly liquidation fund; (23) weakness in the national or local economies; (24) global political and economic uncertainty or negative actions; (25) changes in interest rates and the effects of inflation; (26) changes in U.S. trade policies, including the imposition of tariffs and retaliatory tariffs; (27) changes and trends in capital markets; (28) fluctuation of Fifth Third’s stock price; (29) volatility in mortgage banking revenue; (30) litigation, investigations, and enforcement proceedings; (31) breaches of contractual covenants, representations and warranties; (32) competition and changes in the financial services industry; (33) potential impacts of the adoption of real-time payment networks; (34) changing retail distribution strategies, customer preferences and behavior; (35) difficulties in identifying, acquiring or integrating suitable strategic



partnerships, investments or acquisitions; (36) potential dilution from future acquisitions; (37) loss of income and/or difficulties encountered in the sale and separation of businesses, investments or other assets; (38) results of investments or acquired entities; (39) changes in accounting standards or interpretation or declines in the value of Fifth Third's goodwill or other intangible assets; (40) inaccuracies or other failures from the use of models; (41) effects of critical accounting policies and judgments or the use of inaccurate estimates; (42) weather-related events, other natural disasters, or health emergencies (including pandemics); (43) the impact of reputational risk created by these or other developments on such matters as business generation and retention, funding and liquidity; (44) changes in law or requirements imposed by Fifth Third's regulators impacting our capital actions, including dividend payments and stock repurchases; and (45) Fifth Third's ability to meet its environmental and/or social targets, goals and commitments.

You should refer to our periodic and current reports filed with the SEC for further information on other factors, which could cause actual results to be significantly different from those expressed or implied by these forward-looking statements. Moreover, you should treat these statements as speaking only as of the date they are made and based only on information then actually known to us. We expressly disclaim any obligation or undertaking to release publicly any updates or revisions to any forward-looking statements contained herein to reflect any change in our expectations or any changes in events, conditions or circumstances on which any such statement is based, except as may be required by law, and we claim the protection of the safe harbor for forward-looking statements contained in the Private Securities Litigation Reform Act of 1995. The information contained herein is intended to be reviewed in its totality, and any stipulations, conditions or provisos that apply to a given piece of information in one part of this press release should be read as applying *mutatis mutandis* to every other instance of such information appearing herein.



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Introduction

Section 165(d) of Title I of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”), as amended by the Economic Growth, Regulatory Relief, and Consumer Protection Act (“EGRRCPA”), and the related implementing regulations (the “Title I Rule”), require each U.S. bank holding company with consolidated assets in excess of \$250 billion to periodically submit to the Board of Governors of the Federal Reserve System (the “Board of Governors”) and the Federal Deposit Insurance Corporation (the “FDIC”) a resolution plan for such company’s rapid and orderly resolution in the event of material financial distress or failure.¹ Fifth Third Bancorp (“Bancorp”) is a bank holding company registered with the Board of Governors with consolidated assets less than \$250 billion that does not otherwise meet the definition of a “Covered Company” under the Title I Rule. Therefore, Bancorp is not required to submit a resolution plan under the Dodd-Frank Act and the Title I Rule.

However, the FDIC has adopted a separate rule (the “IDI Rule”), requiring each insured depository institution (an “IDI”) with \$100 billion or more in total assets to submit a full resolution plan to the FDIC triennially.² The Bancorp is the parent of Fifth Third Bank, National Association (the “Bank” or “Fifth Third Bank”),³ an IDI with more than \$100 billion in total assets. The Bank therefore is a “Covered Insured Depository Institution” (“CIDI”) under the IDI Rule and has prepared this resolution plan (the “IDI Resolution Plan” or the “2025 Plan”) in accordance with the IDI Rule and related guidance. In particular, in April 2025, the FDIC issued an FAQ for the IDI Rule (the “FAQ”). The FAQ provides answers to questions frequently asked of FDIC staff in connection with the IDI Rule. Simultaneous with its issuance of the FAQ, the FDIC also issued its “Content Requirement Exemptions for Initial Submission Cycle (12 CFR § 360.10).”

This Public Section discusses elements of the IDI Resolution Plan that was submitted on or prior to July 1, 2025, in conformance with the IDI Rule.

Unless otherwise indicated, information in this Public Section is provided as of December 31, 2024.

¹ See 12 CFR Part 243. U.S. bank holding companies with between \$100 billion and \$250 billion in total consolidated assets with \$75 billion or more in any of cross-jurisdictional activity, nonbank assets, weighted short-term wholesale funding, or off-balance sheet exposure are also subject to the Title I Rule.

² 12 CFR § 360.10.

³ The Bank refers collectively to the legal entity, Fifth Third Bank, as well as all of its wholly owned operating subsidiaries.



A. Material Entities

For purposes of resolution planning, Fifth Third has identified a single material entity under the IDI Rule, namely Fifth Third Bank. A material entity under the IDI Rule is defined as a company, a domestic branch, or a foreign branch that is significant to the activities of a critical service or core business line (each as defined below) and includes all IDIs that are subsidiaries or affiliates of the CIDI. Based on this definition, Fifth Third has only identified the Bank as a material entity under the IDI Rule. The IDI Resolution Plan addresses strategies that could be useful in ensuring the orderly resolution of the Bank in the event of material financial distress or failure.

Fifth Third Bank is a regulated banking entity and an IDI that is an indirect, wholly owned subsidiary of Fifth Third Bancorp by way of Fifth Third Financial Corporation, ("Financial Corp."), an intermediate holding company and headquartered in Cincinnati, Ohio. Given Fifth Third's focus on traditional banking activities, the Bank comprises the majority of Fifth Third's financial profile and activities.

The Bank provides various banking services to its retail and commercial customers. These services include retail banking, consumer and commercial lending, deposit gathering, and investment advising. As of December 31, 2024, Fifth Third had \$212.9 billion in assets and operated its business primarily through 1,089 full-service banking centers in Ohio, Kentucky, Indiana, Michigan, Illinois, Florida, Tennessee, West Virginia, Georgia, North Carolina, and South Carolina. Fifth Third operates three main core business lines: Commercial Banking, Consumer & Small Business Banking, and Wealth and Asset Management. All of the core business lines provide and record all material activities within the Bank. Fifth Third is among the largest money managers in the Midwest and, as of December 31, 2024, had \$634 billion in assets under care, of which it managed \$69 billion for individuals, corporations, and not-for-profit organizations.



B. Core Business Lines

For purposes of resolution planning, core business lines are those business lines of the CIDI, including associated operations, services, functions, and support that upon failure would result in a material loss of revenue, profit, or franchise value to the organization. As of December 31, 2024, Fifth Third has identified three core business lines under the IDI Rule, which correspond to the three business segments across which Fifth Third reports its activities as summarized below.

Core Business Lines

Core Business Line	Description
Commercial Banking	Commercial Banking offers credit intermediation, cash management and financial services to large and middle-market businesses and government and professional customers. In addition to the traditional lending and depository offerings, Commercial Banking products and services include global cash management, foreign exchange and international trade finance, derivatives and capital markets services, asset-based lending, real estate finance, public finance, commercial leasing, and syndicated finance.
Consumer and Small Business Banking	Consumer and Small Business Banking provides a full range of deposit and loan products to individuals and small businesses through a network of full-service banking centers and relationships with indirect and correspondent loan originators in addition to providing products designed to meet the specific needs of small businesses, including cash management services. Consumer and Small Business Banking includes the Bank's residential mortgage, home equity loans and lines of credit, credit cards, automobile and other indirect lending, solar energy installation and other consumer lending activities. Residential mortgage activities include the origination, retention and servicing of residential mortgage loans, sales and securitizations of those loans and all associated hedging activities. Indirect lending activities include extending loans to consumers through automobile dealers, motorcycle dealers, powersport dealers, recreational vehicle dealers and marine dealers. Solar energy installation loans and certain other consumer loans are originated through a network of contractors and installers.
Wealth and Asset Management	Wealth and Asset Management provides a full range of wealth management solutions for individuals, companies, and not-for-profit organizations, including wealth planning, investment management, banking, insurance, trust, and estate services. These offerings include retail brokerage services for individual clients, advisory services for institutional clients including middle market businesses, non-profits, states and municipalities, and wealth management strategies and products for high net worth and ultra-high net worth clients.

For more detailed information with respect to Fifth Third's lines of business, please refer to the annual, quarterly and current reports filed with the SEC and available on the SEC's website at www.sec.gov, including the Annual Report on Form 10-K for the year ended December 31, 2024.



C. Consolidated Financial Information (Assets, Liabilities, Capital and Major Funding Sources)

For detailed financial information with respect to Fifth Third Bancorp, please refer to the annual, quarterly and current reports filed with the SEC and available on the SEC's website at www.sec.gov, including the Annual Report on Form 10-K for the year ended December 31, 2024.

The following financial information is unaudited and pertains only to the Bank. For detailed financial information with respect to Fifth Third Bank, please refer to the quarterly Call Reports filed with the Federal Financial Institutions Examination Council ("FFIEC") and available on the FFIEC's website at www.ffiec.gov, including the Call Report as of December 31, 2024.


Consolidated Balance Sheet for the Bank (Unaudited)

As of 12/31/2024 (Unaudited)	
Assets	Bank (\$ in millions)
Cash and due from banks	2,972
Other short-term investments	17,120
Available-for-sale debt and other securities	39,547
Held-to-maturity securities	11,277
Trading debt securities	1,185
Equity securities	285
Loans and leases held for sale	640
Portfolio loans and leases	119,791
Allowance for loan and lease losses	(2,352)
Portfolio loans and leases, net	117,439
Bank premises and equipment	2,473
Operating lease equipment	319
Goodwill	4,815
Intangible assets	90
Servicing rights	1,704
Investment in Subsidiaries	0
Other assets	12,332
Total Assets	212,197
Liabilities	(\$ in millions)
Deposits:	
Noninterest-bearing deposits	42,007
Interest-bearing deposits	129,693
Total deposits	171,700
Federal funds purchased	204
Other short-term borrowings	4,447
Accrued taxes, interest and expenses	1,977
Other liabilities	4,543
Long-term debt	7,262
Total Liabilities	190,133
Equity	(\$ in millions)
Common stock	5
Preferred stock	0
Capital surplus	16,702
Retained earnings	9,991
Accumulated other comprehensive loss	(4,634)
Treasury stock	0
Non-controlling Interest	0
Total Equity	22,064
Total Liabilities and Equity	212,197



Regulatory Capital Ratios

The Basel III Final Rule sets minimum regulatory capital ratios as well as defines the measure of “well-capitalized” for insured depository institutions.

Prescribed Capital Ratios

Bank Regulatory Capital Ratios	Minimum Regulatory Capital Ratio	Well-Capitalized Minimums
CET1 risk-based capital ratio:	4.50%	6.50%
Tier 1 risk-based capital ratio:	6.00%	8.00%
Total risk-based capital ratio:	8.00%	10.00%
Leverage ratio:	4.00%	5.00%

The following table summarizes the Bank’s regulatory capital and regulatory capital ratios as of December 31, 2024, and 2023:

Bank Regulatory Capital and Regulatory Capital Ratios	2024 (\$ in millions)	2023 (\$ in millions)
Regulatory capital:		
CET1 capital	20,943	20,147
Tier 1 capital	20,943	20,147
Total regulatory capital	23,116	22,463
Risk-weighted assets	162,895	162,166
Regulatory capital ratios:		
CET1 capital	12.86%	12.42%
Tier 1 risk-based capital	12.86%	12.42%
Total risk-based capital	14.19%	13.85%
Leverage	10.02%	9.38%

For more detailed information with respect to Fifth Third’s capital management, please refer to the annual, quarterly and current reports filed with the SEC and available on the SEC’s website at www.sec.gov, including the Annual Report on Form 10-K for the year ended December 31, 2024.

Major Funding Sources

The goal of liquidity management is to provide adequate funds to meet changes in loan and lease demand, unexpected levels of deposit withdrawals and other contractual obligations. Mitigating liquidity risk is accomplished by maintaining liquid assets in the form of cash and investment securities, maintaining sufficient unused borrowing capacity in the debt markets and delivering consistent growth in core deposits.

Fifth Third’s Treasury department manages funding and liquidity based on point-in-time metrics as well as forward-looking projections, which incorporate different



sources and uses of funds under base and stress scenarios. Liquidity risk is monitored and managed by the Treasury department with independent oversight provided by Enterprise Risk Management, and a series of Policy Limits and Key Risk Indicators are established to ensure risks are managed within Fifth Third's risk tolerance. Fifth Third maintains a contingency funding plan that provides for liquidity stress testing, which assesses the liquidity needs under varying market conditions, time horizons, asset growth rates and other events. The contingency funding plan provides for ongoing monitoring of unused borrowing capacity and available sources of contingent liquidity to prepare for unexpected liquidity needs and to cover unanticipated events that could affect liquidity. The contingency funding plan also outlines Fifth Third's response to various levels of liquidity stress and actions that should be taken during various scenarios.

Fifth Third's Asset & Liability Committee, which includes senior management representatives and is accountable to the Enterprise Risk Management Committee, monitors and manages liquidity and funding risk within Board-approved policy Key Risk Indicators.

Fifth Third's primary sources of funds include revenue from noninterest income as well as cash flows from loan and lease repayments, payments from securities related to sales and maturities, the sale or securitization of loans and leases and funds generated by core deposits, in addition to the use of borrowings.

Asset-driven liquidity is provided by Fifth Third's ability to monetize loans, leases and investment securities through a variety of channels, including repurchase agreements, outright sales, securitizations or pledging to secured borrowing sources. In order to reduce the exposure to interest rate fluctuations and to manage liquidity, Fifth Third has developed securitization and sale procedures for several types of interest-sensitive assets. A majority of the long-term, fixed-rate single-family residential mortgage loans underwritten according to Federal Home Loan Mortgage Corporation or Federal National Mortgage Association guidelines are sold for cash upon origination. Additional assets such as certain other residential mortgage loans, certain commercial loans and leases, home equity loans, automobile loans, solar energy installation loans and other consumer loans are also capable of being securitized or sold. Fifth Third sold or securitized loans and leases totaling \$4.4 billion during the year ended December 31, 2024, compared to \$7.1 billion during the year ended December 31, 2023. Fifth Third maintains access to and regularly conducts operational tests of bilateral repo capacities, tri-party repo capacity through the Fixed Income Clearing Corporation, and the Federal Reserve Standing Repo Facility. These repo channels provide ample liquidity to monetize highly liquid assets held within Fifth Third's investment portfolio.

Core deposits have historically provided Fifth Third with a sizeable source of relatively stable and low-cost funds. Fifth Third's average core deposits and average shareholders' equity funded 86% and 85% of its average total assets for the years ended December 31, 2024, and 2023, respectively. In addition to core deposit funding, Fifth Third also accesses a variety of other short-term and long-term funding sources, which include the use of the FHLB system for secured borrowings. As of December 31, 2024, Fifth Third maintained a total secured borrowing capacity at



FHLB Cincinnati of \$16.4BN with approximately \$9.4BN of unused capacity. Fifth Third also pre-positions loans and securities as collateral at the Federal Reserve Discount Window as a contingent borrowing capacity. While not utilized as regular funding, this secured borrowing capacity provides readily available liquidity in a severe liquidity stress event. As of December 31, 2024, Fifth Third's secured borrowing capacity at the Federal Reserve Discount Window totaled more than \$58BN, all of which is available capacity. Fifth Third conducts regular test transactions at the Federal Reserve Discount Window to ensure operational readiness during a time of stress. Management does not rely on any one source of liquidity and manages availability in response to changing balance sheet needs.

For more detailed information with respect to Fifth Third's funding and liquidity management, please refer to the annual, quarterly and current reports filed with the SEC and available on the SEC's website at www.sec.gov, including the Annual Report on Form 10-K for the year ended December 31, 2024.



D. Derivative Activities and Hedging Activities

Fifth Third maintains an overall risk management strategy that incorporates the use of derivative instruments to reduce certain risks related to interest rate, prepayment and foreign currency volatility. Additionally, Fifth Third holds derivative instruments for the benefit of its commercial customers and for other business purposes. Fifth Third does not enter into unhedged speculative derivative positions.

Fifth Third's interest rate risk management strategy involves modifying the repricing characteristics of certain financial instruments so that changes in interest rates do not adversely affect Fifth Third's net interest margin and cash flows. Derivative instruments that Fifth Third may use as part of its interest rate risk management strategy include interest rate swaps, interest rate floors, interest rate caps, forward contracts, forward starting interest rate swaps, options, swaptions and TBA securities. Interest rate swap contracts are exchanges of interest payments, such as fixed-rate payments for floating-rate payments, based on a stated notional amount and maturity date. Interest rate floors protect against declining rates, while interest rate caps protect against rising interest rates. Forward contracts are contracts in which the buyer agrees to purchase, and the seller agrees to make delivery of a specific financial instrument at a predetermined price or yield. Options provide the purchaser with the right, but not the obligation, to purchase or sell a contracted item during a specified period at an agreed upon price. Swaptions are financial instruments granting the owner the right, but not the obligation, to enter into or cancel a swap.

Prepayment volatility arises mostly from changes in fair value of the largely fixed-rate Mortgage Servicing Rights portfolio, mortgage loans and mortgage-backed securities. Fifth Third may enter into various free-standing derivatives (principal-only swaps, interest rate swaptions, interest rate floors, mortgage options, TBA securities and interest rate swaps) to economically hedge prepayment volatility. Principal-only swaps are total return swaps based on changes in the value of the underlying mortgage principal only trust. TBA securities are a forward purchase agreement for a mortgage-backed securities trade whereby the terms of the security are undefined at the time the trade is made.

Foreign currency volatility occurs as Fifth Third enters into certain loans denominated in foreign currencies. Derivative instruments that Fifth Third may use to economically hedge these foreign denominated loans include foreign exchange swaps and forward contracts.

Fifth Third also enters into derivative contracts (including foreign exchange contracts, commodity contracts and interest rate contracts) for the benefit of commercial customers and other business purposes. Fifth Third economically hedges significant exposures related to these free-standing derivatives by entering into offsetting third-party contracts with approved, reputable and independent counterparties with substantially matching terms and currencies. Credit risk arises from the possible inability of counterparties to meet the terms of their contracts. Fifth Third's exposure is limited to the replacement value of the contracts rather than



the notional, principal or contract amounts. Credit risk is minimized through credit approvals, limits, counterparty collateral and monitoring procedures.

Fifth Third holds certain derivative instruments that qualify for hedge accounting treatment and are designated as either fair value hedges or cash flow hedges. Derivative instruments that do not qualify for hedge accounting treatment, or for which hedge accounting is not established, are held as free-standing derivatives. All customer accommodation derivatives are held as free-standing derivatives.

For more detailed information with respect to Fifth Third's derivative and hedging activities, please refer to the annual, quarterly and current reports filed with the SEC and available on the SEC's website at www.sec.gov, including the Annual Report on Form 10-K for the year ended December 31, 2024.



E. Payment, Clearing and Settlement Systems Providers

During 2024, Fifth Third engaged in cash and securities transactions across different payment, clearing, and settlement (“PCS”) systems. The Bank identified the following key PCS systems:

PCS Systems Descriptions

Network	Abbreviation	Description
FedWire Funds Service	(“FedWire”)	FedWire is a real time gross settlement system operated by the FRBs that enables financial institutions to electronically transfer funds between its participants. Payments are continuously settled on an individual, order-by-order basis, without netting.
Clearing House Interbank Payment Systems	(“CHIPS”)	CHIPS is the largest private-sector U.S.-dollar funds-transfer system in the world. CHIPS operates on a global business day and utilizes a sophisticated liquidity savings mechanism (through a netting process) to provide fast, final payments while maximizing liquidity efficiency for participating banks.
The Small Value Payments Company, LLC	(“SVPCO”)	SVPCO is a check image exchange business operated by The Clearing House Payments Company providing financial institutions with check images. SVPCO is an industry utility that connects financial institutions providing the ability for the institutions to exchange check images through SVPCO’s Image Payments Network.
Society for Worldwide Interbank Financial Telecommunications	(“SWIFT”)	SWIFT provides a network that enables financial institutions worldwide to send and receive information between financial institutions and corporations about financial transactions in a secure, standardized, and reliable environment. SWIFT is a member-owned cooperative through which the financial world exchanges millions of standardized financial messages every day.
Depository Trust and Clearing Co.	(“DTCC”)	The Depository Trust and Clearing Corporation (“DTCC”) is a financial services company that provides clearing and settlement services for financial markets. It is also instrumental in the automation, centralization, standardization, and streamlining of said markets. For its subsidiaries, including the Depository Trust Company (“DTC”) and the National Securities Clearing Corporation, it oversees operations and manages financial risks and trade settlement for equities, corporate and municipal bonds, government and mortgage-backed securities, money market instruments, mutual funds, OTC derivatives and insurance transactions.



Network	Abbreviation	Description
Automated Clearing House	("ACH")	The ACH system is the primary electronic funds transfer system used by agencies to make payments and is a centralized US financial network. The ACH system exchanges batched debit and credit payments among business, consumer, and government accounts. The system processes pre-authorized recurring payments and non-recurring payments.
Zelle		Zelle is a peer-to-peer platform that enables customers to send money in real time across different institutions. While the bank supports both consumer-to-consumer and consumer-to-small-business payments, currently, only consumer enrollment is available at Fifth Third.
Real Time Payments	("RTP")	RTP or "instant payments" is a payment rail used to send money electronically between banks in the United States. Instant payments are facilitated by the RTP Network operated by The Clearing House ("TCH") and provides 24x7x365 access. It transfers funds between two bank accounts instantaneously and is available year-round. The Federal Reserve introduced a new instant payments network called FedNow in late 2023.
FedNow		FedNow is a payment rail supported by the Federal Reserve that was introduced in late 2023 that is compared to RTP offered by TCH. FedNow allows funds to be transferred between two bank accounts instantaneously 24x7x365.
CitiBank		Citibank is an Agent Bank utilized to house Multi Currency Accounts for commercial customers. Accounts held jointly with Fifth Third Bank allow customers to hold foreign currency accounts. Payment processing managed via SWIFT, utilizing customer facing application Fifth Third Direct.
Royal Bank of Canada	("RBC")	Royal Bank of Canada is an Agent Bank used to facilitate Canadian check processing (USD and CAD denominations), Canlink and Canadian Branch processing. Accounts held jointly with Fifth Third Bank allow customers to hold foreign currency (CAD) accounts. Payment processing managed via SWIFT, utilizing customer facing application Fifth Third Direct.



Network	Abbreviation	Description
Deutsche		Deutsche is an Agent Bank that processes several foreign currency transactions, both incoming and outgoing. These transactions are made up of SWIFT payments and international checks. Deutsche Bank processes all Fifth Third Bank Reg E payments.
Standard Chartered		Standard Chartered is an Agent Bank that Fifth Third utilizes to process foreign payments via SWIFT payment messaging sent through the Fifth Third Banks wiring system "MTS".
Nostros		CIBC, Bank of New York Mellon, TD Bank, Chase, and several other financial institutions are utilized to facilitate day-to-day activity acting as Agent Banks. Fifth Third Bank holds and maintains Nostro accounts to process payments both incoming and outgoing.
Federal Reserve Check Clearing and Settlement	("Fed Check")	The Federal Reserve Banks' Check Services provide financial institutions with the ability to deposit an image cash letter of forward collection items that the Federal Reserve Banks will clear and present as either substitute checks or an electronic file to the paying bank. The National Settlement Service is a multilateral settlement service owned and operated by the Federal Reserve Banks. The service is offered to depository institutions with Federal Reserve Bank master accounts that settle for participants in clearinghouses, financial exchanges, and other clearing and settlement arrangements.
Viewpointe Exchange	("Viewpointe")	Viewpointe's image exchange solution lets financial institutions process, send, and retrieve check images and tailor their presentment, regardless of organization size or solution requirements. Connect to Viewpointe's National Settlement System to take advantage of settlement services.
FedWire Securities		The Fedwire Securities Service is the electronic securities service that provides issuance, maintenance, transfer, and settlement services for all marketable U.S. Treasury securities, as well as certain securities issued by other federal government agencies, government-sponsored enterprises and international organizations. In addition to the movement of securities, Fedwire Securities also provides collection of interest and maturity payments.



Network	Abbreviation	Description
Total System Services	("TSYS")	TSYS is the solution provider that supports all Fifth Third's issuing from a consumer and commercial card perspective. Fifth Third leverages TSYS as the system of record for all card processing, statement production, and plastic card issuance. TSYS also provides various support functions as it relates to the servicing of the card.
MasterCard		Mastercard is Fifth Third's exclusive card network issuer. Fifth Third will integrate with Mastercard in certain instances to issue virtual cards to augment the solution offering in card. Mastercard integrates with TSYS around the traditional card programs. Fifth Third also leverages Mastercard for other services to support the card program. Fifth Third also supports a BIN sponsorship program where Fifth Third may sponsor various fintechs and other FIs on the Mastercard network for Issuing and Acquiring as well as a limited sponsorship for Mastercard RPPS, a bill pay and debt management network created and supported by Mastercard.
WorldPay		WorldPay provides the Merchant Acquiring services for the Bank. Fifth Third resells WorldPay merchant services and sponsors WorldPay on the card networks. Fifth Third may leverage WorldPay within the branches where Fifth Third is the merchant to support the cash advance function.
IntraFi		IntraFi offers a reciprocal deposit solution - known as the IntraFi Cash Service ("ICS") - which enables depositors to access a greater level of FDIC deposit insurance on their balances. Through the ICS solution, banks may place the uninsured portion of a given customer's deposits into the IntraFi network with said uninsured balances placed in increments of \$250,000 (or less) at other banks. The placing bank then receives an equal amount of funds bank via the reciprocal network, resulting in no net liquidity impact.
Brinks		Provides currency operations, armored car, and external cash vaults to support our cash services business.
Loomis		Provides currency operations, armored car, and external cash vaults to support our cash services business.
Garda		Provides currency operations, armored car, and external cash vaults to support our cash services business.



F. Foreign Operations

Fifth Third maintains limited foreign operations and employees, with the majority of operations and employees located in the United States. As a result, the vast majority of revenues, profits, assets, and liabilities are related to Fifth Third's domestic operations.

Financial Corp. has the following non-bank subsidiaries located outside the United States:

- *Fifth Third Investment Company* (Mauritius and Philippines), although incorporated in Ohio, has the following non-bank subsidiaries with operations located outside the United States:
 - *Fifth Third Mauritius Holdings Limited* (Mauritius) is a holding company for Fifth Third's ownership interest in Coforge Business Process Solutions.
 - *Fifth Third Global Services, Inc.* (Philippines), although incorporated in Ohio, is licensed as a branch in the Philippines and when applicable temporarily hires Fifth Third Bank employees to provide services to vendors in the Philippines.

The Bank also has the following operations located outside the United States (associated with the commercial line of business), which are immaterial and represent less than 1% of Fifth Third's employees:

- A Canadian branch located in Toronto, Ontario, serving Canadian, U.S. and international clients with operations in both Canada and the United States. The Canadian branch's products and services include Canadian Dollar and U.S. Dollar Commercial Demand Deposit Accounts, Commercial & Industrial Loans, and Treasury Management Services.
- A European Representative Office ("ERO"), opened in 2014 and located in the United Kingdom ("UK"), is registered with Companies House in the UK. The ERO does not own any relationships but serves as a business development office.

The Bank has the following subsidiary, MB Financial International Inc. (organized as an Edge Corporation) that owns the following foreign subsidiary:

- Fifth Third Business Capital Canada Inc. organized in British Columbia, Canada. This entity has no business activities.



G. Material Supervisory Authorities

Fifth Third and the Bank are subject to regulation and supervision primarily by the Board of Governors, the Consumer Financial Protection Bureau ("CFPB") and the Office of the Comptroller of the Currency ("OCC") and additionally by certain other functional regulators and self-regulatory organizations. The Bancorp is also subject to regulation by the SEC by virtue of its status as a public company and due to the nature of some of its businesses. The Bank is also subject to regulation by the FDIC, which insures the Bank's deposits as permitted by law.

The federal and state laws and regulations that are applicable to banks and to Bank Holding Companies ("BHCs") regulate, among other matters, the scope of Fifth Third and the Bank's businesses, their activities, their investments, their capital and liquidity levels, their ability to make capital distributions (such as share repurchases and dividends), their reserves against deposits, the timing of the availability of deposited funds, the amount of loans to individual and related borrowers and the nature, the amount of and collateral for certain loans and the amount of interest that may be charged on loans, as applicable. Various federal and state consumer laws and regulations also affect the services provided to consumers.

Fifth Third and the Bank are required to file various reports with and are subject to examination by various regulators, including the Board of Governors, the OCC and the CFPB. The Board of Governors, the OCC and the CFPB have the authority to issue orders for BHCs and banks to cease and desist from certain banking practices and violations of conditions imposed by, or violations of agreements with, the Board of Governors, the OCC and the CFPB. Some of Fifth Third's and the Bank's regulators are also empowered to assess civil money penalties against companies or individuals in certain situations, such as when there is a violation of a law or regulation. Applicable state and federal laws also grant the Bancorp's regulators the authority to impose additional requirements and restrictions on the activities of Fifth Third and the Bank and, in some situations, the imposition of such additional requirements and restrictions will not be publicly available information.

For more detailed information with respect to Fifth Third's regulation and supervision, please refer to the annual, quarterly and current reports filed with the SEC and available on the SEC's website at www.sec.gov, including the Annual Report on Form 10-K for the year ended December 31, 2024.



H. Principal Officers

Officers are appointed annually by the Board of Directors at the meeting of Directors immediately following the Annual Meeting of Shareholders. The names and positions of the Executive Officers of Fifth Third Bank as of December 31, 2024, are listed below:

Principal Officers	Positions and Offices
Timothy N. Spence	Chairman, Chief Executive Officer & President
Kristine R. Garrett ⁴	Executive Vice President, Group Regional President, Head of Wealth and Asset Management
Kala J. Gibson	Executive Vice President, Chief Corporate Responsibility Officer
Kevin P. Lavender	Executive Vice President, Head of Commercial Bank
James C. Leonard	Executive Vice President, Chief Operating Officer
Jeffrey A. Lopper	Senior Vice President, Chief Accounting Officer
Nancy C. Pinckney	Executive Vice President, Chief Human Resources Officer
Bryan D. Preston	Executive Vice President, Chief Financial Officer
Jude A. Schramm	Executive Vice President, Chief Information Officer
Robert P. Shaffer	Executive Vice President, Chief Risk Officer
Melissa S. Stevens	Executive Vice President, Chief Marketing Officer
Susan B. Zaunbrecher ⁵	Executive Vice President, Chief Legal Officer & Corporate Secretary

For more detailed information with respect to Fifth Third's principal officers, please refer to the annual, quarterly and current reports filed with the SEC and available on the SEC's website at www.sec.gov, including the Annual Report on Form 10-K for the year ended December 31, 2024.

⁴ Kristine R. Garrett retired in June 2025 and has been succeeded by Darren King, Executive Vice President, Head of Regional Banking effective April 7, 2025.

⁵ Susan B. Zaunbrecher has been succeeded by Mike Powell as Corporate Secretary. Powell was appointed Corporate Secretary effective February 25, 2025.



I. Corporate Governance Structure

Fifth Third has developed a strong governance framework with respect to its resolution planning obligations under the IDI Rule. This framework has been informed by its resolution planning experience since the adoption of the Dodd-Frank Act. A resolution planning policy, adopted by the Bancorp Board of Directors, memorializes this governance framework.

CHART 1: RESOLUTION PLANNING GOVERNANCE & COMMITTEES CHART



Fifth Third has dedicated significant resources and effort to its resolution planning responsibilities. The Capital and Resolution Planning group operates as a unit within Fifth Third's Finance division and coordinates the development, review, and approval of the IDI Resolution Plan. The CFO manages Fifth Third's resolution planning efforts and is the central point of control with respect to the resolution planning governance structure.

Fifth Third's resolution planning process is conducted through a network of committees, and councils, including the following:

Board of Directors

The Board of Directors includes the boards of directors of each of Bancorp and Bank and governs the activities of Fifth Third. It has ultimate oversight responsibility and accountability for resolution planning and must receive sufficient information to allow for informed decisions.

Risk and Compliance Committee ("RCC")

RCC is a joint committee of the Bancorp and Bank boards with responsibility for oversight of management's compliance with all of Fifth Third's regulatory obligations, under applicable federal and state banking laws, rules, and regulations. RCC includes at least one member who has experience in identifying, assessing, and managing risk exposures of large, complex financial firms.

Enterprise Risk Management Committee ("ERMC")

ERMC provides oversight of risk management across Fifth Third on behalf of the RCC. In addition, ERMC reviews the results of the IDI Resolution Plan, and any senior management action related to the plan. ERMC is chaired by the Chief Risk Officer and its membership is comprised of the Chief Executive Officer and his direct reports as well as additional executive leaders primarily from the risk and finance departments.



Capital Committee

The Capital Committee is authorized by and accountable to the ERM and is responsible for performing ongoing monitoring and management of Fifth Third's current and future capital positions to ensure capital adequacy of the Bancorp and its subsidiaries. The Capital Committee ensures collaboration among Risk Management, Finance, and business units in overseeing the enterprise-wide resolution planning process and is charged with reviewing and recommending Fifth Third's IDI Resolution Plan to the ERM. The Capital Committee is chaired by the CFO and its membership is comprised of executive and senior leaders primarily from the risk and finance departments. In addition, the Capital Committee oversees the resolution planning program and ensures adherence to Resolution Plan content requirements.

Resolution Planning Council

The Resolution Planning Council is responsible for providing continued guidance and monitoring of the IDI Resolution Plan to ensure alignment with changes to the regulatory environment. The Resolution Planning Council is chaired by the Director of Capital Planning and Liquidity and is comprised of senior management from Finance, Information Technology, Legal, Audit, and Enterprise Risk Management and provides guidance and monitoring of the resolution plan to ensure adherence to resolution plan content requirements.



J. Material Management Information Systems

Fifth Third invests in and maintains a robust organization of MIS that enables business operations, risk management, and accounting and aids the generation and analysis of financial, regulatory, and management reports. These applications reside on a variety of platforms (cloud, mainframe, & various distributed computing systems) and consist of user-interfaces that allow for viewing and editing of information along with data repositories and processing systems that store and perform procedures as necessary.

Fifth Third recognizes that the overall computing infrastructure and certain applications are essential to the daily operations of the Bank, its financial stability, risk monitoring and reporting, enterprise management, and regulatory compliance. As part of the resolution planning process, Fifth Third has identified and documented the relationship between the key MIS, core business lines, and critical services.

Policies and procedures that govern the MIS environment have been well established and are updated based on regulatory requirements, business needs, and changes to the environment. This governance framework drives the many protections such as change management, incident management, information security, business continuity, and disaster recovery that enable a controlled computing environment.

Risk Management

All financial institutions must manage and control a variety of business risks that can significantly affect their financial performance. Fifth Third has an enterprise-wide risk management framework, including strategies, policies, processes and systems used to identify, assess, measure, and manage risks. Among the key risks managed by Fifth Third are credit risks, liquidity risks, asset / liability interest rate and market risks, and operations risks. Applications are critical to providing the necessary data, reports, and oversight mechanisms for the prudent management and control of these risks by Fifth Third. Key applications in place for these purposes include systems that provide aggregate counterparty exposures, information regarding credit concentrations and performance, value at risk calculations for market risk, simulations to examine interest rate risk, and other analytics.

Accounting and Financial and Regulatory Reporting

Financial applications are used by accounting teams within the Finance division to record transactions, reconcile general ledger balances, ensure the adequacy of financial controls, and to generate information necessary for the preparation of financial statements and SEC and regulatory reports.

Business Continuity Planning

Fifth Third maintains a thorough business continuity planning methodology and process in order to maintain the continuity of operations and services during times of business disruption. As part of this effort, business continuity staff members advise and guide all departments in the development, maintenance, and testing of departmental business continuity plans. Each plan includes detailed steps needed to maintain business processes as well as communication, personnel, and technology requirements. In addition to business continuity plans, Fifth Third performs a



comprehensive annual technology-focused disaster recovery exercise to provide a full understanding of the effectiveness of technology-related continuity plans. Business continuity and disaster recovery plans and processes are subject to review by regulatory authorities.



K. CIDI's Resolution Strategy

Fifth Third has developed resolution strategies in accordance with the requirements set forth by the FDIC. In the unlikely event that Fifth Third were to fail and need to be resolved, Fifth Third has planned for the rapid and orderly resolution of the Bank by formulating appropriate resolution strategy options that would be available to the relevant resolution authority.

The Whole Bank Purchase and Assumption Bridge Bank ("Whole Bank P&A Bridge Bank") strategy is the preferred resolution strategy. This strategy contemplates the organization by the FDIC of a short-term bridge bank, to which substantially all assets and liabilities of the Bank would be transferred and the subsequent sale of substantially all of the CIDI franchise to a single third-party purchaser. The Whole Bank P&A Bridge Bank strategy is appropriate given Fifth Third's non-complex organizational structure, risk profile, and focus on traditional banking. The Whole Bank P&A Bridge Bank strategy substantially minimizes the risk that the failure of the CIDI would have a serious adverse effect on the financial stability of the United States. This strategy would ensure that Bank depositors would be granted access to their insured deposits within one business day of the Bank's failure (or if the Bank fails on a day other than a Friday, within two business days of failure). Lastly, the Whole Bank P&A Bridge Bank strategy would ensure the continuation and funding of the Bank's Critical Services as necessary.

**L. Glossary**

Defined Term	Definition
2025 Plan	Resolution plan for the CIDI
ACH	Automated Clearing House (FedACH System)
Bancorp	Fifth Third Bancorp
Bank	Fifth Third Bank and all of its subsidiaries
BHC	Bank Holding Company
BIN	Bank Identification Number
Board of Governors	Board of Governors of the Federal Reserve System
CAD	Canadian Dollar
CET1	Common Equity Tier 1 Capital
CFO	Chief Financial Officer
CFPB	Consumer Financial Protection Bureau
CHIPS	Clearing House Interbank Payment Systems
CIBC	Canadian Imperial Bank of Commerce
CIDI	Covered Insured Depository Institution
Coforge	Coforge Business Process Solutions
Dodd-Frank Act	Dodd-Frank Wall Street Reform and Consumer Protection Act
DTC	Deposit Trust Company
DTCC	Deposit Trust & Clearing Corporation
EGRRCPA	Economic Growth, Regulatory Relief, and Consumer Protection Act
ERMC	Enterprise Risk Management Committee
ERO	European Representative Office
FAQ	Frequently Asked Questions (4/18/2025)
FDIA	Federal Deposit Insurance Act
FDIC	Federal Deposit Insurance Corporation
Fed Check	Federal Reserve Check Clearing and Settlement
FedWire	FedWire Fund Services
FFIEC	Federal Financial Institutions Examination Council
FHLB	Federal Home Loan Bank
FHLMC	Federal Home Loan Mortgage Corporation
FI	Financial Institution
Fifth Third	Fifth Third Bancorp collectively with all of its subsidiaries
Fifth Third Bank	Fifth Third Bank, National Association
Financial Corp.	Fifth Third Financial Corporation
FNMA	Federal National Mortgage Association
FRB	Federal Reserve Bank
ICS	IntraFi Cash Service
IDI	Insured Depository Institution



Defined Term	Definition
IDI Resolution Plan	Resolution plan for the CIDI
IDI Rule	12 CFR § 360.10
Mauritius	Fifth Third Mauritius Holdings, Ltd.
MIS	Management Information System
MTS	Money Transfer System
OCC	Office of Comptroller of the Currency
OTC	Over The Counter
P&A	Purchase and Assumption
PCS	Payment, Clearing and Settlement
Philippines	Fifth Third Global Services, Inc.
RBC	Royal Bank of Canada
RCC	Risk and Compliance Committee
Repo	Repurchase Agreements
RPPS	Remote Payment and Presentment Service
RTP	Real Time Payments
SEC	U.S. Securities and Exchange Commission
SVPCO	The Small Value Payments Company, LLC
SWIFT	Society for Worldwide Interbank Financial Telecommunications
TBA	To Be Announced
TCH	The Clearing House
Title I Rule	12 CFR Part 243
TSYS	Total Systems Services
U.S.	United States
UK	United Kingdom
USD	U.S. Dollar
Viewpointe	Viewpointe Exchange



Conclusion

The IDI Resolution Plan provides for rapid and orderly resolution of the Bank in the event of material financial distress or failure without posing systemic risk to the larger financial system and without the need for any government support. The resolution options proposed are designed to ensure that key components of Fifth Third's business would be able to continue their operations during the period immediately following failure, minimizing disruption in the United States. Fifth Third believes that it has developed an effective and feasible plan for resolution.



FIFTH THIRD