



M&T BANK – COVERED INSURED DEPOSITORY INSTITUTION

2025 Resolution Plan

Public Section

July 1, 2025

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Executive Summary

Manufacturers and Traders Trust Company ("M&T Bank") is a New York-chartered commercial bank and a direct, wholly-owned subsidiary of M&T Bank Corporation ("M&T"), a publicly traded company listed on the New York Stock Exchange ("NYSE") under the ticker symbol "MTB." The continuity of M&T Bank's banking business is traced to the organization of Manufacturers and Traders Bank in 1856. As of December 31, 2024, M&T Bank and its subsidiaries had total consolidated assets of \$207.6 billion, representing 99.7% of the consolidated assets of M&T and its subsidiaries (collectively the "Company"). M&T Bank and its subsidiaries had deposits of \$165.4 billion and shareholders' equity of \$27.6 billion.

M&T Bank is a member of the Federal Reserve System ("Federal Reserve") and the Federal Home Loan Bank ("FHLB") System, and its deposits are insured by the Federal Deposit Insurance Corporation ("FDIC") through its Deposit Insurance Fund ("DIF") up to applicable limits. M&T Bank offers a broad range of financial services to a diverse base of consumers, businesses, professional clients, governmental entities and financial institutions through a domestic banking office and ATM network spanning the eastern U.S. from Maine to Virginia and Washington D.C. The principal executive offices of M&T Bank are located at One M&T Plaza, Buffalo, New York, 14203.

In order to promote financial stability, the FDIC adopted a rule ("CIDI Rule") in June 2024 for Covered Insured Depository Institutions ("CIDIs") to enable the FDIC as receiver to resolve a CIDI in a manner that provides depositors timely access to their insured deposits, maximizes the net present value return from the sale or disposition of assets and minimizes the amount of any loss realized by the creditors in the resolution, and addresses risks of adverse effects on U.S. economic conditions or economic stability. The CIDI Rule requires each Insured Depository Institution ("IDI") with \$50 billion or more in total assets to periodically submit a resolution plan to the FDIC. M&T Bank is a CIDI and therefore required to submit a plan for its resolution (the "Resolution Plan") under the CIDI Rule¹.

On June 20, 2024, the FDIC finalized amendments to the resolution planning requirements for CIDIs with \$50 billion or more in total assets. Under the revisions, CIDIs such as M&T Bank with \$100 billion or more in total assets that are not affiliates of U.S. global systemically important banking organizations are required to submit resolution plans on a three-year cycle, with an interim supplement updating key information submitted in the off years. The rule also, among other things, revises the required contents of a resolution plan for an CIDI with \$100 billion or more in total assets and addresses the CIDI's capabilities to produce valuations that the FDIC could use to conduct the statutorily required least-cost analysis in the event of the CIDI's failure. The final rule became effective October 1, 2024, and the FDIC announced in August 2024 that M&T Bank's first submission under the new rule is due by July 1, 2025.

In the unlikely event of failure of M&T Bank, the Resolution Plan for M&T Bank contemplates the sale or disposition of its deposit franchise (including insured and uninsured deposits), core business lines ("CBLs"), and assets by the FDIC in its capacity as receiver of M&T Bank under the Federal Deposit Insurance Act (the "FDIA"). The strategy described in the Resolution Plan would enable the FDIC, as receiver, to resolve M&T Bank in a manner that ensures depositors receive access to their insured deposits within one business day of failure, maximizes the net present value return from the sale or disposition of M&T Bank's assets and minimizes the amount of loss realized by creditors in resolution, if any.

M&T Bank's relatively standard banking services, community-oriented business model and non-complex legal structure contribute to the bank's straightforward organization which should help limit issues in the event of resolution. M&T Bank is focused on providing traditional banking services to customers in the

¹ Pursuant to the Dodd-Frank Act, as amended by the Economic Growth, Regulatory Relief, and Consumer Protection Act, certain Bank Holding Companies ("BHCs") are required to report periodically to the Federal Reserve and the FDIC a resolution plan for their rapid and orderly resolution in the event of material financial distress or failure. M&T is a BHC. In late 2019, the Federal Reserve and FDIC issued modified rules that, among other things, adjusted the review cycles and applicability of the agencies' resolution planning requirements. Under these rules, Category IV banks such as M&T Bank were not required to submit resolution plans.

markets it serves. Funding is primarily secured through a stable deposit base. The conservative and disciplined risk framework of M&T Bank also provides support to an efficient, rapid and orderly resolution process.

The following considerations are noteworthy in understanding and assessing the structure and operations of M&T Bank. These facts aid in supporting the contention that M&T Bank can be resolved in an orderly and efficient manner in the event of material financial distress or failure.

- M&T Bank and its subsidiaries constitute the predominant share of the operations and activities of the Company as reflected in the following metrics. As of December 31, 2024, and for the year then ended, M&T Bank and its subsidiaries represented:
 - 99.7% of the total consolidated assets of \$208.1 billion
 - 97.9% of the total revenues of \$9.3 billion
 - 95.8% of the full-time and part-time employees of 22,354
 - Virtually all loans and deposits
- Trading activities are limited in volume and complexity.
- M&T and M&T Bank have no notable foreign operations. Assets and revenues associated with international activities represented less than 1% of the M&T Bank's consolidated assets and revenues as of December 31, 2024, and for the year then ended.
- Legal entity-related:
 - M&T and M&T Bank consist of relatively simple legal organization structures.
 - The legal entity structure of the Company is regularly assessed for potential rationalization and simplification opportunities. These efforts have resulted in reductions in the number of legal entities within the Company's structure since the first resolution plan was submitted in 2012.

Forward-Looking Statements

This document contains forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995 and the rules and regulations of the Securities and Exchange Commission ("SEC"). Any statement that does not describe historical or current facts is a forward-looking statement, including statements based on current expectations, estimates and projections about M&T Bank's business, and management's beliefs and assumptions.

Statements regarding the potential effects of events or factors specific to the Company and/or the financial industry as a whole, as well as national and global events generally, on the Company's business, financial condition, liquidity and results of operations may constitute forward-looking statements. Such statements are subject to the risk that the actual effects may differ, possibly materially, from what is reflected in those forward-looking statements due to factors and future developments that are uncertain, unpredictable and in many cases beyond the Company's control.

Forward-looking statements are typically identified by words such as "believe," "expect," "anticipate," "intend," "target," "estimate," "continue," or "potential," by future conditional verbs such as "will," "would," "should," "could," or "may," or by variations of such words or by similar expressions. These statements are not guarantees of future performance and involve certain risks, uncertainties and assumptions which are difficult to predict and may cause actual outcomes to differ materially from what is expressed or forecasted.

While there can be no assurance that any list of risks and uncertainties is complete, important factors that could cause actual outcomes and results to differ materially from those contemplated by forward-looking statements include the following, without limitation: economic conditions and growth rates, including inflation and market volatility; events and developments in the financial services industry, including industry conditions; changes in interest rates, spreads on earning assets and interest-bearing liabilities,

and interest rate sensitivity; prepayment speeds, loan originations, loan concentrations by type and industry, credit losses and market values on loans, collateral securing loans, and other assets; sources of liquidity; levels of client deposits; ability to contain costs and expenses; changes in the Company's credit ratings; domestic or international political developments and other geopolitical events, including trade and tariff policies and international conflicts and hostilities; changes and trends in the securities markets; common shares outstanding and common stock price volatility; fair value of and number of stock-based compensation awards to be issued in future periods; the impact of changes in market values on trust-related revenues; federal, state or local legislation and/or regulations affecting the financial services industry, or M&T and its subsidiaries individually or collectively, including tax policy; regulatory supervision and oversight, including monetary policy and capital requirements; governmental and public policy changes; political conditions, either nationally or in the states in which M&T and its subsidiaries do business; the outcome of pending and future litigation and governmental proceedings, including tax-related examinations and other matters; changes in accounting policies or procedures as may be required by the FASB, regulatory agencies or legislation; increasing price, product and service competition by competitors, including new entrants; technological developments and changes; the ability to continue to introduce competitive new products and services on a timely, cost-effective basis; the mix of products and services; protection and validity of intellectual property rights; reliance on large customers; technological, implementation and cost/financial risks in large, multi-year contracts; continued availability of financing; financial resources in the amounts, at the times and on the terms required to support M&T and its subsidiaries' future businesses; and material differences in the actual financial results of merger, acquisition, divestment and investment activities compared with M&T's initial expectations, including the full realization of anticipated cost savings and revenue enhancements.

These are representative of the factors that could affect the outcome of the forward-looking statements. In addition, as noted, such statements could be affected by general industry and market conditions and growth rates, general economic and political conditions, either nationally or in the states in which M&T and its subsidiaries do business, and other factors.

The Company provides further detail regarding these risks and uncertainties in its 2024 Annual Report on Form 10-K filed with the SEC on February 19, 2025, including in the Risk Factors section of such report, as well as in other SEC filings.

Forward-looking statements speak only as of the date they are made, and the Company assumes no duty and does not undertake to update forward-looking statements.

i. The Names of Material Entities

For the purposes of the CIDI Rule, Material Legal Entities 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 CBL, and includes all IDIs that are subsidiaries or affiliates of the CIDI.

There are seven Material Entities in total including M&T Bank and Wilmington Trust, National Association ("WTNA"), which is an affiliate IDI of M&T Bank, as well as two subsidiaries of M&T Bank: Wilmington Trust Company ("WTC") and Wilmington Trust Investment Advisors, Inc. ("WTIA") These entities provide trust, fiduciary, custodial, and advisory services to their clients and are considered critical to the Institutional Services and Wealth Management ("ISWM") CBL. Additionally, three affiliates of M&T Bank, Wilmington Trust Investment Management, LLC ("WTIM"), Wilmington Funds Management Corporation ("WPMC"), and Wilmington Trust Asset Management, LLC ("WTAM"), are also considered Material Entities as they are significant to the critical operations of the ISWM CBL

M&T Bank

M&T Bank is a New York-chartered commercial bank chartered under the laws of the State of New York, and a direct, wholly-owned subsidiary of M&T, a publicly traded company listed on the NYSE under the ticker symbol "MTB." The continuity of M&T Bank's banking business is traced to the organization of Manufacturers and Traders Bank in 1856. As of December 31, 2024, M&T Bank had total consolidated

assets of \$207.6 billion, with M&T Bank representing 99.7% of the consolidated assets of the Company. M&T Bank and its consolidated subsidiaries had deposits of \$165.4 billion and shareholders' equity of \$27.6 billion. M&T Bank and its consolidated subsidiaries had revenues of \$9,086.2 million for the year ended December 31, 2024. M&T conducted nearly the entirety of its operations through M&T Bank as of December 31, 2024. M&T Bank and its consolidated subsidiaries had 21,411 employees as of December 31, 2024.

Additional information regarding M&T Bank may be obtained from M&T Bank's Call Reports filed with the Federal Financial Institutions Examination Council.

Exhibit i.-1 reflects the structure of the Material Entities as denoted for resolution purposes.

WTNA

WTNA is a national chartered bank and a provider of wealth management, corporate and institutional services with total consolidated assets of \$711.0 million and shareholders' equity of \$603.4 million as of December 31, 2024. WTNA had revenues of \$369.7 million for the year ended December 31, 2024. WTNA and its subsidiaries offer various trust and wealth management services. WTNA and its subsidiaries had 779 employees as of December 31, 2024.

WTC

WTC is a Delaware-chartered, non-depository trust company based in Wilmington, Delaware. WTC provides Delaware-based trust, fiduciary, and custodial services to its clients. As of December 31, 2024, WTC had total assets of \$1.1 billion and shareholders' equity of \$804.8 million. WTC had revenues of \$142.6 million for the year ended December 31, 2024. Several of the ISWM services are conducted through WTC, which had 166 employees as of December 31, 2024.

WTIA

WTIA is a Maryland corporation based in Baltimore. It is an investment adviser registered under the Investment Advisers Act and outsources employees to the advisers of M&T's family of proprietary mutual funds and private investment funds, which are subsidiaries of M&T and are discussed in more detail below. It also serves as an adviser to M&T Bank's institutional clients. As of December 31, 2024, WTIA had total assets of \$24.3 million and shareholders' equity of \$17.2 million. WTIA had revenues of \$45.1 million for the year ended December 31, 2024. WTIA had 99 employees as of December 31, 2024.

WTIM

WTIM is an investment adviser registered under the Investment Advisers Act that manages private investment funds, including the Wilmington Funds, and serves as an investment adviser to high net-worth clients. WTIM is a Georgia limited liability company based in Atlanta. As of December 31, 2024, WTIM had total assets of \$5.3 million and shareholders' equity of \$5.3 million. WTIM had revenues of less than \$1 million for the year ended December 31, 2024. WTIM does not have its own employees and leases all personnel from affiliates (including WTIA, M&T Bank, and WTNA).

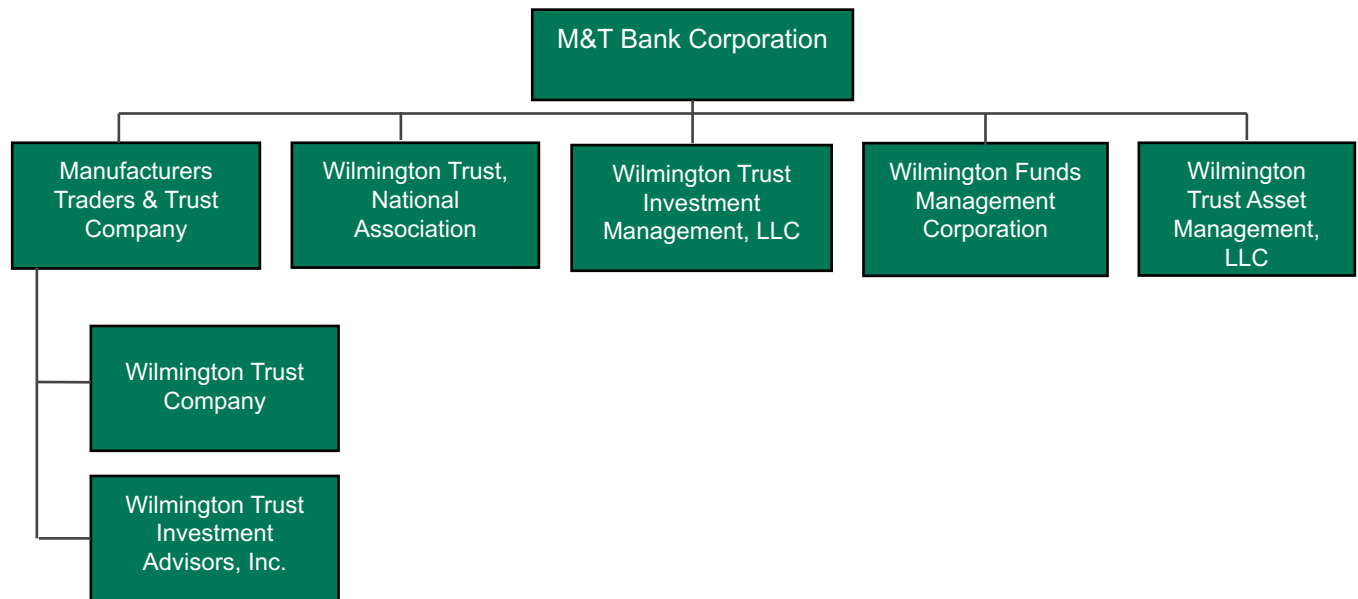
WFMC

WFMC is an investment adviser registered under the Investment Advisers Act that manages the Wilmington Funds, a family of proprietary mutual funds. WFMC is a Delaware corporation based in Wilmington, Delaware. As of December 31, 2024, WFMC had total assets of \$15.8 million and shareholders' equity of \$15.3 million. WFMC had revenues of \$21.2 million for the year ended December 31, 2024. WFMC does not have its own employees and leases all personnel from affiliates (including WTIA, M&T Bank, and WTNA).

WTAM

WTAM, is a registered investment adviser under the Investment Advisers Act and was incorporated as a Maryland corporation in June 1995. WTAM serves as an investment adviser to the Wilmington Funds, a family of proprietary mutual funds, and institutional clients. As of December 31, 2024, WTAM had total assets of \$5.7 million, shareholders' equity of \$5.5 million. WTAM had revenues of \$3.5 million for the year ended December 31, 2024. WTAM does not have its own employees and leases all personnel from affiliates (including WTIA, M&T Bank and WTNA).

Exhibit i.-1: M&T Bank Corporation Simplified Organizational Chart²



M&T Bank and M&T regularly assess their respective legal structures to streamline and simplify the organizations. There have been reductions in the number of legal entities for M&T Bank since the inception of Resolution Plan requirements which support resolvability.

ii. A Description of Core Business Lines

For the purposes of the CIDI Rule, CBLs are defined as 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. M&T Bank has identified the following three CBLs: Commercial Bank, Retail Bank and ISWM.

Commercial Bank

The Commercial Bank CBL provides a wide range of credit products and banking services to middle-market and large commercial customers, mainly within the markets served by M&T Bank. Services provided by this segment include commercial lending and leasing, credit facilities which are secured by various types of commercial real estate, letters of credit, deposit products and cash management services. Commercial real estate loans may be secured by multifamily residential buildings, hotels, offices, retail and industrial space or other types of collateral. Activities of this segment include the origination, sales and servicing of commercial real estate loans through the Fannie Mae Delegated Underwriting and Servicing program and other programs. Commercial real estate loans held for sale are included in this segment.

² M&T Bank Corporation is not a material entity.

Retail Bank

The Retail Bank CBL provides a wide range of services to consumers and small businesses through M&T Bank's branch network and several other delivery channels such as telephone banking, internet banking and ATMs. M&T Bank has domestic banking offices primarily in the Northeastern and Mid-Atlantic regions of the United States including the District of Columbia and Florida. The segment offers to its customers deposit products, including demand, savings and time accounts, and other services. Credit services offered by this segment include automobile and recreational finance loans (primarily originated indirectly through dealers), home equity loans and lines of credit, credit cards and other loan products. This segment also originates and services residential mortgage loans and either sells those loans in the secondary market to investors or retains them for investment purposes. Residential mortgage loans are also originated and serviced on behalf of the ISWM segment. M&T Bank periodically purchases the rights to service residential real estate loans that have been originated by other entities and also sub-services residential real estate loans for others. Residential real estate loans held for sale are included in this segment. This segment also provides various business loans, including loans guaranteed by the Small Business Administration, business credit cards, deposit products and services such as cash management, payroll and direct deposit, merchant credit card and letters of credits to small businesses and professionals through M&T Bank's branch network and other delivery channels.

Institutional Services and Wealth Management

The ISWM CBL provides a variety of trustee, agency, investment management and administrative services for corporations and institutions, investment bankers, corporate tax, finance and legal executives, and other institutional clients, as well as personal trust, planning and advisory, fiduciary, asset management, family office, and other services designed to help high net worth individuals and families grow, preserve and transfer wealth. This segment also provides investment products, including mutual funds and annuities and other services to customers.

iii. Consolidated Financial Information Regarding Assets, Liabilities, Capital and Major Funding Sources

Assets, Liabilities and Capital

Exhibit iii.-1 details the balance sheet for M&T Bank as of December 31, 2024.

Exhibit iii.-1: M&T Bank and its Subsidiaries Balance Sheet

December 31, 2024 (\$ in Thousands)	
ASSETS	\$
Cash and Balances Due from Depository Institutions:	
Cash and Noninterest-Bearing Balances	\$1,907,741
Interest-Bearing Balances	18,812,917
Total Cash and Balances Due from Depository Institutions	20,720,658
Investment Securities:	
Held-to-Maturity	14,195,498
Available for Sale	18,832,672
All Other Securities	169,391
Total Investment Securities	33,197,561
Loans and Leases:	
Loans and Leases Held for Sale	682,934
Loans and Leases Held for Investment	134,954,108
Less: Allowance for Loan and Lease Losses	2,183,229
Loans and Leases, Net	133,453,813
Trading Assets	60,797
Premises and Fixed Assets	1,666,248
Other Intangible Assets	9,053,696
Other Assets	9,403,490
Total Assets	\$207,556,263
LIABILITIES	
Total Deposits	\$165,412,981
Securities Sold Under Agreements to Repurchase	59,583
Other Borrowed Money	9,987,629
Subordinated Notes	474,230
Other Liabilities	4,053,906
Total Liabilities	\$179,988,329
EQUITY CAPITAL	
Common Stock	\$120,635
Surplus	18,938,042
Retained Earnings	8,665,237
Accumulated Other Comprehensive Income (Loss)	(155,980)
Total Equity Capital	\$27,567,934
Total Liabilities and Equity Capital	\$207,556,263

Capital

M&T Bank and its subsidiaries are required to comply with applicable capital adequacy regulations established by the federal banking agencies. Failure to meet minimum capital requirements can result in certain mandatory, and possibly additional discretionary, actions by regulators that, if undertaken, could have a material effect on the financial statements of M&T Bank and its subsidiaries. Pursuant to the rules in effect as of December 31, 2024, the required minimum and well capitalized capital ratios are detailed in Exhibit iii.-2:

Exhibit iii.-2: Regulatory Capital Ratios - M&T Bank and its Subsidiaries

Capital Ratio	12/31/2024	Well Capitalized	Regulatory Minimum
CET1 Capital	12.3%	6.5 %	4.5 %
Tier 1 Capital	12.3 %	8.0 %	6.0 %
Total Capital	13.7 %	10.0 %	8.0 %
Leverage	9.5 %	5.0 %	4.0 %

Capital Rules require buffers in addition to the minimum risk-based capital ratios noted above. M&T is subject to a Stress Capital Buffer ("SCB") requirement that is determined through the Board of Governors of the Federal Reserve System's supervisory stress tests and M&T's bank subsidiaries, including M&T Bank, are subject to a 2.5% capital conservation buffer requirement. The buffer requirement must be composed entirely of CET1. M&T's SCB at December 31, 2024, was 3.8%.

Exhibit iii.-3 details the components of capital used to calculate the capital ratios for M&T Bank.

Exhibit iii.-3: Regulatory Capital Components - M&T Bank and its Subsidiaries

December 31, 2024 (\$ in Thousands)	
Basel III	\$
Tier 1 Capital Components	
CET1 Capital (Before adjustments and deductions)	\$27,608,743
Less: Net Unrealized Gain\ (Loss) on Available For Sale Securities ("AFS")	(152,953)
Income Amounts ("AOCI")	(100,835)
Less: Net Gain\ (Loss) on AOCI Amounts	97,808
Less: Goodwill Net of Associated Tax Liabilities	8,460,719
Less: Other Intangible Assets	71,042
Less: Disallowed Deferred Tax Assets	0
Less: All Other Deductions from (to) CET1 Capital	0
Total Tier 1 Capital	\$19,232,962
Tier 2 Capital Components	
Tier 2 Capital Instruments Plus Related Surplus	\$199,969
Allowance for Loan and Lease Losses Included in Tier 2 Capital	1,954,066
Unrealized Gains on AFS Equity Securities Included in Tier 2 Capital	0
Less: Tier 2 Capital Deductions	0
Total Tier 2 Capital	\$2,154,035
Total Risk-Based Capital	\$21,386,997
Total Risk-Weighted Assets	\$156,154,925
Average Total Assets for Leverage Ratio	\$202,862,141
Capital Ratios	
Tier 1 Capital Ratio	12.32%
Total Capital Ratio	13.70%
Leverage Ratio	9.48%
CET1 to Risk-Weighted Assets	12.32%

Funding

The most significant source of funding for M&T Bank and its subsidiaries is its core deposits, which are generated from a large base of consumer, corporate and institutional customers. Core deposits are considered to include noninterest-bearing deposits, interest-bearing transaction accounts, savings deposits and time deposits of \$250,000 or less. Deposits represent the largest funding source for M&T Bank and its subsidiaries at approximately 92% of total consolidated liabilities as of December 31, 2024.

Additionally, M&T Bank and its subsidiaries supplement funding provided through core deposits with various short-term and long-term wholesale funding. Wholesale funding sources totaled \$10.5 billion as of December 31, 2024. These amounts represented approximately 6% of total consolidated liabilities for the respective period.

Exhibit iii.-4 summarizes M&T Bank and its subsidiaries' funding sources as of December 31, 2024.

Exhibit iii.-4: Funding Sources - M&T Bank and its Subsidiaries

December 31, 2024 (\$ in Thousands)	
Funding Sources	\$
Deposits	
Noninterest-Bearing Deposits	\$46,941,084
Savings & Interest Checking Deposits	94,180,153
Time Deposits	13,476,915
Brokered Deposits	10,814,829
Total Deposits	\$165,412,981
Borrowed Funds	
Federal Funds Purchased	\$0
Federal Home Loan Bank Advances	1,000,000
Short Term Repurchase Agreements	59,583
Total Short Term Borrowings	\$1,059,583
Subordinated Notes	474,230
Intercompany Borrowings	2,000,000
Federal Home Loan Bank Advances	2,004,407
Senior Notes	3,744,946
LT Asset Backed Structured Borrowing	1,228,777
Other Borrowings	9,500
Total Long Term Borrowings	\$9,461,860
Total Borrowed Funds	\$10,514,144

iv. A Description of Derivative Activities and Hedging Activities

As part of managing interest rate risk and foreign exchange risk, M&T Bank engages in various types of derivative transactions, including interest rate swaps, forward contracts, and options, to hedge against risks associated with customer-facing transactions, AFS securities and external debt issuances. M&T Bank designates these derivatives used in the management of interest rate risk and foreign exchange risk as either fair value hedges or cash flow hedges. Derivative agreements are generally entered into with counterparties that meet established credit standards and most contain master netting, collateral and/or settlement provisions protecting the at-risk party. Based on adherence to M&T Bank's credit standards and the presence of the netting, collateral, or settlement provisions, M&T Bank believes that the credit risk inherent in these contracts was not material as of December 31, 2024.

M&T Bank utilizes commitments to sell residential and commercial real estate loans to hedge the exposure to changes in the fair value of real estate loans held for sale. Such commitments have generally been designated as fair value hedges. M&T Bank also utilizes commitments to sell real estate loans to offset the exposure to changes in fair value of certain commitments to originate real estate loans for sale.

Derivative financial instruments used include interest rate derivatives, foreign exchange forward and spot contracts, financial futures and forward commitments to originate and sell both commercial and residential real estate. Interest rate contracts entered into had notional values of \$79.4 billion on December 31, 2024. The notional amounts of foreign currency other option and futures contracts and forward commitments entered into had notional balances of \$5.1 billion at December 31, 2024.

Exhibit iv.-1 summarizes information regarding the fair values of derivative instruments for M&T's consolidated balance sheet and consolidated statement of income as of December 31, 2024, which are consistent in all material respects with values for M&T Bank.

Exhibit iv.-1: Fair Values of Derivative Instruments - M&T

December 31, 2024		
(\$ in Millions)		
	Asset Derivatives Fair Value	Liability Derivatives Fair Value
Derivatives designated and qualifying as hedging Instruments		
Interest rate swap agreements	\$2	\$3
Commitments to sell real estate loans	4	0
	\$6	\$3
Derivatives not designated and qualifying as hedging instruments		
Mortgage banking:		
Commitments to originate real estate loans for sale	\$4	\$32
Commitments to sell real estate loans	39	0
	\$43	\$32
Other		
Interest rate contracts	\$185	\$769
Foreign exchange and other option and future contracts	21	18
	\$206	\$787
Total Derivatives	\$255	\$822

v. A List of Memberships in Material Payment, Clearing, and Settlement Systems, Including Financial Market Utilities

M&T Bank and its subsidiaries directly or indirectly engage in cash, securities, and derivatives transactions with a number of financial market utilities, such as payment, clearing, and settlement systems (collectively, "PCS"). Material PCS are detailed in Exhibit v.-1.

Exhibit v.-1: Payments, Clearing and Settlements Systems

Type	System	Products and Services Description
Payment Systems	CHIPS	Clearing House Interbank Payments System ("CHIPS") is the largest private-sector, U.S. dollar-based, money transfer system in the United States. It's a privately owned, bank-operated system that facilitates the transfer of U.S. dollar-based electronic payments. CHIPS is primarily used by M&T Bank for time-sensitive transactions with international counterparties which are denominated in U.S. dollars, particularly in the financial and business sectors.
	EPN	Electronic Payments Network ("EPN") Provides access to a network that allows M&T Bank to send and receive Automated Clearing House ("ACH") transactions. The network is used for direct deposits, automatic debits, and vendor payments. Services include monitoring for incoming and outgoing files to ensure accuracy.
	Federal Reserve Check Service	Provides M&T Bank with a system of multiple services that are utilized for the presentment and receipt of electric checks including Check 21-Enabled Services, FedForward® Services, FedReturn® Services, FedReceipt® Services, Check Adjustments Services, FedDetect® Duplicate Notification for Check Services, FedImage® and Electronic Check Services, and Paper Check Clearing.
	FedACH	Provides access to a network that allows M&T Bank to send and receive ACH transactions. The network is used for direct deposits, automatic debits, and vendor payments. Services include monitoring for incoming and outgoing files to ensure accuracy.
	FedWire Fund Services	The Fedwire Funds Service is a real-time gross settlement ("RTGS") system operated by the Federal Reserve Banks, used for transferring funds between participating financial institutions. It's a high-speed, electronic funds transfer system primarily used by M&T Bank for large-value, time-critical domestic payments. Payments are final and irrevocable once settled.
	RBC Express	RBC Express is an online application owned by Royal Bank of Canada and is used for Commercial customers of the M&T Bank Canada Branch. It provides secure internet access to banking information, fund transfers, and payments. Services include viewing and managing accounts in multiple currencies, making and receiving payments.
	SVPCO	Small Value Payments Company ("SVPCO") Settlement system operated by the Clearing House Payments Company, LLC. Where electronic check presentment takes place between M&T Bank and partner banks for the settlement of processing files. Files are sent and received in this process.
	SWIFT	Provides a network that enables M&T Bank to send and receive information about financial transactions in a secure, standardized, and reliable environment. Services include payment controls to detect and intercept payment anomalies in real-time, alerting or blocking payment messages, and daily reporting on payment transactions.
	RTP	The Real Time Payments ("RTP") system offers M&T Bank immediate transfer of funds, continuous clearing and settlement, and 24/7 access. It supports receiving and sending payments.
Correspondent Bank	Fifth Third Bank	Provides M&T Bank with an electronic check presentment system that uses information gathered from checks at the point of presentment to clear or reject checks electronically.
	Canadian Imperial Bank of Commerce	Provides M&T Bank with an electronic check presentment system that uses information gathered from checks at the point of presentment to clear or reject checks electronically.

Type	System	Products and Services Description
Settlement Systems	DTC	The Depository Trust Company ("DTC") offers M&T Bank centralized processing of securities, providing a full range of processing, safekeeping, and recordkeeping services. It settles transactions in municipal bonds, fixed income and equity securities, close-ended mutual funds, and hedge fund investments.
	Fedwire Security Services	Provides M&T Bank with 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.
Clearing and Settlement Systems	Chicago Mercantile Exchange	Provides M&T Bank with clearing and settlement services for futures and options contracts, as well as over-the-counter derivatives. It offers risk management and clearing services to ensure the stability and efficiency of financial markets.
	State Street (Non-US Clearing Agencies)	Provides M&T Bank with a range of depository, clearing, and settlement services. These services include the processing, safekeeping, and recordkeeping of securities transactions, as well as the facilitation of electronic funds transfers and the management of regulatory reporting obligations.
Repositories	DDR	DTCC Data Repository ("DDR") offers M&T Bank a range of products and services through its data repository, primarily focusing on trade reporting, derivatives contract servicing and securities safekeeping and record keeping services.
Other Systems	VISA	Provides debit and credit card services, including transaction processing, clearing, and settlement. M&T Bank's VISA debit cards interface with the STAR Network for PIN transactions, and most signature transactions are processed by VISA.
	Star Network	Provides ATM and point-of-sale ("POS") transaction processing services. It enables cardholders to access their funds at ATMs and make purchases at merchants. M&T Bank's VISA debit cards interface with the STAR Network for PIN transactions.

vi. A Description of Foreign Operations

M&T Bank engages in limited international activities, including certain trust-related services in Europe, foreign currency transactions associated with customer activity, providing credit to support the international activities of domestic companies and holding certain loans to foreign borrowers. Assets and revenues associated with international activities represent less than 1% of M&T Bank's consolidated assets and revenue as of December 31, 2024.

M&T Bank operates a commercial banking branch in Toronto, Ontario, providing a range of services tailored to Canadian businesses.

Deposits at the M&T Bank office in Ontario, Canada were \$25 million as of December 31, 2024.

vii. The Identities of Material Supervisory Authorities

The Company is subject to the comprehensive regulatory framework applicable to BHCs and Financial Holding Companies and their subsidiaries. Regulation of financial institutions such as the Company is intended primarily for the protection of depositors, the FDIC's DIF and the banking and financial system as a whole and generally is not intended for the protection of shareholders, investors or creditors other than insured depositors.

M&T is registered with the Federal Reserve as a Financial Holding Company and a Bank Holding Company under the Bank Holding Company Act ("BHCA"). As such, M&T is subject to the supervision, examination, reporting, capital and other requirements of the BHCA and the regulations of the Federal Reserve. In addition, M&T's banking subsidiaries are subject to regulation, supervision and examination by, as applicable, the New York Department of Financial Services ("NYDFS"), the Office of the

Comptroller of the Currency (“OCC”), the FDIC and the Federal Reserve, and their consumer financial products and services are regulated by the Consumer Financial Protection Bureau. Further, financial services entities such as M&T’s investment adviser and broker-dealer subsidiaries are subject to regulation by the SEC, Financial Industry Regulatory Authority, and Securities Investor Protection Corporation, among others. Certain other subsidiaries are subject to regulation by other federal and state regulators as well.

M&T Bank is a New York chartered commercial bank and a member of the Federal Reserve. As a result, it is subject to extensive regulation, examination and oversight by the NYSDFS and the Federal Reserve Bank of New York. New York laws and regulations govern many aspects of M&T Bank’s operations, including branching, dividends, subsidiary activities, fiduciary activities, lending, and deposit taking. M&T Bank is also subject to Federal Reserve regulations and guidance, including with respect to capital levels. Its deposits are insured by the FDIC, subject to certain limitations, which also exercises regulatory oversight over certain aspects of M&T Bank’s operations.

WTNA is a national bank with operations that include fiduciary and related activities with limited lending and deposit business. It is subject to regulation, examination and oversight by the OCC, which governs many aspects of its operations, including fiduciary activities, capital levels, office locations, dividends and subsidiary activities. Its deposits are insured by the FDIC, subject to certain limitations, which also exercises regulatory oversight over certain aspects of the operations of WTNA.

viii. The Identities of the Principal Officers

The Board of Directors of M&T Bank designates certain senior managers to serve as the “Executive Officers” of M&T Bank under relevant federal and state banking laws who participate in policy-making functions of M&T Bank. This group has broad authority to manage M&T Bank and to take various actions affecting M&T Bank.

The Executive Officers of M&T Bank and M&T and their titles applicable to both entities are set forth below.

Exhibit viii.-1: Principal Officers - M&T and M&T Bank as of February 25, 2025

Executive Officers	Titles
René F. Jones	Chairman of the Board and Chief Executive Officer
Kevin J. Pearson	Vice Chairman
Daryl N. Bible	Chief Financial Officer
Peter G. D’Arcy	Head of Commercial Banking
Christopher E. Kay	Head of Enterprise Platforms
Laura P. O’Hara	Chief Legal Officer
Neeraj Singh	Chief Risk Officer
Julianne Urban	Chief Auditor
Michael A. Wisler	Chief Information Officer
Tracy S. Woodrow	Chief Administrative Officer

ix. A Description of the Corporate Governance Structure and Processes Related to Resolution Planning

M&T Bank has developed a governance structure with respect to its Resolution Plan.

The Chief Financial Officer (“CFO”) is the accountable executive responsible for the development, maintenance, and filing of the Resolution Plan and M&T Bank’s compliance with the associated regulation. As the accountable executive, the CFO may delegate oversight of the Resolution Plan to the Finance First Line Risk Officer, the Head of Recovery and Resolution Planning, and the Resolution

Planning Office (“RPO”). The CFO is accountable for ensuring executive management, the Risk Committees of the Boards (collectively referred to as the “Risk Committee”), and both the M&T Bank Board of Directors (the “Board”), as well as the M&T Board of Directors (collectively, referred to as the “Boards”) are fully informed of the Resolution Plan prior to approval and filing.

The RPO is responsible for developing, completing, filing, and obtaining governance approval for the Resolution Plan. The RPO oversees the plan production, collects and compiles necessary data, escalates issues to senior management, and monitors initiatives for impact on the Resolution Plan. The RPO also identifies key resolution capabilities, assesses their effectiveness, tracks and implements enhancements, and participates in regulatory testing and reviews. Additionally, the RPO reviews new regulatory guidance and incorporates necessary changes into the Resolution Plan or business operations.

The Risk Division serves as the Second Line of Defense (“Second Line”), and is responsible for providing independent risk management over resolution planning activities and processes as well as reviewing the Resolution Plan prior to governance committee review and approval. Second Line oversight is conducted by Finance and Regulatory Reporting Oversight (“FRRO”) which is lead by the Director of FRRO. The FRRO is responsible for independent review and effective challenge over the Resolution Plan to ensure the completeness and feasibility of the identified strategy, ensure compliance with regulatory requirements, review of the identification, assessment, and response to any potential extraordinary event, and coordinate engagement across relevant departments in the Risk Division.

The Internal Audit Department serves as the Third Line of Defense (“Third Line”) and will conduct periodic reviews and audits of the Resolution Plan and processes at a frequency set by Internal Audit.

The Resolution Plan Committee (“RPC”) is a management committee responsible for ensuring compliance with regulatory requirements as well as oversight and approval of Resolution Plan submissions, the Resolution Plan Policy, and any procedures and practices prior to approval and recommendation by the Boards. The RPC reviews and recommends Resolution Plan submissions for approval, including associated assurance framework and results of capabilities testing . The assurance framework includes the three lines of defense roles and responsibilities and RPC as the governing body.

The Management Risk Committee (“MRC”) oversees the Enterprise Risk Management Framework by establishing or guiding significant strategies, policies, procedures, controls, and systems to identify, assess, measure, manage, monitor and report the major risks. The MRC helps resolve items escalated by the RPO and RPC. The MRC reviews and recommends strategic decisions, extraordinary event notices and actions to improve resolvability prior to the Risk Committee.

The Risk Committee reviews and evaluates the Resolution Plan and provides input, guidance, and review and challenge to the content and strategy of the Resolution Plan. The Risk Committee also offers insights regarding resolvability concerns to the Boards and sets expectations for management. The Risk Committee also recommends approval of the Resolution Plans and any extraordinary event notices to the Boards for formal approval. In addition, the Risk Committee oversees and approves any material changes to the Resolution Plan on behalf of the Boards, as deemed necessary.

The Disclosure Committee is a management committee reviews and approves for public disclosure the Public Section of the Resolution Plan prior to the Boards approval of the complete Resolution Plan.

Upon review and recommendation by the RPC, MRC, and Risk Committee, the Boards approve the Resolution Plan, any extraordinary event notices, and the Resolution Plan Policy. The Boards delegate primary review and challenge of the Resolution Plan to the Risk Committee.

x. A Description of Material Management Information Systems

M&T Bank uses Management Information Systems (“MIS”) and related technology to support its CBLs, operations, management and back-office functions. As of December 31, 2024, M&T Bank has identified 369 MIS applications that are considered key MIS. MIS systems such as Demand Deposits Accounting (“DDA”), Commercial Loan System (“CLN”) are examples of a host of systems that service and support transactions within the CBLs. These involve deposit and loan information systems, transaction and maintenance systems, accounting and profitability, risk management, compliance and security systems, among others. M&T Bank relies on its MIS structure and services to conduct its range of business operations and activities. In preparation of the Resolution Plan, M&T Bank identified systems and applications that are essential to its business and operations, including alignment among its respective CBL and Material Legal Entities.

M&T Bank’s disaster recovery and business continuity plan is designed to facilitate the resumption of all usual business operations in the event of disruptive events or natural disasters. The Resolution Plan is designed to facilitate the continued operation of material systems until resolution is complete.

xi. A Description, at a High Level, of the CIDI's Identified Strategy

M&T Bank has developed its resolution strategy by considering a range of options. The alternatives identified are intended to:

- Ensure access by depositors to M&T Bank’s insured deposits within one business day
- Incur least cost to the Deposit Insurance Fund of the FDIC
- Maximize value for the receivership
- Limit loss of franchise value that might be caused by a lengthy resolution process

Upon the failure, the supervisory agency would declare M&T Bank insolvent and M&T Bank would be placed under FDIC receivership control as prescribed by the FDIA. This would include the transfer of M&T Bank and its subsidiaries into a bridge depository institution (“bridge bank”) established by the FDIC. Receivership of M&T Bank and its subsidiaries is contemplated to be concluded in a time period of approximately 12-months.

The failure of M&T Bank considers a range of resolution strategies, including among the following:

- Resolution weekend whole bank sale to a single buyer
- Short-term bridge bank

Potential acquirers will be identified based on factors including institutional size, capital adequacy and deployment capacity, geographic alignment, portfolio diversification, post-acquisition market concentration, and prior experience in successful acquisition execution. Utilizing these factors aim to identify a range of strategic acquirers, both U.S. regional and foreign bank bidders that represent the most viable and qualified buyers for acquiring the primary components of M&T Bank including those with capabilities, products and services offerings related to wealth management, trusts, and custodial and collateral. Additionally, the potential divestiture of franchise components and certain smaller business lines and non-core assets of M&T Bank may generate interest from other financial intermediaries, industry consolidators, or potential management group buyouts.