

Shinhan Financial Group

## U.S. Section 165(d) Reduced Resolution Plan

### *Public Section*

June 27, 2022

*This document contains forward-looking statements. Statements that are not historical facts, including statements about Shinhan Financial Group's beliefs and expectations, are forward-looking statements. These statements are based on current plans, estimates and projections, and therefore undue reliance should not be placed on them. The forward-looking information contained in this document is presented for the purpose of interpreting the information contained herein and may not be appropriate for other purposes. Forward-looking statements speak only as of the date they are made, and Shinhan Financial Group undertakes no obligation to update publicly any of them in light of new information or future events.*

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## A. Public Section

### A.1 Introduction

Shinhan Financial Group Co., Ltd. (“SFG”) is a foreign banking organization duly organized and existing under the laws of Korea. SFG’s subsidiary, Shinhan Bank has established a New York state-licensed branch in New York (“SHBNY”). SFG also has a wholly-owned insured depository subsidiary, Shinhan Bank America (“SHBA”). In addition, SFG’s subsidiary, Shinhan Investment Corp., Korea has established a wholly-owned, registered broker-dealer, Shinhan Investment America (“SIA”). This resolution plan (the “U.S. Resolution Plan”) is being filed by SFG pursuant to Section 165(d) of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”) and implementing regulations issued by the Board of Governors of the Federal Reserve System (“FRB”) (12. C.F.R Part 243) and the Federal Deposit Insurance Corporation (“FDIC”) (12 C.F.R. Part 381) (collectively, the “Regulation”).

Section 165(d) of the Dodd-Frank Act and the Regulation require a foreign bank or company that is, or is treated as, a bank holding company under section 8(a) of the International Banking Act of 1978 (the “IBA”) [12 U.S.C. 3106(a)] and that has \$250 billion or more in total consolidated assets to periodically submit a plan for the rapid and orderly resolution of the U.S. operations of a “covered company” in the event of material financial distress or failure.

According to the Regulation, the “covered companies” have been divided into three groups of filers by global consolidated assets, the U.S. assets and risk-based indicators based on combined U.S. operations:

- (a) Biennial filers;
- (b) Triennial full filers; and
- (c) Triennial reduced filers.

All covered companies are required to submit an updated resolution plan for each corresponding group.

SFG is treated as a bank holding company under Section 8(a) of the IBA, because it controls Shinhan Bank which maintains both a branch office and a subsidiary in the U.S. Accordingly, SFG is a “foreign based covered company” subject to the Regulation. SFG is required to submit reduced resolution plan as a triennial reduced filer according to the Regulation.

This Public section of the U.S. Resolution Plan provides an executive summary of SFG’s overall resolution strategy. All financial information included in this U.S. resolution are as of December 31, 2021, SFG’s fiscal year-end.

#### A.1.1 Overview of Shinhan Financial Group (SFG)

Incorporated on September 1, 2001, SFG is the first privately-held financial holding company to be established in Korea. SFG is one of the largest financial holding companies in Korea in terms of consolidated total assets and operates the second largest banking business (as measured by consolidated

total assets as of December 31, 2021) and the largest credit card business (as measured by the total credit purchase volume for the year ended December 31, 2021) in Korea.

SFG has 17 direct subsidiaries and 34 indirect subsidiaries offering a wide range of financial products and services, including commercial banking, credit card, life insurance and securities brokerage. As parts of its global operations, it has 246 offices in the United States, Canada, the United Kingdom, Japan, the People's Republic of China, Germany, India, Australia, Hong Kong, Vietnam, Cambodia, Kazakhstan, Singapore, Mexico, Uzbekistan, Myanmar, Poland, Indonesia, Philippines, the United Arab Emirates and Hungary. While SFG has several overseas branches and subsidiaries, substantially all of SFG's assets are located, and substantially all of SFG's revenues are generated, in Korea.

SFG provides comprehensive financial services, principally consisting of commercial banking services, credit card services, securities brokerage services, life insurance services, etc.

#### ***A.1.1.1 Commercial Banking Services***

Commercial banking services consist of retail banking, corporate and investment banking, international banking, and other banking services. Retail banking services include mortgage and home equity lending and retail lending as well as demand, savings and fixed deposit-taking, checking account services, electronic banking and ATM services, bill paying services, payroll and check-cashing services, currency exchange and wire fund transfer. SFG provides corporate banking services, primarily through Shinhan Bank, to small-and medium sized enterprises, including enterprises known as SOHO, or "small office, home office", which are small enterprises operated by individuals or households, and, to a lesser extent, to large corporations, including corporations that are affiliated with *chaebols*<sup>1</sup>. International banking services include foreign currency-denominated securities trading, foreign exchange trading and services, trade-related financial services, international factoring services, and foreign banking operations through its overseas branches and subsidiaries.

#### ***A.1.1.2 Credit Card Services***

SFG provides credit card services principally through its credit card subsidiary, Shinhan Card, and to a limited extent, through Jeju Bank. Credit card services include credit card payments, cash advances, installment purchases, and card loans. Revenues are mainly generated from merchant fees paid by retail and service establishments, fees and interest charged on cash advances and card loans, annual membership fees paid by credit cardholders, interest charged on revolving service, interest charged on late and deferred payments, etc.

#### ***A.1.1.3 Life Insurance Services***

SFG provides life insurance products and services primarily through Shinhan Life Insurance. Life insurance products and services include whole life insurance, health insurance, juvenile insurance, variable insurance, annuity, etc. These products and services are provided through diversified distribution channels consisting of financial consultant, telemarketing, general agency, and bancassurance. Shinhan Life Insurance also operates direct distribution channels through web and mobile.

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<sup>1</sup> A *chaebol* is a South Korean form of business conglomerate.

#### ***A.1.1.4 Securities Brokerage Services***

Through Shinhan Investment Corp., SFG provides a wide range of financial investment services to SFG's diversified customer base including corporations, institutional investors, governments, and individuals. Brokerage services include brokerage of stocks, corporate bonds, futures and options provided to Shinhan Investment Corp.'s institutional and international customers and sales of institutional financial products. These services are supported by a team of approximately 83 research analysts that specialize in equity, bonds, and derivatives as of December 31, 2021.

#### **A.1.2 Overview of SFG's U.S. Operations**

In the United States, SFG operates a wholly-owned insured depository subsidiary, Shinhan Bank America, an uninsured branch of Shinhan Bank, Korea, in New York, and a registered broker-dealer, Shinhan Investment America, which is a wholly-owned subsidiary of Shinhan Investment Corp., Korea. In the United States, SFG has the following business lines: corporate and wholesale banking, retail banking, and securities brokerage.

### **A.2 Summary of the Resolution Plan**

#### **A.2.1 Overview of U.S. Resolution Plan**

SFG has limited operations in the United States which includes corporate banking, retail banking, and brokerage services. SFG's U.S. Resolution Plan is intended to provide the FRB and the FDIC with an explanation of SFG's plan for the rapid and orderly resolution of its U.S. operations in the event of the material financial distress or failure of the Covered Company. The U.S. Resolution Plan includes the information required by the Regulation, including a description of SFG's banking operations and core business lines that are conducted in whole or in material part in the U.S.

#### **A.2.2 Material Entities**

Under the Regulation, a "material entity" is a subsidiary or foreign office of the covered company that is significant to the activities of a critical operation or a core business line. "Critical operations" are those operations, including associated services, functions, and support, the failure or discontinuance of which would pose a threat to the financial stability of the United States. "Core business lines" are those business lines, including associated operations, services, functions, and support that, in the view of the covered company, upon failure would result in a material loss of revenue, profit, or franchise value.

SFG has determined that it does not have any critical operations that, upon their failure or discontinuance, would pose a threat to the financial stability of the United States. Overall, the relatively limited scope, nature, and volume of SFG's U.S. operations are such that their failure or discontinuance would not pose a threat to the stability of the U.S. financial system.

SFG has also determined that it had no core business lines based on analysis performed on a quantitative, as well as, a qualitative basis. On a qualitative basis, failure of SFG's U.S. operations would not have a material effect on the overall franchise value of the company. As such, SFG determined that none of the business lines conducted in the United States should be considered as a core business line for the purposes of this U.S. Resolution Plan.

Because none of the business lines of SFG that are conducted in the United States have been determined to be a “core business line” or a “critical operation”, SFG determined that it has no material entities for the purposes of this Resolution Plan.

### **A.2.3 Description of Core Business Lines**

As noted above, for the purposes of the U.S. Resolution Plan, SFG has identified no core business lines. None of the business lines in their U.S. operations is significant in quantitative aspects when compared to the global financials of SFG. In addition to the above quantitative analysis, a qualitative analysis was used to determine whether the business lines operating in the United States would have a material effect on the overall franchise value of SFG. Pursuant to SFG’s qualitative and quantitative analyses, no core business lines were identified. A brief summary of SFG’s business lines operating in the U.S. is provided in the sections that follow.

#### ***A.2.3.1 Shinhan Bank New York Branch (“SHBNY”)***

SHBNY conducts corporate banking operations including buying, paying and collecting bills, issuing letters of credit, and granting loans. SHBNY has extensive transactions and relationships with the Head office in Korea, other branches, and affiliates.

#### ***A.2.3.2 Shinhan Bank America (“SHBA”)***

SHBA provides comprehensive financial services for small-to-medium sized business owners, with a focus on the Korean-American market, primarily in the New York-metropolitan, California and Southern regions such as Georgia and Texas. These financial services are mainly for corporate and retail banking. SHBA specializes in commercial loans, which are mostly secured by real property, to multiethnic and small business customers. In addition, SHBA is a preferred lender of Small Business Administration (SBA) loans and provides trade finance loans.

#### ***A.2.3.3 Shinhan Investment America Inc. (“SIA”)***

SIA provides placement services as an intermediary between Korean institutional investor and investment funds, and also engages in broker and dealer transactions for Korean securities. SIA has a clearing agreement with Shinhan Investment Corp., the parent company, whereby Shinhan Investment Corp. clears Korean security transactions for the SIA’s customers. SIA clears all transactions on a fully disclosed basis through the parent company. Accordingly, SIA does not carry customer accounts and does not receive, deliver, or hold cash or securities in connection with such transactions.

## **A.3 Summary of Financial Information Regarding Assets, Liabilities, Capital and Major Funding Sources**

The following table is summary of consolidated financial information under IFRS as of December 31, 2021 for SFG. Please refer to SFG’s annual report for the 2021 fiscal year filed with the Securities and Exchange Commission (“SEC”) (Form 20-F) for the further detail.

**Exhibit A-1: Consolidated Balance Sheet**

	As of December, 31 <sup>2</sup>			
	2018	2019	2020	2021
	(In billions of Won, except per common share data)			
<b>Assets</b>				
Cash and due from banks at amortized cost	₩17,349	₩28,424	₩33,411	₩28,453
Financial assets at fair value through profit or loss	43,535	53,163	59,091	62,404
Derivative assets	1,794	2,829	5,634	3,799
Securities at fair value through other comprehensive income	38,314	59,381	58,316	64,838
Securities at amortized cost	28,478	45,582	47,283	49,930
Loans at amortized cost	299,609	323,245	356,222	389,137
Property and equipment, net	3,004	4,083	3,990	4,046
Intangible assets	4,320	5,559	5,481	5,645
Investments in associates	671	1,453	2,658	2,914
Current tax receivable	45	88	52	15
Deferred tax asset	427	218	215	135
Investment property	475	489	615	675
Net defined benefit assets	-	2	18	142
Other assets	21,572	27,878	32,195	35,974
Assets held for sale	8	25	54	44
<b>Total assets</b>	<b>₩459,601</b>	<b>₩552,420</b>	<b>₩605,234</b>	<b>₩648,152</b>
<b>Liabilities</b>				
Deposits	₩265,000	₩294,874	₩326,417	₩364,897
Financial liabilities at fair value through profit or loss	1,420	1,632	1,437	1,369
Financial liabilities designated at fair value through profit or loss	8,536	9,409	8,456	8,024
Derivative liabilities	2,440	2,303	5,017	3,587
Borrowings	29,819	34,863	41,594	43,167
Debt securities issued	63,228	75,363	75,134	80,149
Net defined benefit liabilities	127	121	63	51
Provisions	508	557	805	1,167
Current tax payable	430	513	390	703
Deferred tax liabilities	22	452	580	176
Liabilities under insurance contracts	26,219	52,163	53,460	54,333
Other liabilities	25,200	38,238	45,526	40,991
<b>Total liabilities</b>	<b>₩422,949</b>	<b>₩510,489</b>	<b>₩558,877</b>	<b>₩598,614</b>
<b>Equity</b>				
Capital stock	₩2,645	₩2,732	₩2,970	₩2,970
Hybrid bond	1,532	1,731	2,180	3,335
Capital surplus	9,895	10,565	12,235	12,095
Capital adjustments	(553)	(1,117)	(688)	(664)
Accumulated other comprehensive loss	(753)	(260)	(404)	(985)
Retained earnings	22,959	25,526	27,777	30,541
Total equity attributable to equity holders of Shinhan Financial Group Co., Ltd	35,726	39,178	44,070	47,291
Non-controlling interest	926	2,752	2,287	2,247
<b>Total equity</b>	<b>₩36,651</b>	<b>₩41,930</b>	<b>₩46,357</b>	<b>₩ 49,538</b>
<b>Total liabilities and equity</b>	<b>₩459,601</b>	<b>₩552,420</b>	<b>₩605,234</b>	<b>₩648,152</b>

2 Any discrepancies in the tables included herein between totals and sums of the amounts listed are due to rounding.

### A.3.1 Capital Adequacy

As of December 31, 2021, SFG’s consolidated capital ratios were maintained at a high level, with a Tier 1 Capital Ratio of 14.94%, a Tier 2 Capital Ratio of 1.26% and a Total Capital Ratio of 16.20%.

SHBA’s capital ratios as of December 31, 2021, were maintained at a high level, with a Tier 1 Capital Ratio of 15.93%, a Tier 2 Capital Ratio of 0.83% and a Total Capital Ratio of 16.76%.

SHBNY and SIA do not have a specified capital requirement; however, it could become subject to asset maintenance requirements imposed by the NYSDFS in certain circumstances.

### A.3.2 Major Funding Sources

SFG obtains funding from a variety of sources, both domestic and foreign. SFG’s principal source of funding is customer deposits obtained from its banking operations and proceeds from the issuance of equity and debt securities. In addition, SFG’s subsidiaries acquire funding through call money, borrowings from the Bank of Korea, other short-term borrowings, corporate debentures, other long-term debt, and asset-backed securitizations.

SFG’s sources of funds consist of deposits of KRW 364,897 billion, long-term debt of KRW 78,023 billion, other short-term borrowings of KRW 28,559 billion, call money of KRW 1,535 billion, borrowings from the Bank of Korea of KRW 5,278 billion, asset securitizations of KRW 10,709 billion, and stockholder’s equity<sup>3</sup> of KRW 17,657 billion. The majority of deposits comes from Shinhan Bank of KRW 354,938 billion as of December 31, 2021<sup>4</sup>

## A.4 Memberships in Material Payment, Clearing, and Settlement Systems

Both SHBNY and SHBA are members of certain U.S. payment, clearing, and settlement systems that enable them to access systems necessary to service their customers and clients. As SIA is an introducing broker and does not hold customer accounts, it does not use any trading, payment, clearing, or settlement systems. The following is the list of SHBNY and SHBA’s memberships in material payment, clearing, and settlement systems;

Exhibit A-2: Memberships in Payment, Clearing, and Settlement Systems

Entity Holding Membership	Name	Description
SHBNY	Fedline Advantage Services	Access to FRB-provided advanced payment service, Fedwire Funds Service
	CitiDirect	Access control for backup bank wire services
	Fedwire	US Dollar Payment System / US Clearing Securities Settlement / FI Depository
SHBA	Fiserv EFT	Debit Network
	ACCEL	Debit Network
	STAR	Debit Network
	PLS2	Debit Network
	NYCE	Debit Network

<sup>3</sup> Includes capital stock, capital surplus, and hybrid bonds issued.

<sup>4</sup> Source: 2021 Audited Consolidated Financial Statement for Shinhan Bank.

CIRRUS	Debit Network
VISA	Debit Network
EDS	Debit Network
PULSE	Debit Network
ACH	Electronic Network for Financial Transactions in the U.S.
DTCC	US Clearing / Settlement Systems, USD Payment System, Securities System
Fedwire	US Dollar Payment System / US Clearing Securities Settlement / FI Depository
FRB Check Processing	U.S. Check Clearing

## A.5 Description of Foreign Operations

As described in greater detail in Section A.1.1, SFG is a global banking organization that provides services mainly to corporate and retail clients through its domestic and overseas operations.

As demonstrated in the table below, most of SFG's income comes from its Korean operations. The exchange rate of 1,188.6 is based on the Noon Buying Rate in the City of New York as of December 30, 2021 for cable transfers according to the H.10 statistical release of the Federal Reserve Board.

Exhibit A-3: SFG Income by Geographic Area as of Dec 31, 2021

Geographic Areas	Operating Income (\$ million)
Domestic (Korea)	\$4,547
U.S.A	26
Other foreign countries	435
Total	\$5,008

Source: 2021 Form 20-F and financial statements of SFG's U.S. operation

The following table provides information of non-current assets by geographical area as of December 31, 2021.

Exhibit A-4: SFG Non-Current Assets by Geographical Area as of Dec 31, 2021

Geographic Areas	Non-Current Assets (\$ million)
Domestic (Korea)	\$8,438
U.S.A	56
Other foreign countries	227
Total	\$8,721

Source: 2021 Form 20-F and financial statements of SFG's U.S. operation

## A.6 Material Supervisory Authorities

The consolidated operations of SFG, including its subsidiaries and overseas offices, are subject to supervision and regulation under the applicable laws and regulations of the countries in which it operates.

SFG in Korea is preliminarily supervised by the Korean Financial Supervisory Service (“FSS”), which is the executive body of the Financial Services Commission of Korea (“FSC”).

SHBNY is licensed by the state banking authority of the State of New York and is therefore subject to regulation and examination by the New York State Department of Financial Services (“NYSDFS”) and is also subject to examination by and reporting to The Board of Governors of the Federal Reserve System (“FRB”). In addition, SHBNY is subject to regulation by the FSS, as long as it does not conflict against local laws and regulations.

SHBA is regulated by the NYSDFS, as its chartering authority, but it is also regulated by Federal Deposit Insurance Corporation (FDIC), as its primary federal banking regulator and as the insurer of its deposits. SFG is also a financial holding company and a bank holding company under U.S. banking laws, and its’ U.S. operations are subject to regulation, supervision and enforcement by the Federal Reserve. SHBA is also subject to regulation by the FSS, as long as it does not conflict against local laws and regulations.

SIA is regulated primarily by Financial Industry Regulatory Authority (FINRA). SIA also has regulatory obligations to the FSS, as long as it does not conflict against local laws and regulations.

The table below provides a full listing of regulators by legal entity.

**Exhibit A-5: Regulators by Legal Entity**

Legal Entity	Primary Regulator	Other Regulators
SFG	<ul style="list-style-type: none"> <li>Korean Financial Supervisory Services (FSS)</li> </ul>	<ul style="list-style-type: none"> <li>The Board of Governors of the Federal Reserve System(FRB)</li> </ul>
SHBNY	<ul style="list-style-type: none"> <li>New York State Department of Financial Services (NYSDFS)</li> <li>Federal Reserve Bank of New York</li> </ul>	<ul style="list-style-type: none"> <li>Korean Financial Supervisory Services (FSS)</li> </ul>
SHBA	<ul style="list-style-type: none"> <li>New York State Department of Financial Services (NYSDFS)</li> <li>Federal Deposit Insurance Corporation (FDIC)</li> </ul>	<ul style="list-style-type: none"> <li>Korean Financial Supervisory Services (FSS)</li> </ul>
SIA	<ul style="list-style-type: none"> <li>Financial Industry Regulatory Authority (FINRA)</li> </ul>	<ul style="list-style-type: none"> <li>Korean Financial Supervisory Services (FSS)</li> </ul>

## A.7 Principal Officers

The tables below list Directors and Senior Management of SFG as of April 30, 2022.

### A.7.1 Executive Directors

Name	Position
Yong Byoung Cho	Chairman and Chief Executive Officer

### A.7.2 Non-Executive and Outside Directors

Name	Position
Okdong Jin	Non-Executive Director
Yoonjae Lee	Outside Director

Joseol Kim	Outside Director
Sukeun Kwak	Outside Director
Ansoon Park	Outside Director
Hoon Bae	Outside Director
Yangho Byeon	Outside Director
Jaeho Sung	Outside Director
Jaewon Yoon	Outside Director
Yongguk Lee	Outside Director
Hyunduk Jin	Outside Director
Jaeboong Choi	Outside Director
Yonghak Huh	Outside Director

### A.7.3 Executive Officers

Name	Position	In charge of
Youngtaeg Heo	Deputy President	• Chief Management Officer(CMO), Shinhan Financial Group
Dongki Jang	Deputy President	• Head of Global Markets and Securities(GMS), Shinhan Financial Group
Hyoryul An	Deputy President	• Head of Wealth Management(WM), Shinhan Financial Group
Youngjong Lee	Deputy President	• Head of Retirement Pension, Shinhan Financial Group
Homin Wang	Deputy President	• Chief Compliance Officer(CCO), Shinhan Financial Group
Eenkyoon Lee	Deputy President	• Chief Operation Officer(COO), Shinhan Financial Group
Junsik Ahn	Deputy President	• Chief Public Relation Officer(CPRO), Shinhan Financial Group
Keunsoo Jung	Deputy President	• Head of Group and Global Investment Banking(GIB), Shinhan Financial Group
Soungjo Kim	Deputy President	• Head of Audit, Shinhan Financial Group
Dongkwon Bang	Deputy President	• Chief Risk Officer(CRO), Shinhan Financial Group
Seunghyeon Seo	Deputy President	• Head of Global Business, Shinhan Financial Group
Taekyung Lee	Deputy President	• Chief Financial Officer(CFO), Shinhan Financial Group
Myounghee Kim	Deputy President	• Chief Digital Officer(CDO), Shinhan Financial Group
Seogheon Koh	Executive Director	• Chief Strategy and Sustainability Officer(CSSO), Shinhan Financial Group
Taeyoun Kim	Executive Director	• Head of Accounting Division, Shinhan Financial Group

## A.8 Resolution Planning Corporate Governance Structure and Processes

SFG has integrated resolution planning into its corporate governance structure and established processes to ensure that the U.S. Resolution Plan received appropriate oversight from designated senior management officials, councils, and the Board of Directors. As such, SFG established the following committees and working groups to provide oversight of the resolution planning process:

- Shinhan Financial Group Resolution Plan Managing Group
- The Office of U.S. Resolution Plan Review (the “U.S. RPR”)
- The Office of U.S. Resolution Planning (the “ORP”)

Shinhan Financial Group Resolution Plan Managing Group has primary responsibility for oversight of the U.S. resolution planning efforts and the periodical Resolution Plan submitted to U.S. regulators. Shinhan Financial Group Resolution Plan Managing Group's members consist of Chief Management Officer, Group Chief Risk Officer, Group Chief Compliance Officer and Head of Global Business of SFG.

The U.S. RPR is a subcommittee of Shinhan Financial Group Resolution Plan Managing Group established to assist the Group in the approval process. The main function of the U.S. RPR is to gather all representatives of each entity with operations in the U.S. to review and discuss all issues related to U.S. resolution planning effort. It consists of senior executives from the Business Management Division and Global Business Group.

The ORP provides day-to-day project management and functional leadership for oversight, development, maintenance, implementation, filing, and compliance of resolution plan, as well as, updating the contents of the Resolution Plan as part of BAU(Business-as-Usual) processes.

SFG's U.S. Resolution Plan is prepared by the Working Group, comprising representatives from each of SFG's U.S. entities. The Plan is reviewed and approved by business approvers with oversight from the ORP. After business approval, the Plan is also reviewed by the U.S. RPR and the Shinhan Financial Group Resolution Planning Managing Group before submission to the Delegee of the Board of Directors who provides final approval of the SFG's U.S. Resolution Plan.

In its capacity, the Board of Directors is the most senior management body of SFG. The Board of Directors, located in Seoul, Korea, is ultimately responsible for evaluating and approving the SFG's U.S. Resolution Plan. For SFG, however, the Board of Directors delegated the responsibility of approval of the Resolution Plan to the CEO of SFG.

Clear roles and responsibilities were defined to ensure effective working processes and compliance with decision-making authorities. These include processes for the preparation, verification, and sign off on the U.S resolution plan at the global and local levels. This ensures that senior management, the Shinhan Financial Group Resolution Plan Managing Group, the U.S. RPR, the ORP, and where applicable, the Delegee of the Board of Directors take responsibility for the content provided within the Plan and are comfortable that the information provided is appropriate and accurate.

## **A.9 Material Management Information Systems**

SFG utilizes management information systems ("MIS") and applications to ensure timely access to accurate and comprehensive data, including those for risk management, accounting, financial, and regulatory reporting. In preparing the U.S. Resolution Plan, SFG has identified key MIS applications and maintains inventories of such systems and applications.

The MIS are primarily used to collect, retain, and report information internally, as well as, to perform functions necessary to support business lines. Multiple reports are generated on a periodic basis for use by senior management to assess the financial health, risks and operations of such business lines. SFG's MIS is capable of collecting, maintaining, and reporting information in a timely manner to management and to regulators.

## A.10 Resolution Strategy Summary

The U.S. Resolution Plan takes into consideration possible strategies for the orderly resolution of SFG's U.S. operations under applicable resolution regimes in the event of material financial distress or failure. The strategies are designed to be executed within a reasonable period of time and in a manner that avoids or substantially mitigates systemic impact on the financial stability of the U.S.

As required by the Final Rule, the U.S. Resolution Plan assumes that the material financial distress is a result of an idiosyncratic event that is specific to SFG and occurs at a time where general macroeconomic conditions are consistent with baseline economic scenario in which other financial institutions and markets generally are not experiencing a system-wide financial panic or crisis. This strategy addresses how the U.S. operations of SFG may undergo an orderly resolution without extraordinary government support in the U.S. or Korea.

Because SHBNY is a New York state-licensed branch, this Resolution Plan contemplates that SHBNY would be subject to the insolvency and liquidation provisions for foreign bank branches under the New York Banking Law ("NYBL"). These provisions include an orderly wind down and liquidation of SHBNY, where under NYBL, the assets and properties of SHBNY would be seized and "ring fenced" by the Superintendent of the New York State Department of Financial Services ("NYSDFS"). The Superintendent is authorized to take possession of (1) all SHBNY assets wherever located that constitute part of the business of SHBNY and appear on the books as such; and (2) all assets of SHB located within New York regardless of whether they constitute part of the business of SHBNY. These "ring fenced" assets would be liquidated to satisfy permissible claims of unaffiliated creditors of SHBNY in accordance with NYBL.

Because SHBA is an insured depository subsidiary of SFG, this Resolution Plan assumes that SHBA would enter into a receivership, under the Federal Deposit Insurance Act (FDIA), over Resolution Weekend with the FDIC appointed as a receiver. Following entry into a receivership, the FDIC may transfer all assets, deposits, certain contracts, and liabilities of SHBA into a bridge bank, organized by the FDIC and chartered by the Office of the Comptroller of the Currency (OCC). The FDIC would exercise all of the rights and powers of SHBA's directors, management, and shareholders to operate the business, dispose of operations and assets, and resolve liabilities. The FDIC would operate the bridge bank as a going concern until its ultimate sale or disposition in order to maximize the value available to creditors. If acquisition by a third-party is not possible, the FDIC could seek to sell SHBA's portfolio of loans and other assets or recapitalize the bridge bank by issuing equity in the bridge bank or a new holding company to new shareholders.

Although SIA is a registered broker-dealer and a member of SIPC, SIA would only be eligible for resolution under the Securities Investor Protection Act of 1970 ("SIPA") if it has "customers" as defined under SIPA upon its entry into resolution. Generally, SIPA is applicable only when customers entrust assets to the broker-dealer. SIA does not generally hold customer assets in the ordinary course of business. Therefore, SFG assumes that SIA would be resolved under Chapter 11 or Chapter 7 of the U.S. Bankruptcy Code and wound down in an orderly manner. The primary objective of both Chapter 11 and Chapter 7 proceedings would be to maximize the value realized from the assets and businesses of SIA.