

# The PNC Financial Services Group, Inc. Basel III Pillar 3 Report: Standardized Approach March 31, 2025

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#### INTRODUCTION

The PNC Financial Services Group, Inc. and its subsidiaries on a consolidated basis (PNC) is one of the largest diversified financial institutions in the United States (U.S.) and is headquartered in Pittsburgh, Pennsylvania. PNC has businesses engaged in retail banking, corporate and institutional banking and asset management, providing many of its products and services nationally. Our retail branch network is located coast-to-coast. We also have strategic international offices in four countries outside the U.S. At March 31, 2025, consolidated total assets, total deposits and total shareholders' equity were \$554.7 billion, \$422.9 billion and \$56.4 billion, respectively.

PNC is a bank holding company registered under the Bank Holding Company Act of 1956 and a financial holding company under the Gramm-Leach-Bliley Act. PNC provides its products and services primarily through PNC's only insured depository institution subsidiary, PNC Bank, National Association (PNC Bank).

This report (Pillar 3 Report) provides information about PNC's capital structure, risk exposures, risk assessment processes, risk-weighted assets and overall capital adequacy and should be read in conjunction with PNC's Securities and Exchange Commission (SEC) filings, including the Annual Report on Form 10-K for the year ended December 31, 2024 (2024 Form 10-K) and Quarterly Report on Form 10-Q for the period ended March 31, 2025 (first quarter 2025 Form 10-Q). These SEC filings are available at https://investor.pnc.com/sec-filings/all-sec-filings/regulatory-disclosures, including PNC Bank's Call Report, are available at https://investor.pnc.com/sec-filings/regulatory-disclosures.

# Forward-Looking Statements

This disclosure may contain forward-looking statements, which are subject to numerous assumptions, risks and uncertainties, which change over time. Forward-looking statements speak only as of the date made. We do not assume any duty and do not undertake to update forward-looking statements. Actual results or future events could differ, possibly materially, from those anticipated in forward-looking statements, as well as from historical performance. See the Cautionary Statement Regarding Forward-Looking Information in PNC's first quarter 2025 Form 10-Q for more information. Also see all risks and uncertainties disclosed in PNC's SEC filings, including its 2024 Form 10-K, and subsequent reports on Forms 10-Q and 8-K, Proxy Statements on Schedule 14A, and, if applicable, its registration statements under the Securities Act of 1933, as amended, all of which are or will upon filing be accessible on PNC's website at www.pnc.com/secfilings and on the SEC's website at www.sec.gov.

#### **Basis of Consolidation**

Our consolidated financial statements include the accounts of the parent company and its subsidiaries, most of which are wholly-owned, certain partnership interests and variable interest entities that are required to be consolidated under accounting principles generally accepted in the United States of America (GAAP). We have eliminated intercompany accounts and transactions. The basis for consolidation for regulatory capital calculations is the same as that used in the presentation of PNC's consolidated financial statements, which is described in further detail in Note 1 Accounting Policies in our 2024 Form 10-K. Consistent with the regulatory capital rules, the minimum capital requirement for our consolidated insurance underwriting subsidiaries under applicable law is deducted from our regulatory capital.

# Basel III Overview

PNC is subject to the regulatory capital requirements established by the Board of Governors of the Federal Reserve System (Federal Reserve). PNC Bank is subject to the regulatory capital requirements established by the Office of the Comptroller of the Currency (OCC). For additional information regarding regulatory capital requirements, see the Banking Regulation and Supervision section included in Item 1 Business of our 2024 Form 10-K.

The Basel III regulatory capital ratios of PNC and PNC Bank as of March 31, 2025 exceeded the applicable minimum levels. For additional information regarding regulatory capital requirements, see the Banking Regulation and Supervision section included in Item 1 Business, the Liquidity and Capital Management portion of the Risk Management section in Item 7 and Note 19 Regulatory Matters in our 2024 Form 10-K.

The disclosures by PNC in this Pillar 3 Report include those required by the standardized approach. PNC is the top-tier entity within the PNC organization to which the standardized approach applies. In addition, PNC has more than \$1.0 billion in aggregate quarterly average trading assets and trading liabilities, and is subject to the market risk capital rule as amended (the "Market Risk Rule"). This Pillar 3 Report also includes PNC's required disclosures under the Market Risk Rule.

#### CAPITAL

#### Summary of Capital

PNC's regulatory capital structure consists of the following capital instruments:

#### **Common Stock**

PNC has \$5 par value common stock. At March 31, 2025, there were 800 million shares authorized, and 543 million shares issued, of which 148 million shares were held in treasury at cost. Holders of PNC common stock are entitled to receive dividends when declared by PNC's Board of Directors out of funds legally available for this purpose. See the Market for Registrant's Common Equity, Related Stockholder Matters and Issuer Purchases of Equity Securities in Item 5 of our 2024 Form 10-K for additional information on our common stock.

#### Preferred Stock

See Note 11 Equity in our 2024 Form 10-K for information on our preferred stock.

# **Qualifying Subordinated Debt**

PNC had \$2.2 billion in subordinated debt that qualified as Tier 2 capital for the Basel III ratio at March 31, 2025. The interest rates on our subordinated debt range from 2.70% to 5.90% and maturities range from 2025 through 2033.

#### Restrictions on Transfer of Funds or Total Capital

Federal law and regulations place a variety of restrictions on the ability of PNC to transfer funds or total capital among entities within the PNC group. See Note 19 Regulatory Matters in our 2024 Form 10-K for additional information on these restrictions.

# Capital Adequacy

PNC's overall capital planning objective is to maintain sufficient capital resources, both in terms of quantity and quality, to cover all of the firm's risks and allow the firm to operate effectively through a range of economic environments. PNC's internal capital adequacy process (CAP) supports this overall objective by taking into account capital stress testing results, capital and liquidity positions and other risk considerations. In addition, PNC's CAP has a sound risk management infrastructure, including but not limited to, the thorough review and consideration of alternative economic scenarios as well as other risks. The Board of Directors, its Risk Committee, and senior management use the firm's CAP results to assess the level of capital that is appropriate for the firm to maintain in light of the range of risks facing the firm, the firm's business strategy, and its risk appetite. Sound capital stress testing practices and methodologies are a key component of PNC's CAP.

In addition to the CAP, PNC is subject to the Federal Reserve's capital plan rule, annual capital stress testing requirements and Comprehensive Capital Analysis and Review (CCAR) process, as well as the applicable Dodd-Frank capital stress testing requirements of the Federal Reserve and the OCC. As part of the CCAR process, the Federal Reserve undertakes a supervisory assessment of PNC's capital adequacy. This assessment is based on a review of a comprehensive capital plan submitted by PNC to the Federal Reserve that describes the company's planned capital actions during the nine-quarter review period, as well as the results of stress tests conducted by both the company and the Federal Reserve under different hypothetical macroeconomic scenarios, including supervisory severely adverse scenarios provided by the Federal Reserve.

# Capital Ratios

All current period capital ratios are calculated using the regulatory capital methodology applicable to us during 2025. These Basel III capital ratios may be impacted by any additional regulatory guidance or analysis by PNC as to the application of the rules to PNC.

At March 31, 2025, PNC and PNC Bank, our sole banking subsidiary, were both considered "well capitalized," based on applicable U.S. regulatory capital ratio requirements. To qualify as "well capitalized," PNC must have Basel III capital ratios of at least 6% for Tier 1 risk-based capital and 10% for Total risk-based capital, and PNC Bank must have Basel III capital ratios of at least 6.5% for Common equity Tier 1 (CET1) risk-based capital, 8% for Tier 1 risk-based capital, 10% for Total risk-based capital and a Leverage ratio of at least 5%. For PNC Bank's capital ratios, see PNC Bank's Call Report for the period ended March 31, 2025.

The Basel III capital rule also includes regulatory capital buffer requirements above the minimum risk-based capital ratio requirements that banking organizations must meet in order to avoid limitations on capital distributions (including dividends and repurchases of any Tier 1 capital instrument, including common and qualifying preferred stock) and certain discretionary incentive compensation payments. Currently, PNC and PNC Bank must maintain a CET1 capital ratio of at least 7.0%, a Tier 1 capital ratio of at least 8.5%, and a Total capital ratio of at least 10.5%. At March 31, 2025, both PNC and PNC Bank were above these ratio requirements.

In the third quarter of 2020, the Federal Reserve, OCC and FDIC also adopted a final rule that revises the definition of "eligible retained income" for purposes of the stress capital buffer (SCB) and other Basel III capital buffers. This revision is designed to phase in the potential application of these buffers more gradually, especially in periods when banking organizations are distributing all or a substantial majority of their net income. Under the final rule, eligible retained income is the greater of (i) the banking organization's net income for the four preceding calendar quarters, net of any distributions and associated tax effects not already reflected in net income, and (ii) the average of the banking organization's net income over the preceding four quarters. PNC's eligible retained income at March 31, 2025 was \$2.3 billion.

In the first quarter of 2025, CECL is fully reflected in regulatory capital. See additional discussion of the CECL transition provision in the Supervision and Regulation section of Item 1 Business and Item 1A Risk Factors of our 2024 Form 10-K.

On July 27, 2023, the Federal Reserve, OCC, and FDIC proposed for public comment an interagency rule to implement the final components of the Basel III framework that would significantly revise the capital requirements for large banking organizations, including PNC and PNC Bank. The proposed rule would apply an expanded risk-based approach which leverages the Basel rules. including the calculation of risk-weighted assets, in addition to the current U.S. standardized approach. In addition, this proposal would align the regulatory capital elements and required deductions for Category III banking organizations, such as PNC and PNC Bank, with those currently applicable to Category I and II banking organizations. PNC and PNC Bank would be required to recognize most elements of AOCI in regulatory capital and deduct from CET1 capital, among other items, mortgage servicing assets and deferred tax assets that individually exceed 10% of CET1 capital or in the aggregate with other threshold items that exceed 15% of CET1 capital. PNC and PNC Bank would be required to calculate their risk-based capital ratios under the existing standardized approach and the expanded risk-based approach and would be subject to the lower of the two resulting ratios for their risk-based capital minimums and buffer requirements, including the SCB. The proposed effective date was originally July 1, 2025, with certain provisions—including the recognition of AOCI elements in regulatory capital and the increase in risk-weighted assets due to the expanded risk-based approach—having a three-year phase-in period. See additional discussion of this rule in the Supervision and Regulation section in Item 1 Business and Item 1A Risk Factors of our 2024 Form 10-K. Given the negative comments from the industry on the proposal, and the banking agencies' comments on the need for a re-proposal or other broad changes, the proposal will not be effective by July 1, 2025.

See Note 3 Loans and Related Allowance for Credit Losses in our first quarter 2025 Form 10-Q for additional information about loan modifications on delinquency status, which impacts our risk-weighted calculations.

The following table outlines the Basel III ratios for PNC as of March 31, 2025:

Table 1: Capital Ratios (a)

	Mar	ch 31, 2025
In millions	]	Basel III
Consolidated PNC		
Regulatory capital		
Common equity Tier 1 capital	\$	44,893
Tier 1 capital	\$	50,644
Total capital	\$	58,011
Risk-weighted assets		
Basel III standardized approach risk-weighted assets	\$	423,931
Average quarterly adjusted total assets	\$	548,955
Risk-based capital and leverage ratios		
Common equity Tier 1		10.6 %
Tier 1		11.9 %
Total		13.7 %
Leverage		9.2 %
Supplementary Leverage Ratio		7.6 %

<sup>(</sup>a) See Table 30: Basel III Capital in the Capital Management portion of the Liquidity and Capital Management section of Risk Management in our first quarter 2025 Form 10-Q for additional information on the elements of, and adjustments and deductions to, our consolidated regulatory capital.

The following table outlines PNC's standardized approach risk-weighted assets as of March 31, 2025 using the categorization based on the standardized definitions:

Table 2: Standardized Risk-Weighted Assets

In millions	Mar	rch 31, 2025
On Balance Sheet		
Exposures to sovereign entities (a)	\$	7
Exposures to depository institutions and foreign banks		782
Exposures to public sector entities		3,540
Corporate exposures		210,266
Residential mortgage exposures		43,665
High volatility commercial real estate		916
Past due loans		2,664
Other assets		36,647
Securitization exposures		12,421
Equity exposures		9,855
Off Balance Sheet and Market Risk		
Off balance sheet commitments, maturity less than one year		6,922
Off balance sheet commitments, maturity more than one year		74,132
Derivatives		2,401
Securitization exposures		4,794
Letters of credit and other		11,565
Market Risk		3,354
Excess allowance for credit losses (b)		_
Total Standardized Risk-Weighted Assets	\$	423,931

<sup>(</sup>a) Exposures to, and portions of exposures that are directly and unconditionally guaranteed by, the U.S. government, its agencies and the Federal Reserve receive 0% risk weight.

# SUPPLEMENTARY LEVERAGE RATIO

The Supplementary Leverage Ratio (SLR) is defined as Basel III Tier I capital divided by supplementary leverage exposure. Unlike the traditional leverage ratio, the denominator of the SLR takes into account certain off-balance sheet items, including loan commitments and potential future exposure under derivative contracts. Under the Basel III capital rule, Category III firms (such as PNC and PNC Bank) are subject to minimum SLR requirements.

The following table represents the components of PNC's Supplementary Leverage Ratio as of March 31, 2025.

Table 3: Supplementary Leverage Ratio

In millions	 March 31, 2025
Tier 1 Capital	\$ 50,644
Total Consolidated Assets (a)	\$ 556,377
Adjustment for derivative transactions	704
Adjustment for repo-style transactions	83
Adjustment for off-balance sheet exposures	127,102
Other adjustments (b)	(18,690)
Total Supplementary Leverage Exposure	\$ 665,576
Supplementary Leverage Ratio	7.6 %

<sup>(</sup>a) Total average assets for the three months ended March 31, 2025, as reported in the Average Consolidated Balance Sheet and Net Interest Analysis table of our first quarter 2025 Form 10-O

For additional information on the Supplementary Leverage Ratio, refer to Schedule A "Advanced Approaches Regulatory Capital" of our March 31, 2025 Regulatory Capital Reporting for Institutions Subject to the Advanced Capital Adequacy Framework - FFIEC 101.

<sup>(</sup>b) Any allowance in Tier 2 capital that exceeds 1.25% of Credit Risk risk-weighted assets must be deducted from risk-weighted assets.

<sup>(</sup>b) Includes adjustments to Tier 1 capital, adjustments for frequency calculations, and adjustments for deductions of qualifying central bank deposits for custodial banking organizations.

#### **CREDIT RISK**

Credit risk represents the possibility that a customer, counterparty, or issuer may not perform in accordance with the contractual terms of their loan, extension of credit or other financial obligation with PNC. Credit risk is inherent in the financial services business and results from extending credit to customers, purchasing securities and entering into financial derivative transactions and certain guarantee contracts. Credit risk is one of our most significant risks. Our processes for managing credit risk are designed to be embedded in our risk culture and in our decision-making processes using a systematic approach whereby credit risks and related exposures are identified and assessed, managed through specific policies and processes, measured and evaluated against our risk appetite and credit concentration limits, and reported, along with specific mitigation activities, to management and the Board of Directors through our governance structure. Our most significant concentration of credit risk is in our loan portfolio.

# Credit Risk Management

Credit risk management is integrated into the overall enterprise risk management governance model. The committees responsible for conducting specific oversight, monitoring and reporting of credit risk management activities are described in further detail within the Risk Management section included in our 2024 Form 10-K. PNC's overall credit process includes comprehensive credit policies, judgmental or statistical credit underwriting, frequent and detailed risk measurement and modeling, extensive credit training programs, and an ongoing credit risk review and/or audit process. PNC management desires to construct and maintain a loan portfolio that will allow it to meet its strategic return goals while remaining within our risk appetite, as described further in the Risk Management section included in our 2024 Form 10-K. A component of our credit risk management framework is our credit concentration process, by which we maintain limits and monitor credit exposure by industry, geography, property, product type and customer. Loan participations with third parties, and loan sales and syndications, are used to manage risk concentrations.

In addition to credit policies and procedures, PNC uses established guidelines for delinquent and nonperforming loans, acceptable levels of industry and total borrower exposure, and other relevant credit measures to monitor risk. These guidelines are established by Credit Risk Management at the corporate, business and segment levels with the goal of remaining within a desired level of risk within PNC's risk appetite. The established portfolio limits focus on specific pools or characteristics of risk and are designed to ensure that we become aware of portfolio trends and help to enforce the desired construct of the loan portfolio. We may employ portfolio diversification and risk mitigation techniques to counter any undesirable risk pool trends or concentrations. Please refer to the Credit Risk Management section in our first quarter 2025 Form 10-Q and 2024 Form 10-K for the metrics that we use to monitor and manage credit risk.

Credit risk management actions undertaken across the enterprise include continual refinement of underwriting standards, efforts to reduce credit exposure where appropriate, and regular credit risk monitoring and management activities. To further mitigate credit risk, we may periodically reduce or exit certain lending areas. Where we have chosen not to retain the credit risk, it is either because it did not fit within the desired risk appetite, and/or because compensation for such risk is not adequate.

### Summary of Credit Exposures

PNC's major types of credit risk exposures consist of the following, all of which are presented in accordance with GAAP:

#### Loans

PNC had \$318.9 billion in loans at March 31, 2025. See the Loans section in the Consolidated Balance Sheet Review of our first quarter 2025 Form 10-Q for quantitative information on our loans and Note 3 Loans and Related Allowance for Credit Losses in our first quarter 2025 Form 10-Q for further information on loans.

Credit concentration limits have been established to avoid excessive credit concentrations in certain risk pools that, in the event of increased credit losses, could affect portfolio optimization in terms of capital preservation. Credit concentrations arise when otherwise unrelated loans are linked by a common characteristic (such as aggregate customer exposure, industry, product, property or geography).

See Table 16 Commercial and Industrial Loans by Industry in the Credit Risk Management section of our first quarter 2025 Form 10-Q for the distribution of commercial loans by industry. See Table 17 Commercial Real Estate Loans by Geography and Property Type, Table 18 Residential Real Estate Loan Statistics and Table 19 Home Equity Loan Statistics in the Credit Risk Management section of our first quarter 2025 Form 10-Q for loans by geographic market, property type and lien type.

The following table presents our consumer and commercial loan portfolios by remaining contractual maturity:

Table 4: Loan Exposures by Remaining Contractual Maturity

	 March 31, 2025										
In millions	1 Year or Less		Total								
Commercial loans	\$ 67,805	\$	135,883	\$	15,888	\$	219,576				
Consumer loans	16,052		21,991		61,231		99,274				
Total	\$ 83,857	\$	157,874	\$	77,119	\$	318,850				

The methodologies used to estimate our allowance for loan and lease losses and PNC's policies for: (i) determining past due or delinquency status, (ii) placing loans on nonaccrual, (iii) returning loans to accrual status, and (iv) charging off uncollectible amounts are described in detail in the Credit Risk Management and Critical Accounting Estimates and Judgments sections in Item 7, as well as Note 1 Accounting Policies in our 2024 Form 10-K.

#### Securities

PNC had \$137.8 billion in investment securities at March 31, 2025. See the Investment Securities section within the Consolidated Balance Sheet Review of our first quarter 2025 Form 10-Q for quantitative information on our investment securities. Also see Note 2 Investment Securities in our first quarter 2025 Form 10-Q for further information on investment securities, including the remaining contractual maturity on our debt securities.

#### Cash

PNC had \$32.3 billion in interest-earning deposits with banks and \$6.1 billion in cash and due from banks at March 31, 2025. See the Consolidated Balance Sheet Review included in our first quarter 2025 Form 10-Q for further information on interest-earning deposits with banks.

#### **Derivatives**

PNC had \$3.1 billion in gross fair value of derivatives in an asset position and \$4.7 billion in gross fair value of derivatives in a liability position at March 31, 2025. See Note 12 Financial Derivatives in our first quarter 2025 Form 10-Q for further quantitative and qualitative information on derivatives.

See the Average Consolidated Balance Sheet and Net Interest Analysis within our first quarter 2025 Form 10-Q for average balances of our credit risk exposures.

# **CREDIT RISK MITIGATION**

PNC uses various strategies to mitigate credit risk in its portfolios, including: establishing credit risk appetite measures and limits that define acceptable levels of total borrower exposure, and transferring loans to government agencies in securitization transactions. As described within the Counterparty Credit Risk section of this Pillar 3 Report, we may also obtain collateral from counterparties to manage our overall credit risk. In addition, guarantors can serve as a secondary source of repayment. The primary types of guarantors mitigating credit risk are: individuals, business entities, and the U.S. Government. Under the standardized approach, PNC can recognize a credit risk mitigation benefit for certain third-party guarantees. As of March 31, 2025, the reduction to risk-weighted assets as a result of our qualifying third-party guarantees was approximately \$1.7 billion.

# **COUNTERPARTY CREDIT RISK**

Counterparty credit exposure arises from the risk that a counterparty is unable to meet its payment obligations to PNC under certain financial contracts. PNC aggregates a counterparty's exposures for all transactions involving derivatives and repurchase agreements. For further information on PNC's use of derivatives, refer to Note 12 Financial Derivatives in our first quarter 2025 Form 10-Q.

A primary responsibility of credit risk management is the approval of new counterparty trading relationships and the subsequent ongoing review of the creditworthiness of the counterparty. The credit risk associated with derivatives executed with customers is essentially the same as that involved in extending loans and is subject to normal credit policies. See the Credit Risk section within this Pillar 3 Report for further discussion of our credit policies. In addition to using master netting agreements and other collateral agreements to reduce credit risk associated with derivative instruments, we also seek to manage credit risk by evaluating credit ratings of counterparties and by using internal credit analysis, limits, and monitoring procedures. Credit risk is included in the determination of the estimated net fair value of our derivatives.

Credit limits are typically set on a loan equivalent exposure basis and credit exposures and limits are monitored daily.

For further information on counterparty credit risk, including counterparty and transaction rating, credit approval process and provisioning and for the notional amount of our derivatives, see Note 12 Financial Derivatives in our first quarter 2025 Form 10-Q.

#### Counterparty Credit Risk Mitigation

Credit risk from derivatives is mitigated, where possible, through master netting agreements whereby derivative assets and liabilities with the same counterparty can be offset. The International Swaps and Derivatives Association, Inc. (ISDA) Master Agreement is PNC's preferred agreement for documenting over-the-counter (OTC) derivatives. It provides the contractual framework within which dealing activities across a full range of OTC products are conducted and contractually binds both parties to apply close-out netting across all outstanding transactions covered by such master netting agreement if either party defaults or other termination events occur. There are certain instances in which we use customized agreements in lieu of an ISDA Master Agreement; however, these agreements include closeout netting language to protect PNC in a similar manner as the ISDA Master Agreement.

Repurchase and resale agreements are typically entered into with counterparties under industry standard master netting agreements which provide for the right to offset amounts owed to one another with respect to multiple repurchase and resale agreements under such master netting agreement (referred to as netting arrangements) and liquidate the purchased or borrowed securities in the event of counterparty default. In order for an arrangement to be eligible for netting under GAAP, we must obtain the requisite assurance that the offsetting rights included in the master netting agreement would be legally enforceable in the event of bankruptcy, insolvency, or a similar proceeding of such third party. Enforceability is evidenced by obtaining a legal opinion that supports, with sufficient confidence, the enforceability of the master netting agreement in bankruptcy.

#### **Collateral**

PNC may obtain collateral against derivative assets, depending on the creditworthiness of the counterparty and/or nature of the transaction. All marketable transactions and associated collateral positions are independently revalued and monitored daily. Collateral thresholds vary by counterparty. The majority of collateral held as credit risk mitigation is either cash, U.S. Treasury, or Government agency securities.

With respect to repurchase and resale agreements, PNC takes possession of securities purchased under agreements to resell. We monitor the market value of securities to be repurchased and resold and additional collateral may be obtained where considered appropriate to protect against credit exposure.

Certain derivative agreements contain various credit-risk-related contingent provisions, such as those that require PNC's debt to maintain a specified credit rating from one or more of the major credit rating agencies. For additional information on the potential impact of an investment rating downgrade, see the Offsetting and Counterparty Credit Risk and Credit-Risk Contingent Features sections of Note 12 Financial Derivatives in our first quarter 2025 Form 10-Q.

Further detail regarding the net unsecured credit exposure on our derivatives and other contracts is presented in the following table:

Table 5: Counterparty Credit Risk Exposures

March 31, 2025					1	Net Unsecured Credit		
In millions	Gross Positive Fair Value Collateral Held Exposure				Cre	edit Equivalent Amount		
OTC derivatives	\$	10,693	\$	4,077	\$	3,077	\$	3,131
Repo-style transactions	\$	1,682	\$	1,577	\$	105	\$	133

#### **SECURITIZATION**

The Basel III rules define a securitization exposure as an exposure that meets the following criteria:

- All or a portion of the credit risk of one or more underlying exposures is transferred to one or more third parties;
- The credit risk associated with the underlying exposures has been separated into at least two tranches reflecting different levels of seniority;
- Performance of the securitization depends on performance of the underlying exposures;
- All or substantially all of the underlying exposures are financial exposures;
- The underlying exposures are not owned by an operating company; and
- The underlying exposures are not owned by a small business investment company or related to a community development investment.

Generally, PNC does not securitize its own assets but does have multiple asset types meeting the definition of securitization exposure, which are primarily secured lending and investment positions. See the Credit Risk section within this report for further discussion of our credit policies. The following activities meet the regulatory definition of a securitization:

- Investment securities that meet the definition of a securitization exposure including asset-backed securities, commercial and residential mortgage-backed securities, and collateralized loan obligations;
- Secured lending to our clients consisting of collateralized loan obligations and securitizations of trade receivables, auto loan and lease assets, equipment leases, fleet leases, and capital commitments;
- Servicing advances to transactions including commercial and residential mortgage-backed securities;
- Subscription line facilities to real estate investment funds secured by the capital commitments of the funds' investors; and
- OTC derivatives to special purpose entities.

For a description of the roles that PNC plays in the securitization process, refer to Note 4 Loan Sale and Servicing Activities and Variable Interest Entities in our 2024 Form 10-K.

#### Summary of Accounting Policies for Securitization Activities

A summary of PNC's accounting policies for securitization activities is outlined in Note 1 Accounting Policies and in Note 4 Loan Sale and Servicing Activities and Variable Interest Entities in our 2024 Form 10-K.

#### Risk Management

PNC's risk department monitors the identification and categorization of securitization exposures. Each quarter, senior management of each line of business with securitization exposures approves a summary of securitization exposures attributable to their business, including the associated capital requirements and the status of associated controls.

For further information on how we use derivatives to mitigate risk associated with changes in the fair value of assets, see Note 15 Financial Derivatives in our 2024 Form 10-K. Information on how we monitor and evaluate changes in credit can be found in Note 2 Investment Securities and Note 3 Loans and Related Allowance for Credit Losses in our first quarter 2025 Form 10-Q.

The following table presents our total on- and off-balance sheet securitization exposures:

Table 6: Securitization Exposures by Underlying Asset Type

	March 31, 2025						
In millions		On-Balance Sheet Amount (a)		Off-Balance Sheet Amount (b)		Total Exposure	
Residential mortgage-backed securities	\$	726	\$	_	\$		726
Commercial mortgage-backed securities		1,319					1,319
Asset-backed securities		5,189		<del>_</del>			5,189
State and municipal securities		1					1
Total securities	\$	7,235	\$	_	\$		7,235
Loans	\$	39,596	\$	22,809	\$		62,405
Other assets (c)		939		25			964
Total	\$	47,770	\$	22,834	\$		70,604

<sup>(</sup>a) Excludes gain/loss amounts for available for sale securities.

#### Regulatory Treatment of Securitizations

The standardized approach requires banks to use either the Simplified Supervisory Formula Approach (SSFA) or assign a 1250% risk-weight to determine regulatory capital for securitization exposures. The total exposure includes the aggregate of all on- and off-balance sheet exposures.

<sup>(</sup>b) Primarily unfunded commitments to extend credit.

<sup>(</sup>c) Includes accrued interest on securitization exposures.

The following table outlines our securitization exposures, the related risk-weighted amount and capital requirement:

Table 7: Capital Requirements of Securitization Exposures by Risk-Weighting (a)

In millions	March 31, 2025					
Risk-Weight Bands		Total Exposure		Risk-Weighted Amount	(	Capital Requirement (b)
Simplified Supervisory Formula Approach (SSFA)				-		
=20%	\$	66,056	\$	13,201	\$	1,056
> 20% and $<= 100%$		3,610		1,515		121
> 100% and <= 650%		933		2,446		196
> 650% and <1250%		2		12		1
=1250%		3		41		3
Non-Simplified Supervisory Formula Approach (Non-SSFA)						
=1250% (c)	\$	_	\$	_	\$	_
Total	\$	70,604	\$	17,215	\$	1,377

- (a) Includes total resecuritization exposures of \$15 million with a risk-weighted amount and capital requirement of \$79 million and \$6 million, respectively.
- (b) Capital requirement is calculated as 8% of risk-weighted assets.
- (c) The total exposure and capital requirement rounds to less than \$1 million.

# **EQUITIES NOT SUBJECT TO THE MARKET RISK RULE**

Equity investment risk is the risk of potential losses associated with investing in both private and public equity markets. Equity investments include investments in unconsolidated subsidiaries, equity and other investments classified within other assets and fund investments that, in each case, are not a covered position for purposes of the Market Risk Rule nor a securitization exposure.

Various PNC business units manage our equity and other investment activities and are responsible for making investment decisions within the approved policy limits and associated guidelines. PNC has established enterprise-wide policies and methodologies to identify, measure, monitor and report market risk. Credit Risk Management and Market Risk Management provide independent oversight by monitoring compliance with established guidelines and reporting significant risks in the business to management committees and, where appropriate, the Risk Committee of the Board of Directors. All exposures and corresponding risk-weighted assets are monitored and reported to senior level management committees, including the Regulatory Reporting Oversight Committee and the Executive Capital Committee, on at least a quarterly basis.

For additional details on the management of equity investment risk, see the Market Risk Management section of our 2024 Form 10-K. For additional information on valuation and accounting, see Note 1 Accounting Policies and Note 14 Fair Value in our 2024 Form 10-K.

#### Summary of Equity Investment Exposures

PNC holds the following equity investments that do not meet the qualifications of a covered position under the Market Risk Rule and are not a securitization exposure. Private equity investments are held primarily for capital appreciation purposes. Other equity and investment fund positions are held primarily for reasons other than capital gains, including strategic purposes. Our significant equity exposures include the following investments:

- Tax Credit Investments see Note 4 Loan Sale and Servicing Activities and Variable Interest Entities in our first quarter 2025 Form 10-Q and in our 2024 Form 10-K for further information on tax credit investments.
- Private Equity see the Market Risk Management section of our first quarter 2025 Form 10-Q and 2024 Form 10-K for more information on private equity investments.
- VISA see the Market Risk Management section of our first quarter 2025 Form 10-Q and 2024 Form 10-K for more information on our VISA investment.
- Bank Owned/Company Owned Life Insurance policies that are considered investment funds and qualify as equity exposures under the regulatory capital framework.
- Federal Home Loan Bank and Federal Reserve Bank stock, which are considered equity exposures under the regulatory capital framework.

The following tables outline the book and fair values of investments that do not qualify as covered positions:

Table 8: Book Value and Fair Value of Equity Exposures Not Subject to Market Risk Rule

In millions	March 31, 2025						
<b>Equity Exposures</b>	Book Value		Fair Value				
Publicly traded	\$ 996	\$		996			
Non-publicly traded	11,109			11,584			
Total	\$ 12,105	\$		12,580			

There were no unrealized gains/(losses) related to equity exposures included in Tier 1 or Tier 2 capital as of March 31, 2025. Realized gains/(losses) from sales and liquidations of equity exposures were \$66 million for the three months ended March 31, 2025.

Latent revaluation gains/(losses) are unrealized gains/(losses) on non-public equity investments that are recorded at cost. Such unrealized gains/(losses) are not recognized in the income statement or through accumulated other comprehensive income. Latent revaluation gains, all on our investment in VISA shares, were \$0.9 billion at March 31, 2025.

PNC uses the Simple Risk Weight Approach (SRWA) for its equity investments and either the Simple Modified Look Through Approach (SMLTA) or the Alternative Modified Look Through Approach (AMLTA) for certain investment funds. The following table outlines the capital requirements of equity investment exposures by risk-weighting:

Table 9: Capital Requirements of Equity Investment Exposures by Risk-Weighting

	March 31, 2025					
In millions		Exposure Balance		Risk-Weighted Assets (a)		Capital Requirement (b)
Simple Risk Weight Approach (SRWA)						
0% Risk Weight	\$	2,364	\$	_	\$	_
20% Risk Weight		751		150		12
100% Risk Weight		7,073		7,073		566
Sub-Total SRWA Equity Exposures	\$	10,188	\$	7,223	\$	578
Simple Modified Look Through Approach (SMLTA)		72		289		23
Alternative Modified Look Through Approach (AMLTA)		3,351		2,343		187
Total	\$	13,611	\$	9,855	\$	788

<sup>(</sup>a) Includes both on- and off-balance sheet amounts.

#### MARKET RISK CAPITAL

The U.S. banking agencies' market risk capital rules define the types of positions that are subject to the market risk capital framework (referred to as "covered positions"). Covered positions are generally defined as those positions that are held (i) for the purpose of short-term resale, (ii) with the intent of benefiting from actual or expected short-term price movements, (iii) to lock in arbitrage profits, or (iv) in order to hedge any of these types of positions. In addition, subject to certain exceptions, foreign exchange and commodity positions are considered covered positions. Characterization of a position as "trading" for purposes of GAAP is not on its own sufficient to classify the position as a covered position. As a result, certain positions classified as trading under GAAP for our financial statement presentation are not subject to the regulatory market risk capital framework.

Our covered positions primarily arise from the underwriting, investing and risk management services we provide to our customers and associated market risk mitigating hedge activities. Our covered positions are measured and reported in our financial statements at fair value. The products that make up our covered positions are primarily fixed income securities, interest rate derivatives and foreign exchange derivatives. The fixed income securities include mortgage-backed securities and municipal securities. Interest rate derivatives include interest rate swaps, swaptions, caps and floors.

# Governance of Covered Positions

PNC has established a Covered Positions Working Group to provide governance over the identification of covered positions, including reviewing our compliance with policies governing management of covered positions. The Covered Positions Working Group is composed of representatives from the areas of business, risk and finance, and is subject to oversight by the Regulatory Reporting Oversight Committee.

<sup>(</sup>b) Capital requirement is calculated as 8% of risk-weighted assets.

#### Valuation Policies, Procedures & Methodologies

For details regarding our valuation policies, procedures, and methodologies, see Note 11 Fair Value in our first quarter 2025 Form 10-Q. For details regarding the risks associated with our valuation policies, procedures, and methodologies, see the Risk Factors section of our 2024 Form 10-K.

# Value at Risk (VaR) Models

Our primary metrics used to measure the market risk of our covered position activity are Value at Risk (VaR) and Stressed VaR (sVaR). VaR is a statistically-based measure of risk that estimates the amount of potential loss that may be incurred due to adverse market movements. The measure is of the maximum loss that should not be exceeded on 99 out of 100 days for a 99% VaR. Market Risk Management (MRM) performs a VaR and sVaR calculation on a daily basis using a historical VaR methodology. 10-day VaR and sVaR are calculated at the 99% confidence interval by converting from corresponding daily measures while accounting for autocorrelation and mean-reversion. VaR is calculated using a look-back period of 500 days with market data and sensitivities updated daily, while sVaR is computed based on a 250-day period of significant stress (stress period) which remains constant through the quarter. The chosen stress period is designed to capture the buildup of volatility and profit and loss (P&L) distribution widening. The selected 250-day stress period is monitored by MRM and is updated quarterly. The models used to measure VaR and sVaR take into account the following key market risk factors: interest rates, credit spreads, foreign exchange rates, mortgage rate basis, and implied interest rate and foreign exchange volatilities.

For the three months ended March 31, 2025, our VaR and sVaR metrics were as follows:

Table 10: VaR-Based Metrics (a)

		March 31, 2025							
In millions	Credit S	Spread Risk	Interest Rate Risk			Foreign Exchange Risk		Overall Portfolio	
Min VaR (b)	\$	1.1	\$	0.1	\$	1.0	\$	2.5	
Max VaR (b)	\$	2.8	\$	0.5	\$	1.3	\$	4.3	
Average (Mean) VaR	\$	1.8	\$	0.3	\$	1.1	\$	3.2	
Period End VaR	\$	2.8	\$	0.3	\$	1.2	\$	4.3	
Min SVaR (b)	\$	6.2	\$	0.3	\$	4.6	\$	12.2	
Max SVaR (b)	\$	16.8	\$	1.5	\$	7.3	\$	24.9	
Average (Mean) SVaR	\$	11.1	\$	0.6	\$	5.5	\$	17.2	
Period End SVaR	\$	16.8	\$	0.8	\$	7.3	\$	24.9	

<sup>(</sup>a) There were no covered positions subject to equity price risk for the three months ended March 31, 2025.

For calculating market risk regulatory capital, daily VaRs assume a zero diversification benefit. We use the standardized measurement method, as defined by the Market Risk Rule, to determine the specific risk charge for our covered positions and therefore we are not required to calculate and hold incremental risk capital. In addition, our trading policies do not permit the conduct of correlation trading. Therefore, we are not required to calculate and hold comprehensive risk capital for our covered position.

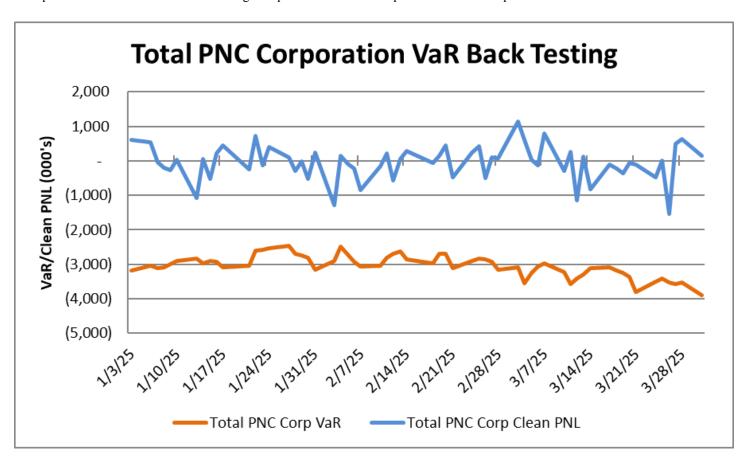
# **Back Testing**

To help ensure the integrity of the models used to calculate VaR for our portfolio of covered positions, we use a back testing process, which consists of comparing actual observations of gains or losses against the VaR levels that were calculated at the close of the prior day. Actual gains and losses for these purposes is calculated by holding end-of-day positions constant, and excludes fees, commissions, reserves, net interest income, income from customer transactions and intraday trading in order to isolate the impact of market price changes on end-of-day positions. Because of these adjustments, actual gains or losses for purposes of back testing is also referred to as "Clean P&L."

We utilize a variety of market risk measures to monitor covered activities, as identified within our MRM policies and utilize the same measures to identify significant outliers. Model owners assess the results of the back testing to verify that the models are performing as expected. In addition, model owners monitor PNC's sensitivity to changes in market risk factors on a daily basis.

<sup>(</sup>b) The minimum and maximum for the overall portfolio may have occurred on different trading days than the minimum and maximum for the individual components. Thus, the minimum and maximum for the overall portfolio will not equal the sum of the individual components.

The following graph shows a comparison of actual gains and losses against prior-day non-diversified VaR for the period. During the first quarter 2025 there were no back testing exceptions for our overall portfolio of covered positions.



#### Model Validation

The Model Risk Management Group performs independent validations to evaluate the conceptual framework used by the VaR and sVaR models (e.g., historical simulation), the assumptions underlying the models, the sufficiency and completeness of the risk factors identified as key risk drivers, as well as the sufficiency and accuracy of the historical market data used in the models. Part of the evaluation considers the approach used in the VaR and sVaR calculations, assesses the parameters used in the models, the accuracy of estimated P&L amounts, as well as the extent to which they may be auto-correlated, and corresponding adjustments.

#### Stress Testing

MRM performs daily stress-testing of covered positions based on seven different historical stress periods. Stress testing is different from VaR which estimates a potential one day loss in a normal market environment. It is designed to measure potential losses due to extreme market movements so it is an additional risk management tool that allows PNC to assess its market risk exposure relative to its risk appetite.

The stress tests employed use one-day market movements representative of market behavior during each of the historical stress periods. The P&L estimate for each scenario is treated as an instantaneous shock for each trading desk. We consider the following risk factors in performing our daily stress-testing: interest rates, credit spreads, foreign exchange rates, mortgage rate basis and implied interest rate volatility.

### Securitization Positions

As of March 31, 2025, we had \$78 million of securitization positions that were covered positions under the Market Risk Rule. MRM uses the same VaR metrics as described within the Value at Risk (VaR) Models section of this report to monitor and measure changes to market risk daily in PNC's securitization positions.

As of March 31, 2025, we do not hold any covered positions that are re-securitization positions as defined by the Market Risk Rule, and our trading desks currently do not purchase credit protection for securitization positions.

# INTEREST RATE RISK FOR NON-TRADING ACTIVITIES

Interest rate risk results primarily from our traditional banking activities of gathering deposits and extending loans. Many factors, including economic and financial conditions, movements in interest rates and consumer preferences, affect the difference between the interest that we earn on assets, the interest that we pay on liabilities and the level of our noninterest-bearing funding sources. Due to the repricing term mismatches and embedded options inherent in certain of these products, changes in market interest rates not only affect expected near-term earnings, but also the economic values of these assets and liabilities.

For further information on interest rate risk, including an interest sensitivity analysis, see the Market Risk Management - Interest Rate Risk section included in our first quarter 2025 Form 10-Q.

#### **GLOSSARY OF TERMS**

This Glossary defines terms related to the Pillar 3 Report. For additional definitions of terms and acronyms, refer to the Glossary in our 2024 Form 10-K.

Alternative Modified Look Through Approach (AMLTA) – Under this approach, a banking organization assigns the adjusted carrying value of an equity exposure to an investment fund on a pro rata basis to different risk weight categories based on the investment limits described in the fund's prospectus. The banking organization's risk-weighted asset amount is the sum of each portion of the adjusted carrying value assigned to an exposure type multiplied by the applicable risk weight. For purposes of the calculation the banking organization must assume the fund is invested in assets with the highest risk weight permitted by its prospectus and to the maximum amounts permitted.

<u>Covered Position</u> – The Market Risk Rule defines the types of positions that are subject to the market risk capital framework (referred to as "covered positions"). Covered positions are generally defined as those positions that are held (i) for the purpose of short-term resale, (ii) with the intent of benefiting from actual or expected short-term price movements, (iii) to lock in arbitrage profits, or (iv) in order to hedge any of these types of positions. In addition, subject to certain exceptions, foreign exchange and commodity positions are considered covered positions.

<u>Credit Equivalent Amount</u> – Carrying value (including net accrued but unpaid interest and fees) for the exposure or segment less any allocated transfer risk reserve for the exposure or segment for on-balance sheet exposures. For off-balance sheet exposures, credit equivalent amount is the best estimate of net additions to the outstanding amount owed the bank, including estimated future additional draws of principal and accrued but unpaid interest and fees, that are likely to occur over a one-year horizon assuming default, and potential future exposure of derivative contracts. Certain counterparty exposure credit equivalent amounts can be reduced by recognizing the credit loss mitigation benefits of financial collateral securing the exposure.

<u>High Volatility Commercial Real Estate (HVCRE)</u> – A credit facility that finances or has financed the acquisition, development, or construction of real property.

<u>Latent Revaluation Gains/(Losses)</u> – Unrealized gains/(losses) on nonpublic equity investments that are recorded at cost. Such unrealized gains/(losses) are not recognized in the income statement or through accumulated other comprehensive income.

<u>Simple Modified Look Through Approach (SMLTA)</u> – Under this approach, a banking organization multiplies the adjusted carrying value of its investment in a fund by the highest risk weight that applies to any exposure the fund is permitted to hold as described in the prospectus or fund documents.

<u>Simple Risk Weight Approach (SRWA)</u> – Under this approach, a banking organization would determine the risk-weighted asset amount for each equity exposure by multiplying the adjusted carrying value of the equity exposure by the lowest applicable risk weight permitted.

Simplified Supervisory Formula Approach (SSFA) – Under this approach, a banking organization takes into account the nature and quality of the underlying collateral when assigning a risk weight to a securitization exposure. It was designed to apply relatively higher capital requirements to the more risky junior tranches of a securitization that are the first to absorb losses and apply relatively lower requirements to the most senior positions.

<u>Sovereign</u> – A central government or agency, department, ministry, or central bank of a central government. A sovereign exposure is directly and unconditionally backed by the full faith and credit of a sovereign.

<u>Supplementary Leverage Exposure</u> - The sum of adjusted average assets and certain off-balance sheet exposures, including undrawn credit commitments and derivative potential future exposures.

# **BASEL PILLAR 3 DISCLOSURE MATRIX**

Table	Disclosure Requirement	Disclosure Location	Basel Pillar 3 Disclosure Page	Source Reference - if applicable
Table 1:	Introduction/Scope of Application			
Quanti	tative Disclosures:			
(a)	The name of the top corporate entity in the group to which the standardized approach applies.	Basel Pillar 3 Regulatory Capital Disclosures: Introduction	3	
(b)	A brief description of the differences in the basis for consolidating entities for accounting and regulatory purposes, with a description of those entities: (1) that are fully consolidated; (2) that are deconsolidated and deducted from total capital; (3) for which the total capital requirement is deducted; and (4) that are neither consolidated nor deducted (for example, where the investment in the entity is assigned a risk weight in accordance with the standardized approach).	Basel Pillar 3 Regulatory Capital Disclosures: Basis of Consolidation Q1 2025 Form 10-Q: Note 1 - Accounting Policies  2024 Form 10-K: Note 1 - Accounting Policies  PNC does not have differences in the basis of consolidation for accounting and regulatory purposes.	3	<b>Q1 2025 Form 10-Q:</b> pg. 47 <b>2024 Form 10-K:</b> pg. 97
(c)	Any restrictions, or other major impediments, on transfer of funds or total capital within the group.	Basel Pillar 3 Regulatory Capital Disclosures: Restrictions on Transfer of Funds or Total Capital  2024 Form 10-K: Note 19: Regulatory Matters	4	<b>2024 Form 10-K:</b> pg. 175
Quant	itative Disclosures:			
(d)	The aggregate amount of surplus capital of insurance subsidiaries included in the total capital of the consolidated group.	None		None
(e)	The aggregate amount by which actual total capital is less than the minimum total capital requirement in all subsidiaries, with total capital requirements and the name(s) of the subsidiaries with such deficiencies.	Basel Pillar 3 Regulatory Capital Disclosures: Capital Ratios  The only bank subsidiary subject to capital requirements is PNC Bank, N.A., which exceed minimum capital requirements.	4	
Table 2:	Capital Structure			
	Summary information on the terms and conditions of the main features of all regulatory capital instruments.	Basel Pillar 3 Regulatory Capital Disclosures: Summary of Capital  2024 Form 10-K: Part I Item 1 - Supervision and Regulation Part I Item 1A - Risk Factors Part II Item 5 - Market for Registrant's Common Equity, Related Stockholder Matters and Issuer Purchases of Equity Securities Note 11 - Equity Note 19 - Regulatory Matters	4	<b>2024 Form 10-K:</b> pg. 1 pg. 15 pg. 33 pg. 143 pg. 175
Quanti	I tative Disclosures:			<u> </u>
(b)	The amount of common equity tier 1 capital, with separate disclosure of: (1) common stock and related surplus; (2) retained earnings; (3) common equity minority interest; (4) AOCI; and (5) regulatory adjustments and deductions made to common equity tier 1 capital.	Basel Pillar 3 Regulatory Capital Disclosures: Table 1: Capital Ratios  Q1 2025 Form 10-Q: MD&A Liquidity and Capital Management - Basel III Capital Table  Consolidated Financial Statements for Holding Companies – FR Y-9C: Schedule HC-R - Regulatory Capital  2024 Form 10-K: MD&A Liquidity and Capital Management - Basel III Capital Table	5	Q1 2025 Form 10-Q: pg. 31 Consolidated Financial Statements for Holding Companies – FR Y-9C: Schedule HC-R 2024 Form 10-K: pg. 75

Tak	ble	Disclosure Requirement	Disclosure Location	Basel Pillar 3 Disclosure Page	Source Reference - if applicable
	(0)	The amount of tier 1 capital, with separate disclosure of: (1) additional tier 1 capital elements, including additional tier 1 capital instruments and tier 1 minority interest not included in common equity tier 1 capital; and (2) regulatory adjustments and deductions made to tier 1 capital.	Basel Pillar 3 Regulatory Capital Disclosures: Table 1: Capital Ratios  Q1 2025 Form 10-Q: MD&A Liquidity and Capital Management - Basel III Capital Table  Consolidated Financial Statements for Holding Companies – FR Y-9C: Schedule HC-R - Regulatory Capital	5	Q1 2025 Form 10-Q: pg. 31  Consolidated Financial Statements for Holding Companies – FR Y-9C: Schedule HC-R
			2024 Form 10-K: MD&A Liquidity and Capital Management - Basel III Capital Table		<b>2024 Form 10-K:</b> pg. 75
	(d)	The amount of total capital, with separate disclosure of: (1) Tier 2 capital elements, including tier 2 capital instruments and total capital minority interest not included in tier 1 capital; and (2) regulatory adjustments and deductions made to total capital.	Basel Pillar 3 Regulatory Capital Disclosures: Table 1: Capital Ratios  Q1 2025 Form 10-Q: MD&A Liquidity and Capital Management - Basel III Capital Table  Consolidated Financial Statements for Holding Companies – FR Y-9C: Schedule HC-R - Regulatory Capital	5	Q1 2025 Form 10-Q: pg. 31  Consolidated Financial Statements for Holding Companies – FR Y-9C:
			2024 Form 10-K: MD&A Liquidity and Capital Management - Basel III Capital Table		Schedule HC-R <b>2024 Form 10-K:</b> pg. 75
Tabl	les 3:	Capital Adequacy			
Qı	ualita	tive Disclosures:			
	(a)	A summary discussion of PNC's approach to assessing the adequacy of its capital to support current and future activities.	Basel Pillar 3 Regulatory Capital Disclosures: Capital Adequacy	4	
	ıanti	tative Disclosures:	<u> </u>		
<u> </u>		Risk-weighted assets for: (1) exposures to sovereign entities; (2) exposures to certain supranational entities and MDBs; (3) exposures to depository institutions, foreign banks, and credit unions; (4) exposures to PSEs; (5) corporate exposures; (6) residential mortgage exposures; (7) statutory multifamily mortgages and pre-sold construction loans; (8) HVCRE loans; (9) past due loans; (10) other assets; (11) cleared transactions; (12) default fund contributions; (13) unsettled transactions; (14) securitization exposures; and (15) equity exposures.	Basel Pillar 3 Regulatory Capital Disclosures: Table 2: Standardized Risk-Weighted Assets 2,7 (pre-sold construction loans), and 12 do not apply to PNC.	6	
	(c)	Standardized market risk-weighted assets as calculated under the market risk rule.	Basel Pillar 3 Regulatory Capital Disclosures: Table 2: Standardized Risk-Weighted Assets Q1 2025 Form 10-Q: MD&A Liquidity and Capital Management - Basel III Capital Table 2024 Form 10-K: MD&A Liquidity and Capital Management - Basel III Capital Table	6	<b>Q1 2025 Form 10-Q:</b> pg. 31 <b>2024 Form 10-K:</b> pg. 75

Tab	le	Disclosure Requirement	Disclosure Location	Basel Pillar 3 Disclosure Page	Source Reference - if applicable
	(d)	Common equity tier 1, tier 1 and total risk-based capital ratios:	Basel Pillar 3 Regulatory Capital Disclosures: Table 1: Capital Ratios	5	при
		<ul><li>(1) for the top consolidated group; and</li><li>(2) for each depository institution subsidiary.</li></ul>	Consolidated Reports of Condition and Income for A Bank With Domestic and Foreign Offices - FFIEC 031: Schedule RC-R Part 1 - Regulatory Capital Components and Ratios		Consolidated Reports of Condition and Income for A Bank With Domestic and Foreign Offices - FFIEC 031: Schedule RC-R Part 1
			Consolidated Financial Statements for Holding Companies – FR Y-9C: Schedule HC-R - Regulatory Capital		Consolidated Financia Statements for Holding Companies – FR Y-9C: Schedule HC-R
			Q1 2025 Form 10-Q: MD&A Liquidity and Capital Management - Basel III Capital Table		Q1 2025 Form 10-Q: pg. 31
			<b>2024 Form 10-K:</b> MD&A Liquidity and Capital Management - Basel III Capital Table		<b>2024 Form 10-K:</b> pg. 75
	(e)	Total standardized risk-weighted assets.	Basel Pillar 3 Regulatory Capital Disclosures: Table 2: Standardized Risk-Weighted Assets	6	
			Consolidated Financial Statements for Holding Companies – FR Y-9C: Schedule HC-R - Regulatory Capital		Consolidated Financia Statements for Holding Companies – FR Y-9C: Schedule HC-R
			Q1 2025 Form 10-Q: MD&A Liquidity and Capital Management - Basel III Capital Table		<b>Q1 2025 Form 10-Q:</b> pg. 31
			2024 Form 10-K: MD&A Liquidity and Capital Management - Basel III Capital Table		<b>2024 Form 10-K:</b> pg. 75
Γable	e 4:	Capital Conservation Buffer			
Qu T		tative Disclosures:  At least quarterly, PNC must calculate and publicly disclose	Basel Pillar 3 Regulatory Capital Disclosures:		T
	(4)	the capital conservation buffer.	Capital Ratios	4-5	
			Consolidated Reports of Condition and Income for A Bank With Domestic and Foreign Offices - FFIEC 031: Schedule RC-R Part 1 - Regulatory Capital Components and Ratios		Consolidated Reports of Condition and Income for A Bank With Domestic and Foreign Offices - FFIEO 031: Schedule RC-R Part 1
			Consolidated Financial Statements for Holding Companies – FR Y-9C: Schedule HC-R - Regulatory Capital		Consolidated Financia Statements for Holding Companies – FR Y-9C: Schedule HC-R
	(b)	At least quarterly, PNC must calculate and publicly disclose the eligible retained income.	Basel Pillar 3 Regulatory Capital Disclosures: Capital Ratios	4-5	
					1

Table	Disclosure Requirement	Disclosure Location	Basel Pillar 3 Disclosure Page	Source Reference - if applicable
(c)	At least quarterly, PNC must calculate and publicly disclose any limitations it has on distributions and discretionary bonus payments resulting from the capital conservation buffer framework, including the maximum payout amount for the quarter.	Basel Pillar 3 Regulatory Capital Disclosures: Capital Ratios  Consolidated Reports of Condition and Income for A Bank With Domestic and Foreign Offices - FFIEC 031: Schedule RC-R Part 1 - Regulatory Capital Components and Ratios  Consolidated Financial Statements for Holding Companies – FR Y-9C: Schedule HC-R - Regulatory Capital	4-5	Consolidated Reports of Condition and Income for A Bank With Domestic and Foreign Offices - FFIEC 031: Schedule RC-R Part 1 Consolidated Financia Statements for Holding Companies – FR Y-9C: Schedule HC-R
able 5:	Credit Risk: General Disclosures			
Genera	al Qualitative Disclosure Requirements (for each separate risk ar	<u>ea)</u>		
(c)	Describe the risk management objectives and policies, including: (1) strategies and processes; (2) the structure and organization of the relevant risk management function; (3) the scope and nature of risk reporting and/or	Basel Pillar 3 Regulatory Capital Disclosures: Credit Risk Management  Q1 2025 Form 10-Q: MD&A - Credit Risk Management	7	<b>Q1 2025 Form 10-Q</b> : pg. 19
	(a) the scope and induction of this reporting and/or measurement systems; (4) policies for hedging and/or mitigating risk; and (5) strategies and processes for monitoring the continuing effectiveness of hedges/mitigants.	2024 Form 10-K: MD&A - Credit Risk Management		<b>2024 Form 10-K</b> : pg. 59
Oualita	ntive Disclosures			
	The general qualitative disclosure requirement with respect to credit risk (excluding the counterparty credit risk disclosed in accordance with Table 6), including the:  (1) policy for determining past due or delinquency status; (2) policy for placing loans on nonaccrual; (3) policy for returning loans to accrual status; (4) definition of and policy for identifying the impaired loans (for financial accounting purposes); (5) description of the methodology that PNC uses to estimate its allowance for loan and lease losses, including statistical methods used where applicable; (6) policy for charging-off uncollectible amounts; and (7) discussion of PNC's credit risk management policy.	Basel Pillar 3 Regulatory Capital Disclosures: Credit Risk Management  Q1 2025 Form 10-Q: Consolidated Income Statement Review - Provision for Credit Losses Table Consolidated Balance Sheet Review MD&A - Credit Risk Management Average Consolidated Balance Sheet and Net Interest Analysis Critical Accounting Estimates and Judgments Note 1 - Accounting Policies Note 2 - Investment Securities Note 3 - Loans and Related Allowances for Credit Losses Note 12 - Financial Derivatives	7	Q1 2025 Form 10-Q: pg. 8 pg. 8 pg. 19 pg. 35 pg. 37 pg. 47 pg. 48 pg. 51 pg. 79
		2024 Form 10-K: Consolidated Income Statement Review - Provision for (Recapture of) Credit Losses Table Consolidated Balance Sheet Review MD&A - Credit Risk Management Average Consolidated Balance Sheet and Net Interest Analysis Critical Accounting Estimates and Judgments Note 1 - Accounting Policies Note 2 - Investment Securities Note 3 - Loans and Related Allowances for Credit Losses Note 15 - Financial Derivatives		2024 Form 10-K: pg. 43  pg. 44 pg. 59 pg. 81  pg. 83 pg. 97 pg. 116 pg. 119  pg. 160

Table	Disclosure Requirement	Disclosure Location	Basel Pillar 3 Disclosure Page	Source Reference - if applicable
(b)	Total credit risk exposures and average credit risk exposures, after accounting offsets in accordance with GAAP, without taking into account the effects of credit risk mitigation techniques (for example, collateral and netting not permitted under GAAP), over the period categorized by major types of credit exposure. For example, PNC could use categories similar to that used for financial statement purposes. Such categories might include, for instance:  (1) loans, off-balance sheet commitments, and other non-derivative off-balance sheet exposures;  (2) debt securities; and  (3) OTC derivatives.	Basel Pillar 3 Regulatory Capital Disclosures: Summary of Credit Exposures  Q1 2025 Form 10-Q: Consolidated Balance Sheet Review - Loans Table Note 2 - Investment Securities Note 3 - Loans and Related Allowance for Credit Losses Note 12 - Financial Derivatives  2024 Form 10-K: Consolidated Balance Sheet Review - Loans Table Note 2 - Investment Securities Note 3 - Loans and Related Allowance for Credit Losses Note 15 - Financial Derivatives	7-9	Q1 2025 Form 10-Q: pg. 9 pg. 48 pg. 51 pg. 79 2024 Form 10-K: pg. 45 pg. 116 pg. 119 pg. 160
(c)	Geographic distribution of exposures, categorized in significant areas by major types of credit exposure.	Basel Pillar 3 Regulatory Capital Disclosures: Summary of Credit Exposures	7	
		Q1 2025 Form 10-Q: MD&A - Credit Risk Management - Commercial and Industrial Loans by Industry Table MD&A - Credit Risk Management - Commercial Real Estate Loans by Geography and Property Type Table MD&A - Credit Risk Management - Residential Real Estate Loan Statistics Table MD&A - Credit Risk Management - Home Equity Loan Statistics Table		<b>Q1 2025 Form 10-Q:</b> pg. 20 pg. 21 pg. 22 pg. 23
		2024 Form 10-K: MD&A - Credit Risk Management - Commercial and Industrial Loans by Industry Table MD&A - Credit Risk Management - Commercial Real Estate Loans by Geography and Property Type Table MD&A - Credit Risk Management -		<b>2024 Form 10-K:</b> pg. 60 pg. 61 pg. 62
		Residential Real Estate Loan Statistics Table MD&A - Credit Risk Management - Home Equity Loan Statistics Table		pg. 63
(d)	Industry or counterparty type distribution of exposures, categorized by major types of credit exposure.	Basel Pillar 3 Regulatory Capital Disclosures: Summary of Credit Exposures  Q1 2025 Form 10-Q: MD&A - Credit Risk Management - Commercial and Industrial Loans by Industry Table	7	<b>Q1 2025 Form 10-Q:</b> pg. 20
		2024 Form 10-K: MD&A - Credit Risk Management - Commercial and Industrial Loans by Industry Table		<b>2024 Form 10-K</b> : pg. 60
		PNC does not categorize residential mortgage or other retail exposures by industry.		

Tab	le	Disclosure Requirement	Disclosure Location	Basel Pillar 3 Disclosure Page	Source Reference - if applicable
	(e)	By major industry or counterparty type: (1) amount of impaired loans for which there was a related allowance under GAAP; (2) amount of impaired loans for which there was no related allowance under GAAP; (3) amount of loans past due 90 days and on nonaccrual; (4) amount of loans past due 90 days and still accruing (note that PNC is encouraged to also provide an analysis of the aging of past due loans); (5) the balance in the allowance for loan and lease losses at the end of each period, disaggregated on the basis of PNC's impairment method. To disaggregate the information required on the basis of impairment methodology, an entity shall separately disclose the amounts based on the requirements in GAAP; and (6) charge-offs during the period.	2024 Form 10-K: Note 1 - Accounting Policies Note 3 - Loans and Related Allowance for Credit Losses		<b>2024 Form 10-K:</b> pg. 97 pg. 119
	(f)	Amount of impaired loans and, if available, the amount of past due loans categorized by significant geographic areas including, if practical, the amounts of allowances related to each geographical area, further categorized as required by GAAP. Note that the portion of the general allowance that is not allocated to a geographical area should be disclosed separately.	2024 Form 10-K: Note 1 - Accounting Policies Note 3 - Loans and Related Allowance for Credit Losses		<b>2024 Form 10-K</b> : pg. 97 pg. 119
	(g)	Reconciliation of changes in ACL, which should include: (1) A description of the allowance; (2) the opening balance of the allowance during the period; (3) charge-offs taken against the allowance during the period; (4) amounts provided (or reversed) for estimated probable loan losses during the period; (5) any other adjustments (for example, exchange rate differences, business combinations, acquisitions and disposals of subsidiaries), including transfers between allowances; and (6) the closing balance of the allowance.  Note: Charge-offs and recoveries that have been recorded directly to the income statement should be disclosed separately.	Q1 2025 Form 10-Q: Note 3 - Loans and Related Allowance for Credit Losses  2024 Form 10-K: Note 3 - Loans and Related Allowance for Credit Losses		Q1 2025 Form 10-Q: pg. 51 2024 Form 10-K: pg. 119
	(h)	Remaining contractual maturity delineation (for example, one year or less) of the whole portfolio, categorized by credit exposure.	Basel Pillar 3 Regulatory Capital Disclosures: Table 4: Loan Exposures by Remaining Contractual Maturity  Q1 2025 Form 10-Q: Note 2 - Investment Securities  2024 Form 10-K: Note 2 - Investment Securities	8	Q1 2025 Form 10-Q: pg. 48 2024 Form 10-K: pg. 116
Tal	ble 6	i: General Disclosure for Counterparty Credit Risk-Related Expo	sures		l
Ge		Describe the risk management objectives and policies, including: (1) strategies and processes; (2) the structure and organization of the relevant risk management function; (3) the scope and nature of risk reporting and/or measurement systems; (4) policies for hedging and/or mitigating risk; and (5) strategies and processes for monitoring the continuing effectiveness of hedges/mitigants.	Basel Pillar 3 Regulatory Capital Disclosures: Credit Risk Management Counterparty Credit Risk  Q1 2025 Form 10-Q: Note 12 - Financial Derivatives  2024 Form 10-K: Note 15 - Financial Derivatives	7 8-9	<b>Q1 2025 Form 10-Q:</b> pg. 79 <b>2024 Form 10-K:</b> pg. 160

Table	Disclosure Requirement	Disclosure Location	Basel Pillar 3 Disclosure Page	Source Reference - if applicable
Qualita	ative Disclosures			<u> </u>
	The general qualitative disclosure requirement with respect to OTC derivatives, eligible margin loans, and repo-style transactions, including a discussion of: (1) the methodology used to assign credit limits for counterparty credit exposures; (2) policies for securing collateral, valuing and managing collateral, and establishing credit reserves; (3) the primary types of collateral taken; and (4) the impact of the amount of collateral PNC would have to provide given a deterioration in PNC's own creditworthiness.	Basel Pillar 3 Regulatory Capital Disclosures: Counterparty Credit Risk Collateral  Q1 2025 Form 10-Q: Note 12 - Financial Derivatives  2024 10-K: Note 15 - Financial Derivatives	8 9	<b>Q1 2025 Form 10-Q:</b> pg. 79 <b>2024 10-K:</b> pg. 160
Quanti	tative Disclosures			
(b)	Gross positive fair value of contracts, collateral held (including type, for example, cash, government securities), and net unsecured credit exposure. PNC also must disclose the notional value of credit derivative hedges purchased for counterparty credit risk protection and the distribution of current credit exposure by exposure type.	Basel Pillar 3 Regulatory Capital Disclosures: Table 5: Counterparty Credit Risk Exposures	9	
(c)	Notional amount of purchased and sold credit derivatives, segregated between use for PNC's own credit portfolio and in its intermediation activities, including the distribution of the credit derivative products used, categorized further by protection bought and sold within each product group.	Q1 2025 Form 10-Q: Note 12 - Financial Derivatives 2024 10-K: Note 15 - Financial Derivatives		<b>Q1 2025 Form 10-Q:</b> pg. 79 <b>2024 10-K:</b> pg. 160
able 7:	Credit Risk Mitigation			
Genera	al Qualitative Disclosure Requirements (for each separate risk are	<u>ea)</u>		
(c)	Describe the risk management objectives and policies, including: (1) strategies and processes; (2) the structure and organization of the relevant risk management function; (3) the scope and nature of risk reporting and/or measurement systems; (4) policies for hedging and/or mitigating risk; and (5) strategies and processes for monitoring the continuing effectiveness of hedges/mitigants.	Basel Pillar 3 Regulatory Capital Disclosures: Credit Risk Credit Risk Mitigation Counterparty Credit Risk  Q1 2025 Form 10-Q: Note 12 - Financial Derivatives  2024 10-K: Note 15 - Financial Derivatives	7 8 8	<b>Q1 2025 Form 10-Q:</b> pg. 79 <b>2024 10-K:</b> pg. 160
Qualita	ative Disclosures			
(a)	The general qualitative disclosure requirement with respect to credit risk mitigation, including a discussion of: (1) policies and processes for collateral valuation and management; (2) a description of the main types of collateral taken by PNC; (3) the main types of guarantors/credit derivative counterparties and their creditworthiness; and (4) information about (market or credit) risk concentrations with respect to credit risk mitigation.	Basel Pillar 3 Regulatory Capital Disclosures: Credit Risk Credit Risk Mitigation Counterparty Credit Risk Mitigation Q1 2025 Form 10-Q: Note 12 - Financial Derivatives 2024 10-K: Note 15 - Financial Derivatives	7 8 9	<b>Q1 2025 Form 10-Q:</b> pg. 79 <b>2024 10-K:</b> pg. 160
Quanti	tative Disclosures			
(b)	For each separately disclosed credit risk portfolio, the total exposure that is covered by eligible financial collateral, and after the application of haircuts.	Basel Pillar 3 Regulatory Capital Disclosures: Collateral Table 5: Counterparty Credit Risk Exposures	9 9	
(c)	For each separately disclosed credit risk portfolio, the total exposure that is covered by guarantees/credit derivatives and the risk-weighted asset amount associated with that exposure.	Basel Pillar 3 Regulatory Capital Disclosures: Credit Risk Mitigation	8	
Table 8	I 3: Securitization			
	al Qualitative Disclosure Requirements (for each separate risk are			

Describe the risk management objectives and policies, including:  (1) strategies and processes; (2) the structure and organization of the relevant risk management function; (3) the scope and nature of risk reporting and/or measurement systems; (4) policies for hedging and/or mitigating risk; and (5) strategies and processes for monitoring the continuing effectiveness of hedges/mitigants.   tive Disclosures  The general qualitative disclosure requirement with respect to a securitization (including synthetic securitizations), including a discussion of: (1) PNC's objectives for securitizing assets, including the extent to which these activities transfer credit risk of the underlying exposures away from PNC to other entities and including the type of risks assumed and retained with resecuritization activity. (2) the nature of the risks (e.g. liquidity risk) inherent in the	Basel Pillar 3 Regulatory Capital Disclosures: Securitization Risk Management  2024 Form 10-K: Note 1 - Accounting Policies Note 4 - Loan Sale and Servicing Activities and Variable Interest Entities  Basel Pillar 3 Regulatory Capital Disclosures: Securitization Regulatory Treatment of Securitizations Table 7: Capital Requirements of Securitization Exposures by Risk-Weighting	9 10 9 10	<b>2024 Form 10-K</b> : pg. 97 pg. 132
The general qualitative disclosure requirement with respect to a securitization (including synthetic securitizations), including a discussion of: (1) PNC's objectives for securitizing assets, including the extent to which these activities transfer credit risk of the underlying exposures away from PNC to other entities and including the type of risks assumed and retained with resecuritization activity.	Securitization Regulatory Treatment of Securitizations Table 7: Capital Requirements of	10	
to a securitization (including synthetic securitizations), including a discussion of: (1) PNC's objectives for securitizing assets, including the extent to which these activities transfer credit risk of the underlying exposures away from PNC to other entities and including the type of risks assumed and retained with resecuritization activity.	Securitization Regulatory Treatment of Securitizations Table 7: Capital Requirements of	10	
securitized assets; (3) the roles played by PNC in the securitization process (for example, originator, investor, servicer, provider of credit enhancement, sponsor, liquidity provider or swap provider) and an indication of the extent of PNC's involvement in each of them; (4) the processes in place to monitor changes in the credit and market risk of securitization exposures including how those processes differ for resecuritization exposures; (5) PNC's policy for mitigating the credit risk retained through securitization and resecuritization exposures; and (6) the risk-based capital approaches that PNC follows for its securitization exposures including the type of securitization exposure to which each approach applies.	Q1 2025 Form 10-Q: Note 3 - Loans and Related Allowance for Credit Losses  2024 Form 10-K: Note 1 - Accounting Policies Note 3 - Loans and Related Allowance for Credit Losses Note 4 - Loan Sale and Servicing Activities and Variable Interest Entities Note 15 - Financial Derivatives	11	Q1 2025 Form 10-Q: pg. 51 2024 Form 10-K: pg. 97 pg. 119 pg. 132 pg. 160
A list of: (1) the type of securitization SPEs that PNC, as sponsor, uses to securitize third-party exposures. PNC must indicate whether it has exposure to these SPEs, either on- or off-balance sheet; and (2) affiliated entities: (i) that PNC manages or advises; and (ii) that invest either in the securitization exposures that PNC has securitized or in securitization SPEs that PNC sponsors. Such affiliated entities may include, for example, money market funds, to be listed individually, and personal and private trusts, to be noted collectively.	Basel Pillar 3 Regulatory Capital Disclosures: Securitization  2024 Form 10-K: Note 4 - Loan Sale and Servicing Activities and Variable Interest Entities  PNC does not use affiliated entities for securitization activity.	9-11	<b>2024 Form 10-K</b> : pg. 132
Summary of PNC's accounting policies for securitization activities, including: (1) whether the transactions are treated as sales or financings (2) recognition of gain-on-sale; (3) methods and key assumptions applied in valuing retained or purchased interests; (4) changes in methods and key assumptions from the previous period for valuing retained interests and impact of the changes; (5) treatment of synthetic securitizations; (6) how exposures intended to be securitized are valued and whether they are recorded under the standardized approach; and (7) policies for recognizing liabilities on the balance sheet for arrangements that could require PNC to provide financial support for securitized assets.	Basel Pillar 3 Regulatory Capital Disclosures: Securitization  2024 Form 10-K: Note 1 - Accounting Policies Note 4 - Loan Sale and Servicing Activities and Variable Interest Entities  PNC has no exposures pending securitization as PNC does not securitize its own assets, and all securitizations are traditional in nature.	9-11	<b>2024 Form 10-K:</b> pg. 97 pg. 132
An explanation of significant changes to any quantitative information since the last reporting period.	Basel Pillar 3 Regulatory Capital Disclosures: Securitization	9-11	
	enhancement, sponsor, liquidity provider or swap provider) and an indication of the extent of PNC's involvement in each of them;  (4) the processes in place to monitor changes in the credit and market risk of securitization exposures including how those processes differ for resecuritization exposures;  (5) PNC's policy for mitigating the credit risk retained through securitization and resecuritization exposures; and  (6) the risk-based capital approaches that PNC follows for its securitization exposures including the type of securitization exposure to which each approach applies.  A list of:  (1) the type of securitization SPEs that PNC, as sponsor, uses to securitize third-party exposures. PNC must indicate whether it has exposure to these SPEs, either on- or off-balance sheet; and  (2) affiliated entities:  (i) that PNC manages or advises; and  (ii) that invest either in the securitization exposures that PNC has securitized or in securitization SPEs that PNC sponsors. Such affiliated entities may include, for example, money market funds, to be listed individually, and personal and private trusts, to be noted collectively.  Summary of PNC's accounting policies for securitization activities, including:  (1) whether the transactions are treated as sales or financings (2) recognition of gain-on-sale;  (3) methods and key assumptions applied in valuing retained or purchased interests;  (4) changes in methods and key assumptions from the previous period for valuing retained interests and impact of the changes;  (5) treatment of synthetic securitizations;  (6) how exposures intended to be securitized are valued and whether they are recorded under the standardized approach; and  (7) policies for recognizing liabilities on the balance sheet for arrangements that could require PNC to provide financial support for securitized assets.	enhancement, sponsor, liquidity provider or swap provider) and an indication of the extent of PNC's involvement in each of them;  (4) the processes in place to monitor changes in the credit and market risk of securitization exposures; including how those processes differ for resecuritization exposures; and of (6) the risk-based capital approaches that PNC follows for its securitization exposures; and (6) the risk-based capital approaches that PNC follows for its securitization exposures including the type of securitization exposures. PNC must indicate whether it has exposure to these SPEs, either on- or off-balance sheet; and (2) affiliated entities may include, for example, money market funds, to be listed individually, and personal and private trusts, to be noted collectively.  Summary of PNC's accounting policies for securitization activities, including: (1) whether the transactions are treated as sales or financings (2) recognition of gain-on-sale; (3) methods and key assumptions applied in valuing retained or purchased interests; (4) changes in methods and key assumptions applied in valuing retained or purchased interests; (4) changes in methods and key assumptions from the previous period for valuing retained interests and impact of the changes; (6) how exposures intended to be securitized are valued and whether they are recorded under the standardized approach; and (7) policies for recognizing liabilities on the balance sheet for arrangements that could require PNC to provide financial support for securitized assets.  An explanation of significant changes to any quantitative information since the last reporting period.	enhancement, sponsor, liquidity provider or swap provider) and an indication of the extent of PrC's involvement in each of them;  (4) the processes in place to monitor changes in the credit and market risk of securitization exposures; including how those processes differ for resecuritization exposures;  (5) PNC's policy for mitigating the credit risk retained through (6) the risk-based capital approaches that PNC follows for its securitization exposures and (6) the risk-based capital approaches that PNC follows for its securitization exposures including the type of securitization exposures including the type of securitization exposures are to securitize third-party exposures. PNC must indicate whether it has exposure to these SPEs, either on- or off-balance sheet; and (2) affiliated entities:  (1) that PNC manages or advises; and (ii) that invest ither in the securitization exposures that PNC has securitized or in securitization SPEs that PNC sponsors. Such affiliated entities may include, for example, money market funds, to be listed individually, and personal and private trusts, to be noted collectively.  Summary of PNC's accounting policies for securitization activities, including:  (1) whether the transactions are treated as sales or financings?  (2) recognition of gain-on-sale;  (3) methods and key assumptions applied in valuing retained or purchased interests;  (3) methods and key assumptions applied in valuing retained or purchased interests;  (5) treatment of synthetic securitizations;  (5) treatment of synthetic securitizations;  (6) the exposures intended to be securitized are valued and whether they are recorded under the standardized approach;  and  (7) policies for recognizing liabilities on the balance sheet for arrangements that could require PNC to provide financial support for securitized assets.  An explanation of significant changes to any quantitative information since the last reporting period.

Tabl	е	Disclosure Requirement	Disclosure Location	Basel Pillar 3 Disclosure Page	Source Reference - if applicable
		The total outstanding exposures securitized by PNC in securitizations that meet the operational criteria provided in §41 (categorized into traditional and synthetic securitizations), by exposure type, separately for securitizations of third-party exposures for which the bank acts only as sponsor.	None		None
		For exposures securitized by PNC in securitizations that meet the operational criteria in §41: (1) amount of securitized assets that are impaired/past due categorized by exposure type (include credit-related OTTI); and (2) losses recognized by PNC during the current period categorized by exposure type. For example, charge-offs/ allowances (if the assets remain on PNC's balance sheet) or credit-related OTTI of interest-only strips and other retained residual interests, as well as recognition of liabilities for probable future financial support required of PNC with respect to securitized assets.	None		None
(	(g)	The total amount of outstanding exposures intended to be securitized categorized by exposure type.	None		None
	Ì	Aggregate amount of: (1) on-balance sheet securitization exposures retained or purchased categorized by exposure type; and (2) off-balance sheet securitization exposures categorized by exposure type.	Basel Pillar 3 Regulatory Capital Disclosures: Table 6: Securitization Exposures by Underlying Asset Type	10	
		(1) Aggregate amount of securitization exposures retained or purchased and the associated capital requirements for these exposures, categorized between securitization and resecuritization exposures, further categorized into a meaningful number of risk weight bands and by risk-based capital approach (e.g., SSFA); and (2) Exposures that have been deducted entirely from tier 1 capital, CEIOs deducted from total capital, and other exposures deducted from total capital should be disclosed separately by exposure type.	Basel Pillar 3 Regulatory Capital Disclosures: Table 7: Capital Requirements of Securitization Exposures by Risk-Weighting	11	
		Summary of current year's securitization activity, including the amount of exposures securitized (by exposure type), and recognized gain or loss on sale by exposure type.	None		None
		Aggregate amount of resecuritization exposures retained or purchased categorized according to: (1) exposures to which credit risk mitigation is applied and those not applied; and (2) exposures to guarantors categorized according to guarantor creditworthiness categories or guarantor name.	None		None
Tab	le 9	: Equities Not Subject to the Market Risk Rule			
$\overline{}$		I Qualitative Disclosure Requirements (for each separate risk ar Describe the risk management objectives and policies,	ea)  Basel Pillar 3 Regulatory Capital Disclosures:		<u> </u>
		(1) strategies and processes; (2) the structure and organization of the relevant risk management function; (3) the scope and nature of risk reporting and/or measurement systems; (4) policies for hedging and/or mitigating risk; and (5) strategies and processes for monitoring the continuing effectiveness of hedges/mitigants.	Equities not Subject to the Market Risk Rule Summary of Equity Investment Exposures  Q1 2025 Form 10-Q: MD&A - Market Risk Management Note 4 - Loan Sale and Servicing Activities and Variable Interest Entities  2024 Form 10-K: MD&A - Market Risk Management Note 1 - Accounting Policies Note 4 - Loan Sale and Servicing Activities and Variable Interest Entities Note 14 - Fair Value	11 11	Q1 2025 Form 10-Q: pg. 32 pg. 62 2024 Form 10-K: pg. 76 pg. 97 pg. 132 pg. 147

Table	Disclosure Requirement	Disclosure Location	Basel Pillar 3 Disclosure Page	Source Reference - if applicable
Qualit	ative Disclosures			
(a)	The general qualitative disclosure requirement with respect to equity risk for equities not subject to the market risk rule, including: (1) differentiation between holdings on which capital gains are expected and those taken under other objectives including for relationship and strategic reasons; and (2) discussion of important policies covering the valuation of and accounting for equity holdings not subject to the market risk rule. This includes the accounting techniques and valuation methodologies used, including key assumptions and practices affecting valuation as well as significant changes in these practices.	Basel Pillar 3 Regulatory Disclosures: Summary of Equity Investment Exposures  Q1 2025 Form 10-Q: MD&A - Market Risk Management Note 4 - Loan Sale and Servicing Activities and Variable Interest Entities  2024 Form 10-K: MD&A - Market Risk Management Note 1 - Accounting Policies Note 4 - Loan Sale and Servicing Activities and Variable Interest Entities Note 14 - Fair Value	11, 12	Q1 2025 Form 10-Q: pg. 32 pg. 62 2024 Form 10-K: pg. 76 pg. 97 pg. 132 pg. 147
Ouant	I itative Disclosures			<u> </u>
	Value disclosed on the balance sheet of investments, as well as the fair value of those investments; for securities that are publicly traded, a comparison to publicly-quoted share values where the share price is materially different from fair value.	Basel Pillar 3 Regulatory Disclosures: Table 8: Book Value and Fair Value of Equity Exposures Not Subject to Market Risk Rule There are no publicly traded securities that have a share price materially different from fair value.	12	
(c)	The types and nature of investments, including the amount that is: (1) publicly traded; and (2) non-publicly traded.	Basel Pillar 3 Regulatory Disclosures: Table 8: Book Value and Fair Value of Equity Exposures Not Subject to Market Risk Rule	12	
(d)	The cumulative realized gains (losses) arising from sales and liquidations in the reporting period.	Basel Pillar 3 Regulatory Disclosures: Summary of Equity Investment Exposures	12	
(e)	(1) Total unrealized gains (losses) recognized on the balance sheet but not through earnings. (2) Total latent revaluation gains (losses) not recognized either on the balance sheet or through earnings. (3) Any amounts of the above included in tier 1 or tier 2 capital.	Basel Pillar 3 Regulatory Disclosures: Summary of Equity Investment Exposures	12	
(f)	Capital requirements categorized by appropriate equity groupings, consistent with PNC's methodology, as well as the aggregate amounts and the type of equity investments subject to any supervisory transition regarding regulatory capital requirements.	Basel Pillar 3 Regulatory Disclosures: Table 9: Capital Requirements of Equity Investment Exposures by Risk-Weighting	12	
Marke	t Risk Rule			
Quant	itative Disclosures			
	High, low & mean VaR-based measures	Basel Pillar 3 Regulatory Disclosures: Table 10: VaR-Based Metrics	13	
	High, low & mean stressed VaR -based measures	Basel Pillar 3 Regulatory Disclosures: Table 10: VaR-Based Metrics	13	
	High, low & mean incremental risk capital	None		None
	High, low & mean comprehensive risk capital	None		None

Table	Disclosure Requirement	Disclosure Location	Basel Pillar 3 Disclosure Page	Source Reference - if applicable
	Separate measures for interest rate risk, credit spread risk, equity price risk, foreign exchange risk, and commodity price risk used to calculate the VaR-based measure	Basel Pillar 3 Regulatory Disclosures: Table 10: VaR-Based Metrics	13	
	A comparison of VaR-based estimates with actual gains or losses experienced by the bank, w/analysis of important outliers	Basel Pillar 3 Regulatory Disclosures: Back Testing	13	
	Aggregate amount of on-balance sheet and off-balance sheet securitization positions by exposure type	Basel Pillar 3 Regulatory Disclosures: Securitization Positions	14	
	The aggregate amount of correlation trading positions	None		None
Qualita	I ntive Disclosures			
	The composition of material portfolios of covered positions	Basel Pillar 3 Regulatory Disclosures: Market Risk Capital	12	
	The bank's valuation policies, procedures, and methodologies for covered positions including, for securitization positions, the methods and key assumptions used for valuing such positions, any significant changes since the last reporting period, and the impact of such change	Basel Pillar 3 Regulatory Disclosures: Valuation Policies, Procedures & Methodologies	13	
	The characteristics of the internal models used for purposes of this appendix. For the incremental risk capital requirement and the comprehensive risk capital requirement, this must include:  (i) The approach used by PNC to determine liquidity horizons;  (ii) The methodologies used to achieve a capital assessment that is consistent with the required soundness standard; and  (iii) The specific approaches used in the validation of these models	Basel Pillar 3 Regulatory Disclosures: Value at Risk (VaR) Models	13	
	A description of the approaches used for validating and evaluating the accuracy of internal models and modeling process for purposes of this appendix	Basel Pillar 3 Regulatory Disclosures: Back Testing Model Validation	13 14	
	For each market risk category, a description of the stress test applied to the positions subject to the factor	Basel Pillar 3 Regulatory Disclosures: Stress Testing	14	
	The results of the comparison of the bank's internal estimates for purposes of this appendix along with outcomes during a sample period not used in model development.	Basel Pillar 3 Regulatory Disclosures: Back testing	13	
	The soundness standard on which the bank's internal capital adequacy assessment under this appendix is based, including a description of the methodologies used to achieve a capital adequacy assessment that is consistent with the soundness standard.	Basel Pillar 3 Regulatory Disclosures: Capital Adequacy	4	
	A description of the bank's processes for monitoring changes in the credit and market risk of securitization positions, including how those processes differ for resecuritization positions	None		None
	A description of the bank's policy governing the use of credit risk mitigation to mitigate the risks of securitization and resecuritization positions.	None		None
Table 1	LO: Interest Rate Risk for Non-Trading Activities			
	al Qualitative Disclosure Requirements (for each separate risk ar	ea)		

Table	Disclosure Requirement	Disclosure Location	Basel Pillar 3 Disclosure Page	Source Reference - if applicable
(c)	Describe the risk management objectives and policies, including: (1) strategies and processes; (2) the structure and organization of the relevant risk management function; (3) the scope and nature of risk reporting and/or measurement systems; (4) policies for hedging and/or mitigating risk; and (5) strategies and processes for monitoring the continuing effectiveness of hedges/mitigants.	Basel Pillar 3 Regulatory Disclosures: Interest Rate Risk for Non-Trading Activities Q1 2025 Form 10-Q: MD&A - Market Risk Management - Interest Rate Risk 2024 Form 10-K: MD&A - Market Risk Management - Interest Rate Risk	15	<b>Q1 2025 Form 10-Q:</b> pg. 32 <b>2024 Form 10-K:</b> pg. 76
Qualita	Lative Disclosures			
(a)	The general qualitative disclosure requirement, including the nature of interest rate risk for non-trading activities and key assumptions, including assumptions regarding loan prepayments and behavior of non-maturity deposits, and frequency of measurement of interest rate risk for non-trading activities.	Basel Pillar 3 Regulatory Disclosures: Interest Rate Risk for Non-Trading Activities  Q1 2025 Form 10-Q: MD&A - Market Risk Management - Interest Rate Risk  2024 Form 10-K: MD&A - Market Risk Management - Interest Rate Risk	15	<b>Q1 2025 Form 10-Q:</b> pg. 32 <b>2024 Form 10-K:</b> pg. 76
	tative Disclosures  The increase (decline) in earnings or economic value (or relevant measure used by management) for upward and downward rate shocks according to management's method for measuring interest rate risk for non-trading activities, categorized by currency (as appropriate).	Basel Pillar 3 Regulatory Disclosures: Interest Rate Risk for Non-Trading Activities  Q1 2025 Form 10-Q: MD&A - Market Risk Management - Interest Rate Risk  2024 Form 10-K:	15	Q1 2025 Form 10-Q: pg. 32 2024 Form 10-K:
		MD&A - Market Risk Management - Interest Rate Risk		pg. 76
Supple	mentary Leverage Ratio			
	(1) Summarize the differences between total consolidated accounting assets and the calculation of total leverage exposure.     (2) Provide components of the total leverage exposure.	Basel Pillar 3 Regulatory Capital Disclosures: Table 3: Supplementary Leverage Ratio  Q1 2025 Form 10-Q: MD&A - Liquidity and Capital Management - Basel III Capital Table Average Consolidated Balance Sheet and Net Interest Analysis	6	<b>Q1 2025 Form 10-Q:</b> pg. 31 pg. 35
		FFIEC 101 Report Schedule A - Advanced Approaches to Regulatory Capital  2024 Form 10-K: MD&A - Liquidity and Capital Management - Basel III Capital Table Average Consolidated Balance Sheet and Net Interest Analysis		FFIEC 101 Report: Schedule A  2024 Form 10-K: pg. 75 pg. 81