

Zions Bancorporation, National Association

*Covered Insured Depository Institution
Informational Filing*

October 1, 2025

Public Summary

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Section 1: PUBLIC SECTION

1.1. Introduction

To ensure prompt access to insured deposits for depositors in the event of an insured depository institution (“**IDI**”) failure, and to enable the FDIC to execute its resolution functions efficiently, the FDIC has implemented a rule (the “**IDI Rule**”) requiring each IDI with total assets between \$50 billion and \$100 billion to periodically submit an informational filing to the FDIC.

Zions Bancorporation, National Association (“**Zions**”), with total assets exceeding \$50 billion but below \$100 billion, qualifies as a covered insured depository institution (“**CIDI**”) under the IDI Rule and is therefore required to submit this information filing. This document represents Zions’ initial submission under the IDI Rule.

In the unlikely event of failure, this filing provides material information to support the FDIC in developing strategic options for Zions’ orderly and efficient resolution. The applicable insolvency regime would be receivership under the Federal Deposit Insurance Act, as amended (the “**FDIA**”).

Unless otherwise noted, all information contained in this Public Summary is current as of December 31, 2024.

Zions Bancorporation, National Association (“**Zions**” or the “**CIDI**”) is a commercial bank headquartered in Salt Lake City, Utah. It does not have a holding company within its legal framework.

As of December 31, 2024, Zions operated 404 domestic branches in 11 western and southwestern states. Zions provides a wide range of banking products and related services through its geographically defined bank divisions and other subsidiaries, primarily in the states of Utah, California, Texas, Arizona, Nevada, Colorado, Idaho, Washington and Oregon. Each of the divisions operates with its own local branding and management teams. The divisions are all part of the same single legal entity and IDI, and the local management teams report to enterprise management.

Zions manages its operations and provides internal management reporting according to these divisions, rather than by product- or customer-based business lines. The Bank also segments its financial information for Securities and Exchange Commission (“**SEC**”) reporting purposes by these divisions, although two of the divisions are combined into one reporting segment. The seven reporting segments are:

- Zions First National Bank (“**Zions Bank**”), doing business in Utah, Idaho and Wyoming.
- California Bank & Trust (“**CB&T**”), doing business in California.
- Amegy Bank (“**Amegy**”), doing business in Texas.
- National Bank of Arizona (“**NBAZ**”), doing business in Arizona.

- Nevada State Bank (“**NSB**”), doing business in Nevada.
- Vectra Bank Colorado (“**Vectra**”), doing business in Colorado and New Mexico.
- The Commerce Bank of Washington (“**TCBW**”), doing business in Washington, which also includes reporting for The Commerce Bank of Oregon (“**TCBO**”), doing business in Oregon.

1.2. Summary of the Informational Filing

1.2.1 Material Entities

For purposes of this informational filing, Zions is the sole entity designated Material Entity (an “**ME**”). Zions Bancorporation and its subsidiaries have no other MEs. Zions holds all core business lines and provides all critical services for the Bank. Zions is a national bank, chartered and primarily supervised by the Office of the Comptroller of the Currency (“**OCC**”). Its deposits are insured by the Federal Deposit Insurance Corporation (the “**FDIC**”). Zions does not have a parent company and no other entities have been designated as MEs.

1.2.2 Core Business Lines

As previously noted, Zions manages its operations, management reporting, and financial segment disclosures for SEC reporting purposes by its seven divisions, rather than by product lines or customer types. Based on this criteria, Zions has identified its Core Business Lines as its three largest geographic divisions and operating segments—Zions Bank, CB&T, and Amegy Bank. Collectively, these divisions account for approximately 60% of Zions’ total assets.

1.2.3 Consolidated Financial Information Regarding Assets, Liabilities, Capital

The following balance sheet is derived from Zions’ Consolidated Report of Condition and Income, as filed with the FDIC on FFIEC Form 031 for the year-end reporting date of December 31, 2024.

Balance Sheet of CIDI

Exhibit 1.2.1. Zions Bancorporation Consolidated Balance Sheet as of December 31, 2024 (\$ Millions)	
	December 31, 2024
ASSETS	
Cash and due from banks	\$ 651
Money market investments:	
Interest-bearing deposits	2,850
Federal funds sold and securities purchased under agreements to resell	1,453
Trading securities, at fair value	35
Investment securities:	
Available-for-sale, at fair value	9,095
Held-to-maturity, at amortized cost	9,669
Total investment securities	18,764
Loans held for sale	74
Loans, net of unearned income and fees	59,410
Allowance for loan losses	696
Loans held for investment, net of allowance	58,714
Other noninterest-bearing investments	1,020
Premises, equipment and software, net	1,366
Goodwill and intangibles	1,052
Other real estate owned	1
Other assets	2,795
Total assets	\$ 88,775
LIABILITIES AND SHAREHOLDERS' EQUITY	
Deposits:	
Noninterest-bearing demand	24,704
Interest-bearing:	
Savings and money market	40,037
Time	11,482
Total deposits	76,223
Federal funds and other short-term borrowings	3,832
Long-term debt	950
Reserve for unfunded lending commitments	45
Other liabilities	1,601
Total liabilities	82,651
Shareholders' equity:	
Preferred stock	66
Common stock	1,737
Retained earnings	6,701
Accumulated other comprehensive income (loss)	(2,380)
Total shareholders' equity	6,124
Total liabilities and shareholders' equity	\$ 88,775

Regulatory Capital

Quantitative measures established by regulation to ensure capital adequacy require Zions to maintain minimum amounts and ratios of Total and Tier 1 capital (as defined in banking agencies' Basel III-based capital rules) to risk-weighted assets (as defined), and of Tier 1 capital (as defined) to average assets (as defined). As of December 31, 2024, all Zions' capital ratios exceeded the "well-capitalized" levels under the regulatory framework for prompt corrective action.

Exhibit 1.2.2. Zions Capital Ratios as of December 31, 2024 (\$ Millions)				
Basel III Regulatory Capital Amounts and Ratios	December 31, 2024		Minimum requirement to be "well-capitalized"	
	Amount	Ratio	Amount	Ratio
Common equity Tier 1 capital (to risk-weighted assets)	\$ 7,363	10.9 %	\$ 4,400	6.5 %
Tier 1 capital (to risk-weighted assets)	7,430	11.0	5,415	8.0
Total risk-based capital (to risk-weighted assets)	9,026	13.3	6,769	10.0
Tier 1 leverage ratio	7,430	8.3	4,454	5.0

Funding and Liquidity Management

Zions primary funding source is customer deposits. Zions also accesses capital markets to supplement the Bank's funding. Management executes a corporate liquidity and funding policy adopted by the Board of Directors, which establishes guiding principles for maintaining sufficient liquidity, diversifying funding sources, monitoring Zions' liquidity position, and anticipating future funding requirements. The policy incorporates liquidity ratio benchmarks, such as "time to required funding" and fixed charge coverage ratios, that are used to assess Zions' liquidity profile. It also includes stress testing and liquid asset metrics to support ongoing liquidity oversight and risk management.

Zions maintains sufficient liquidity to fulfill loan commitments, repay demand and maturing deposits and debt, and meet both expected and unexpected funding requirements under normal and stressed conditions. Additionally, Zions ensures compliance with applicable regulatory liquidity standards.

Zions actively manages concentration risk within its investment portfolio by avoiding excessive exposure to assets that may become illiquid during periods of financial stress. These include complex structured asset-backed securities, bank-owned life insurance, equity investments, and non-rated municipal securities. To ensure resilience under adverse market conditions, Zions maintains a robust position in highly liquid securities and cash equivalents that are not subject to significant credit risk, thereby supporting its ability to meet time-to-required funding obligations and other stress-related liquidity guidelines.

1.2.4 Derivative Instruments and Hedging Activities

Zions utilizes derivative instruments primarily to manage the duration of specific assets, liabilities, or equity positions, as deemed appropriate, in order to manage exposure to interest rate fluctuations and other identified risks. Additionally, derivatives may be employed to offset positions arising from customer transactions. As part of its cash flow hedging strategy, Zions uses interest rate swaps to hedge variable cash flows associated with designated commercial loans.

Credit risk associated with derivative instruments stems from the potential for counterparty nonperformance. Zions primarily engages with well-established, well-capitalized financial institutions and manages this risk through a framework of credit approvals, exposure limits, collateral arrangements, and ongoing monitoring. To date, Zions has not incurred losses due to counterparty nonperformance; however, credit risk is evaluated and measured as appropriate.

Zions' interest rate risk management strategy includes the use of hedging instruments to reduce the potential adverse impact of interest rate changes. Interest rate swap agreements designated as cash flow hedges involve the exchange of fixed-rate receipts for variable-rate payments over the life of the agreement, without the exchange of principal.

Zions engages in both exchange-traded and over-the-counter (“**OTC**”) derivative transactions. Exchange-traded derivatives, such as forward currency exchange contracts, are primarily offered as part of Zions' commercial banking services. OTC derivatives, including interest rate swaps, options, and futures, are utilized to manage interest rate exposure, modify the duration of assets, liabilities, or equity, and to offset customer-facing derivative positions.

To manage risk associated with customer swaps, Zions immediately enters into offsetting hedge contracts, thereby minimizing net exposure. Fee income generated from these customer swaps is reported under other service charges, commissions, and fees.

Zions has not designated any derivative instruments as hedges for investments in foreign operations. All derivative instruments are recorded at fair value on the balance sheet. When market quotes are unavailable, Zions applies widely accepted valuation methodologies, such as discounted cash flow analysis, to estimate fair value. These valuations are sensitive to changes in market conditions—particularly interest and foreign exchange rates—which may cause fluctuations in the estimated values over time, as market conditions evolve and as cash flows are realized. Such fluctuations may result in either favorable or adverse impacts on Zions' reported valuations.

1.2.5 Payment, Clearing and Settlement Service Providers

Zions relies on a range of payment, clearing, and settlement systems to support its daily cash and securities transactions. The following table outlines the key systems in which Zions maintains active membership:

Exhibit 1.2.3. Memberships in Material Payment, Clearing and Settlement Systems	
System	Description
FedLine Services	Secure Federal Reserve access platform supporting high-volume transactions, including FedWire, FedACH, and Check 21 services.
Fiserv PEP+ (ACH & Zelle Processing)	ACH processing platform from Fiserv, facilitating electronic payments and Zelle transactions for financial institutions.
FedACH Services	Federal Reserve's ACH network for batch processing of electronic credit and debit transactions.
Early Warning Services (EWS) - Zelle Payments Network	Real-time peer-to-peer payments network operated by EWS, enabling instant transfers via Zelle.
ACI MTS (Money Transfer System)	High-value wire transfer system supporting both domestic and international payments.
FedWire Services	Real-time gross settlement system operated by the Federal Reserve for large-value, time-critical payments.
Fed Check Clearing Services	Federal Reserve's check processing system for clearing and settlement of paper and electronic checks.
SWIFT	Global messaging network used for secure international financial transactions and communications.
ACI Base24 / Fiserv Optis (Debit card Issuing & Acquiring)	Card transaction platforms supporting debit card issuance, authorization, and settlement.
VISA / STAR	Global card network (VISA) and U.S. debit network (STAR) for ATM and point-of-sale transactions.
The Clearing House (TCH) - Real-Time Payments	U.S.-based real-time payments network enabling instant clearing and settlement of payments 24/7/365.

1.2.6 Foreign Operations

Zions does not maintain any foreign operations.

1.2.7 Material Supervisory Authorities

Zions operates within a highly regulated banking and financial services environment. These regulatory frameworks are designed to promote the stability of financial institutions and safeguard the interests of customers, including both borrowers and depositors. Zions is primarily supervised by the Office of the Comptroller of the Currency (“**OCC**”), and is also subject to oversight by the Federal Deposit Insurance Corporation (“**FDIC**”) and the Consumer Financial Protection Bureau (“**CFPB**”).

1.2.8 Principal Officers

The following individuals have been appointed by the Board of Directors to serve as key officers and members of management, effective as of the date of this submission.

Exhibit 1.2.8. Principal Officers	
Name	Position
Harris H. Simmons	Chairman and Chief Executive Officer
Scott J. McLean	President and Chief Operating Officer
Bruce K. Alexander	Executive Vice President; Chief Executive Officer of Vectra Bank Colorado Division
Paul E. Burdiss	Executive Vice President; Chief Executive Officer of Zions First National Bank Division
Kenneth J. Collins	Executive Vice President, Chief Transformation Officer
Eric Ellingsen	Executive Vice President; Chief Executive Officer of California Bank & Trust Division
Alan M. Forney	Executive Vice President; Chief Executive Officer of The Commerce Bank of Washington Divisions
Olga T. Hoff	Executive Vice President, Enterprise Retail Banking
Christopher Kyriakakis	Executive Vice President, Chief Risk Officer
Scott A. Law	Executive Vice President, Chief Human Resources Officer
Eric Lucero	Executive Vice President, Chief Marketing Officer
Michael MacDonald	Executive Vice President, Capital Markets
Rena A. Miller	Executive Vice President, General Counsel
R. Ryan Richards	Executive Vice President, Chief Financial Officer
Rebecca K. Robinson	Executive Vice President, Wealth Management
Terrance A. Shirey	Executive Vice President; Chief Executive Officer of Nevada State Bank Division
Jennifer A. Smith	Executive Vice President, Chief Technology and Operations Officer
Mark Stebbings	Executive Vice President; Chief Executive Officer National Bank of Arizona Division
Steven D. Stephens	Executive Vice President; Chief Executive Officer of Amegy Bank Division
Randy R. Stewart	Executive Vice President, Mortgage

1.2.9 Informational Filing Corporate Governance Structure and Processes

Zions has established a robust governance framework to support its informational filing obligations, underscoring its commitment to consistent, sustainable risk management practices and the highest standards of ethics and corporate governance. The affairs of the CIDI are overseen by a strong, qualified, and actively engaged Board of Directors, which exercises independent judgment and effective risk oversight in the interest of shareholders and other stakeholders.

The preparation of this informational filing reflects the deployment of substantial internal and external resources. Key contributors include a dedicated working group operating within Zions' enterprise risk management framework, as well as personnel from across business lines, operations, technology, finance, treasury, risk, legal, compliance, audit, and other functions. This submission was formally approved by the Board of Directors prior to filing.

1.2.10 Material Management Information Systems

Zions Bancorporation has invested substantial resources in the development, maintenance, and oversight of its comprehensive information technology and management information systems (“**MIS**”) to support core business functions, including operations, transaction processing, risk management, accounting, and the generation of financial, regulatory, and management reports.

In preparing this informational filing, the CIDI identified MIS components deemed material to its operations. The policies and procedures governing the MIS environment are well-established and are regularly updated to reflect evolving regulatory requirements, business objectives, and technological changes.

Zions’ risk governance framework drives critical control mechanisms—such as change management, incident response, information security, business continuity, and disaster recovery—that ensure the reliability and resilience of its MIS infrastructure. Additionally, Zions has implemented processes to facilitate regulatory access to key MIS in the unlikely event of receivership.