

SHARED NATIONAL CREDIT PROGRAM

GUIDELINES FOR PREPARING

SHARED NATIONAL CREDIT DATA

April 2012
SNC Business Office

I. Table of Contents

II. GENERAL INSTRUCTIONS 3

 A. ORGANIZATION OF THE INSTRUCTION BOOK 3

 B. PURPOSE 3

 C. WHO MUST REPORT..... 3

 D. HOW TO REPORT.....4

 E. WHERE TO REPORT.....5

 F. WHEN TO REPORT5

 G. DATA RETENTION6

 H. CONFIDENTIALITY.....6

 I. OFFICER ATTESTATION6

 J. REVISED DATA6

III. WHAT TO REPORT6

 A. REPORTABLE CREDITS.....7

IV. DETAILED INSTRUCTIONS8

 A. AGENT FILE DATA8

 B. EXPANDED PARTICIPANT FILE DATA16

APPENDIX I—Examples for Determining if Credits are SNCs

APPENDIX II—Credit Type and Purpose Codes

APPENDIX III—Contact Information

II. GENERAL INSTRUCTIONS

A. ORGANIZATION OF THE INSTRUCTION BOOK

This instruction book covers the data requirements for data collected by the Federal Reserve System for the Shared National Credit Program and it is divided into the following sections:

Section I: General Instructions – This section describes the overall reporting requirements.

Section II: What to Report – This section describes the types of credits reported.

Section III: Detailed Instructions – This section describes the detailed data requirements and supplements the information in the general instructions.

B. PURPOSE

The Shared National Credit (SNC) Program is an interagency program designed to evaluate large and complex syndicated credits. The program is administered by the three federal banking regulatory agencies which include: the Federal Reserve System (FRS), Office of the Comptroller of the Currency (OCC), and the Federal Deposit Insurance Corporation (FDIC).

Program Objectives

The objectives of the program are:

- To provide uniformity in approach and credit rating determinations;
- To allow the agencies to gain efficiencies in risk analysis;
- To provide timely results to the banks and regulatory agencies; and
- To gather and analyze bank data.

To meet the program objectives, data are collected from federally supervised institutions annually (as of December 31). These data are analyzed and a sample of credits is selected for review by the agencies and participating state banking supervisors during the onsite examination phase of the program (typically during May and June). After the examination phase is completed, results are compiled and distributed to federally supervised institutions that are agents or participants in a SNC. In addition, large institutions may be selected by their supervisor to report data quarterly to allow for off-cycle monitoring of SNCs.

C. WHO MUST REPORT

Reporting Entities

Entities subject to the reporting requirements are referred to as “federally supervised institutions.” A federally supervised institution is any financial institution (including subsidiaries) subject to supervision by one of the federal banking agencies (Agencies). Reporting institutions whose primary regulator is the

OCC should contact the OCC for reporting requirements (see the Appendix for a complete listing of contacts).

Federally supervised institutions include the following:

- FDIC-insured banks and thrifts, their branches and subsidiaries.
- Federally licensed branches and agencies of foreign banks (including non-U.S. branches managed by a U.S. branch)
- State-licensed branches and agencies of foreign banks (including non-U.S. branches managed by a U.S. branch)
- U.S. Subsidiaries of Foreign Banking Organizations
- Bank holding companies and financial holding companies, and their non-bank subsidiaries subject to examination by the Federal Reserve System.

Federally supervised institutions do not include U.S. representative or loan production offices of foreign banks.

The agent or administrative agent of the SNC is responsible for reporting. The agent is the federally supervised institution that originates a SNC or administers the credit for the syndication or participating lenders. Each individual U.S. branch or agency of a foreign bank should report SNCs for which it is the agent.

If a federally supervised institution assumes the administrative agent duties for another reporting institution, the successor agent is required to report the credits and contact the SNC Business Office immediately (see Section E, "Where to Report" for contact information).

D. HOW TO REPORT

Scope of the "Consolidated Entity"

FDIC-Insured Banks Thrifts and Bank Holding Companies

FDIC-insured banks and thrifts should follow the consolidation requirements for the FFIEC 031/041. Reporting entities that are Bank Holding Companies (BHCs) should follow the consolidation requirements of the FR Y-9C. However, BHCs should exclude credits that are consolidated under a depository institution (these data should be filed separately by the depository institution). All credits between consolidated entities included in the consolidation described above should be eliminated.

U.S. Branches and Agencies of Foreign Banks

U.S. branches and agencies should consolidate in a similar manner as done for the Call Report (FFIEC 002) with the following additions:

- Include loans meeting the reporting criteria that are booked at a non U.S. branch managed by the U.S. branch.
- Include loans meeting the reporting criteria that are booked at U.S. subsidiaries of the reporting entity's parent FBO. If the parent FBO has multiple U.S. branches or agencies that are required to file, these loans may be reported with any one of the reporting entities but should be filed consistently with the chosen reporter.

All commitments or loans to entities included in the consolidation described above should be eliminated.

All loans meeting the reporting requirements (see "What to Report" below) are reportable regardless of whether they are held in the banking book or trading book.

Valuation

The funded (utilized) portion of all credits (including credits held for sale and held in the trading book) should be reported at amortized cost.

E. WHERE TO REPORT

Reporting entities must submit data via the FRS eSNC reporting application. See http://www.newyorkfed.org/banking/reportingforms/shared_national_credits.html for information on eSNC. For questions regarding the eSNC application, contact the eSNC Help Desk (see the Appendix for a list of contacts).

Reporting entities may submit data via an XML file (system-to-system) or manual data entry. Validations will run on data electronically loaded or manually entered into eSNC. All validations must be remediated (either by correcting data or acknowledging the data is correct) prior to submission of the data. If a reporting entity chooses to change the method it uses to submit data, contact the SNC Help Desk for further information. See the eSNC User Guide for further information on the validation process (a copy of the eSNC User Guide is available at http://www.newyorkfed.org/banking/reportingforms/shared_national_credits.html).

F. WHEN TO REPORT

All reporting entities submit data annually which is used for the annual examination. In addition, reporting entities that agent a significant volume of SNCs or agent SNCs with significant aggregate commitment amounts report quarterly to allow for off-cycle monitoring. Each reporting entity is informed of frequency requirements by its primary regulator.

Annual reporters should report SNC data as of December 31 of the current calendar year. All data should be submitted via eSNC no later than the last day of January. Quarterly reporters should report SNC data as of the last day of March, June, September, and December. Data should be submitted via eSNC no later than the last day of April, July, October, and January. For quarterly and annual reporting, if the last business day falls on a weekend or holiday the deadline for submission moves to the next business day.

G. DATA RETENTION

All data used in the preparation of SNC data must be retained by the reporting institution for a period of 5 years from the date of submission.

H. CONFIDENTIALITY

Data reported by individual reporting entities data are regarded as examination data and are treated as such by the Agencies. Data for individual reporting entities will not be published or otherwise publicly disclosed. Aggregate data that are published or otherwise publicly disclosed will not reveal the identity of any individual reporting entity.

SNC data is made available to the participating agencies (OCC, FRB, and FDIC). In addition, results from the annual examination are shared with federally supervised participants in any SNC and the applicable state banking departments.

I. OFFICER ATTESTATION

Annually, a senior officer of the reporting entity that has managerial responsibilities for the internal controls for reporting SNC data will be required to attest that the data were prepared in conformity with the instructions issued by the Federal Reserve System and are accurate. This may include the CEO, CFO, Chief Credit Officer or equivalent officer with these responsibilities. The signing officer is expected to notify the SNC Business Office if they become aware of any material inaccuracies in any reported data. Details on the required documentation will be provided with the annual first day letter. The Officer Attestation is due at the time of the annual data submission.

J. REVISED DATA

Agency staff review SNC data submitted. As a result of their review and analytical procedures, Agency staff may ask reporters to explain data conditions or submit revisions. In addition, if the reporting entity is aware of significant reporting errors revisions should be submitted. Reporting entities must contact the SNC Business Office prior to revising data. Since these data are extremely time-sensitive, reporters should respond as quickly as possible to these requests.

III. WHAT TO REPORT

Reporting entities are classified as *basic* or *expanded*. Basic reporting entities do not file Basel II data for credits they agent and do not file expanded participant data (section III.B). Classification of reporting entities as basic or expanded is made by the reporting entities' primary regulator. Report all data in whole dollars. Credits denominated in foreign currencies should be converted to U.S. dollars using the spot rate as of the report date.

All data elements are required unless specified as optional. Items are considered optional if they are not stored electronically or cannot be derived from data stored electronically. For each report date, a list of the data elements that are optional and will not be reported by the reporting entity should be noted in the comments section when submitting data via eSNC.

A. REPORTABLE CREDITS

Include as Reportable Credits:

Shared National Credits

A Shared National Credit (SNC) is any loan or loan commitment (U.S. or Non-U.S.) for which the commitment amount aggregates \$20 million or more; and 1) which is shared by three¹ or more federally supervised unaffiliated institutions under a formal lending agreement; or 2) a portion of which is sold to two or more federally supervised unaffiliated institutions, with the purchasing institutions assuming their pro rata share of the credit risk. SNCs include assets such as other real estate owned, stocks, notes and debentures taken for debts previously contracted.

Include as Shared National Credits:

- Two or more credits to the same borrower for the same origination date where the aggregate commitment amount of the credits is greater than or equal to \$20 million and is shared by three or more unaffiliated, supervised participant lenders. All unaffiliated supervised participant lenders should be lenders in each credit.
- Any credit facility or tranche of a syndicated loan agreement that equals \$20 million or more and includes three or more federally supervised institutions, and all the other credit facilities or tranches subject to that agreement regardless of the dollar amount or the number of federally supervised institutions participating in them.
- Report each tranche/facility as a separate credit when a credit agreement has tranches/facilities with different terms.

Any other large credit(s) designated by the Federal Reserve Bank, Federal Deposit Insurance Corporation, or Office of Thrift Supervision as meeting the general intent or purpose of the SNC program.

(See the Appendix for examples of determining whether a credit qualifies as a SNC.)

Exclude as Shared National Credits:

- Credits that are fully guaranteed by a sovereign entity.
- Credits to sovereign borrowers.
- “Club credits” including related borrowings from multiple lenders but are not extended under the same lending agreement.
- Credits with different maturity dates for participating lenders.
- Credits in which the obligor is an individual.

¹ For purposes of meeting the federally supervised institutions threshold, the reporting institution is included if it maintains a position in the credit (i.e., the reporting bank’s share of the committed exposure is greater than zero).

If a reporting entity cannot determine if a credit meets the criteria above, it should contact its primary regulator or the SNC Business Office for assistance.

Other Reportable Credits (*applies only to reporting entities that are classified as expanded reporters*)

Reporting entities that are classified as “expanded” are required to report all syndicated credits they agent. Syndicated credits include all credit that is arranged and extended by two or more financial entities regardless of the number of participants that are considered regulated entities. These credits differ from SNCs since the number of participants is at least two (three for SNCs), there is no requirement that the participants be federally supervised (SNCs must have three federally supervised participants), and there is no minimum commitment amount (SNCs must have a commitment amount of at least \$20 million).

General Definitions

Related

Any legal entity meeting the consolidation requirements (see How to Report above) is considered related for SNC reporting.

Sovereign

The definition of the Sovereign is identical to “Foreign Governments and Official Institutions” as defined for the FFIEC 031/041, FFIEC 002 and FR Y-9C reports. Sovereign institutions include:

- Central, state, provincial and local governments and their departments, and agencies.
- Treasuries, ministries of finance, central banks, stabilization funds, exchange authorities, and diplomatic establishments.
- Government owned banks, including development banks that perform as an important part of their activities, the functions of a treasury, central bank, exchange control office, or stabilization fund.
- International or regional organizations or subordinate or affiliated agencies thereof, created by treaty or convention between sovereign states, including the International Monetary Fund, the International Bank for Reconstruction and Development (World Bank), the Bank for International Settlements, the Inter-American Development Bank, and the United Nations.

Banking institutions owned by a government that do not function as the central bank and/or bank of issue are excluded from SNC eligibility.

IV. DETAILED INSTRUCTIONS

A. AGENT DATA

The data below are submitted by all reporting entities unless otherwise specified. If a reporting entity is the agent and the reporting entity’s share of the committed exposure is greater than zero, the reporting

entity is included as a participant.

Item by Item Instructions

Listed below are definitions for all reportable items. Unless specified, items are applicable to all reporters (some items are only reported by expanded reporters).

Agent Identification

This section contains requirements for identifying information about the agent of the credit. This may be different than the reporting entity if the legal entity that serves as the agent is not the reporting entity.

1. **Internal ID:** The reporting entity's unique identifier for the agent of the credit.
2. **Original Internal ID:** The reporting entity's Internal ID (see above) assigned to the agent in the previous submission. If there is no change from the prior submission, or if it is the first time the entity is being reported, the Internal ID should be used as the Original Internal ID.
3. **Name:** The full legal name of the agent. If a co-agent exists, report the lead or primary agent.
4. **Short Name:** Short or abbreviated name of the agent used by the reporting entity. (Optional)
5. **City:** The name of the city where the agent's credits are booked.
6. **State:** The two character abbreviation of the U.S. state or Canadian province where the agent's credits are booked.
7. **Country:** The name of the country where the agent's credits are booked.
8. **ZIP/Postal Code:** U.S. ZIP or other foreign postal code.
9. **Industry Code—NAICS:** The 5 or 6 digit code that best describes the primary business activity of the reporting agent according to the North American Industry Classification System. If the reporting entity does not electronically store NAICS codes, please report a SIC code (see item #10 below) but do not report both a NAICS and a SIC code. See <http://www.census.gov/eos/www/naics/> for further information about NAICS codes or to download a file containing all active NAICS codes.
10. **Industry Code – SIC:** The 4 digit numeric code that describes the primary business activity of the reporting agent according to the Standard Industrial Classification system. The Agencies prefer NAICS codes, however SIC codes are acceptable if the reporting entity does not electronically store NAICS codes. Only report a SIC or NAICS code, not both. See <http://www.census.gov/epcd/www/sic.html> for further information about SIC codes or <http://www.naics.com/search.htm> to find corresponding NAICS codes for existing SIC codes.
11. **TIN:** The taxpayer identification number assigned to the agent by the U.S. Internal Revenue Service (IRS) in the administration of tax laws. (*Optional*)

Obligor Data

This section contains requirements for data identifying the obligor of the credit.

- 12. Internal ID:** The reporting entity's unique identifier for the legal entity that is the obligor. Each legal entity should have a unique Internal ID. Do not use the same Internal ID for related obligors.
- 13. Original Internal ID:** The reporting entity's Internal ID assigned to the obligor agent in the previous submission. If there is no change from the prior submission, or if it is the first time the entity is being reported, the Internal ID should be reported as the Original Internal ID.
- 14. Name:** Full legal name of the obligor.
- 15. Short Name:** Short or abbreviated name of the obligor used by the reporting entity. *(Optional)*.
- 16. City:** The name of the city in which the obligor is headquartered.
- 17. State:** The two-character abbreviation of the U.S. state or Canadian province in which the obligor is headquartered.
- 18. Country:** The name of the country in which the obligor is headquartered.
- 19. ZIP/Postal Code:** U.S. ZIP or other foreign postal code.
- 20. Industry Code—NAICS:** The 5 or 6 digit code that best describes the primary business activity of the reporting agent according to the North American Industry Classification System. If the reporting entity does not electronically store NAICS codes, please report a SIC code (see item #21 below) but do not report both a NAICS and a SIC code. See <http://www.census.gov/eos/www/naics/> for further information about NAICS codes or to download a file containing all active NAICS codes.
- 21. Industry Code – SIC:** The 4 digit numeric code that describes the primary business activity of the reporting agent according to the Standard Industrial Classification system. The Agencies prefer NAICS codes, however SIC codes are acceptable if the reporting entity does not electronically store NAICS codes. Only report a SIC or NAICS code, not both. See <http://www.census.gov/epcd/www/sic.html> for further information about SIC codes or <http://www.naics.com/search.htm> to find corresponding NAICS codes for existing SIC codes.
- 22. TIN:** The taxpayer identification number assigned to the agent by the U.S. Internal Revenue Service (IRS) in the administration of tax laws. *(Optional)*

Credit Data

This section contains reporting requirements for the contractual terms of the credit.

- 23. Internal Credit ID:** An identifier assigned by the reporting entity to uniquely identify the credit facility in the reporter's information system.

- 24. Original Internal Credit ID:** The Internal Credit ID assigned to the credit in the previous submission. If there is no change from the prior submission, or if it is the first time the entity is being reported, the Internal Credit ID should be reported as the Original Internal Credit ID.
- 25. Internal Utility Field 1:** This field may be used by the reporting entity to provide information to the agencies relevant to this credit. *(Optional)*
- 26. Internal Utility Field 2:** This field may be used by the reporting entity to provide information to the agencies relevant to this credit. *(Optional)*
- 27. Internal Utility Field 3:** This field may be used by the reporting entity to provide information to the agencies relevant to this credit. *(Optional)*
- 28. CUSIP:** CUSIPs are 9-character identifiers created and delivered by the CSB (CUSIP Service Bureau). The CSB is managed on behalf of the American Bankers Association by Standard & Poor's. The CUSIP captures the financial instrument's important differentiating characteristics within a common structure and is distributed for the purposes of facilitating clearing and settlement of trades. Report if credit facility has a CUSIP assigned. *(Optional)*
- 29. Origination Date:** The date a credit becomes legally binding.
- 30. Maturity Date:** Latest date upon which the funds must be repaid, according to the most recent terms of the credit agreement.
- 31. Type:** Report the type of credit. Report the code that best describes the type of credit. Valid credit type codes can be found in the Appendix. If the predefined list does not adequately reflect the credit type, "Other" should be reported and a description of the type entered in Other Type Description.
- 32. Other Type Description:** This should only be reported in cases where the Type reported is "Other". If the predefined credit types do not adequately describe the credit type, "Other" should be reported for Type above and a description of the credit type should be reported in this item. *(Optional)*
- 33. Purpose:** Report the primary purpose of the credit. Report the purpose code that best describes the primary purpose of the credit. Valid purpose codes can be found in the Appendix. If the predefined list does not adequately reflect the purpose of the credit, "Other" should be selected and a description of the purpose entered in Other Purpose Description.
- 34. Other Purpose Description:** This should only be reported in cases where the Purpose reported is "Other". If the predefined credit types do not adequately describe the credit purpose, "Other" should be reported for Purpose above and a description of the credit purpose should be reported in this item. *(Optional)*
- 35. Committed Exposure Global (in whole dollars):** The current amount the obligor is legally allowed to borrow according to the credit agreement.
- 36. Utilized Exposure Global (in whole dollars):** The current amortized cost the obligor has drawn

which has not been repaid.

- 37. Cumulative Charge-offs:** For the agent's share of the credit, the cumulative charge-offs associated with this credit on the reporting entity's books. For credits accounted for at fair value where information on charge-offs is not available this field is optional. (Optional).
- 38. # Days Principal or Interest Past Due:** For the agent's share of the credit, the number of days principal and/or interest payments are past due. If payments are not past due 30 days or more report zero.
- 39. Non-accrual Date:** The date the credit was placed on non-accrual status, if applicable. If the credit is accruing, report 12/31/9999.
- 40. Department Handling Account:** Name of the reporting entity's business unit that is responsible for monitoring the obligor's performance and credit quality.

Participant Lender Data

This section details the requirements for data about each participant and each participant's share of the credit. Participants should be reported by legal entity and not aggregated. In addition, if the agent has a share of the credit, it should be included as a participant. If the agent does not hold a share of the credit, a participant record is not required for the agent.

- 41. Internal ID:** Internal identifier assigned to the participating lender by the reporting entity in the reporting entity's information system.
- 42. Original Internal ID:** The Internal ID assigned to the participant in the previous submission. If there is no change from the prior submission, the Internal ID should be reported as the Original Internal ID.
- 43. Name:** Full legal name of the participant.
- 44. Short Name:** Short or abbreviated name of the participant used by the reporting entity. (Optional)
- 45. City:** The name of the city where the participant's credits are booked.
- 46. State:** The two-character abbreviation of the U.S. state or Canadian province where the participant's credits are booked.
- 47. Country:** The name of the country where the participant's credits are booked.
- 48. ZIP / postal code:** U.S. ZIP or Canadian postal code only; international postal codes are not accepted.
- 49. Industry Code—NAICS:** The 5 or 6 digit code that best describes the primary business activity of the reporting agent according to the North American Industry Classification System. If the reporting entity does not electronically store NAICS codes, please report a SIC code (see item #50 below) but do not report both a NAICS and a SIC code. See

<http://www.census.gov/eos/www/naics/> for further information about NAICS codes or to download a file containing all active NAICS codes.

- 50. Industry Code – SIC:** The 4 digit numeric code that describes the primary business activity of the reporting agent according to the Standard Industrial Classification system. The Agencies prefer NAICS codes, however SIC codes are acceptable if the reporting entity does not electronically store NAICS codes. Only report a SIC or NAICS code, not both. See <http://www.census.gov/epcd/www/sic.html> for further information about SIC codes or <http://www.naics.com/search.htm> to find corresponding NAICS codes for existing SIC codes.
- 51. TIN:** The taxpayer identification number (TIN) assigned to the participant by the U.S. Internal Revenue Service (IRS) in the administration of tax laws. (Optional)
- 52. Share of Committed Exposure (in whole dollars):** The current dollar amount the participant has legally committed to lend according to the credit agreement
- 53. Share of Utilized Exposure (in whole dollars):** The current book value of the amount the participant has extended which has not been repaid by the obligor.

Credit Risk Ratings²

Report the internal risk rating and the regulatory equivalent as of the report date that is assigned to a credit by the agent. The internal risk rating is then converted into at least one of the regulatory risk ratings below. The evaluation of each credit should be based upon the fundamentals of the particular credit, including, at a minimum:

- The overall financial condition and resources of the borrower, including the current and stabilized cash flow.
- The credit history of the borrower.
- The borrower's or principal's character.
- The purpose of the credit relative to the source of the repayment.
- The types of secondary sources of repayment.

Internal Risk Rating

- 54. Obligor Internal Risk Rating:** Report the obligor rating grade from the reporting entity's internal risk rating system. If the reporting entity carries its position in a held for sale or trading account, or if it is a successor agent (see page 4) report HFS, TA, or SA, as applicable, and report NR for Credit Exposure Internal Risk Rating and Basel risk rating data elements (expanded reporters only) and report 100 for Pass for the Regulatory Risk Rating.
- 55. Credit Exposure Internal Risk Rating:** Report the credit exposure's assigned loss severity rating grade from the reporting entity's internal risk rating system. Report NR if the reporting

² See the Commercial Bank Examination Manual at <http://www.federalreserve.gov/boarddocs/supmanual/> for guidance on credit classification and regulatory risk ratings.

entity carries its position in a held for sale or trading account. A Credit Exposure Internal Risk Rating is required even if the reporting entity does not have a position in the credit facility. If a Credit Exposure Risk Rating is not available, report the Obligor Internal Risk Rating in this field.

Regulatory Risk Rating

The internal risk rating above should be converted to one of the regulatory risk ratings below based upon a percentage of how regulatory risk rating applies to the internal risk rating. For example, if there is a one to one match between the internal risk rating and the regulatory risk rating, 100 is entered in the appropriate regulatory risk rating. If an internal risk rating covers more than one regulatory risk rating the percent applicable to each regulatory risk rating should be entered (e.g., 60 Pass 40 Substandard). Report 100 for Pass if the reporting entity carries its position in a held for sale or trading account.

Listed below are descriptions of the regulatory ratings.

Special Mention (SM)

A special mention credit is defined as having potential weaknesses that deserve management's close attention. If left uncorrected, these potential weaknesses may, *at some future date*, result in the deterioration of the repayment prospects for the credit or the entity's credit position. SM credits are not considered part of the classified credits reference below.

Substandard (SS)

A substandard credit is inadequately protected by the current sound worth and paying capacity of the obligor or of the collateral pledged, if any. SS credits are characterized by the distinct possibility that the bank will sustain some loss if the deficiencies are not corrected.

Doubtful (D)

Doubtful credits have all the inherent weaknesses of SS credits with the added characteristics that the weaknesses make collection or liquidation in full, on the basis of currently existing facts, conditions, and values, highly questionable and improbable. The possibility of loss is extremely high, but because of certain important and reasonably specific pending factors that may work to the advantage of and strengthen the credit the loss cannot be quantified at this time.

Loss (L)

Loss credits are considered uncollectable and of such little value that their continuance as bankable assets is not warranted.

Pass (P)

Pass credits are credits that do not fall into the assessments referenced above.

56. % Pass: Percentage of the Committed Exposure for the credit internally rated as "Pass" using the regulatory classification system.

- 57. % Special Mention:** Percentage of the Committed Exposure for the credit internally rated as “Special Mention” using the regulatory classification system.
- 58. % Substandard:** Percentage of the Committed Exposure for the credit internally rated as “Substandard” using the regulatory classification system.
- 59. % Doubtful:** Percentage of the Committed Exposure for the credit internally rated as “Doubtful” using the regulatory classification system.
- 60. % Loss:** Percentage of the Committed Exposure for the credit internally rated as “Loss” using the regulatory classification system.

Credit risk ratings must be entered in whole numbers. Do not enter decimal points. The sum of the credit risk ratings must equal 100 for each reported credit.

Basel II Capital Data (Expanded Reporters Only)

This section contains risk ratings for institutions that manage risk using Basel II capital standards. For further information on how these items are calculated, refer to the Advanced Capital Adequacy Framework (final rule) and the report instructions for the FFIEC 101. Line references to the FFIEC 101 are listed below for reference. If the reporting entity carries its position in a held for sale or trading account, report NR for the Basel II risk rating data elements.

- 61. Obligor Probability of Default (PD):** FFIEC 101 Advanced Risk-Based Capital Standards- Preamble and Final Rule Definition. CORRESPONDS TO AACA J035 ON FFIEC 101. (Optional)
- 62. Exposure at Default (EAD) \$:** FFIEC 101 Advanced Risk-Based Capital Standards- Preamble and Final Rule Definition. CORRESPONDS TO AACE J035 ON FFIEC 101. (Optional)
- 63. 62 Effective Maturity (M) (Years):** FFIEC 101 Advanced Risk-Based Capital Standards- Preamble and Final Rule Definition. CORRESPONDS TO AACF J035 ON FFIEC 101. (Optional)
- 64. 63 Loss Given Default (LGD) Before Consideration of Eligible Guarantees and Credit Derivatives:** FFIEC 101 Advanced Risk-Based Capital Standards- Preamble and Final Rule Definition. CORRESPONDS TO AACG J035 ON FFIEC 101. (Optional)
- 65. 64 Loss Given Default (LGD) After Consideration of Credit Risk Mitigants:** FFIEC 101 Advanced Risk-Based Capital Standards- Preamble and Final Rule Definition. CORRESPONDS TO AACH J035 ON FFIEC 101. (Optional)
- 66. 65 Effect of PD Substitution and LGD Adjustment Approaches on RWA (\$):** FFIEC 101 Advanced Risk-Based Capital Standards- Preamble and Final Rule Definition. CORRESPONDS TO AACI J035 ON FFIEC 101. (Optional)
- 67. 66 Effect of Double Default Treatment on RWA (\$):** FFIEC 101 Advanced Risk-Based Capital Standards- Preamble and Final Rule Definition. (Optional) CORRESPONDS TO AACJ J035 ON

FFIEC 101

- 68. 67 Risk Weighted Assets (RWA) (\$): FFIEC 101 Advanced Risk-Based Capital Standards-Preamble and Final Rule Definition. CORRESPONDS TO AACK J035 ON FFIEC 101. (Optional)
- 69. 68 Expected Credit Loss (ECL) (\$): FFIEC 101 Advanced Risk-Based Capital Standards-Preamble and Final Rule Definition. CORRESPONDS TO AACL J035 ON FFIEC 101. (Optional)
- 70. 69 CRM Flag: Credit risk mitigants are used for this credit (Y or N). (Optional)

B. EXPANDED PARTICIPANT FILE DATA

The items below are submitted in a separate participant file by reporting entities that are required to submit expanded data. These data are for all syndicated credits where the reporting entity or a consolidated subsidiary is only a participant (not the agent) in the credit. If a reporting entity is the agent, the reporting entity's exposure is included as a participant with the Agent file data above. For this section, wherever the instructions refer to the participant, it means the legal entity within the consolidated reporting entity that holds the participation in the credit.

Item by Item Instructions

Listed below are all definitions all reportable items. Some items are only reported by "Expanded Reporters" and will be identified below. Unless specified, items are applicable to all reporters.

Agent Identification

This section details requirements for information about the agent for the credit. It should not be the reporting institution or any consolidated subsidiary.

1. **Internal ID:** The reporting entity's unique identifier for the agent of the credit.
2. **Original Internal ID:** The reporting entity's Internal ID (see above) assigned to the agent in the previous submission. If there is no change from the prior submission, or if it is the first time the entity is being reported, the Internal ID should be used as the Original Internal ID.
3. **Name:** The full legal name of the agent. If a co-agent exists, report the lead or primary agent.
4. **Short Name:** Short or abbreviated name of the agent used by the reporting entity. (Optional)
5. **City:** The name of the city where the agent's credits are booked.
6. **State:** The two character abbreviation of the U.S. state or Canadian province where the agent's credits are booked.
7. **Country:** The name of the country where the agent's credits are booked.

8. **ZIP/Postal Code:** U.S. ZIP or Canadian postal code only; international postal codes are not accepted.
9. **Industry Code—NAICS:** The 5 or 6 digit code that best describes the primary business activity of the reporting agent according to the North American Industry Classification System. If the reporting entity does not electronically store NAICS codes, please report a SIC code (see item #10 below) but do not report both a NAICS and a SIC code. See <http://www.census.gov/eos/www/naics/> for further information about NAICS codes or to download a file containing all active NAICS codes.
10. **Industry Code – SIC:** The 4 digit numeric code that describes the primary business activity of the reporting agent according to the Standard Industrial Classification system. The Agencies prefer NAICS codes, however SIC codes are acceptable if the reporting entity does not electronically store NAICS codes. Only report a SIC or NAICS code, not both. See <http://www.census.gov/epcd/www/sic.html> for further information about SIC codes or <http://www.naics.com/search.htm> to find corresponding NAICS codes for existing SIC codes.
11. **TIN:** The taxpayer identification number assigned to the agent by the U.S. Internal Revenue Service (IRS) in the administration of tax laws. (*Optional*)

Obligor Data

This section contains requirements for data identifying the obligor of the credit.

12. **Internal ID:** The reporting entity's unique identifier for the legal entity that is the obligor. Each legal entity should have a unique Internal ID. Do not use the same Internal ID for related obligors.
13. **Original Internal ID:** The reporting entity's Internal ID assigned to the obligor agent in the previous submission. If there is no change from the prior submission, or if it is the first time the entity is being reported, the Internal ID should be reported as the Original Internal ID.
14. **Name:** Full legal name of the obligor.
15. **Short Name:** Short or abbreviated name of the obligor used by the reporting entity. (*Optional*).
16. **City:** The name of the city in which the obligor is headquartered.
17. **State:** The two-character abbreviation of the U.S. state or Canadian province in which the obligor is headquartered.
18. **Country:** The name of the country in which the obligor is headquartered.
19. **ZIP/Postal Code:** U.S. ZIP or Canadian postal code only; international postal codes are not accepted.
20. **Industry Code—NAICS:** The 5 or 6 digit code that best describes the primary business activity of the reporting agent according to the North American Industry Classification System. If the reporting entity does not electronically store NAICS codes, please report a SIC code (see item

#21 below) but do not report both a NAICS and a SIC code. See <http://www.census.gov/eos/www/naics/> for further information about NAICS codes or to download a file containing all active NAICS codes.

21. **Industry Code – SIC:** The 4 digit numeric code that describes the primary business activity of the reporting agent according to the Standard Industrial Classification system. The Agencies prefer NAICS codes, however SIC codes are acceptable if the reporting entity does not electronically store NAICS codes. Only report a SIC or NAICS code, not both. See <http://www.census.gov/epcd/www/sic.html> for further information about SIC codes or <http://www.naics.com/search.htm> to find corresponding NAICS codes for existing SIC codes.
22. **TIN:** The taxpayer identification number assigned to the agent by the U.S. Internal Revenue Service (IRS) in the administration of tax laws. *(Optional)*

Credit Data

This section contains reporting requirements for the contractual terms of the credit.

23. **Internal Credit ID:** An identifier assigned by the reporting entity to uniquely identify the credit facility in the reporter's information system.
24. **Original Internal Credit ID:** The Internal Credit ID assigned to the credit in the previous submission. If there is no change from the prior submission, or if it is the first time the entity is being reported, the Internal Credit ID should be reported as the Original Internal Credit ID.
25. **Internal Utility Field 1:** This field may be used by the reporting entity to provide information to the agencies relevant to this credit. *(Optional)*
26. **Internal Utility Field 2:** This field may be used by the reporting entity to provide information to the agencies relevant to this credit. *(Optional)*
27. **Internal Utility Field 3:** This field may be used by the reporting entity to provide information to the agencies relevant to this credit. *(Optional)*
28. **CUSIP:** CUSIPs are 9-character identifiers created and delivered by the CSB (CUSIP Service Bureau). The CSB is managed on behalf of the American Bankers Association by Standard & Poor's. The CUSIP captures the financial instrument's important differentiating characteristics within a common structure and is distributed for the purposes of facilitating clearing and settlement of trades. Report if credit facility has a CUSIP assigned. *(Optional)*
29. **Origination Date:** The date a credit becomes legally binding.
30. **Maturity Date:** Latest date upon which the funds must be repaid, according to the most recent terms of the credit agreement.
31. **Type:** Report the type of credit. Report the code that best describes the type of credit. Valid credit type codes can be found in the Appendix. If the predefined list does not adequately reflect the credit type, "Other" should be reported and a description of the type entered in Other Type

Description.

- 32. Other Type Description:** This should only be reported in cases where the Type reported is “Other”. If the predefined credit types do not adequately describe the credit type, “Other” should be reported for Type above and a description of the credit type should be reported in this item. *(Optional)*
- 33. Purpose:** Report the primary purpose of the credit. Report the purpose code that best describes the primary purpose of the credit. Valid purpose codes can be found in the Appendix. If the predefined list does not adequately reflect the purpose of the credit, “Other” should be selected and a description of the purpose entered in Other Purpose Description.
- 34. Other Purpose Description:** This should only be reported in cases where the Purpose reported is “Other”. If the predefined credit types do not adequately describe the credit purpose, “Other” should be reported for Purpose above and a description of the credit purpose should be reported in this item. *(Optional)*
- 35. Committed Exposure Global (in whole dollars):** The current amount the obligor is legally allowed to borrow according to the credit agreement.
- 36. Utilized Exposure Global (in whole dollars):** The current amortized cost the obligor has drawn which has not been repaid.
- 37. Cumulative Charge-offs:** For the agent’s share of the credit, the cumulative charge-offs associated with this credit on the reporting entity's books. For credits accounted for at fair value where information on charge-offs is not available this field is optional. *(Optional)*.
- 38. # Days Principal or Interest Past Due:** For the agent’s share of the credit, the number of days principal and/or interest payments are past due. If payments are not past due 30 days or more report zero.
- 39. Non-accrual Date:** The date the credit was placed on non-accrual status, if applicable. If the credit is accruing, report 12/31/9999.
- 40. Department Handling Account:** Name of the reporting entity's business unit that is responsible for monitoring the obligor’s performance and credit quality.

Participant Data

This section contains information on the legal entity within the consolidated reporting entity that holds the share of the credit. This is not necessarily the reporting entity but the legal entity within the consolidated reporting entity where the participation is held.

- 41. Internal ID:** Internal identifier assigned to the participating lender by the reporting entity in the reporting entity's information system.
- 42. Original Internal ID:** The Internal ID assigned to the participant in the previous submission. If there is no change from the prior submission, the Internal ID should be reported as the Original

Internal ID.

43. **Name:** Full legal name of the participant.
44. **Short Name:** Short or abbreviated name of the participant used by the reporting entity. (Optional)
45. **City:** The name of the city where the participant's credits are booked.
46. **State:** The two-character abbreviation of the U.S. state or Canadian province where the participant's credits are booked.
47. **Country:** The name of the country where the participant's credits are booked.
48. **ZIP / postal code:** U.S. ZIP or other foreign postal code.
49. **Industry Code—NAICS:** The 5 or 6 digit code that best describes the primary business activity of the reporting agent according to the North American Industry Classification System. If the reporting entity does not electronically store NAICS codes, please report a SIC code (see item #50 below) but do not report both a NAICS and a SIC code. See <http://www.census.gov/eos/www/naics/> for further information about NAICS codes or to download a file containing all active NAICS codes.
50. **Industry Code – SIC:** The 4 digit numeric code that describes the primary business activity of the participant according to the Standard Industrial Classification system. The Agencies prefer NAICS codes, however SIC codes are acceptable if the reporting entity does not electronically store NAICS codes. Only report a SIC or NAICS code, not both. See <http://www.census.gov/epcd/www/sic.html> for further information about SIC codes or <http://www.naics.com/search.htm> to find corresponding NAICS codes for existing SIC codes.
51. **TIN:** The taxpayer identification number (TIN) assigned to the participant by the U.S. Internal Revenue Service (IRS) in the administration of tax laws. (Optional)
52. **Share of Committed Exposure (in whole dollars):** The current dollar amount the participant has legally committed to lend according to the credit agreement
53. **Share of Utilized Exposure (in whole dollars):** The current book value of the amount the participant has extended which has not been repaid by the obligor.

Credit Risk Ratings—See Agent Data above for more information on Credit Risk Ratings.

54. **Obligor Internal Risk Rating:** Report the obligor rating grade from the reporting entity's internal risk rating system. If the reporting entity carries its position in a held for sale or trading account, report HFS or TA as applicable, report NR for Credit Exposure Internal Risk Rating and Basel risk rating data elements (expanded reporters only) and report 100 for Pass for the Regulatory Risk Rating. If an Obligor Internal Risk Rating is not available, report the Credit Exposure Internal Risk Rating.
55. **Credit Exposure Internal Risk Rating:** Report the credit exposure's assigned loss severity

rating grade from the reporting entity's internal risk rating system. Report NR if the reporting entity carries its position in a held for sale or trading account. A Credit Exposure Internal Risk Rating is required even if the reporting entity does not have a position in the credit facility. If a Credit Exposure Risk Rating is not available, report the Obligor Internal Risk Rating in this field.

Credit risk ratings must be entered in whole numbers. Do not enter decimal points. The sum of the credit risk ratings must equal 100 for each reported credit.

- 56. % Pass:** Percentage of the Committed Exposure for the credit internally rated as “Pass” using the regulatory classification system.
- 57. % Special Mention:** Percentage of the Committed Exposure for the credit internally rated as “Special Mention” using the regulatory classification system.
- 58. % Substandard:** Percentage of the Committed Exposure for the credit internally rated as “Substandard” using the regulatory classification system.
- 59. % Doubtful:** Percentage of the Committed Exposure for the credit internally rated as “Doubtful” using the regulatory classification system.
- 60. % Loss:** Percentage of the Committed Exposure for the credit internally rated as “Loss” using the regulatory classification system.
- 61. Obligor Probability of Default (PD):** FFIEC 101 Advanced Risk-Based Capital Standards- Preamble and Final Rule Definition. CORRESPONDS TO AACA J035 ON FFIEC 101. (Optional)
- 62. Exposure at Default (EAD) \$:** FFIEC 101 Advanced Risk-Based Capital Standards- Preamble and Final Rule Definition. CORRESPONDS TO AACE J035 ON FFIEC 101. (Optional)
- 63. 62 Effective Maturity (M) (Years):** FFIEC 101 Advanced Risk-Based Capital Standards- Preamble and Final Rule Definition. CORRESPONDS TO AACF J035 ON FFIEC 101. (Optional)
- 64. 63 Loss Given Default (LGD) Before Consideration of Eligible Guarantees and Credit Derivatives:** FFIEC 101 Advanced Risk-Based Capital Standards- Preamble and Final Rule Definition. CORRESPONDS TO AACG J035 ON FFIEC 101. (Optional)
- 65. 64 Loss Given Default (LGD) After Consideration of Credit Risk Mitigants:** FFIEC 101 Advanced Risk-Based Capital Standards- Preamble and Final Rule Definition. CORRESPONDS TO AACH J035 ON FFIEC 101. (Optional)
- 66. 65 Effect of PD Substitution and LGD Adjustment Approaches on RWA (\$):** FFIEC 101 Advanced Risk-Based Capital Standards- Preamble and Final Rule Definition. CORRESPONDS TO AACI J035 ON FFIEC 101. (Optional)

- 67.** 66 Effect of Double Default Treatment on RWA (\$): FFIEC 101 Advanced Risk-Based Capital Standards- Preamble and Final Rule Definition. (Optional) CORRESPONDS TO AACJ J035 ON FFIEC 101
- 68.** 67 Risk Weighted Assets (RWA) (\$): FFIEC 101 Advanced Risk-Based Capital Standards- Preamble and Final Rule Definition. CORRESPONDS TO AACK J035 ON FFIEC 101. (Optional)
- 69.** 68 Expected Credit Loss (ECL) (\$): FFIEC 101 Advanced Risk-Based Capital Standards- Preamble and Final Rule Definition. CORRESPONDS TO AACL J035 ON FFIEC 101. (Optional)
- 70.** 69 CRM Flag: Credit risk mitigants are used for this credit (Y or N). (Optional)

Appendix I

Examples for Determining if Credits are SNCs

- 1) This credit is a SNC since the committed exposure global is => \$20 million with three federally supervised entities as participants. (By definition, the reporting institution is a federally supervised entity.)

| Loan Origination Date | Committed Exposure Global | Share of Committed Exposure | Obligor | Participant Lenders |
|-----------------------|---------------------------|-----------------------------|-----------------|-----------------------|
| 3/15/2011 | \$50,000,000 | \$10,000,000 | Car Company ABC | Reporting Institution |
| | | \$20,000,000 | | OCC Regulated Bank B |
| | | \$15,000,000 | | FDIC Regulated Bank C |
| | | \$5,000,000 | | Hedge Fund D |

- 2) This credit is not a SNC. While the committed exposure global is => \$20 million, the reporting institution does not have a share of the committed exposure therefore there are only two federally supervised entities as participants.

| Loan Origination Date | Committed Exposure Global | Share of Committed Exposure | Obligor | Participant Lenders |
|-----------------------|---------------------------|-----------------------------|-----------------|-----------------------|
| 3/15/2011 | \$50,000,000 | \$25,000,000 | Car Company ABC | OCC Regulated Bank B |
| | | \$20,000,000 | | FDIC Regulated Bank C |
| | | \$5,000,000 | | Hedge Fund D |
| | | | | |

- 3) This credit is not a SNC since the committed exposure global is less than \$20 million.

| Loan Origination Date | Committed Exposure Global | Share of Committed Exposure | Obligor | Participant Lenders |
|-----------------------|---------------------------|-----------------------------|-----------------|-----------------------|
| 3/7/2011 | \$5,000,000 | \$1,000,000 | Car Company ABC | Reporting Institution |
| | | \$2,000,000 | | OCC Regulated Bank B |
| | | \$1,000,000 | | FDIC Regulated Bank C |
| | | \$1,000,000 | | Hedge Fund D |

- 4) Both of the credits below are SNCs. Individually they would not qualify as SNCs since each is less than the \$20 million global commitment amount required. However, if two or more credits are issued to the same obligor with the same origination date, meet the \$20 million threshold in aggregate, and are shared by three or more federally supervised participants (all supervised participants must be participants in each credit), all associated credits qualify as SNCs.

| Loan Origination Date | Committed Exposure Global | Share of Committed Exposure | Obligor | Participant Lenders |
|-----------------------|---------------------------|-----------------------------|----------------|------------------------|
| 4/15/2011 | \$15,000,000 | \$1,000,000 | Food Company H | Hedge Fund A |
| | | \$2,000,000 | | Reporting Institution |
| | | \$3,000,000 | | OCC Regulated Thrift G |
| | | \$2,000,000 | | OCC Regulated Bank F |
| | | \$7,000,000 | | Hedge Fund D |

| Loan Origination Date | Committed Exposure Global | Share of Committed Exposure | Obligor | Participant Lenders |
|-----------------------|---------------------------|-----------------------------|----------------|------------------------|
| 4/15/2011 | \$10,000,000 | \$5,000,000 | Food Company H | Hedge Fund C |
| | | \$2,000,000 | | Reporting Institution |
| | | \$1,000,000 | | OCC Regulated Thrift G |
| | | \$1,000,000 | | OCC Regulated Bank F |
| | | \$1,000,000 | | Hedge Fund E |

- 5) Neither of the credits below are SNCs. Although they are to the same obligor, have the same origination date and, in aggregate, are greater than \$20 million commitment amount global, each federally supervised participant is not in both credits. (OCC Regulated Bank B

is not a participant in the first credit.)

| Loan Origination Date | Committed Exposure Global | Share of Committed Exposure | Obligor | Participant Lenders |
|-----------------------|---------------------------|-----------------------------|----------------|-----------------------|
| 5/20/2011 | \$15,000,000 | \$1,000,000 | Food Company H | Hedge Fund A |
| | | \$2,000,000 | | Reporting Institution |
| | | \$3,000,000 | | OCC Regulated Thrift |
| | | \$2,000,000 | | OCC Regulated Bank A |
| | | \$7,000,000 | | Hedge Fund D |

| Loan Origination Date | Committed Exposure Global | Share of Committed Exposure | Obligor | Participant Lenders |
|-----------------------|---------------------------|-----------------------------|----------------|-----------------------|
| 5/20/2011 | \$10,000,000 | \$3,000,000 | Food Company H | Hedge Fund C |
| | | \$2,000,000 | | Reporting Institution |
| | | \$2,000,000 | | OCC Regulated Thrift |
| | | \$1,000,000 | | OCC Regulated Bank A |
| | | \$1,000,000 | | OCC Regulated Bank B |
| | | \$1,000,000 | | Hedge Fund E |

- 6) This credit is not a SNC. While the committed exposure global is greater than the threshold and there are three federally supervised entities, two of these entities (Reporting Institution and FDIC Regulated Bank and Trust) are affiliated and count as one towards the threshold of federally supervised entities. Therefore this credit does not meet the reporting threshold.

| Loan Origination Date | Committed Exposure Global | Share of Committed Exposure | Obligor | Participant Lenders |
|-----------------------|---------------------------|-----------------------------|-----------------|--|
| 9/1/2011 | \$100,000,000 | \$50,000,000 | Brewing Company | Reporting Institution |
| | | \$25,000,000 | | FDIC Regulated Bank and Trust (affiliate of Reporting Institution) |
| | | \$25,000,000 | | OCC Regulated Bank A |

7) This credit is a SNC. The reporting institution in this example is Foreign Bank, N.Y. Branch. It manages the Cayman Branch of its foreign parent bank. The Cayman Branch is the agent for the credit and qualifies as a federally supervised entity. This credit has three federally supervised entities and is above the threshold for committed exposure global.

| Loan Origination Date | Committed Exposure Global | Share of Committed Exposure | Obligor | Participant Lenders |
|-----------------------|---------------------------|-----------------------------|------------------------|--------------------------------------|
| 3/15/2011 | \$40,000,000 | \$10,000,000 | Technology Company TUV | Cayman Island Branch of Foreign Bank |
| | | \$10,000,000 | | OCC Regulated Bank B |
| | | \$10,000,000 | | FDIC Regulated Bank C |
| | | \$10,000,000 | | Hedge Fund D |

Appendix II—Credit Type and Purpose Codes

CREDIT TYPE AND PURPOSE CODES

| CREDIT TYPE | | |
|--------------------|--------------------------------|--|
| Code | Abbreviated Description | Long Description |
| 1 | RC | Revolving Credit |
| 2 | RC - TL | Revolving Credit converting to term credit |
| 3 | RC - AB | Revolving Credit - Asset Based |
| 4 | RC - DIP | Revolving Credit - DIP |
| 5 | NON RC | Non-revolving Line of Credit |
| 6 | NON RC - TL | Non-revolving Line of Credit converting to term credit |
| 7 | TL | Term Loan |
| 8 | TL - A | Term Loan - A |
| 9 | TL - B | Term Loan - B |
| 10 | TL - C | Term Loan - C |
| 11 | TL - BR | Term Loan - Bridge |
| 12 | TL - AB | Term Loan – Asset Based |
| 13 | TL - DIP | Term Loan – DIP |
| 14 | LEASES | Capitalized Lease Obligation |
| 15 | SB L/C | Standby Letter of Credit |
| 16 | OREO | Other Real Estate Owned |
| 17 | OA | Other Asset |
| 0 | Other | Other |

| CREDIT PURPOSE | | |
|-----------------------|--------------------------------|--|
| Code | Abbreviated Description | Long Description |
| 1 | ACQUIS | Acquisition and/or merger financing |
| 2 | A SEC | Asset securitization financing |
| 3 | CAPEX | Capital expenditures excluding real estate |
| 4 | BK CP | Commercial paper back-up |
| 5 | BK IRB | Industrial revenue bond back-up |
| 6 | MTG WH | Mortgage warehousing |
| 7 | TRD FN | Trade financing |
| 8 | PF GTY | Performance guarantee |
| 9 | WC ST | Working capital – short term/seasonal |
| 10 | WCP | Working capital – permanent |
| 11 | GCP | General corporate purposes |
| 12 | DEBTREP | Debt refinance/consolidation |
| 13 | ESOP | ESOP financing |
| 14 | AG LS | Agriculture and/or livestock production |
| 15 | AG RE | Agriculture and/or ranching real estate |
| 16 | STOCK | Stock buyback |
| 17 | PTFACQ | Portfolio acquisition including note purchase agreements |
| 18 | RE LND | Real estate acquisition/development/construction – land |
| 19 | RE RES | Real estate acquisition/development/construction – residential |
| 20 | RE C&I | Real estate acquisition/development/construction - commercial and industrial |
| 21 | REP RES | Real estate investment/permanent financing – residential |
| 22 | REP C&I | Real estate investment/permanent financing - commercial and industrial |
| 23 | RECAP | Business recapitalization/dividends |
| 24 | NEW PR | New product development |
| 25 | PR FIN | Project financing |
| 0 | Other | Other |

Appendix III—Contact Information

SNC Business Office Contacts

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