Wells Fargo & Company

Basel III Pillar 3
Regulatory Capital Disclosures

For the quarter ended March 31, 2020

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Any reference to "Wells Fargo," "the Company," "we," "our," or "us" in this Report, means Wells Fargo & Company and Subsidiaries (consolidated). When we refer to the "Parent," we mean Wells Fargo & Company. See the Glossary of Acronyms for definitions of terms used throughout this Report. This Report contains forward-looking statements, which may include our current expectations and assumptions regarding our business, the economy, and other future conditions. Please see the "Forward-Looking Statements" section for more information, including factors that could cause our actual results to differ materially from our forward-looking statements.

Disclosure Map

The table below shows where disclosures related to topics addressed in this Pillar 3 disclosure report can be found in our first quarter 2020 Form 10-Q and our 2019 Form 10-K.

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Introduction

Executive Summary

The Pillar 3 disclosures included within this Report are required by the regulatory capital rules issued by the Office of the Comptroller of the Currency (OCC), the Board of Governors of the Federal Reserve System (FRB) (collectively, the Agencies), and the Federal Deposit Insurance Corporation (FDIC), and are designed to comply with the rules and regulations associated with the Basel III capital adequacy framework, which prescribed these disclosures under its Pillar 3 - Market Discipline rules. These disclosures should be read in conjunction with our Quarterly Report on Form 10-Q for the quarter ended March 31, 2020 (first quarter 2020 Form 10-Q) and our Annual Report on Form 10-K for the year ended December 31, 2019 (2019 Form 10-K). The Pillar 3 disclosures provide qualitative and quantitative information about regulatory capital calculated under the Advanced Approach for first quarter 2020.

At March 31, 2020, we calculated our Common Equity Tier 1 (CET1), tier 1, and total capital ratios in accordance with the Standardized and Advanced Approaches. The lower of each ratio calculated under the two approaches is used in the assessment of our capital adequacy. Table 1 summarizes our CET1, tier 1 capital, total capital, risk-weighted assets (RWAs), and the respective capital ratios under the Advanced and Standardized Approaches at March 31, 2020. The capital ratios set forth in Table 1 exceed the minimum required capital ratios for CET1, tier 1, and total capital, respectively.

Table 1: Capital Components and Ratios Under Basel III (1)

		March 31, 2020
(in millions, except ratios)	**Advanced Approach**	**Standardized Approach**
Common Equity Tier 1 Capital	$ **134,751**	**134,751**
Tier 1 Capital	**154,277**	**154,277**
Total Capital	**184,068**	**192,121**
Risk-Weighted Assets	**1,181,271**	**1,262,808**
Common Equity Tier 1 Capital Ratio	**11.41 %**	**10.67 %** *
Tier 1 Capital Ratio	**13.06**	**12.22** *
Total Capital Ratio	**15.58**	**15.21** *

(1) The requirements for calculating CET1 and tier 1 capital, along with RWAs, are fully phased-in. However, the requirements for calculating tier 2 and total capital are still in accordance with Transition Requirements.
* Denotes the lowest capital ratio determined under the Advanced and Standardized Approaches.

As a covered bank holding company, we are required to maintain a minimum supplementary leverage ratio (SLR) of at least 5.00% to avoid restrictions on capital distributions and discretionary bonus payments. The rule also requires that all of our insured depository institutions (IDIs) maintain a SLR of at least 6.00% to be considered well-capitalized under applicable regulatory capital adequacy guidelines. At March 31, 2020, SLR for the Company was 6.84%, and we exceeded the applicable SLR requirements for each of our IDIs.

As a global systemically important bank (G-SIB), we are required to have a minimum amount of equity and unsecured long-term debt for purpose of resolvability and resiliency, often referred to as Total Loss Absorbing Capacity (TLAC). As of March 31, 2020, our eligible external TLAC as a percentage of total RWAs was 23.27% compared with a required

minimum of 22.00%. For additional information, see the “Total Loss Absorbing Capacity” section in Management’s Discussion and Analysis to our first quarter 2020 Form 10-Q.

Company Overview

Wells Fargo & Company is a diversified, community-based financial services company with $1.98 trillion in assets. Founded in 1852 and headquartered in San Francisco, we provide banking, investment and mortgage products and services, as well as consumer and commercial finance, through 7,400 locations, more than 13,000 ATMs, digital (online, mobile, and social), and contact centers (phone, email, and correspondence), and we have offices in 31 countries and territories to support customers who conduct business in the global economy. With approximately 263,000 active, full-time equivalent team members, we serve one in three households in the United States and ranked No. 29 on *Fortune’s* 2019 rankings of America’s largest corporations. We ranked fourth in assets and third in the market value of our common stock among all U.S. banks at March 31, 2020.

Wells Fargo manages a variety of risks that can significantly affect our financial performance and our ability to meet the expectations of our customers, stockholders, regulators, and other stakeholders. The Company measures and considers risk in connection with the products and services we offer to customers. The risks we take include financial, such as interest rate, credit, liquidity and market risks, and non-financial, such as operational (including compliance and model risk), strategic, and reputational risks. A discussion of our risk management framework is provided in the “Risk Management” section in Management’s Discussion and Analysis to our 2019 Form 10-K.

Basel III Overview

The Company is subject to rules issued by the Agencies and FDIC to implement the Basel Committee on Banking Supervision (BCBS) Basel III capital requirements for U.S banking organizations (Final Rule). The Basel III capital rules contain two frameworks for calculating capital requirements, a Standardized Approach and an Advanced Approach applicable to certain institutions, including Wells Fargo. See the “Capital Management” section in Management’s Discussion and Analysis to our first quarter 2020 Form 10-Q and our 2019 Form 10-K for additional information concerning various regulatory capital adequacy rules applicable to us.

In the assessment of our capital adequacy, we must report the lower of our CET1, tier 1, and total capital ratios calculated under the Standardized Approach and under the Advanced Approach. The capital requirements that apply to us can change in future reporting periods as a result of changes to these rules, and the tables within this report include information regarding the Company’s RWAs as calculated under the Advanced Approach.

The Final Rule is part of a comprehensive set of reform measures and regulations intended to improve the banking sector’s ability to absorb shocks arising from financial and economic stress, improve risk management and governance, and strengthen banks’ transparency and disclosures. To achieve these objectives, the Final Rule, among other things, required on a fully phased-in basis as of March 31, 2020:

- A minimum CET1 ratio of 9.00%, comprised of a 4.50% minimum requirement plus a capital conservation buffer of 2.50% and for us, as a G-SIB, a capital surcharge of 2.00% for 2020;
- A minimum tier 1 capital ratio of 10.50%, comprised of a 6.00% minimum requirement plus the capital conservation buffer of 2.50%, and the G-SIB capital surcharge of 2.00%;

- A minimum total capital ratio of 12.50%, comprised of a 8.00% minimum requirement plus the capital conservation buffer of 2.50%, and the G-SIB capital surcharge of 2.00%;
- A potential countercyclical buffer of up to 2.50% to be added to the minimum capital ratios, which could be imposed by regulators at their discretion if it is determined that a period of excessive credit growth is contributing to an increase in systemic risk;
- A minimum tier 1 leverage ratio of 4.00%; and
- A minimum SLR of 5.00% (comprised of a 3.00% minimum requirement plus a supplementary leverage buffer of 2.00%) for large and internationally active bank holding companies (BHCs).

Effective October 1, 2020, a stress capital buffer will be added to the minimum capital ratio requirements. The stress capital buffer will be calculated based on the decrease in a financial institution's risk-based capital ratios under the supervisory severely adverse scenario in the annual Comprehensive Capital Analysis and Review (CCAR), plus four quarters of planned common stock dividends. The stress capital buffer will replace the 2.50% capital conservation buffer under the Standardized Approach. Because the stress capital buffer will be calculated annually as part of CCAR and will be based on data that can differ over time, the amount of the buffer is subject to change in future years.

As a G-SIB, we are also subject to the FRB's rule implementing the additional capital surcharge of between 1.00-4.50% on the minimum capital requirements of G-SIBs. Under the rule, we must annually calculate our surcharge under two methods and use the higher of the two surcharges. The first method (method one) considers our size, interconnectedness, cross-jurisdictional activity, substitutability, and complexity, consistent with the methodology developed by the BCBS and the Financial Stability Board (FSB). The second (method two) uses similar inputs, but replaces substitutability with use of short-term wholesale funding and will generally result in higher surcharges than the BCBS methodology. Because the G-SIB capital surcharge is calculated annually based on data that can differ over time, the amount of the surcharge is subject to change in future years.

The Company is not subject to any limitations on capital distributions and discretionary bonus payments under the Final Rule as our capital ratios at March 31, 2020 exceeded the minimum required capital ratios with Transition Requirements by 167 bps for CET1, 172 bps for tier 1 capital, and 271 bps for total capital under the Standardized Approach.

The following table presents the minimum required capital ratios under Transition Requirements to which the Company was subject, and their anticipated phase-in through 2020:

	2015	2016	2017	2018	2019	2020 (1)
Common Equity Tier 1 Capital	4.500%	5.625%	6.750%	7.875%	9.000%	9.000%
Tier 1 Capital	6.000%	7.125%	8.250%	9.375%	10.500%	10.500%
Total Capital	8.000%	9.125%	10.250%	11.375%	12.500%	12.500%

(1) At March 31, 2020, the CET1, tier 1, and total capital minimum ratio requirements for Wells Fargo & Company include a capital conservation buffer of 2.500% and a G-SIB capital surcharge of 2.000%. Effective October 1, 2020, the 2.500% capital conservation buffer will be replaced under the Standardized Approach by a stress capital buffer that will be calculated annually as part of CCAR.

The Final Rule is structured around three Pillars as follows:

- **Pillar 1 - Minimum Capital Adequacy Standards:** Relative to Basel I, Basel III requires banks to develop more refined approaches to quantifying the capital requirements for credit risk, and also introduces a capital charge for operational risk under the Advanced Approach, which was not included in Basel I.

- **Pillar 2 - Internal Capital Adequacy Assessment Process:** Pillar 2 modifies Pillar 1 capital requirements to include idiosyncratic risk that is not included in Pillar 1 (e.g., interest rate risk on the banking book). Pillar 2 is principle-based and places significant emphasis not only on the calculations of capital, but also on the calculation processes and the mechanisms management uses to assure itself that Wells Fargo is adequately capitalized. In accordance with Pillar 2, Wells Fargo is required to develop and maintain an Internal Capital Adequacy Assessment Process (ICAAP) to support the assessment of its capital adequacy. Furthermore, Pillar 2 outlines principles of supervisory review to monitor banks' capital and evaluate banks' management of risks through the use of internal control processes.
- **Pillar 3 - Market Discipline:** The objective of Pillar 3 is to improve risk disclosure in order to permit market forces to exert pressure on insufficiently capitalized banks. This has resulted in the establishment of new minimum requirements for qualitative and quantitative disclosures to be made available to the public that contain the outcome of capital calculations and risk estimates, as well as the methods and assumptions used in performing those calculations. These requirements are scheduled to be fully phased-in by the end of 2021. These revisions will enable market participants to compare banks' disclosures of RWAs and improve transparency of the internal model-based approaches that banks use to calculate minimum regulatory capital requirements. The Agencies have not yet published the proposed rules to implement the revised requirements issued by the BCBS.

Scope of Application of Basel III

The Basel III framework applies to Wells Fargo & Company and its subsidiary banks. Wells Fargo & Company's subsidiary banks are Wells Fargo Bank, National Association (Wells Fargo Bank, N.A.), Wells Fargo Bank South Central, National Association (Wells Fargo Bank South Central, N.A.), Wells Fargo National Bank West, and Wells Fargo Limited. As of June 30, 2018, Wells Fargo Trust Company, N.A. became exempt from reporting under the Basel III Advanced Approaches Framework.

The basis of consolidation used for regulatory reporting is the same as that used under United States (U.S.) Generally Accepted Accounting Principles (GAAP). We currently do not have any unconsolidated entities whose capital is deducted from the Company's total capital except for certain insurance subsidiaries. For additional information on our basis for consolidating entities for accounting purposes, see Note 1 (Summary of Significant Accounting Policies) to Financial Statements in our first quarter 2020 Form 10-Q and our 2019 Form 10-K. For information regarding restrictions or other major impediments on the transfer of funds and capital distributions, see Note 3 (Cash, Loan and Dividend Restrictions) to Financial Statements in our first quarter 2020 Form 10-Q and our 2019 Form 10-K.

Capital under Basel III

Basel III modified earlier rules by narrowly defining qualifying capital and increasing capital requirements for certain exposures. CET1 capital primarily includes common stockholders' equity, accumulated other comprehensive income (AOCI), and retained earnings less deductions for certain items such as goodwill, gains related to securitization transactions, intangibles, and minority interests, as well as certain items with values exceeding specified thresholds including: mortgage servicing rights, deferred tax assets, and investments in financial institutions as defined by the Final Rule. Tier 1 capital consists of CET1 capital in addition to capital instruments that qualify as tier 1 capital such as preferred stock. Tier 2 capital includes qualifying allowance for credit losses, long-term debt, and certain other

instruments that qualify as tier 2 capital. Total capital is the sum of tier 1 and tier 2 capital. The Basel III capital requirements for calculating CET1 and tier 1 capital, along with RWAs, are fully phased-in. However, the requirements for calculating tier 2 and total capital are still in accordance with Transition Requirements and are scheduled to be fully phased-in by the end of 2021.

Risk-Weighted Assets under Basel III

Compared with the Standardized Approach, the calculation of RWAs under the Advanced Approach requires that applicable banks employ robust internal models for risk quantification. The significant differences in the two approaches consist of the following:

- Credit Risk: under the Advanced Approach, credit risk RWA is calculated using risk-sensitive calculations that rely upon internal credit models based upon the Company's experience with internal rating grades, whereas under the Standardized Approach, credit risk RWA is calculated using risk weights prescribed in the Final Rule that vary by exposure type;
- Operational Risk: the Advanced Approach includes a separate operational risk component within the calculation of RWAs, while the Standardized Approach does not;
- Credit Valuation Adjustment (CVA) capital charge: the Advanced Approach for counterparty credit risk includes a capital charge for CVA and the Standardized Approach does not; and
- Add-on Multiplier: under the Advanced Approach, a 6.00% add-on multiplier is applied to all components of credit risk RWAs other than the CVA component.

The primary components of RWAs under the Advanced Approach include:

- Credit Risk RWAs, which reflect the risk of loss associated with a borrower or counterparty default (failure to meet obligations in accordance with agreed upon terms), are presented by exposure type including wholesale credit risk, retail credit risk, counterparty credit risk, securitization credit risk, equity credit risk, and other exposures;
- Market Risk RWAs, which reflect the risk of possible economic loss from adverse changes in market risk factors such as interest rates, credit spreads, foreign exchange rates, equity and commodity prices, and the risk of possible loss due to counterparty exposure; and
- Operational Risk RWAs, which reflect the risk of operating loss resulting from inadequate or failed internal processes or systems.

Transitional Period for Basel III

The Final Rule provides for a transitional period for certain elements of the rule calculations extending through the end of 2021, at which point the capital requirements become fully phased-in, as demonstrated in the diagram below. The requirements for calculating CET1 and tier 1 capital, along with RWAs, are fully phased-in. However, the requirements for calculating tier 2 and total capital are still in accordance with Transition Requirements.

		Transitional Period		Fully Phased in
		2014	**2015 2017**	**2018 & beyond**
Capital (Numerator)		Basel III Transitional Capital		Basel III Capital [1]
Risk-Weighted Assets (Denominator)	Standardized Approach	Basel I With 2.5 [2]	Basel III Standardized	
	Advanced Approach [3]	Basel III Advanced		

[1] Trust preferred securities and other non-qualifying capital instruments to be phased-out by December 31, 2021.

[2] Refers to the Final Market Risk rule issued August 30, 2012. Collectively, this approach is referred to as the “General Risk-Based Capital Approach”.

[3] Only firms that have exited parallel are allowed to use the Advanced Approach.

Capital Requirements and Management

Wells Fargo's objective in managing its capital is to maintain capital at an amount commensurate with our risk profile and risk tolerance objectives, and to meet both regulatory and market expectations. We primarily fund our regulatory capital needs through the retention of earnings net of both dividends and share repurchases, as well as through the issuance of preferred stock, long-term debt, and other qualifying instruments. We manage capital to meet internal capital targets with the goal of ensuring that sufficient capital reserves remain in excess of regulatory requirements and applicable internal buffers (set in excess of minimum regulatory requirements by the Company's Board of Directors (Board)). There are operational and governance processes in place designed to manage, forecast, monitor, and report to management and the Board capital levels in relation to regulatory requirements and capital plans.

The Company and each of its IDIs are subject to various regulatory capital adequacy requirements administered by the Agencies and the FDIC. Risk-based capital guidelines establish a risk-adjusted ratio relating capital to different categories of assets and off-balance sheet exposures. Our capital adequacy assessment process contemplates material risks that the Company is exposed to and also takes into consideration our performance under a variety of stressed economic conditions, as well as regulatory expectations and guidance.

Capital Management

Wells Fargo actively manages capital through a comprehensive process for assessing its overall capital adequacy. Our Capital Management Committee (CMC) and Corporate Asset/Liability Committee (Corporate ALCO), each overseen by the Finance Committee of our Board, provide oversight of our capital management framework. CMC recommends our capital objectives and strategic actions to the Finance Committee for approval, establishes our capital targets and triggers, and sets the capital policy. ALCO reviews the actual and forecasted capital levels every month, and together with CMC, monitors capital against regulatory requirements and internal triggers for signs of stress. CMC and ALCO review the Company's capital management performance against objectives to ensure alignment with the expectations and guidance offered by regulatory agencies and our Board. The Company's annual capital plan serves as our primary planning tool to establish and test our capital strategy relative to our capital policy and provides a comprehensive discussion of our capital targets. Throughout the year, progress against our capital plan is monitored and reported to executive management, CMC, ALCO, and our Board. Our capital plan incorporates baseline forecasts as well as forecasts under stress, in order to assess our capital position under multiple economic conditions. Our Board's Risk Committee, Finance Committee, and Credit Committee meet regularly throughout the year to establish the risk appetite, and the Finance Committee and Credit Committee review the results of stress testing in order to evaluate and oversee the management of the Company's projected capital adequacy. For information on the terms and conditions of our regulatory capital instruments, refer to Note 20 (Preferred Stock) and Note 21 (Common Stock and Stock Plans) to Financial Statements in our 2019 Form 10-K. For a discussion on our risk management framework, see the "Risk Management" section in Management's Discussion and Analysis to our 2019 Form 10-K.

Additionally, the Company's Capital Reporting Committee (CRC) provides oversight of the regulatory capital calculation results and capital calculation disclosures. The CRC reports directly to the Regulatory and Risk Reporting Oversight Committee (RRROC), a management-level governance committee overseen by the Audit Committee of the

Company's Board. The RRROC provides oversight of Wells Fargo's regulatory reporting and disclosures, and assists senior management in fulfilling their responsibilities for oversight of the regulatory financial reports and disclosures made by the Company.

Wells Fargo & Company is the primary provider of capital to its subsidiaries. However, each of the Company's IDIs manages its own capital to support planned business growth and meet regulatory requirements within the context of the Company's annual capital plan. For additional information on our capital management, see the "Capital Management" section in Management's Discussion and Analysis to our first quarter 2020 Form 10-Q and our 2019 Form 10-K.

Internal Capital Adequacy Assessment Process

Our internal capital adequacy assessment process, referred to as ICAAP, is designed to identify our exposure to material risks and evaluate the capital resources available to absorb potential losses arising from those risks. We execute company-wide capital stress tests as a key analytical tool to assess our capital adequacy relative to our risk profile and risk appetite. Company-wide capital stress testing is a forward-looking assessment of the potential impact of adverse events and circumstances on Wells Fargo's capital adequacy. The key outputs from stress testing are pro forma balance sheets and income statements prepared consistent with U.S. GAAP, which are then used to evaluate capital adequacy.

Comprehensive Capital Analysis and Review

In addition to its use in Wells Fargo's ongoing ICAAP, the Company's stress testing framework is also used in calculating results in support of the FRB's annual CCAR and stress tests administered by the OCC, including related regulatory reporting requirements and disclosure by Wells Fargo of stress testing methodologies and certain adverse scenario results.

For details on our CCAR process, refer to the "Capital Planning and Stress Testing" section in Management's Discussion and Analysis to our first quarter 2020 Form 10-Q and our 2019 Form 10-K.

Key Regulatory Developments

Current Expected Credit Loss (CECL) Accounting Standard: Effective January 1, 2020, the Company adopted Accounting Standards Update 2016-13 – Financial Instruments – Credit Losses (Topic 326). For additional information on the CECL accounting standard, see Note 1 (Summary of Significant Accounting Policies) to Financial Statements in our first quarter 2020 Form 10-Q and the "Capital Management" section in Management's Discussion and Analysis to our first quarter 2020 Form 10-Q.

Regulatory Developments Related to COVID-19: In response to the COVID-19 pandemic and related events, federal banking regulators have issued several joint interim final rules amending the regulatory capital rules and other prudential regulations to ease certain restrictions on banking organizations and encourage the use of certain FRB-established facilities in order to promote lending to consumers and businesses. For additional information on the measures undertaken by federal banking regulators in response to the COVID-19 pandemic, see the "Regulatory Matters" section in Management's Discussion and Analysis to our first quarter 2020 Form 10-Q.

Capital Summary

Table 2 shows the adequacy of risk-based capital for Wells Fargo & Company and its IDIs under the Advanced Approach at March 31, 2020.

Table 2: Capital Adequacy of Wells Fargo & Company and its Insured Depository Subsidiaries (1) March 31, 2020

Advanced Approach (in millions, except ratios)	**CET 1 Capital (2)**	**Tier 1 Capital (3)**	**Total Capital (4)**	**Advanced Approach RWAs (5)**	**CET1 Capital Ratio (6)**	**Tier 1 Capital Ratio (7)**	**Total Capital Ratio (8)**
Wells Fargo & Company	$ 134,751	154,277	184,068	1,181,271	11.41 %	13.06 %	15.58 %
Wells Fargo Bank, N.A.	147,537	147,537	162,300	1,061,736	13.90	13.90	15.29
Wells Fargo Bank South Central, N.A.	712	712	712	2,150	33.12	33.12	33.12
Wells Fargo National Bank West	1,576	1,576	1,589	3,110	50.69	50.69	51.08
Wells Fargo Limited	801	801	801	920	87.06	87.06	87.06

(1) The requirements for calculating CET1 and tier 1 capital, along with RWAs, are fully phased-in. However, the requirements for calculating tier 2 and total capital are still in accordance with Transition Requirements.
(2) Common Equity Tier 1 capital (CET1 capital) consists of common shares issued and additional paid-in capital, retained earnings, and other reserves excluding cash flow hedging reserves, less specified regulatory adjustments.
(3) Tier 1 capital is the sum of CET1 capital and additional tier 1 capital.
(4) Total capital is defined as tier 1 capital plus tier 2 capital.
(5) Total RWAs under the Advanced Approach includes the 6.00% credit risk multiplier where applicable.
(6) CET1 capital ratio = CET1 capital / RWA.
(7) Tier 1 capital ratio = Tier 1 capital / RWA.
(8) Total capital ratio = Total capital / RWA.

Table 3 provides information regarding the components of capital used in calculating CET1 capital, tier 1 capital, tier 2 capital, and total capital under the Advanced Approach for Wells Fargo & Company at March 31, 2020.

Table 3: Total Regulatory Capital Base (1) March 31, 2020

(in millions)	**Risk Based Capital**
Common stock plus related surplus, net of treasury stock	$ (1,090)
Retained earnings	165,308
Accumulated other comprehensive income (AOCI)	(1,564)
Common Equity Tier 1 capital (CET1) before regulatory adjustments and deductions	**162,654**
Less: Goodwill (net of associated deferred taxes)	26,990
Other (includes intangibles, net gain/loss on cash flow hedges)	913
Total adjustments and deductions for Common Equity Tier 1 capital	**27,903**
CET1 capital	**134,751**
Additional Tier 1 capital instruments plus related surplus	20,064
Less: Total additional Tier 1 capital deductions	538
Additional Tier 1 capital	**19,526**
Tier 1 capital	**154,277**
Tier 2 capital before regulatory adjustments and deductions	29,962
Less: Total Tier 2 capital deductions	171
Tier 2 capital	**29,791**
Total capital	**$ 184,068**

(1) The requirements for calculating CET1 and tier 1 capital, along with RWAs, are fully phased-in. However, the requirements for calculating tier 2 and total capital are still in accordance with Transition Requirements.

Table 4 presents information on the RWAs components included within our regulatory capital ratios under the Advanced Approach on a fully phased-in basis for Wells Fargo & Company at March 31, 2020.

Table 4: Risk-Weighted Assets by Risk Type - Advanced Approach

(in millions)	March 31, 2020 **Advanced Approach RWAs**
Credit Risk-Weighted Assets	
Wholesale exposures:	
Corporate	$ 304,930
Bank	10,678
Sovereign	3,933
Income Producing Real Estate	99,023
High Volatility Commercial Real Estate	2,947
Total Wholesale exposures	**421,511**
Retail exposures:	
Residential mortgage - first lien	52,783
Residential mortgage - junior lien	1,872
Residential mortgage - revolving	25,699
Qualifying revolving (1)	43,333
Other retail	66,851
Total Retail exposures	**190,538**
Counterparty exposures:	
OTC Derivatives	19,985
Margin loans and repo style transactions	6,442
Cleared transactions (2)	1,919
Unsettled Trades	275
Total Counterparty exposures	**28,621**
Credit Valuation Adjustments (CVA)	**25,488**
Securitization exposures	**34,742**
Equity exposures	**45,871**
Other exposures (3)	**55,915**
Total Credit Risk-Weighted Assets	**802,686**
Market risk	**42,860**
Operational risk	**335,725**
Total Risk-Weighted Assets (Advanced Approach)	**$ 1,181,271**

(1) Qualifying revolving exposures are unsecured revolving exposures where the undrawn portion of the exposure is unconditionally cancellable by the bank.

(2) Includes Derivative and Repo exposures to Central Counterparties with RWAs of $897 million and $25 million, respectively. Default fund contribution to counterparties resulted in RWAs of $997 million, which is also included.

(3) Other exposures include other assets, non-deducted Intangibles, and Mortgage Servicing Rights.

Credit Risk

Overview

We define credit risk as the risk of loss associated with a borrower or counterparty default (failure to meet obligations in accordance with agreed upon terms). Credit risk exists with many of our assets and exposures such as debt security holdings, certain derivatives, and loans. Our loan portfolios represent the largest component of assets on our balance sheet for which we have credit risk. A key to our credit risk management is our adherence to a well-controlled underwriting process, which we believe is appropriate for the needs of customers as well as investors who purchase loans or securities collateralized by the loans we underwrite. Our processes are designed to approve applications and make loans only if we believe the customer has the ability to repay the loan or line of credit in accordance with all of its contractual terms. Our ongoing methods for monitoring and measuring various forms of credit risk are discussed by respective credit risk type in subsequent sections.

The Company's credit risk management oversight process is governed centrally, but provides for decentralized management and accountability by our lines of business. Under Wells Fargo's credit risk management operating model, each business group and enterprise function is responsible for identifying, assessing, managing, and mitigating the credit risk associated with its activities. The Company's Independent Risk Management function establishes and maintains the company's risk management program, and provides oversight, including challenge to and independent assessment of the front line's execution of its risk management responsibilities. The overall credit process includes comprehensive credit policies, disciplined credit underwriting, frequent and detailed risk measurement and modeling, extensive credit training programs, and a continual independent loan review and audit process. In addition, regulatory examiners review and perform detailed tests of our credit underwriting and loan administration processes.

The Company uses numerous control processes to monitor and validate its systems on an ongoing basis. These control processes are independent of the development, implementation, and operation of the Advanced Internal Ratings Based (A-IRB) systems. Under the A-IRB systems, risk parameters (e.g., probability of default - PD, loss given default - LGD, and exposure at default - EAD) are calculated using internal models. We rely on historical data along with external benchmarks, such as agency reports and macroeconomic data, to develop and implement these models, and various corporate risk groups are responsible for independent model validation (Corporate Model Risk, or CMoR) and ongoing performance monitoring (Corporate Functional Model Oversight, or CFMO).

For additional information about our credit risk management and practices, accounting policies, and current exposures as reported under U.S. GAAP, refer to the "Credit Risk Management" section in Management's Discussion and Analysis to our first quarter 2020 Form 10-Q and our 2019 Form 10-K . The following provides specific references:

Accounting Policies

- Refer to Note 1 (Summary of Significant Accounting Policies) to Financial Statements in our first quarter 2020 Form 10-Q and our 2019 Form 10-K for a summary of our significant accounting policies, including a discussion of our policies relating to nonaccrual and past due loans, returning nonaccrual loans to accrual status, impaired loans, and loan charge-off policies.

- On January 1, 2020, we adopted the CECL accounting standard, which requires us to record an allowance for credit losses on available-for-sale and held-to-maturity debt securities.

Total Credit Risk Exposures, Impaired Loans, Net Charge-offs, and Allowance for Credit Losses

- Credit Exposure and Impaired Loans - refer to Note 6 (Loans and Related Allowance for Credit Losses) to Financial Statements in our first quarter 2020 Form 10-Q;
- Debt Securities - refer to Note 5 (Available-for-Sale and Held-to-Maturity Debt Securities) to Financial Statements in our first quarter 2020 Form 10-Q;
- Credit Losses -
  - For loan and lease losses, refer to Table 25 (Net Loan Charge-offs) in Management's Discussion and Analysis and Table 6.5 (Allowance for Credit Losses for Loans) in Note 6 (Loans and Related Allowance for Credit Losses) to Financial Statements in our first quarter 2020 Form 10-Q;
  - For securities, refer to Table 5.7 (Allowance for Credit Losses for Debt Securities) in Note 5 (Available-for-Sale and Held-to-Maturity Debt Securities) to Financial Statements in our first quarter 2020 Form 10-Q;
- The discussions of quarterly credit losses in the sections cited above describe changes from prior periods. The *Historical Credit Results* section in this report compares actual charge-offs to Expected Credit Loss as defined and estimated using the inputs to the Advanced Approach; and
- Derivatives - refer to Note 15 (Derivatives) to Financial Statements in our first quarter 2020 Form 10-Q.

Distribution by Geography, Industry or Counterparty Type and Contractual Maturity

- Debt Securities - refer to Note 5 (Available-for-Sale and Held-to-Maturity Debt Securities) to Financial Statements in our first quarter 2020 Form 10-Q for details on counterparty type and contractual maturity;
- Loans - refer to Table 13 (Maturities for Selected Commercial Loan Categories) in our 2019 Form 10-K; and Table 11 (Commercial and Industrial Loans and Lease Financing by Industry), Table 12 (CRE Loans by State and Property Type), Table 13 (Select Country Exposures), Table 15 (Real Estate 1-4 Family Mortgage Loans by State), Table 18 (Junior Lien Mortgage Line and Loan and First Lien Mortgage Line Portfolios Payment Schedule), Table 20 (Analysis of Changes in Nonaccrual Loans), and Table 24 (Loans 90 Days or More Past Due and Still Accruing) in Management's Discussion and Analysis in our first quarter 2020 Form 10-Q;
- Derivatives - refer to Note 15 (Derivatives) to Financial Statements in our first quarter 2020 Form 10-Q.

Average Balances

- Refer to Table 1 (Average Balances, Yields and Rates Paid (Taxable-Equivalent Basis)) in Management's Discussion and Analysis in our first quarter 2020 Form 10-Q.

The following is a discussion of how we assess, manage, and measure credit risk by Basel exposure type.

Wholesale Credit Risk

Overview/Management approach

Wholesale exposures primarily include the following:

- All individually risk-rated loans and commitments, excluding certain commercial loans under $1 million which receive retail regulatory capital treatment and other commercial loans which meet the definition of securitization exposures;
- Deposits with and money due from banks, excluding cash items in the process of collection;
- Debt securities, excluding those asset-backed securities (ABS) which meet the definition of a securitization exposure;
- Trading assets that do not qualify as covered positions under the market risk capital rules, but meet the definition of a wholesale exposure;
- Accounts receivable that do not fit in other reporting categories;
- Certain insurance exposures where the Company could suffer a loss if the insurer were to default;
- Reverse repurchase transactions that do not meet the definition of a securitization exposure or a repo-style transaction due to the nature of the collateral or contractual terms of the arrangement; and
- Non-derivative financial guarantees that obligate the Company to make payment if another party fails to perform.

At origination, and throughout the life of a wholesale loan exposure, our underwriters and loan officers use a risk rating methodology to indicate credit quality. Risk rating is essential to wholesale credit approval, risk management monitoring and reporting, loan pricing, determination of an appropriate allowance for loan and lease losses, regulatory capital assignments under the Advanced Approach, and sound corporate governance processes. Risk ratings are individually evaluated and incorporate quantitative and qualitative factors including both point-in-time and through-the-cycle elements. External ratings and other assessments may be considered by underwriters and loan officers as a part of their overall credit evaluation and independent assignment of an internal rating.

Credit Officers certify risk ratings quarterly and are accountable for their accuracy. Our Corporate Credit and Market Risk functions and line of business credit functions continually evaluate and modify credit policies, including risk ratings, to address unacceptable levels of risk as they are identified. Further oversight is provided by our Corporate Risk Asset Review group.

RWAs Measurement: Advanced Internal Ratings Based

Table 4 presents risk-weighted assets by Basel reporting classification. The Corporate, Bank, and Sovereign classifications include credit exposure to corporate entities, banks, and sovereign entities, respectively. Some loans made for the purposes of real estate acquisition, development and construction, other than 1-4 family residential properties, present higher risk and are categorized as high volatility commercial real estate (HVCRE) per regulatory instructions, which were updated in 2018. Additionally, loans which finance commercial real estate (CRE), where the

prospects for repayments and recovery depend on the cash flows generated by the real estate serving as collateral for the exposures, are categorized as income-producing real estate (IPRE) in the Final Rule.

Risk-weighted assets are determined by using internal risk parameters. The estimation process for these parameters begins with internal borrower risk-ratings assigned to the obligor and internal collateral quality ratings assigned to the credit facility. The borrower ratings are mapped to estimates of PD and the collateral quality ratings are mapped to estimates of LGD. Borrower ratings and collateral quality ratings are used for both internal risk management and regulatory capital calculations. Parameters are based on models which are validated and back-tested against historical data - including data from periods outside of those used to develop the models - by an independent internal model risk governance team. A Corporate Functional Model Oversight team also performs ongoing monitoring of the models, back-testing model performance against results from the past few years, focused on assessing performance under current conditions.

To calculate wholesale credit RWAs, the Company inputs its modeled risk parameters (PD, EAD, and LGD) and maturity (M) into the A-IRB risk weight formula, as specified by the Final Rule. PD is an estimate of the probability that an obligor will default over a one-year horizon. EAD is an estimate of the amount that would be owed to Wells Fargo if the obligor were to default. LGD is an estimate of the portion of the EAD that would be lost (including the economic cost of delayed recovery and the cost of collection) in a stressed environment with high default rates. M is the effective remaining maturity of the exposures. Additionally, modeled parameters may be supplemented with judgmental overlays to address model or data limitations and to help ensure conservatism where appropriate.

The risk mitigating benefit of guarantees are reflected in the RWAs calculation by adjusting the PD or LGD. At March 31, 2020, $97.1 billion of wholesale exposures reflected the benefit of eligible guarantees.

Table 5 provides the distribution of wholesale exposures and key parameter estimates by PD bands. The commercial loan portfolio comprises more than half of the wholesale EAD and nearly 90% of the wholesale RWAs. The non-loan categories (identified in the bullet points at the start of the Wholesale Credit Risk section) add significant balances to the low-risk part of the portfolio.

Table 5: The Company's Credit Risk Assessment of Wholesale Exposures by Probability of Default Grades March 31, 2020

(in millions, except ratios)					Exposure weighted average		
PD Range (percentage)	Balance Sheet Amount	Undrawn Commitments	Exposure at Default	Advanced Approach RWAs (1)	PD	LGD	Risk Weight
0.00 to < 0.05	$ 468,131	6,961	471,309	17,711	0.02 %	9.75 %	3.76 %
0.05 to < 0.25	234,459	175,448	300,916	95,713	0.13	35.72	31.81
0.25 to < 1.50	240,939	126,851	296,795	199,746	0.65	35.20	67.30
1.50 to < 5.00	62,812	21,611	72,297	68,695	2.31	32.34	95.02
5.00 to < 13.50	17,764	7,995	22,954	25,654	7.34	27.07	111.76
13.50 to < 100	4,326	1,509	5,054	9,411	17.98	32.70	186.18
100 (default)	3,877	876	4,416	4,581	100.00	36.74	103.69
Total Wholesale (2)	**$ 1,032,308**	**341,251**	**1,173,741**	**421,511**	**0.95 %**	**24.77 %**	**35.91 %**

(1) RWAs under Basel III Advanced Approach includes the 6.00% credit risk multiplier where applicable.

(2) Includes commercial loans, debt securities, deposits with (and other funds due from) banks/other institutions, plus other non-loan exposures.

Retail Credit Risk

Overview/Management approach

The credit quality of retail exposures is indicated through loan scoring or other statistical approaches appropriate for homogenous types of credits. Modelers supporting lines of business with retail portfolios are responsible for developing valid, statistically based models for credit decisions, collateral valuation, and risk management. All credit scoring, loss forecasting, valuation, and other risk management models are subject to the Wells Fargo Model Risk Management Policy. See the “Model Risk Management” and “Asset/Liability Management” sections in Management’s Discussion and Analysis to our 2019 Form 10-K for discussion on our model risk management.

RWAs Measurement: Advanced Internal Ratings Based

In accordance with Basel III, the retail population for regulatory capital includes all loans in the consumer loan portfolio segment under U.S. GAAP plus certain small business loans and some accounts receivable related to other retail exposures. Retail exposures are assigned PDs and LGDs by retail segment. Retail segmentation is determined by portfolios which align with respective Basel categories: Residential Mortgage - First Lien, Residential Mortgage - Junior Lien, Residential Mortgage - Revolving, Qualifying Revolving Exposures, and Other Retail. The retail segmentation process uses various factors relevant to the credit risk of retail borrowers and groups those borrowers into pools for risk quantification purposes, after which the risk parameters are quantified at the pool level. The model development methodology selection incorporates expert judgment, business knowledge, account management, collection strategy, and risk management experience. PD and LGD are estimated separately for each retail segment, and EAD is estimated for each retail exposure. The risk parameters for each retail segment are used as inputs to an A-IRB risk-based capital formula specified in the Final Rule. As with the wholesale parameters, the retail risk parameters are estimated using proprietary internal models and independently validated by the CMoR team and monitored on an ongoing basis by the CFMO team.

Table 6 provides the distribution of the portfolio segments in alignment with Basel segmentation and key parameter estimates by PD bands.

Table 6: The Company's Credit Risk Assessment of Retail Exposures by Probability of Default (PD) Grades March 31, 2020

(in millions, except ratios)						Exposure weighted average		
PD range (percentage)		**Balance Sheet Amount**	**Undrawn Commitments**	**Exposure at Default**	**Advanced Approach RWAs (1)**	**PD (2)**	**LGD**	**Risk Weight**
Residential mortgage - first lien:								
0.00 to < 0.10	$	232,336	—	232,336	17,261	0.10 %	30.28 %	7.43 %
0.10 to < 0.25		25,285	20,937	41,707	5,838	0.22	30.31	14.00
0.25 to < 1.00		18,479	—	18,482	4,652	0.52	30.17	25.17
1.00 to < 5.00		6,149	135	6,285	4,168	2.24	32.16	66.32
5.00 to < 10.00		5,770	—	5,770	6,618	7.31	27.24	114.68
10.00 to < 100.00		6,576	129	6,704	8,059	37.68	22.77	120.20
100 (default)		9,929	—	9,929	6,187	100.00	21.70	62.31
Total residential mortgage first lien	**$**	**304,524**	**21,201**	**321,213**	**52,783**	**4.18 %**	**29.84 %**	**16.43 %**
Residential mortgage - junior lien:								
0.00 to < 0.10	$	499	—	499	81	0.08 %	80.43 %	16.16 %
0.10 to < 0.25		49	—	49	12	0.20	56.68	24.66
0.25 to < 1.00		545	—	545	349	0.50	78.89	63.89
1.00 to < 5.00		391	—	391	630	2.38	69.71	161.04
5.00 to < 10.00		136	—	136	442	7.42	81.69	324.92
10.00 to < 100.00		60	—	60	250	31.66	75.46	414.70
100 (default)		106	—	106	108	100.00	73.19	101.74
Total residential mortgage junior lien	**$**	**1,786**	**—**	**1,786**	**1,872**	**8.27 %**	**76.46 %**	**104.77 %**
Residential mortgage - revolving:								
0.00 to < 0.10	$	8,566	51,309	23,439	1,942	0.03 %	81.89 %	8.28 %
0.10 to < 0.25		18,508	5,701	19,327	6,048	0.17	82.08	31.29
0.25 to < 1.00		5,538	355	5,628	5,918	0.93	83.10	105.16
1.00 to < 5.00		2,185	75	2,244	4,634	2.82	83.67	206.51
5.00 to < 10.00		551	502	710	2,389	7.13	80.41	336.69
10.00 to < 100.00		710	31	724	3,520	28.25	84.02	485.92
100 (default)		1,109	61	1,177	1,248	100.00	77.36	106.00
Total residential mortgage revolving	**$**	**37,167**	**58,034**	**53,249**	**25,699**	**2.98 %**	**82.07 %**	**48.26 %**
Qualifying revolving: (3)								
0.00 to < 0.25	$	3,364	89,327	20,024	1,371	0.11 %	95.98 %	6.84 %
0.25 to < 1.00		11,377	25,089	17,918	5,022	0.60	96.43	28.02
1.00 to < 2.50		9,348	6,700	12,301	7,973	1.75	96.63	64.81
2.50 to < 5.00		9,137	3,159	11,207	11,209	3.45	96.81	100.02
5.00 to < 10.00		4,281	689	4,873	7,527	6.63	96.84	154.47
10.00 to <100.00		3,664	442	4,051	10,229	34.57	96.75	252.48
100 (default)		2	—	2	2	100.00	97.07	106.00
Total qualifying revolving	**$**	**41,173**	**125,406**	**70,376**	**43,333**	**3.49 %**	**96.45 %**	**61.57 %**
Other retail:								
0.00 to < 0.25	$	29,854	28,622	44,424	9,920	0.11 %	76.34 %	22.33 %
0.25 to < 1.00		22,620	4,212	26,142	15,412	0.56	68.60	58.95
1.00 to < 2.50		21,435	1,747	23,150	21,083	1.70	68.02	91.07
2.50 to < 5.00		7,387	1,002	8,320	9,308	3.80	74.01	111.87
5.00 to < 10.00		4,006	178	4,214	5,108	7.34	72.81	121.23
10.00 to <100.00		3,429	30	3,600	5,683	26.16	70.28	157.87
100 (default)		389	13	402	337	100.00	49.98	83.99
Total other retail	**$**	**89,120**	**35,804**	**110,252**	**66,851**	**2.36 %**	**72.14 %**	**60.64 %**
Total Retail Exposures	**$**	**473,770**	**240,445**	**556,876**	**190,538**	**3.63 %**	**51.78 %**	**34.22 %**

(1) RWAs under Basel III Advanced Approach includes the 6.00% credit risk multiplier where applicable.

(2) Exposure-weighted average PD may fall outside of the PD range due to precision.

(3) Qualifying revolving exposures are unsecured revolving exposures where the undrawn portion of the exposure is unconditionally cancellable by the bank.

Historical Credit Results

Actual credit losses for loans and leases, presented below in Table 7 (Net Loan Charge-Offs), are based on the loan categories as disclosed in our first quarter 2020 Form 10-Q. These categories are aligned with the Basel Wholesale and Retail subcategories, although not completely equivalent. Losses may be compared to expected credit loss (ECL) as defined by the Basel III capital rule, which are shown in Table 8 (Expected Credit Loss).

The Basel Wholesale category includes commercial and industrial loans and leases, commercial real estate mortgages, real estate construction loans, and leases. Table 7 (Net Loan Charge-Offs) includes loans treated as securitization exposures, which are excluded from the Basel Wholesale category and which by rule have no ECL. The Basel Wholesale category includes non-loan credit exposures such as bonds, cash due from other banks, and certain accounts receivable, none of which are included in Table 7 (Net Loan Charge-Offs). Losses from non-loan credit exposures and securitization exposures are typically very small relative to losses on loans and leases. Some small business exposures included in the commercial loan categories in Table 7 (Net Loan Charge-Offs) and Table 8 (Expected Credit Loss) are classified under the Other Retail category in Table 4 (Risk-Weighted Assets by Risk Type - Advanced Approach) and Table 6 (The Company's Credit Risk Assessment of Retail Exposures by Probability of Default (PD) Grades).

The Basel Retail category includes 1-4 family first lien mortgages, 1-4 family junior lien mortgages, credit cards, automobile loans, and other revolving consumer lines and loans in alignment with Table 7 (Net Loan Charge-Offs) below. The Basel subcategory for residential mortgages can be compared with the "real estate 1-4 family first mortgage" and "real estate 1-4 family junior lien mortgage" lines. The Basel subcategory for revolving loans secured by residential mortgages includes both first- and second-lien loans, with the latter category comprising nearly 75% of the subcategory total. The Basel Retail qualifying revolving exposures (QRE) category aligns primarily with the credit card lines included in Table 7 (Net Loan Charge-Offs) and Table 8 (Expected Credit Loss); certain other revolving credit and installment lines comprise less than 10% of the QRE category balances. The Basel Other Retail subcategory consists of automobile loans, the remaining other revolving credit and installment loans, and Retail small business loans as described above.

Actual net loan charge-offs were $909 million, or 0.38% (annualized) of average loans for the quarter ended March 31, 2020, compared with $695 million, or 0.30% (annualized) of average loans for the quarter ended March 31, 2019. For more details on net charge-offs, refer to Table 25 (Net Loan Charge-offs) in Management's Discussion and Analysis in our first quarter 2020 Form 10-Q.

Table 7: Net Loan Charge-Offs (1)

(in millions)					Quarter ended
	Mar 31, 2020	Dec 31, 2019	Sep 30, 2019	Jun 30, 2019	Mar 31, 2019
Commercial (Wholesale) loans:					
Commercial and industrial	$ 333	168	147	159	133
Real estate mortgage	(2)	4	(8)	4	6
Real estate construction	(16)	—	(8)	(2)	(2)
Lease financing	9	31	8	4	8
Total Commercial (Wholesale)	**$ 324**	**203**	**139**	**165**	**145**
Consumer (Retail) loans:					
Real estate 1-4 family first mortgage	$ (3)	(3)	(5)	(30)	(12)
Real estate 1-4 family junior lien mortgage	(5)	(16)	(22)	(19)	(9)
Credit Card	377	350	319	349	352
Automobile	82	87	76	52	91
Other revolving credit and installment	134	148	138	136	128
Total Consumer (Retail)	**$ 585**	**566**	**506**	**488**	**550**
Total Net Loan Charge-offs	**$ 909**	**769**	**645**	**653**	**695**

(1) Losses for non-loan credit exposures are not reflected in this table. In nearly all cases, such losses are immaterial (including during all periods shown).

Charge-offs shown in Table 7 (Net Loan Charge-Offs) may be compared to ECL as defined by the Basel III capital rule and as shown in Table 8 (Expected Credit Loss) below. There are, however, some definitional differences between the two measures.

For loans not defaulted, ECL is the product of PD, LGD, and EAD as described in the *Credit Risk Overview* section of this document. No ECL is computed for credit exposures that are marked to market. PD is measured as the through-the-cycle long-run average of exposures with given risk characteristics (e.g., risk ratings for wholesale exposures; credit scores and loan-to-value ratios for retail exposures). Since the PD assigned for each such group of exposures (e.g., those with a certain borrower grade) is the average across time, portfolio-level PD will rise and fall less over a credit cycle than actual defaults over that same cycle. Actual defaults will be above PD for a particular exposure group during stressed periods and lower than PD during non-stressed periods of a credit cycle. Because ECL is determined in part based on PD, ECL will tend to be higher than charge-offs during non-stressed periods and lower than charge-offs during stressed periods. Migration of particular exposures to better or worse grades explains some but not all of the variation in observed defaults.

LGD is the loss rate expected for loans that default during severely stressed periods. LGD includes costs (workout expenses and discounting of delayed cash flows) that are not included in charge-offs, and actual losses for defaulted loans tend to be higher during stressed periods than in other times; therefore, LGD (and, as a result, ECL) is typically higher than charge-offs, particularly during non-stressed periods. ECL is an annual measure, which must be taken into account when comparing to actual losses during a period.

Furthermore, ECL includes losses expected for defaulted loans that remain on the balance sheet. We expect that there will be future charge-offs from these loans as well as from exposures that are not yet defaulted. However, to avoid double counting, the ECL for such loans should not be included when summing ECL across time to compare with actual losses.

Table 8: Expected Credit Loss (ECL)

(in millions)					Quarter Ended
	Mar 31, 2020	Dec 31, 2019	Sep 30, 2019	Jun 30, 2019	Mar 31, 2019
Commercial (Wholesale) loans:					
Commercial and industrial	$ 1,954	1,799	1,759	1,761	1,899
Real estate mortgage	585	425	441	468	476
Real estate construction	151	148	153	156	165
Lease financing	221	216	235	244	224
Total Commercial (Wholesale) Expected Credit Loss	**$ 2,911**	**2,588**	**2,588**	**2,629**	**2,764**
Consumer (Retail) loans:					
Real estate 1-4 family first mortgage	$ 816	904	926	947	1,012
Real estate 1-4 family junior lien mortgage	271	298	320	347	372
Credit Card	2,372	2,441	2,412	2,315	2,277
Automobile	744	747	815	847	834
Other revolving credit and installment	467	477	476	471	494
Total Consumer (Retail) Expected Credit Loss	**$ 4,670**	**4,867**	**4,949**	**4,927**	**4,989**
Total Loan Expected Credit Loss	**$ 7,581**	**7,455**	**7,537**	**7,556**	**7,753**
Non-loan Expected Credit Loss	394	393	377	390	358
Total Expected Credit Loss	**$ 7,975**	**7,848**	**7,914**	**7,946**	**8,111**

Counterparty Credit Risk

Overview/Management Approach

Counterparty Credit Risk (CCR) is the possibility that a customer or trading counterparty will fail to fulfill contractual obligations, and such failure may result in the termination or replacement of the transaction at a loss to Wells Fargo. Such exposures arise primarily in relation to over-the-counter (OTC) derivatives, repo-style transactions, margin loans, transactions cleared through a central counterparty or exchange, and unsettled trades. The majority of CCR exposure is incurred in transactions designed to help our clients manage their interest rate, currency, and other risks, and in the associated hedging of those transactions.

Wells Fargo uses a range of models and methodologies to estimate the potential size of counterparty exposures and establishes limits and controls around activities incurring these risks. Counterparty exposure is typically mitigated using collateral. Collateral arrangements supporting Wells Fargo's counterparty credit risk exposures can be grouped into two broad categories:

- Many of Wells Fargo's counterparty risks arise out of its derivatives activities undertaken with corporate clients. In many cases, the counterparty credit risk is managed by relationship/credit officers close to the client and is cross-collateralized with securities supporting loan and other exposures to the same counterparty (e.g., receivables and inventory). Any benefit deemed to accrue from this type of cross-collateralization is reflected in the credit grades applied to the exposure, which in turn impacts the regulatory capital required.
- Exposures for many counterparty relationships are covered by stand-alone collateral arrangements which require the posting of liquid financial collateral. Collateral arrangements are managed by a dedicated collateral management function, which handles the posting and receipt of collateral per the Collateral Support Annex (CSA). The CSA is supporting documentation for a collateral arrangement between counterparties. The

majority of the absolute value of collateral received and posted typically comprises cash with the remainder primarily in the form of instruments issued or backed by the U.S. Government or Government Sponsored Entities (GSEs) (e.g., treasuries, agencies, or agency mortgage-backed securities). For disclosure of the impact on the amount of collateral we would be required to post in the event of a significant deterioration in our credit, see Note 15 (Derivatives) to Financial Statements in our first quarter 2020 Form 10-Q.

The Final Rule provides a specific definition of derivative exposures, which differs from the U.S. GAAP definition. Some of the key differences include:

- Certain forward-settling transactions are considered derivatives under the Final Rule, but not under U.S. GAAP due to the timing of settlement;
- Derivative transactions where we act as an agent between a qualifying clearing agent and a client are considered derivatives under the Final Rule, but not recognized as assets or liabilities under U.S. GAAP; and
- Certain embedded derivatives subject to bifurcation are considered derivatives under U.S. GAAP, but not under the Final Rule.

Wells Fargo establishes counterparty credit risk exposure limits in a decentralized manner that relies on the expertise of those closest to the customer, and is guided by policies and procedures established at the enterprise-level as well as within the individual lines of business. Aggregate counterparty risk is managed on a centralized basis to ensure consistent application of standards and risk appetite. Internal ratings are the starting point in establishing credit assessments and are based on multiple factors including the counterparty's financial condition, liquidity, quality of management, and the counterparty's financial performance. Risk limits are set based on the credit assessment, customer need, and risk mitigation embedded in a qualifying master netting agreement, which can cover items such as daily margining, termination events, credit support, and cross collateralization. At the enterprise-level, risk limit exceptions are identified and delivered to each risk officer responsible for the specific counterparty limit. Risk officers are responsible for addressing each one of these exceptions. The Enterprise Counterparty Risk Management team maintains a record of all responses, and unapproved exceptions are reported and discussed with senior management on a monthly basis.

RWAs Measurement

Wells Fargo uses the Current Exposure Method (CEM) to calculate EAD, which is used in the calculation of RWAs using the wholesale credit risk exposure model. Mitigants are recognized using the Collateral Haircut approach with prescribed regulatory haircuts. Under the CEM approach, EAD is the sum of current credit exposure (CCE) and the potential future exposure (PFE). The CCE is the sum of net positive fair values, and the PFE is an estimate of the maximum amount of the exposure that could occur over a one year horizon. The PFE is based on the derivative notional amount and a credit conversion factor (CCF) and is a component of EAD irrespective of the fair value of the derivative contract. The CCF is based on the underlying contract type and remaining maturity. PFE is also adjusted for those contracts subject to a master netting agreement as prescribed by the Final Rule.

The netting benefits of master netting agreements (e.g., the International Swaps and Derivatives Association's Master Agreement) and collateral arrangements (e.g., the Credit Support Annex) are reflected in the EAD. For descriptions of counterparty credit risk, see Note 15 (Derivatives) to Financial Statements in our first quarter 2020 Form 10-Q.

Table 9 shows derivative metrics by underlying exposure type and provides our derivative activity for contracts traded in OTC markets and contracts cleared through a central counterparty or exchange. OTC derivatives are those traded between two parties directly without the use of an exchange and result in counterparty credit exposure to the OTC counterparty. Derivatives cleared through a central counterparty or an exchange limit counterparty risk because the central clearing party or exchange serves as the counterparty to both parties to the derivative.

Table 9: Counterparty Credit Risk Derivatives Exposure Types March 31, 2020

(in millions)	Notional (1)	Gross Positive Fair Value	Adjusted PFE	Pre Mitigant EAD	Netting & Collateral Benefit	Post Mitigant EAD	Advanced Approach RWAs (2)
OTC derivatives:							
Interest rate contracts	$ 5,608,569	51,023	10,518	61,542	39,651	21,890	12,572
Foreign exchange contracts	401,115	8,410	3,371	11,781	7,110	4,671	2,160
Equity contracts	162,259	9,518	5,207	14,725	9,006	5,720	2,491
Credit derivatives contracts	38,368	94	1,505	1,599	878	721	492
Commodities and Other	73,699	1,795	3,711	5,506	1,053	4,453	2,270
Total OTC derivative contracts (principal+agent)	**$ 6,284,010**	**70,840**	**24,312**	**95,153**	**57,698**	**37,455**	**19,985**
Central counterparty (CCP) & Exchange traded derivatives:							
Interest rate contracts	$ 10,784,084	7,610	8,987	16,597	6,155	10,442	378
Foreign exchange contracts	—	—	—	—	—	—	—
Equity contracts	67,180	4,385	1,722	6,106	2,450	3,656	262
Credit derivatives contracts	11,162	30	836	866	(36)	902	20
Commodities and Other	29,567	872	1,460	2,331	(2,615)	4,946	237
Total CCP & Exchange traded derivatives contracts	**$ 10,891,993**	**12,897**	**13,005**	**25,900**	**5,954**	**19,946**	**897**

(1) Excluding sold derivatives and written options.

(2) RWAs under Basel III Advanced Approach includes the 6.00% credit risk multiplier where applicable.

The table above distinguishes between OTC and centrally cleared or exchange traded derivatives, and includes:

- Notional, which is used in the calculation of the PFE add-on;
- Gross Positive Fair Value, which is the sum of all derivative transactions with a positive fair value before the mitigating effects of counterparty netting and collateral;
- Adjusted PFE, which is the PFE adjusted for those contracts subject to a master netting agreement as prescribed by the Final Rule;
- Pre-mitigant EAD, which is the sum of the Gross Positive Fair Value and the Adjusted PFE;
- Netting & Collateral Benefit, which is the EAD reduction realized by fair value netting and the application of collateral, when valid netting agreements are in place;
- Post Mitigant EAD, which is the EAD after fair value netting and application of eligible collateral. This is the total EAD amount used for RWAs calculation; and
- Advanced Approach RWAs, which is calculated under the Basel III Advanced Approach on a fully phased-in basis.

Table 10 displays a breakout of collateral by type which has been received by the Company in connection with derivatives, repo-style transactions, and margin loans.

Table 10: Counterparty Collateral Types March 31, 2020

(in millions)		Derivatives Collateral	Repo & Margin Loan Collateral
Cash	$	23,122	116,993
Treasuries		11,275	64,762
Agencies		1,821	24,994
Corporate Bonds		613	4,950
Main Index Equities		1,344	13,678
Other Public Equities		2,014	48,668
Mutual Funds		792	10,840
Other		206	6,305
Total Collateral	**$**	**41,187**	**291,190**

Table 11 presents a distribution of EAD, RWAs, and weighted average measures by PD band for counterparty credit risk exposures.

Table 11: Counterparty Credit Risk Exposure Type March 31, 2020

(in millions, except ratios)				Exposure weighted average		
PD Range (percentage)		Exposure at Default	Advanced Approach RWAs (1)	PD	LGD	Risk Weight
OTC Derivatives & Repos						
0.00 to < 0.05	$	2,805	435	0.03 %	45.97 %	15.49 %
0.05 to < 0.25		32,367	10,683	0.11	45.03	33.01
0.25 to < 1.50		18,696	12,720	0.58	40.24	68.04
1.50 to < 5.00		1,063	1,065	2.83	34.65	100.14
5.00 to < 13.50		242	429	12.63	35.73	177.36
13.50 to < 100		—	—	—	—	—
100 (default)		14	15	100.00	34.68	106.00
Default Fund Contribution		4,835	997	—	—	20.63
Margin Loans		1,699	1,080	—	—	63.57
Cleared Transactions (2)		20,915	922	—	—	4.41
Unsettled Trades		261	275	—	—	105.36
Total Counterparty Credit Risk Exposure	**$**	**82,897**	**28,621**	**0.39 %**	**43.27 %**	**34.53 %**

(1) RWAs under Basel III Advanced Approach includes the 6.00% credit risk multiplier where applicable.

(2) Includes cleared derivative and cleared repo transactions.

CVA Capital Charge

A credit valuation adjustment (CVA) is a required fair value adjustment under U.S. GAAP, which is included in earnings and capital, to reflect counterparty credit risk in the valuation of an OTC derivative contract. In order to improve a bank's ability to withstand losses due to CVA volatility, an incremental CVA capital charge was introduced in the Final Rule. The CVA capital charge is a bank holding company level, bilateral derivative portfolio measure and is based on counterparty credit quality, remaining trade duration, and EAD. The RWAs arising due to the CVA capital charge were $25.5 billion at March 31, 2020.

Securitization Credit Risk

Overview/Management Approach

Securitization exposures are those which arise from traditional securitization, synthetic securitization, or resecuritization transactions where credit risk from underlying assets has been transferred to third parties and separated into at least two tranches reflecting different levels of seniority, whereby the performance of the issued exposures is dependent on the performance of the underlying assets, and substantially all of the underlying assets are considered financial assets. A resecuritization is a securitization which has more than one underlying exposure and in which one or more of the underlying exposures is a securitization exposure. In addition, the Final Rule distinguishes between traditional and synthetic securitizations. In a traditional securitization, assets, which are typically loans or debt securities, are transferred from an originator or sponsor to a special purpose entity (SPE), which receives funds to purchase the assets by issuing debt and equity securities to investors. Synthetic securitization achieves the transfer of credit risk to the investor through the use of credit derivatives or guarantees.

Conforming residential mortgage loan securitizations are those guaranteed by the GSEs, including the Government National Mortgage Association. Due to the additional credit protection provided by the government guarantee, these positions usually do not include credit tranching. Since the presence of tranches is the key determinant of whether a given exposure would be subject to the securitization capital rules, such exposures do not meet the definition of a securitization per the Final Rule. As a result, our investments in conforming residential mortgage securitizations have been excluded from our disclosure of securitization exposure and activity in this report.

On-balance sheet securitization exposures include a portion of the assets classified on our balance sheet as loans for U.S. GAAP purposes, securities, and non-GSE securitization servicer cash advances. Off-balance sheet securitization exposures include commitments, guarantees, and derivatives to SPEs.

Wells Fargo's objectives in relation to securitization activity are as follows:

- Provide proactive and prudent management of our balance sheet and multiple, diverse sources of funding;
- Earn fee income by providing credit facilities to clients via securitization related activities;
- Earn fee income from structuring securitizations for internally and third-party originated assets; and
- Earn fee income as servicer and/or trustee for asset securitizations.

In connection with our securitization activities, the Company also has various forms of ongoing involvement with SPEs which may include:

- Making markets in ABS;
- Providing OTC derivatives to Securitization SPEs that require securitization treatment; and
- Providing credit enhancement on securities issued by SPEs or market value guarantees of assets held by SPEs through the use of letters of credit, financial guarantees (on a limited basis), credit default swaps, and total return swaps, or by entering into other derivative contracts with SPEs.

Wells Fargo's roles in the securitization process are multi-faceted and generally include certain or all of the following:

- Originator: where the bank, through the extension or credit or otherwise, creates a financial asset that collateralizes an asset-backed security, and sells that asset directly or indirectly to a sponsor. The originator may be a sole originator or affiliated with the sponsor (including for legacy positions);
- Sponsor: where the bank organizes and initiates an asset-backed securities transaction by selling or transferring assets, either directly or through an affiliate, to the issuing entity. This includes approving positions, and where applicable, managing a securitization program that retains residual tranches (providing excess spread or over collateralization), with sponsors having first loss exposure;
- Investor: where the bank assumes the credit risk of a securitization exposure (other than through acting as originator or sponsor);
- Trustee: where the bank considers the interests of investors who own the securities issued via the securitization and retains primary responsibility for administering the SPE or trust that maintains the securitized assets; and
- Servicer: where the bank engages in direct interaction with borrowers by collecting payments, providing customer service, administrating escrow accounts, and managing the delinquency process (including loan modifications, short sales, and foreclosures).

Our due diligence process provides us with an understanding of the features that would materially affect the performance of a securitization or resecuritization. Based on the requirements of the Final Rule, for all securitization and resecuritization positions, Wells Fargo conducts initial due diligence prior to acquiring the position and documents the due diligence within three business days after the acquisition. We also evaluate, review, and update our ongoing understanding of each securitization position at least quarterly, as appropriate. The level of detail is commensurate with the complexity of the position and materiality of the position in relation to capital. The Company's accounting policies, with respect to securitization and securitization vehicles, are established in accordance with U.S. GAAP. For additional information, refer to Note 1 (Summary of Significant Accounting Policies) and Note 10 (Securitizations and Variable Interest Entities) to Financial Statements in our first quarter 2020 Form 10-Q.

As part of the initial and ongoing due diligence process, we review the following items in accordance with the Final Rule:

- Structural features of the securitization that would materially impact the performance of the position;

- Relevant information regarding the performance of the underlying credit exposure(s);
- Relevant market data on the securitization; and
- For any resecuritization position, performance information on the underlying securitization exposures.

When applicable, individual business lines must review the accuracy of any assigned internal risk ratings within their portfolios on a quarterly basis. Minimum credit exposure thresholds for this certification may be established by the businesses with approval from the Corporate Credit and Market Risk functions. Initial reviews may include checks of collateral quality, credit subordination levels, and structural characteristics of the securitization transaction. Ongoing regular performance reviews may include checks of periodic servicer reports against any performance triggers/ covenants in the loan documentation, as well as overall performance trends in the context of economic, sector, and servicer developments.

The Company manages the risks associated with securitization and resecuritization positions through the use of offsetting positions and portfolio diversification. The monitoring of resecuritization positions takes into consideration the performance of the securitized tranches' underlying assets, to the extent available, as it relates to the resecuritized position.

RWAs Measurement

Based on regulatory guidance, Wells Fargo uses a combination of the Supervisory Formula Approach (SFA) and the Simplified Supervisory Formula Approach (SSFA) in assessing its regulatory capital requirements for securitization exposures. SSFA is used for approximately half of the exposures, except for those exposures where the data available permits the application of SFA. SSFA requires the use of inputs and assumptions which consider the credit quality of the underlying assets, the point in the SPE's capitalization at which our exposure begins to absorb losses, and likewise, the point in the SPE's capitalization that would result in a total loss of principal. The SFA requires a calculation of the capital requirement of the underlying exposures as if they were held by us directly as well as the degree of credit enhancement provided by the structure. Use of the SFA approach requires approval by our regulators.

Table 12 presents the aggregate EAD amount of the Company's outstanding on-balance sheet and off-balance sheet securitizations positions and RWAs by exposure type:

Table 12: Aggregate Amount of On- and Off- Balance Sheet Securitization Exposures March 31, 2020

(in millions)		On Balance Sheet EAD	Off Balance Sheet EAD	Total Exposure at Default	Advanced Approach RWAs (1)
Commercial mortgages	$	12,133	6,980	19,113	5,433
Residential mortgages		1,111	677	1,788	926
Corporate		52,149	7,161	59,310	13,037
Auto loans / leases		12,428	4,246	16,674	4,273
Student loans		5,120	74	5,194	1,101
Other		8,362	6,644	15,006	9,972
Total Securitization Exposures	**$**	**91,303**	**25,782**	**117,085**	**34,742**

(1) RWAs under Basel III Advanced Approach includes the 6.00% credit risk multiplier where applicable.

Table 13 presents the aggregate EAD amount of securitization exposures retained or purchased and their associated risk approaches and RWAs, categorized between securitization and resecuritization exposures.

Table 13: Aggregate Amount of Securitized and Resecuritized Exposures by Risk Weights and Approach March 31, 2020

(in millions)	SFA		SSFA		1250% Risk Weight		Total	
	Exposure at Default	Advanced Approach RWAs (1)	Exposure at Default	Advanced Approach RWAs (1)	Exposure at Default	Advanced Approach RWAs (1)	Exposure at Default	Advanced Approach RWAs (1)
Securitizations:								
Risk Weight								
0% to <=20%	$ 16,459	10,494	54,858	11,630	—	—	71,317	22,124
>20% to <=50%	41,015	9,123	2,153	672	—	—	43,168	9,795
>50% to <=100%	—	—	1,188	909	—	—	1,188	909
>100% to <1250%	15	51	549	1,569	—	—	564	1,620
Equal to 1250%	—	—	4	55	—	—	4	55
Total Securitizations	**$ 57,489**	**19,668 ***	**58,752**	**14,835**	**—**	**—**	**116,241**	**34,503**
Resecuritizations (2):								
Risk Weight								
0% to <=20%	$ —	—	791	168	—	—	791	168
>20% to <=50%	—	—	—	—	—	—	—	—
>50% to <=100%	—	—	17	15	—	—	17	15
>100% to <1250%	—	—	36	56	—	—	36	56
Equal to 1250%	—	—	—	—	—	—	—	—
Total Resecuritizations	**$ —**	**—**	**844**	**239**	**—**	**—**	**844**	**239**
Total Securitizations and Resecuritizations	**$ 57,489**	**19,668**	**59,596**	**15,074**	**—**	**—**	**117,085**	**34,742**

(1) RWAs under Basel III Advanced Approach includes the 6.00% credit risk multiplier where applicable.

(2) The bank is not applying credit risk mitigation to any resecuritization exposures.

* The bank holds a RWA buffer of $7.0 billion to account for the uncertainty to execute the SFA for certain portfolios under the Advanced Approach.

Securitization Activity

For information on our 2020 activity and realized gains or loss on sales of financial assets in securitizations, see Note 10 (Securitizations and Variable Interest Entities) to Financial Statements in our first quarter 2020 Form 10-Q. Gains on sale from securitization of $44 million were deducted from tier 1 capital as of March 31, 2020. This deduction is required for a portion of the gain generated through the sale of assets resulting from securitization transactions.

In addition to the assets already securitized, we currently have $0.5 billion of commercial mortgage loans and $5.4 billion of residential mortgage loans we intend to securitize that are currently risk-weighted as wholesale and retail exposures, respectively. Exposures we intend to securitize include those loans currently classified on our balance sheet as either mortgages held for sale or loans held for sale and are saleable in an active securitization market.

We periodically securitize consumer and CRE loans. For a discussion on this topic, refer to loans sales and securitization activity in Note 10 (Securitizations and Variable Interest Entities) to Financial Statements in our first quarter 2020 Form 10-Q.

Table 14 provides information on the principal amount of past due or impaired assets and losses recognized on our balance sheet related to interests held in securitization transactions to which we transferred assets and/or sponsored.

Table 14: Impaired / Past-Due Assets and Current Quarter Recognized Losses on Securitized Assets by Exposure Types March 31, 2020

(in millions)		Total Impaired or Past Due Amount on Securitized Assets (1)	Total Current Period Losses (2)
Commercial mortgages	$	201	—
Residential mortgages		226	15
Commercial loans and debt obligations		—	—
Other loans		—	—
Total Securitized Assets	**$**	**427**	**15**

(1) The total impaired amount on securitized assets represents the carrying value of investment securities held by us that were issued from securitization transactions we sponsored and for which we have recognized allowances for credit losses (ACL) for accounting purposes. This column also includes the total past due amount on securitized assets, which represents loans recorded on our balance sheet that are 90 days or more past due or in nonaccrual status that are held in securitization transactions we sponsored.

(2) Total Current Period Losses represents ACL recognized during the quarter on investment securities and charge-offs and allowances recognized on loans held on our balance sheet related to securitization transactions we sponsored.

Equity Credit Risk

Overview/Management Approach

Equity exposures that are subject to the equity credit risk capital rules include banking book equity exposures and trading book equity exposures not covered under the market risk capital rules. These exposures are classified as equity securities in our financial statements. Marketable equity securities are measured at fair value through earnings. Nonmarketable equity securities are measured at either fair value through earnings, under the cost method (cost, less impairment), or accounted for under the measurement alternative or equity method of accounting. The measurement alternative is similar to the cost method, except that the carrying value is adjusted to fair value through earnings upon the occurrence of observable transactions in the same or similar investment.

Investments subject to the equity method of accounting are adjusted for our proportionate share of the investees' earnings and other changes in shareholders' equity, less impairment. All equity securities, other than those measured at fair value through earnings, are assessed at least quarterly for possible impairment. For information on accounting policies related to equity securities, refer to Note 1 (Summary of Significant Accounting Policies) to Financial Statements in our first quarter 2020 Form 10-Q and our 2019 Form 10-K. For information on net gains arising from equity securities refer to the "Market Risk - Equity Securities" section in Management's Discussion and Analysis and Note 8 (Equity Securities) to Financial Statements in our first quarter 2020 Form 10-Q.

Investments in equity securities made with a strategic objective or to maintain strategic relationships include investments in support of the Community Development Reinvestment Act, statutory and/or financing investments required for membership in the Federal Reserve or a Federal Home Loan Bank, and separate account bank-owned life insurance (BOLI) invested in various asset strategies. Equity exposures subject to the equity credit risk capital rules are also held to generate capital gains and include discretionary private equity and venture capital transactions. Under the Final Rule, equity exposures also include investment funds (including separate accounts) and investments made in connection with certain employee deferred compensation plans.

Our investments in equity securities are conducted in accordance with corporate policy and regulatory requirements. Discretionary investments in equity securities are reviewed at both the individual investment and portfolio level.

Individual lines of business are responsible for conducting a periodic review of all individual investments which may include recent financial performance, exit strategy, current outlook, and expected returns. We monitor nonmarketable equity securities through portfolio reviews, which include monitoring portfolio objectives, current assessments of portfolio performance and internal ratings, historical returns, risk profiles, current strategies, and unfunded commitments. Corporate Risk provides independent oversight over our investments in equity securities.

Investments in separate account BOLI portfolios, which are considered equity exposures and classified in other assets in our financial statements, make up a significant percentage of our equity securities portfolio and are monitored centrally within Corporate Treasury and reported on a monthly basis to senior management and annually to the Board. The investments in separate accounts are exclusive of balances attributable to stable value protection, which are considered wholesale credit exposures to the underlying insurance company. Separate account exposures are assigned risk weights using a look-through approach, whereas general account exposures are considered general obligations of the issuing insurance company and are risk-weighted as wholesale exposures to the issuing insurance company. General and separate account BOLI exposures are reported as an aggregate amount included in other assets in our 2019 Form 10-K.

RWAs Measurement

For equity exposures, the Company applies the Full Look-Through Approach (FLTA), the Simple Risk-Weight Approach (SRWA), or the Alternative Modified Look-Through Approach (AMLTA) to determine RWAs. Under the FLTA, risk weights are applied on a proportional ownership share basis to each equity exposure held by an investment fund, as if Wells Fargo held the exposure directly. Under the SRWA, the RWAs for each equity exposure are calculated by multiplying the adjusted carrying value of the equity exposure by the applicable regulatory prescribed risk weight. Under the AMLTA, the adjusted carrying value of the equity exposure in an investment fund is assigned on a pro-rata basis to different risk weight categories based on investment limits in the fund’s prospectus or other legal document. Wells Fargo’s non-significant equity exposure is the sum of publicly and non-publicly traded equity securities that are 10% or less of total capital, and is risk-weighted at 100%.

Table 15 details the carrying value and estimated fair value of the Company's equity exposures in the banking book as well as those in the trading book not covered under the market risk capital rules as of March 31, 2020.

Table 15: Equity Securities March 31, 2020

(in millions)		Carrying Value	Fair Value	Unrealized gain/(loss) (1)
Publicly Traded Equity Securities:				
Marketable equity securities held for trading (2)	$	301	301	—
Marketable equity securities not held for trading		7,584	7,584	—
Total Publicly Traded Equity Securities	**$**	**7,885**	**7,885**	**—**
Non-Publicly Traded Equity Securities:				
Nonmarketable equity securities under equity method				
Low income housing tax credit investments		11,290	11,290	—
Private equity and other		3,351	5,841	2,490
Tax-Advantage renewable energy		3,991	3,991	—
New Market tax credit and other		387	387	—
Total equity method		19,019	21,509	2,490
Other nonmarketable equity securities				
Nonmarketable equity securities at fair value		6,895	6,895	—
Federal bank stock and other at cost (3)		4,520	4,556	36
Private equity at measurement alternative		2,340	2,418	78
Total Other nonmarketable equity securities		13,755	13,869	114
Total Non-Publicly Traded Equity Securities	**$**	**32,774**	**35,378**	**2,604**
Separate Account BOLI (4)		13,256	13,256	—
Other		47	47	—
Total Equity Securities (5)	**$**	**53,962**	**56,566**	**2,604**

(1) Represents unrealized gain/(loss) not recognized on our balance sheet or through earnings.

(2) Primarily includes trading portfolio positions not covered under the market risk capital rules. Excludes certain equity derivatives subject to hedge pair treatment.

(3) Carrying value includes $8 million of accrued interest/dividends associated with Federal Reserve Bank stock.

(4) Total carrying value for BOLI is $20.1 billion. The carrying value of certain separate account BOLI components which are classified as equity exposures under the Final Rule is $13.3 billion. The carrying value of BOLI considered obligations of the issuer and classified as wholesale exposures under the Final Rule is $6.8 billion (remaining carrying value of separate account BOLI and carrying value of general account BOLI).

(5) Equity exposures that are considered securitization and wholesale under the Final Rule are not included in Table 15.

Table 16 includes the RWAs for equity exposures as of March 31, 2020.

Table 16: Capital Requirements by Risk Weight for Equity Exposures March 31, 2020

(in millions)		Carrying Value	Exposure at Default	Advanced Approach RWAs (1)
Simple Risk Weight Approach (SRWA)				
Federal Reserve stock and Sovereign exposures	$	3,537	3,537	—
Federal Home Loan Bank exposures		971	971	206
Community development equity exposures		11,741	11,836	12,546
Effective portion of hedge pairs		6,783	7,749	8,214
Non-significant equity exposures (2)		10,860	13,197	13,989
Significant investments in unconsolidated financial institutions		1,470	1,884	4,993
600% risk weight equity exposures		3	15	95
Equity Exposures to Investment Funds				
Full look-through approach		14,259	14,341	4,295
Alternative modified look-through approach		4,338	4,338	1,533
Total Equity Exposures	**$**	**53,962**	**57,868**	**45,871**

(1) RWAs under Basel III Advanced Approach includes the 6.00% credit risk multiplier where applicable.

(2) Publicly and non-publicly traded equity exposures do not exceed 10% of the Company's total capital.

Operational Risk

Operational risk, which includes compliance risk and model risk, is the risk of operating loss resulting from inadequate or failed internal processes or systems. Operational risk may result in a loss from events such as fraud, breaches of customer privacy, business disruptions, vendors that do not adequately or appropriately perform their responsibilities, and regulatory fines and penalties. At March 31, 2020, our operational risk RWA was $335.7 billion.

Operational Risk Capital Measurement

As one of the largest bank holding companies in the United States, we are required to develop a quantification system using the Advanced Measurement Approach (AMA) to estimate the regulatory capital charge for the Company's operational risk exposures. To satisfy this requirement, the AMA model estimates aggregate operational risk exposure at a 99.9% confidence level over a one-year time horizon.

Per the regulatory guidance, we incorporate the following data elements into our AMA model:

- Internal Loss Data (ILD) - a factual, quantitative historical view of our loss experience that provides the foundation for capital modeling efforts. We record and maintain operational loss event data, an essential element in our ability to measure and manage operational risk and to comply with the requirements of the AMA. Operational loss events are recorded in an internal database, with those $10,000 or greater appropriately enriched and reviewed, and are captured across all business lines, product types, and geographic locations;
- External Loss Data (ELD) - a factual, quantitative historical view of the loss experiences of other financial institutions that supports capital modeling efforts by supplementing ILD. Event-level ELD is obtained through our membership in the Operational Riskdata eXchange Association (ORX), an industry consortium containing information on operational risk loss events of €20,000 or more;
- Scenario Analysis Estimates - a hypothetical, qualitative view of potential loss experience should certain risks manifest. We conduct an annual scenario analysis process designed to identify risk drivers and control failures which form the basis of loss severity estimates under varying levels of stress for plausible, yet hypothetical operational loss events over a forward looking horizon. The scenario analysis process and the resulting estimates are informed by internal and external loss data to provide useful insight for the subject matter experts when assessing potential future losses, especially those that have not yet been observed;
- Business Environment and Internal Control Factors (BEICF) - a qualitative view based on management's forward-looking assessment of the state of internal controls and the current operational risk business environment. BEICF data is obtained from a variety of sources including, but not limited to, the Risk and Control Self-Assessment (RCSA) process, risk appetite measures, and operational risk profile reports. The RCSA is a process executed across the Company designed to capture management's assessment of the operational risk and controls in its business. The BEICF assessment considers the products and activities, the existing and emerging risks, the design and effectiveness of controls, and any changes in the business environment.

The AMA model is based on a Loss Distribution Approach (LDA) that estimates the frequency and severity of operational losses that could occur to determine, quarterly, the level of operational risk capital required to meet management and regulatory expectations.

Under the LDA:

- Our internal losses (and relevant external losses) are segmented into units of measure, or partitions, defined by business line and seven event types prescribed by international regulatory guidance;
- For each partition, the LDA combines two distributions: one for the loss frequency (based on our historical loss experience) and the other for the severity of events (based on our historical loss experience, as well as relevant external loss data);
- The frequency and severity distributions are combined into the aggregate loss distribution for each partition; and
- The enterprise-level operational risk exposure is estimated by aggregating the partition-level loss distributions, taking into account correlation across business lines and event types.
- The LDA model incorporates internal and external loss data two quarters following the period in which the internal losses were realized or the external losses were booked into the ORX database due to processing times (and to keep the datasets in sync). These losses remain in the LDA model even after the factors contributing to the losses may have been reduced or remediated.

The scenario analysis estimates and BEICF information are then evaluated and considered in conjunction with the statistical model results, and adjustments are made as appropriate to reflect the Company's operational risk profile.

Use of Insurance

While Wells Fargo purchases insurance to provide financial protection against specific losses, these policies are not currently incorporated into the AMA capital model to provide any offset to the capital levels calculated.

For additional information on operational risk, refer to the "Operational Risk Management" section in Management's Discussion and Analysis to our 2019 Form 10-K.

Market Risk

Market risk is the risk of possible economic loss from adverse changes in market risk factors such as interest rates, credit spreads, foreign exchange rates, equity and commodity prices, and the risk of possible loss due to counterparty exposure. Market risk is intrinsic to the Company's sales and trading, market making, investing, and risk management activities. For information on the Company's market risk oversight, monitoring and controls, please refer to the "Market Risk - Trading Activities" section in Management's Discussion and Analysis to our first quarter 2020 Form 10-Q and our 2019 Form 10-K. For a discussion of risk oversight, refer to the "Risk Management," "Risk Governance," "Risk Operating Model - Roles and Responsibilities," and "Market Risk" sections in Management's Discussion and Analysis to our 2019 Form 10-K.

Regulatory Market Risk Capital

Regulatory market risk capital reflects U.S. regulatory agency risk-based capital regulations that are based on the international agreed set of measures developed by the BCBS. The Company must calculate regulatory capital under the Basel III market risk capital rule, which requires banking organizations with significant trading activities to ensure their capital requirements reflect the market risks of those activities based on comprehensive and risk sensitive methods and models. The market risk capital rule is intended to cover the risk of loss in value of covered positions due to changes in market conditions.

Composition of Material Portfolio of Covered Positions

Covered positions, as defined by the Basel III rule, include trading assets and liabilities, specifically those held by the Company for the purpose of short-term resale or with the intent of benefiting from actual or expected short-term price movements, or to lock in arbitrage profits. In addition, foreign exchange and commodity positions are considered covered positions, except for structural foreign currency positions. Positions excluded from market risk regulatory capital treatment are considered non-covered trading positions and are subject to the credit risk capital rules. Wells Fargo has internal governance for determining which positions meet the definition of covered positions under the Basel III capital rules.

The material portfolio of the Company's covered positions is concentrated in trading assets and liabilities within Wholesale Banking, where the substantial portion of market risk capital resides. Wholesale Banking engages in the fixed income, traded credit, foreign exchange, equities, and commodities markets businesses. Other business segments hold smaller trading positions covered under the market risk capital rule.

Table 17 shows the Company's market risk capital and RWA by capital component. The Market Risk RWA for the Company was $42.9 billion for the quarter ended March 31, 2020.

Table 17: Market Risk Capital and RWA

(in millions)		Quarter ended March 31, 2020	
		Risk Based Capital	**Risk Weighted Assets**
Total VaR	$	486	6,074
Total Stressed VaR		1,121	14,018
Incremental Risk Charge (IRC)		115	1,439
Internal Models Total	$	**1,722**	**21,531**
Securitization Product Charge		337	4,215
Standard Specific Risk Charge		1,040	13,003
De Minimis Charges (positions not included in models)		330	4,111
Company Capital and RWA	$	**3,429**	**42,860**

Regulatory Market Risk Capital Components

The capital required for market risk on the Company's covered positions is determined by internally developed models or standardized specific risk charges. The market risk regulatory capital models are subject to internal model risk management and validation. The models are continuously monitored and enhanced in response to changes in market conditions and composition of positions. The Company is required to obtain and has received prior written approval from its regulators before using its internally developed models to calculate the market risk capital charge.

Value-at-risk (VaR) is a statistical risk measure used to estimate the potential loss from adverse moves in the financial markets. The VaR measures assume that historical changes in market values (historical simulation analysis) are representative of the potential future outcomes and measure the expected loss over a given time interval at a given confidence level. The Company calculates VaR as prescribed by the Basel III capital rule, using a 10-day holding period at a 99% confidence level. We treat data from all historical periods as equally relevant and use a 12-month look-back period. A portfolio of positions is usually less risky than the sum of the risks from the individual components. Each risk category can offset the exposure to the other risk category creating a diversification benefit.

The VaR models measure exposure to the following risk categories:

- Credit risk - exposures from corporate, asset-backed security, and municipal credit spreads.
- Interest rate risk - exposures from changes in the level, slope, and curvature of interest rate curves and volatilities.
- Equity risk - exposures to changes in equity prices and volatilities.
- Commodity risk - exposures to changes in commodity prices and volatilities.
- Foreign exchange risk - exposures to changes in foreign exchange rates and volatilities.

Basel III prescribes various VaR measures in the determination of regulatory capital and RWAs. For regulatory purposes, we use the following metrics to determine the Company's market risk capital requirements:

- General VaR measures the risk of broad market movements such as changes in the level of credit spreads, interest rates, equity prices, commodity prices, and foreign exchange rates. General VaR uses historical simulation analysis based on 99% confidence level with a 10-day holding period and a 12-month look-back period.

Table 18 shows the General VaR measure categorized by major risk categories. Average 10-day Company Regulatory General VaR was $98 million for the quarter ended March 31, 2020.

Table 18: Regulatory 10-Day 99% General VaR by Risk Category

(in millions)		March 31, 2020	Three months ended March 31, 2020		
		Period End	High	Low	Average
Wells Fargo Regulatory General VaR by Risk Category					
Credit	$	413	681	22	105
Interest rate		246	377	10	82
Equity		11	70	1	15
Commodity		19	31	3	8
Foreign exchange		18	34	2	8
Diversification benefit (1)		(228)	N/A	N/A	(120)
Company Regulatory General VaR	**$**	**479**	**522**	**7**	**98**

(1) The period-end and average Company VaRs were less than the sum of the VaR components described above, which is due to portfolio diversification. The diversification benefit is not applicable (N/A) for low and high metrics since they may occur on different days.

- Specific Risk measures the risk of loss that could result from factors other than broad market movements, and includes event risk, default risk, and idiosyncratic risk. Specific Risk is calculated for both debt and equity position and uses Monte Carlo simulation analysis based on a 99% confidence level and a 10-day holding period.
- Total VaR is the combination of General VaR and Specific Risk. Total VaR-Based Capital is calculated using the higher of period end Total VaR or the quarterly average Total VaR multiplied by a back-testing factor as prescribed by the Basel III capital rules based on regulatory back-testing outcomes discussed later in this document. For first quarter 2020, our Total VaR-Based Capital was based on the period end Total VaR.

Table 19: Total VaR Risk-Weighted Assets

(in millions)		March 31, 2020	Three months ended March 31, 2020				
		Period End	High	Low	Average	Risk Based Capital	Risk Weighted Assets
Total VaR	$	486	528	25	107	486	6,074

- Total Stressed VaR uses a historical period of significant financial stress over a continuous 12-month period using historically available market data and is calibrated monthly against current exposures. Total Stressed VaR is the combination of Stressed General VaR and Stressed Specific Risk, and uses the same methodology and models as Total VaR. The Company's selection of the 12-month period of significant financial stress is evaluated on an ongoing basis.

Table 20: Total Stressed VaR Risk-Weighted Assets

(in millions)		March 31, 2020	Three months ended March 31, 2020				
		Period End	High	Low	Average	Risk Based Capital	Risk Weighted Assets
Total Stressed VaR	$	486	528	210	374	1,121	14,018

- Incremental Risk Charge (IRC) captures losses due to both issuer default and credit migration risk at the 99.9% confidence level over a 12-month capital horizon under a constant position assumption.

The Company calculates IRC by generating a portfolio loss distribution using Monte Carlo simulation, which assumes numerous scenarios, where an assumption is made that the portfolio's composition remains constant for a 12-month time horizon. Individual issuer credit grade migration and issuer default risk is modeled through generation of the issuer's credit rating transition based upon statistical modeling. Correlation between credit grade migration and default is captured by a multifactor proprietary model which takes into account industry classifications as well as regional effects. Additionally, the impact of market and issuer specific concentrations is reflected in the modeling framework by assignment of a higher charge for portfolios that have increasing concentrations in particular issuers or sectors. Lastly, the model captures product basis risk; that is, it reflects the material disparity between a position and its hedge.

IRC uses the higher of the quarterly average or the quarter end result as defined by the Basel III rule. For first quarter 2020, the required capital for market risk equals the quarter end result.

Table 21: Incremental Risk Charge (IRC) Risk-Weighted Assets

(in millions)		March 31, 2020	Three months ended March 31, 2020				
		Period End	High	Low	Average	Risk Based Capital	Risk Weighted Assets
IRC	$	115	198	39	91	115	1,439

- Securitization Positions Charge - Basel III requires a separate market risk capital charge for positions classified as a securitization or resecuritization. The primary criteria for classification as a securitization are whether there is a transfer of risk and whether the credit risk associated with the underlying exposures has been separated into at least two tranches reflecting different levels of seniority. Covered trading securitization positions include consumer and commercial asset-backed securities (ABS), commercial mortgage-backed securities, residential mortgage-backed securities, and collateralized loan and other debt obligations (CLO/CDO) positions. The securitization capital requirements are the greater of the capital requirements of the net long or short exposure, and are capped at the maximum loss that could be incurred on any given transaction.

Table 22 shows the aggregate net fair market value of securities and derivative securitization positions by exposure type that meet the regulatory definition of a covered trading securitization position at March 31, 2020.

Table 22: Covered Securitization Positions by Exposure Type (Net Market Value) March 31, 2020

(in millions)					
Securitization exposure:		**ABS**	**CMBS**	**RMBS**	**CLO/CDO**
Securities	$	466	388	673	634
Derivatives		(0)	(0)	3	0
Total	**$**	**466**	**388**	**676**	**634**

- Securitization Due Diligence and Risk Monitoring - The market risk capital rule requires that the Company conduct due diligence on the risk of each securitization position within three days of its purchase. The Company's due diligence seeks to provide an understanding of the features that would materially affect the performance of a securitization or resecuritization. The due diligence analysis is re-performed on a quarterly basis for each securitization and resecuritization position. The Company aims to manage the risks associated with securitization and resecuritization positions through the use of offsetting positions and portfolio diversification.

- Standardized Specific Risk Charge - For debt and equity positions that are not processed by approved internal specific risk models, a regulatory prescribed standard specific risk charge is applied. The standard specific risk add-on for sovereign entities, public sector entities, and depository institutions is based on the Organization for Economic Co-operation and Development country risk classifications and the remaining contractual maturity of the position. These specific risk add-ons for debt positions range from 0.25% to 12%. The add-on for corporate debt is based on creditworthiness and the remaining contractual maturity of the position. All other types of debt positions are subject to an 8% add-on. The standard specific risk add-on for equity positions is generally 8%.
- Comprehensive Risk Charge/Correlation Trading - The market risk capital rule requires capital for correlation trading positions. The Company's correlation trading exposure covered under the market risk capital rule matured in fourth quarter 2014.
- De Minimis Charge is applied to risks that are not captured in the VaR models.

VaR Back-testing

The market risk capital rule requires back-testing as one form of validation of the VaR model. Back-testing is a comparison of the daily VaR estimate with clean profit and loss (clean P&L) as defined by the market risk capital rule. Clean P&L is the change in the value of the Company's covered trading positions that would have occurred had previous end-of-day covered trading positions remained unchanged (therefore, excluding fees, commissions, net interest income, and intraday trading gains and losses). Any clean P&L loss that exceeds Total VaR is considered a market risk regulatory capital back-testing exception. The Company observed eight back-testing exceptions during the preceding 12 months.

Table 23 shows daily Total VaR (1-day, 99%) used for regulatory market risk capital back-testing for the 12 months ended March 31, 2020. The Company's average Total VaR for first quarter 2020 was $35 million with a high of $131 million and a low of $13 million.

Table 23: Daily Total 1-Day 99% VaR Measure (Rolling 12 Months)

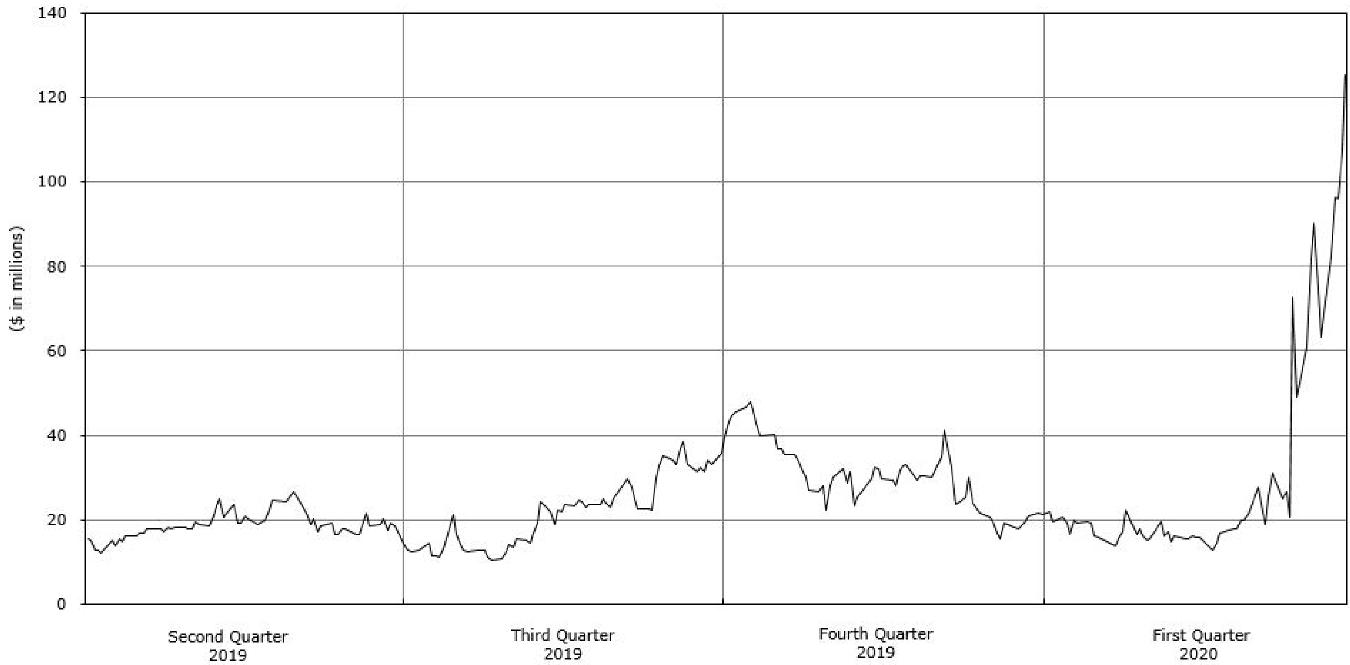
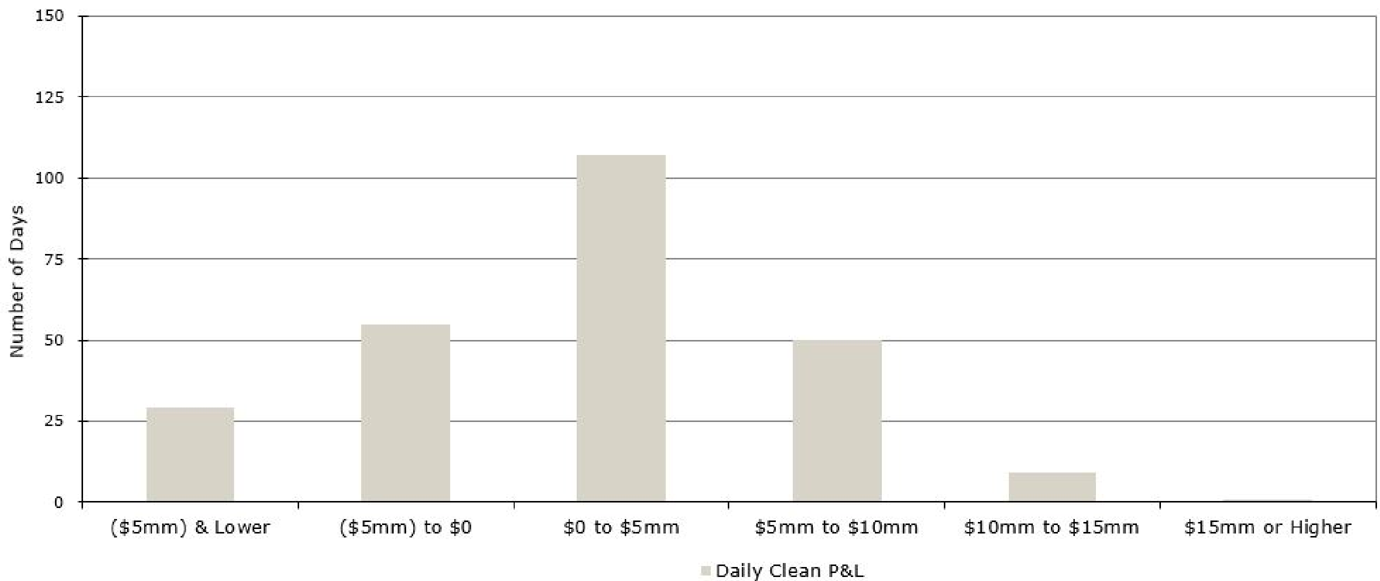


Table 24 provides information on the distribution of daily trading-related revenues for the Company's covered positions. This trading-related revenue is the clean P&L of the Company's covered trading positions that would have occurred had previous end-of-day covered trading positions remained unchanged, as defined above.

Table 24: Distribution of Daily Clean P&L - 12 Months Ended March 31, 2020



Supplementary Leverage Ratio

In April 2014, federal banking regulators finalized a rule that enhances the SLR requirements for BHCs, like Wells Fargo, and their IDIs. The calculation of the SLR is tier 1 capital divided by the Company's total leverage exposure. Total leverage exposure consists of total average assets, less goodwill and other permitted tier 1 capital deductions (net of deferred tax liabilities), plus certain off-balance sheet exposures. In April 2020, the FRB issued an interim final rule that temporarily allows a BHC to exclude on-balance sheet amounts of U.S. Treasury securities and deposits at Federal Reserve Banks from the calculation of its total leverage exposure in the denominator of the SLR. The interim final rule became effective April 1, 2020, and expires on March 31, 2021.

As a BHC, we are required to maintain a SLR of at least 5.00% (comprised of the 3.00% minimum requirement plus a supplementary leverage buffer of 2.00%) to avoid restrictions on capital distributions and discretionary bonus payments. Our IDIs are required to maintain a SLR of at least 6.00% to be considered well-capitalized under applicable regulatory capital adequacy guidelines. In April 2018, the FRB and OCC proposed rules (the "Proposed SLR Rules") that would replace the 2.00% supplementary leverage buffer with a buffer equal to one-half of our G-SIB capital surcharge. The Proposed SLR Rules would similarly tailor the current 3.00% minimum SLR requirement for our IDIs. For additional details on the SLR, refer to the "Capital Management" section in Management's Discussion and Analysis to our first quarter 2020 Form 10-Q.

The following table sets forth our Supplementary Leverage Ratio and related components at March 31, 2020.

Table 25a: Supplementary Leverage Ratio

(in millions, except ratio)			March 31, 2020
Tier 1 capital	(A)	$	**154,277**
Total average assets			1,950,659
Less: amounts deducted from Tier 1 capital			28,530
Total adjusted average assets			1,922,129
Adjustment for derivative exposures (1)			75,994
Adjustment for repo-style transactions (2)			4,613
Adjustment for other off-balance sheet exposures (3)			253,578
Total off-balance sheet adjustments			334,185
Total leverage exposure	(B)	$	**2,256,314**
Supplementary leverage ratio	**(A)/(B)**		**6.84 %**

(1) Adjustment represents derivatives and collateral netting exposures as defined for supplementary leverage ratio determination purposes.

(2) Adjustment represents counterparty credit risk for repo-style transactions where Wells Fargo & Company is the principal (i.e., principal counterparty facing the client).

(3) Adjustment represents credit equivalent amounts of other off-balance sheet exposures not already included as derivatives and repo-style transactions exposures.

The table below presents the components of the total leverage exposure for derivatives, repo-style transactions, and other off-balance sheet exposures at March 31, 2020. The other off-balance sheet exposures consist of wholesale and retail commitments after the application of credit conversion factors.

Table 25b: Components of Total Leverage Exposure		March 31, 2020
(in millions)		
On-balance sheet exposures		
Total average assets, as reported	$	1,950,659
Less: amounts deducted from Tier 1 capital		28,530
Total on-balance sheet exposures		1,922,129
Derivative exposures		
Replacement cost for derivative exposures (that is, net of cash variation margin)		23,196
Add-on amounts for potential future exposure (PFE) for derivative exposures		39,294
Gross-up for cash collateral posted if deducted from the on-balance sheet assets, except for cash variation margin		7,720
LESS: Deductions of receivable assets for cash variation margin posted in derivative transactions, if included in on-balance sheet assets		—
LESS: Exempted CCP leg of client-cleared transactions		—
Effective notional principal amount of sold credit protection		26,073
LESS: Effective notional principal amount offsets and PFE adjustments for sold credit protection		1,735
LESS: on-balance sheet assets for derivative exposures		18,554
Total off-balance sheet derivative exposures		75,994
Repo-style transactions		
On-balance sheet assets for repo-style transactions, except include the gross value of receivables for reverse repurchase transactions		126,531
LESS: Reduction of the gross value of receivables in reverse repurchase transactions by cash payables in repurchase transactions under netting agreements		20,141
Counterparty credit risk for all repo-style transactions		4,613
LESS: on-balance sheet assets for repo-style transactions		106,390
Total off-balance sheet exposures for repo-style transactions		4,613
Other off-balance sheet exposures		
Off-balance sheet exposures at gross notional amounts		637,158
LESS: Adjustments for conversion to credit equivalent amounts		383,580
Total Other off-balance sheet exposures		253,578
Total leverage exposure	**$**	**2,256,314**

Appendix

In May 2020, Wells Fargo amended FR Y-9C Reports, Call Reports (FFIEC 031), and Regulatory Capital Reports (FFIEC 101) for Wells Fargo & Company and Wells Fargo Bank, N.A.

Below are revised Table 2 and Table 4 figures for our Pillar 3 Disclosures for the two periods for which there was a material impact:

Table 2: Revised Capital Summary for Wells Fargo & Company and Wells Fargo Bank, N.A. (1) December 31, 2019

Advanced Approach (in millions, except ratios)		**CET 1 Capital (2)**	**Tier 1 Capital (3)**	**Total Capital (4)**	**Advanced Approach RWAs (5)**	**CET1 Capital Ratio (6)**	**Tier 1 Capital Ratio (7)**	**Total Capital Ratio (8)**
Wells Fargo & Company	$	138,760	158,949	188,333	1,165,079	11.91 %	13.64 %	16.16 %
Wells Fargo Bank, N.A.		145,149	145,149	158,615	1,047,054	13.86	13.86	15.15

(1) The requirements for calculating CET1 and tier 1 capital, along with RWAs, are fully phased-in. However, the requirements for calculating tier 2 and total capital are still in accordance with Transition Requirements.
(2) Common Equity Tier 1 capital (CET1 capital) consists of common shares issued and additional paid-in capital, retained earnings, and other reserves excluding cash flow hedging reserves, less specified regulatory adjustments.
(3) Tier 1 capital is the sum of CET1 capital and additional tier 1 capital.
(4) Total capital is defined as tier 1 capital plus tier 2 capital.
(5) Total RWAs under the Advanced Approach includes the 6.00% credit risk multiplier where applicable.
(6) CET1 capital ratio = CET1 capital / RWA.
(7) Tier 1 capital ratio = Tier 1 capital / RWA.
(8) Total capital ratio = Total capital / RWA.

Table 4: Revised Risk-Weighted Assets for Wells Fargo & Company by Risk Type - Advanced Approach December 31, 2019

(in millions)		**Advanced Approach RWAs**
Operational risk	**$**	**338,650**
Total Risk-Weighted Assets (Advanced Approach)	**$**	**1,165,079**

Table 2: Revised Capital Summary for Wells Fargo & Company and Wells Fargo Bank, N.A. (1) September 30, 2019

Advanced Approach (in millions, except ratios)		**CET 1 Capital (2)**	**Tier 1 Capital (3)**	**Total Capital (4)**	**Advanced Approach RWAs (5)**	**CET1 Capital Ratio (6)**	**Tier 1 Capital Ratio (7)**	**Total Capital Ratio (8)**
Wells Fargo & Company	$	144,739	164,872	194,526	1,167,354	12.40 %	14.12 %	16.66 %
Wells Fargo Bank, N.A.		145,265	145,265	157,212	1,045,529	13.89	13.89	15.04

(1) The requirements for calculating CET1 and tier 1 capital, along with RWAs, are fully phased-in. However, the requirements for calculating tier 2 and total capital are still in accordance with Transition Requirements.
(2) Common Equity Tier 1 capital (CET1 capital) consists of common shares issued and additional paid-in capital, retained earnings, and other reserves excluding cash flow hedging reserves, less specified regulatory adjustments.
(3) Tier 1 capital is the sum of CET1 capital and additional tier 1 capital.
(4) Total capital is defined as tier 1 capital plus tier 2 capital.
(5) Total RWAs under the Advanced Approach includes the 6.00% credit risk multiplier where applicable.
(6) CET1 capital ratio = CET1 capital / RWA.
(7) Tier 1 capital ratio = Tier 1 capital / RWA.
(8) Total capital ratio = Total capital / RWA.

Table 4: Revised Risk-Weighted Assets for Wells Fargo & Company by Risk Type - Advanced Approach September 30, 2019

(in millions)		**Advanced Approach RWAs**
Operational risk	**$**	**330,925**
Total Risk-Weighted Assets (Advanced Approach)	**$**	**1,167,354**

Glossary of Acronyms

Acronym	Description
ABS	Asset-Backed Securities
ACL	Allowance for Credit Losses
A-IRB	Advanced Internal Ratings Based
ALCO	Asset/Liability Management Committee
AMA	Advanced Measurement Approach
AMLTA	Alternative Modified Look-Through Approach
AOCI	Accumulated Other Comprehensive Income
BCBS	Basel Committee on Banking Supervision
BEICF	Business Environment and Internal Control Factors
BHCs	Bank Holding Companies
Board	Wells Fargo Board of Directors
BOLI	Bank-Owned Life Insurance
CCAR	Comprehensive Capital Analysis and Review
CCE	Current Credit Exposure
CCF	Credit Conversion Factor
CCP	Central Counterparty
CCR	Counterparty Credit Risk
CECL	Current Expected Credit Losses
CEM	Current Exposure Method
CET1	Common Equity Tier 1
CFMO	Corporate Functional Model Oversight
CLO/CDO	Collateralized Loan and Other Debt Obligations
CMC	Capital Management Committee
CMoR	Corporate Model Risk
CRC	Capital Reporting Committee
CRE	Commercial Real Estate
CSA	Collateral Support Annex
CVA	Credit Valuation Adjustment
EAD	Exposure at Default
ECL	Expected Credit Loss
ELD	External Loss Data
FDIC	Federal Deposit Insurance Corporation
Final Rule	Basel III Final Rule for U.S. Bank Holding Companies and Banks
FLTA	Full Look-Through Approach
FRB	Board of Governors of the Federal Reserve System
FSB	Financial Stability Board
GAAP	Generally Accepted Accounting Principles
GSEs	Government Sponsored Entity
G-SIB	Global Systemically Important Bank
HVCRE	High Volatility Commercial Real Estate
ICAAP	Internal Capital Adequacy Assessment Process
IDIs	Insured Depository Institutions
ILD	Internal Loss Data
IPRE	Income-Producing Real Estate
IRC	Incremental Risk Charge
LDA	Loss Distribution Approach
LGD	Loss Given Default
M	Maturity
OCC	Office of the Comptroller of the Currency
ORX	Operational Riskdata eXchange Association
OTC	Over-the-Counter
P&L	Profit and Loss
PD	Probability of Default
PFE	Potential Future Exposure
QRE	Qualifying Revolving Exposures
RCSA	Risk and Control Self-Assessment
RRROC	Regulatory and Risk Reporting Oversight Committee
RWAs	Risk-Weighted Assets
SFA	Supervisory Formula Approach
SLR	Supplementary Leverage Ratio
SPE	Special Purpose Entity
SRWA	Simple Risk-Weight Approach
SSFA	Simplified Supervisory Formula Approach
TLAC	Total Loss Absorbing Capacity
U.S.	United States
VaR	Value-at-Risk

Forward-Looking Statements

This document contains forward-looking statements. In addition, we may make forward-looking statements in our other documents filed or furnished with the SEC, and our management may make forward-looking statements orally to analysts, investors, representatives of the media, and others. Forward-looking statements can be identified by words such as "anticipates," "intends," "plans," "seeks," "believes," "estimates," "expects," "target," "projects," "outlook," "forecast," "will," "may," "could," "should," "can," and similar references to future periods. In particular, forward-looking statements include, but are not limited to, statements we make about: (i) the future operating or financial performance of the Company, including our outlook for future growth; (ii) our noninterest expense and efficiency ratio; (iii) future credit quality and performance, including our expectations regarding future loan losses and our allowance for credit losses; (iv) the appropriateness of the allowance for credit losses; (v) our expectations regarding net interest income and net interest margin; (vi) loan growth or the reduction or mitigation of risk in our loan portfolios; (vii) future capital or liquidity levels, ratios, or targets, our estimated Common Equity Tier 1 ratio, and our estimated total loss absorbing capacity ratio; (viii) the performance of our mortgage business and any related exposures; (ix) the expected outcome and impact of legal, regulatory and legislative developments, as well as our expectations regarding compliance therewith; (x) future common stock dividends, common share repurchases, and other uses of capital; (xi) our targeted range for return on assets, return on equity, and return on tangible common equity; (xii) expectations regarding our effective income tax rate; (xiii) the outcome of contingencies, such as legal proceedings; and (xiv) the Company's plans, objectives, and strategies. Forward-looking statements are not based on historical facts but instead represent our current expectations and assumptions regarding our business, the economy and other future conditions. Investors are urged to not unduly rely on forward-looking statements as actual results could differ materially from expectations. Forward-looking statements speak only as of the date made, and we do not undertake to update them to reflect changes or events that occur after that date.

For more information about factors that could cause actual results to differ materially from expectations, refer to the "Forward-Looking Statements" section in Management's Discussion and Analysis to our first quarter 2020 Form 10-Q, as well as to our other reports filed with the Securities and Exchange Commission and available on its website at www.sec.gov, including the discussion under the "Risk Factors" section in Management's Discussion and Analysis in our 2019 Form 10-K.