M&T Bank Corporation

Pillar 3 Regulatory Capital Disclosures

For the Quarter Ended

December 31, 2023

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GLOSSARY OF TERMS

The following listing includes acronyms and terms used throughout the document.

Term	Definition
ACL	Allowances for Credit Losses
Basel III	Basel Committee's December 2010 final capital framework for strengthening international capital standards
BOLI	Bank Owned Life Insurance
BHC	Bank Holding Company
Capital Rules	Capital adequacy standards established by the federal banking agencies
CAP	Capital Adequacy Assessment Process
CET1	Common Equity Tier 1
CMC	Capital Management Committee
COLI	Corporate Owned Life Insurance
Company	M&T Bank Corporation and its consolidated subsidiaries
Dodd-Frank Act	Dodd-Frank Wall Street Reform and Consumer Protection Act
FASB	Financial Accounting Standards Board
Federal Reserve	Board of Governors of the Federal Reserve System
Form 10-K	M&T’s Annual Report on Form 10-K for the year ended December 31, 2023
FR Y-9C	M&T's Consolidated Financial Statements for Bank Holding Companies for the quarter ended December 31, 2023
Future Factors	Certain risks, uncertainties, and assumptions
GAAP	Accounting principles generally accepted in the U.S.
GTAL	Gross trading assets and liabilities
HVCRE	High-volatility Commercial Real Estate
MRR	Market Risk Rule
M&T	M&T Bank Corporation
M&T Bank	Manufacturers and Traders Trust Company
OTC	Over-the-counter
People’s United	People’s United Financial, Inc.
RAS	Risk Appetite Statement
RWA	Risk-weighted Assets
SCB	Stress Capital Buffer
SEC	Securities and Exchange Commission
SSFA	Simplified Supervisory Formula Approach
U.S.	United States of America
Wilmington Trust, N.A.	Wilmington Trust National Association

Background

M&T and its wholly owned bank subsidiaries, M&T Bank and Wilmington Trust, N.A., are required to comply with applicable Capital Rules, which are based on Basel III.

On April 1, 2022, M&T completed the acquisition of People's United. Through subsidiaries, People's United provided commercial banking, retail banking and wealth management services to individual, corporate and municipal customers through a network of branches located in Connecticut, southeastern New York, Massachusetts, Vermont, New Hampshire and Maine. Following the merger, People's United Bank, National Association, a national banking association and a wholly owned subsidiary of People's United, merged with and into M&T Bank, the principal banking subsidiary of M&T, with M&T Bank as the surviving entity. The results of operations acquired from People's United have been included in the Company's financial results since April 1, 2022. Pursuant to the terms of the merger agreement dated February 22, 2021, People's United shareholders received consideration valued at .118 of an M&T common share in exchange for each common share of People's United. The purchase price totaled approximately $8.4 billion (with the price based on M&T's closing price of $164.66 per share as of April 1, 2022). M&T issued 50,325,004 common shares in completing the transaction. Additionally, People's United outstanding preferred stock was converted into 10,000,000 new shares of Series H Preferred Stock of M&T at a liquidation preference per share of $25. The $8.4 billion of consideration paid for People's United common equity resulted in goodwill of $3.9 billion and $261 million of core deposit and other intangible assets as of the acquisition date. The capital disclosures and amounts therein each reflect the impact of the People's United acquisition. Refer to note 2 of Notes to Financial Statements in Form 10-K for further discussion of the acquisition.

Overview

In accordance with Pillar 3 of the Capital Rules, BHCs with total consolidated assets of $50 billion or more, including M&T, are required to provide market participants certain information regarding their capital adequacy, including a summary of information about: corporate risk management framework and governance; the internal capital adequacy assessment process; and disclosures regarding credit, counterparty, interest rate, and other specified forms of risk. M&T does not meet the criteria to be considered an advanced approaches organization and, as a result, is required to provide disclosures under the standardized approach.

The Regulatory Capital Disclosures provided within this document or in M&T's filings noted below and referenced in Appendix A of this document are presented in compliance with Sections 61 and 63 of Regulation Q – Part 217, Public Disclosures Related to Capital Requirements. M&T's Form 10-K filed with the SEC contains management's discussion of the overall risk profile of the Company. The Pillar 3 Regulatory Capital Disclosures should be read in conjunction with Form 10-K filed with the SEC and the FR Y-9C. The accompanying Pillar 3 Regulatory Capital Disclosure Cross-reference Sheet (see Appendix A) indicates where the required disclosures are located. The Pillar 3 Regulatory Capital Disclosures have not been audited by M&T's external auditors.

Risk Management Framework and Governance

M&T's Enterprise Risk Management Framework represents the Company's overall risk management structure, including the policies, processes, controls and systems through which risk is managed on a daily basis. The Enterprise Risk Management Framework provides a common method for all employees, officers and directors to understand and communicate the types of risk that M&T faces in pursuit of its business objectives. It serves as an integral part of daily operations, business planning and capital planning, and is a foundational component of M&T's disciplined risk management culture. It encompasses the significant aspects of risk management, and pertains to current and emerging risk considerations. These risks are described extensively in M&T's Form 10-K in Part I, Item 1A "Risk Factors." The major risks facing the Company and described therein include:

- Market Risk
- Risks Relating to Compliance and the Regulatory Environment
- Credit Risk
- Liquidity Risk
- Strategic Risk
- Operational Risk (including legal, reputational and cybersecurity risks)
- Business Risk (including model risk and climate risk)

Detailed discussions of the risks outlined above and other risks facing the Company are included within Form 10-K in Part I, Item 1 "Business," and Part II, Item 7 "Management's Discussion and Analysis of Financial Condition and Results of Operations." Furthermore, in Part II, Item 7, included under the heading "Forward-Looking Statements," is a description of certain risks, uncertainties and assumptions identified by management that are difficult to predict and that could materially affect the Company's financial condition and results of operations, as well as the value of the Company's financial instruments in general, and M&T common stock, in particular.

The Enterprise Risk Management Framework supports the identification, measurement, monitoring and reporting of material risks with appropriate governance and oversight, thereby ensuring transparency, consistency and accountability for risk throughout the enterprise and adherence to the Company's risk appetite. The Enterprise Risk Management Framework incorporates the following components.

Risk Appetite Statement

M&T's RAS articulates the types of risks that the Company is willing to accept and those that it seeks to avoid in pursuit of its business objectives. The RAS affirms the principles by which the Company identifies itself, while providing a central guide for decision-making processes. It serves as the link between the Company's corporate values and business operations by ensuring that all directors, officers and employees share a consistent understanding of the Company's appetite for risk, further enhancing the risk identification process and providing more clarity for aligning the Company's approach to capital management with its key risk appetite metrics.

Qualitative and quantitative risk metrics monitor emerging risks and provide specific measures that are used to monitor risk-taking relative to the Company's risk appetite.

Committee Roles and Responsibilities

M&T's integrated risk governance structure begins with oversight by members of the Board of Directors through the Risk Committee of the Board of Directors. Senior management oversight of the Enterprise Risk Management Framework is provided through a risk governance structure that includes the Management Risk Committee, which oversees eight Risk Governance Committees that monitor specific risks applicable to the Company's businesses.

Risk Management Policies and Practices

The Enterprise Risk Management Framework incorporates a culture of risk ownership within the business lines, with independent risk management functions and Internal Audit serving as additional layers of challenge and oversight. Front-line business and operational support areas participate in the delivery of products or services to customers, as well as related servicing and technology. They are responsible for aligning their respective business strategies with the risk appetite established by M&T. These units are responsible for identifying key risks within their operations and establishing appropriate internal controls within the units. They are also responsible for establishing business line policies, procedures and limits in accordance with the RAS and monitor performance against those limits to ensure they operate within the boundaries of their risk-taking authority. The Risk Management and Regulatory Affairs Division, which is independent from the front-line business and operational support areas, establishes the enterprise-wide risk management policies, procedures, methodologies and tools, including the risk governance framework. This function oversees the establishment of risk limits and monitors compliance with those limits, in accordance with the risk appetite. Internal Audit, which reports to the Audit Committee of the Board of Directors, serves as an additional layer of control and is independent from the front-line business and operational support areas and the risk management functions. They provide assurance to executive management and the Board of Directors as to the effectiveness of risk management programs, policies, processes, practices, and controls, as well as adherence to regulatory standards.

Internal CAP

M&T's CAP is the established documented approach through which the Company assesses its capital requirements in relation to the material risks facing the organization, leveraging the efforts of the Enterprise Risk Management Framework. The CAP is intended to ensure that M&T holds sufficient capital relative to its risk profile to support its business activities under a range of conditions, including adverse economic environments.

The Company's assessment of capital adequacy incorporates enterprise-wide capital stress testing that evaluate potential post-stress capital requirements in relation to available capital resources, considering the comprehensive inventory of key vulnerabilities and scenarios identified through the aforementioned risk identification process. This approach considers key risks and vulnerabilities when assessing the capital needs stemming from potential exposures; whether on- or off-balance sheet. The CAP also incorporates explicit capital adequacy thresholds and limits with respect to the Company's established risk appetite.

M&T's CMC is the primary management body responsible for regular oversight of the Company's capital position and outlook and for communicating with other members of executive leadership and the Board of Directors regarding matters related to capital. The CMC proactively monitors M&T's prospective capital generation and capital requirements, as well as potential material risks facing the Company, leveraging the Company's risk management infrastructure. M&T’s Risk Committee of the Board of Directors is responsible for establishment of capital goals reflecting the organization’s risk appetite and verifying that the Company’s capital position considers material risks and is appropriate for its risk profile.

Regulatory Capital Ratios

M&T and its subsidiary banks are required to comply with applicable capital adequacy standards established by the federal banking agencies. Among other matters, those Capital Rules: (i) include a capital measure called CET1 and a related regulatory capital ratio of CET1 to RWA; (ii) specify that Tier 1 capital consists of CET1 and “Additional Tier 1 capital” instruments meeting certain revised requirements; and (iii) mandate that most deductions/adjustments to regulatory capital measures be made to CET1 and not to the other components of capital. Under the Capital Rules, for most banking organizations, including M&T, the most common form of Additional Tier 1 capital is non-cumulative perpetual preferred stock and the most common forms of Tier 2 capital are subordinated notes and a portion of the allowance for credit losses, in each case, subject to the specific requirements of the Capital Rules.

Pursuant to the Capital Rules, the minimum capital ratios for a banking organization to be considered adequately capitalized are as follows:

- 4.5% CET1 to RWA (each as defined in the Capital Rules);
- 6.0% Tier 1 capital (that is, CET1 plus Additional Tier 1 capital) to RWA (each as defined in the Capital Rules);
- 8.0% Total capital (that is, Tier 1 capital plus Tier 2 capital) to RWA (each as defined in the Capital Rules); and
- 4.0% Tier 1 capital to average consolidated assets as reported in consolidated financial statements (known as the “leverage ratio”), as defined in the Capital Rules.

Capital Rules require buffers in addition to the minimum risk-based capital ratios noted above. M&T is subject to a SCB requirement that is determined through the Federal Reserve’s supervisory stress tests and M&T’s bank subsidiaries are subject to a 2.5% capital conservation buffer requirement. The buffer requirement must be composed entirely of CET1. In June 2023, the Federal Reserve released the results of its most recent supervisory stress tests. Based on those results, on October 1, 2023, M&T's SCB declined from 4.7% to 4.0%.

On July 27, 2023 the federal banking agencies issued a notice of proposed rulemaking to modify the regulatory capital requirements applicable to large banking organizations with over $100 billion of total assets and their depository institution subsidiaries. The proposed rule would generally require banking organizations subject to Category III and IV standards, like the Company, to compute their regulatory capital consistent with Category I and II standards. Management is in the process of evaluating the impact of the proposed rule on the regulatory capital requirements of M&T and its subsidiary banks and currently estimates the proposed rules would increase the Company's RWA by a percentage in the mid-single digits.

The Company does not have any limitations on distributions and discretionary bonus payments resulting from the capital buffer requirements. As of December 31, 2023, M&T's regulatory capital ratios exceeded the minimum capital ratios and the additional SCB. The lowest of the three capital ratio differences was total capital ratio of 599 basis points over the minimum total capital ratio. M&T had eligible retained income of $1.17 billion.

The federal bank regulatory agencies have issued rules that allow banks and BHCs to phase-in the impact of adopting the expected credit loss accounting model on regulatory capital. Those rules allow banks and BHCs to delay for two years the day one impact on retained earnings of adopting the expected loss accounting standard and 25% of the cumulative change in the reported allowance for credit losses subsequent to the initial adoption through the end of 2021, followed by a three-year transition period. M&T and its subsidiary banks have elected to adopt these rules and the impact is reflected in the regulatory capital ratios presented below.

A more detailed discussion of regulatory capital requirements is included in Part I, Item 1 of M&T's Form 10-K under the headings "Capital Requirements" and "Limits on Undercapitalized Depository Institutions."

Table 1 provides the regulatory capital ratios of the Company, M&T Bank and Wilmington Trust, N.A. as of December 31, 2023:

Table 1: Regulatory Capital Ratios

December 31, 2023

	M&T (Consolidated)	**M&T Bank**	**Wilmington Trust, N.A.**
CET1 capital	10.98%	11.53%	263.48%
Tier 1 capital	12.29%	11.53%	263.48%
Total capital	13.99%	12.97%	263.85%
Tier 1 leverage	9.43%	8.83%	86.00%

Pursuant to the Capital Rules, non-advanced approaches banking organizations, including M&T, could make a one-time permanent election to exclude the effects of certain accumulated other comprehensive income or loss items reflected in shareholders' equity under GAAP. M&T made that election during the first quarter of 2015.

In compliance with the Capital Rules, the Company reviewed the aggregate amount of surplus capital of insurance subsidiaries included in the regulatory capital of the consolidated group and has determined that it was not material.

For further information on capital, refer to Form 10-K in Part I, Item 1 under the headings "Enhanced Prudential Standards", "Capital Requirements" and "Stress Testing and Stress Capital Buffer," Part II, Item 7 under the heading "Capital" and notes 10 and 24 of Notes to Financial Statements in Part II, Item 8.

RWA

The Capital Rules also address asset risk weights that affect the denominator in banking institutions' regulatory risk-based capital ratios. Under the Capital Rules, M&T is subject to the standardized approach for determination of RWA associated with its on- and off-balance sheet exposures. Table 2 summarizes the Company's standardized RWA by certain categories, as defined in the Capital Rules.

Table 2: RWA

December 31, 2023
(In millions)

	M&T (Consolidated)
Exposures to sovereign entities	$ 3,177
Exposures to depository institutions, foreign banks & credit unions	699
Exposures to public sector entities	655
Corporate and other exposures	118,409
Residential mortgage exposures	16,609
Statutory multifamily mortgages & pre-sold construction loans	1,359
HVCRE loans	316
Past due loans	2,668
Other assets	7,833
Cleared transactions	—
Securitization exposures	275
Equity exposures	2,007
Total RWA before excess allowance for credit losses	154,007
Less: Excess allowance for credit losses	74
Total RWA *(a)*	$ 153,933

(a) M&T does not have any exposures to supranational entities and multilateral development banks, default fund contributions, unsettled transactions or market risk.

Credit Risk General Disclosures

The Company employs a long-term strategy and credit risk philosophy that focuses on stable, proven and conservative underwriting criteria and active portfolio monitoring which is consistent with the Company's risk appetite. The process integrates transparent qualitative and quantitative factors in the decision-making process with credit scorecards and models to create a robust underwriting and risk management framework. Past due loan status is measured based on the number of days that contractually required principal or interest payments are delinquent.

Commercial Exposures

- The Company utilizes a committee approval structure for large commercial relationships.
- Approval decisions are not solely made centrally but are supplemented by regional committees that enhance centrally assembled corporate best practices with in-market expertise. Using a mix of centralized and regional committees, the Company is able to retain credit consistency while applying geographic expertise.
- A centralized underwriting function provides for consistent application of underwriting standards, including debt service and loan-to-value ratios, and independence from the business line.
- The Company's risk rating consists of two measurements, a Probability of Default and a Loss Given Default. These measurements, which incorporate expectations for default and give consideration to collateral types and values, are used to differentiate risk within the portfolio and consider the expectation of default for each loan.

Once approved, loans are subject to a granular approach to portfolio management which assists in the early identification of asset quality issues.

- Extensive monthly and quarterly reporting for Executive Management and the Board of Directors.
  - Includes metrics such as portfolio size, industry concentrations, property type, delinquency, non-performing, charge-offs and risk rating distributions.
- Commercial Credit Quality Assurance team is responsible to ensure basic safety and soundness of the commercial and industrial loan and commercial real estate loan portfolios. The team's primary focus is the continuous monitoring, analysis, and general oversight of the commercial criticized asset portfolios to ensure these loans are properly risk-rated with appropriate accrual designation and timely recognition of charge-offs.

Consumer and Residential Real Estate Exposures

- Residential real estate loans are generally underwritten according to the standards set by the secondary markets, including Fannie Mae and Freddie Mac.
- Consumer loan underwriting decisions are primarily based on Credit Score (FICO), Debt-to-Income, Revolving Debt-to-Income, Combined Loan-to-Value, Lien Position (Home Equity) and, when appropriate, Internal Custom Scorecards.
- The performance of the residential real estate loan and consumer loan portfolios is monitored very closely through a combination of reporting, feedback from the Customer Asset Management (collections) area, and management oversight. Reporting is varied and extensive, with reports being produced monthly or quarterly, including monthly dashboard reports that provide product performance metrics.

Further discussion of the credit quality of the loan portfolios is provided in M&T's Form 10-K, as referenced in Appendix A.

Table 3: Loans and Leases, Net of Unearned Discount provides the geographic distribution by major types of credit exposures that includes loans and leases, net of unearned discount, and contractual commitments to extend credit and letters of credit. For further information on the Company's commitments to extend credit and letters of credit, Appendix A provides references to M&T's Form 10-K and FR Y-9C.

Table 3: Loans and Leases, Net of Unearned Discount

December 31, 2023

	Outstandings	Unused Commitments(a)	Total	Percent of Total: New York	Mid-Atlantic (b)	New England (c)	Other
	(Dollars in millions)						
Real estate							
Residential	$ 23,264	$ 494	$ 23,758	31%	30%	26%	13%
Commercial	33,003	5,935	38,938	34	28	19	19
Total real estate	56,267	6,429	62,696	32%	29%	22%	17%
Commercial and industrial	54,459	30,450	84,909	25%	34%	15%	26%
Consumer							
Home equity lines and loans	4,649	8,109	12,758	32%	42%	25%	1%
Recreational finance	10,058	—	10,058	9	16	7	68
Automobile	3,992	—	3,992	24	50	6	20
Other secured or guaranteed	694	—	694	29	38	9	24
Other unsecured	1,398	4,107	5,505	37	55	5	3
Total consumer	20,791	12,216	33,007	24%	37%	14%	25%
Total loans	131,517	49,095	180,612	28%	33%	17%	22%
Commercial leases	2,551	—	2,551	22%	24%	7%	47%
Total loans and leases	$ 134,068	$ 49,095	$ 183,163	28%	32%	17%	23%
Letters of credit	$ —	$ 2,351	$ 2,351	42%	47%	10%	1.00%

(a) *Includes contractual commitments to extend credit and letters of credit.*
(b) *Includes Delaware, Maryland, New Jersey, Pennsylvania, Virginia, West Virginia and the District of Columbia.*
(c) *Includes Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island and Vermont.*

Table 4 presents the geographic distribution for the Company's state and municipal securities.

Table 4: State and Municipal Securities Exposure

December 31, 2023
(In millions)

Region	Exposure Amount	Percentage of Total
New York	$ 102	4%
Mid-Atlantic (a)	223	9%
New England (b)	391	16%
Other		
California	274	11%
Texas	230	9%
Florida	140	6%
Minnesota	133	5%
Washington	131	5%
Wisconsin	110	4%
All other states	767	31%
Total state and municipal securities at amortized cost	$ 2,501	100%

(a) *Includes Delaware, Maryland, New Jersey, Pennsylvania, Virginia, West Virginia and the District of Columbia.*
(b) *Includes Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island and Vermont.*

For each separately disclosed portfolio, Table 5 presents the total exposure that is covered by guarantees and the RWA amount associated with that exposure.

Table 5: Guarantees

December 31, 2023
(In millions)

Exposure Type	Guarantor	Exposure amount	RWA
Investment securities held to maturity	U.S. Treasury / Federal Agencies	1,005	$ —
Investment securities held to maturity	Government Issued / Guaranteed(a)	11,780	1,993
Investment securities available for sale	U.S. Treasury / Federal Agencies	7,818	—
Investment securities available for sale	Government Issued / Guaranteed(a)	2,697	397
Loans and Leases - Residential	Government Issued / Guaranteed(a)	2,978	655
Loans and Leases - All Other	Government Issued / Guaranteed(a)	581	66
Total		$ 26,859	$ 3,111

(a) Includes guarantees by Government-sponsored entities.

Table 6 presents the Company's remaining contractual maturities by credit exposure category.

Table 6: Remaining Contractual Maturities by Credit Exposure

December 31, 2023
(In millions)

	One year or less	One year through five years	Over five years	Total
Loans and leases, net(a)	$ 25,737	$ 52,761	$ 53,404	131,902
Unfunded commitments	24,523	24,815	7,544	56,882
Investment securities available for sale(b)	5,489	3,898	1,053	10,440
Investment securities held to maturity(c)	453	3,006	11,871	15,330
Total	$ 56,202	$ 84,480	$ 73,872	$ 214,554

(a) Net of unearned income and fees. Amounts do not include nonaccrual loans of approximately $2.2 billion
(b) Investment securities available for sale are presented at estimated fair value.
(c) Investment securities held to maturity are presented at amortized cost.

GAAP requires an ACL to be deducted from the amortized cost basis of financial assets to present the net carrying value that is expected to be collected over the contractual term of the assets considering relevant information about past events, current conditions, and reasonable and supportable forecasts that affect the collectability of the reported amount. Management determines the ACL based on the relative risk characteristics of the loan portfolio. On January 1, 2023 the Company adopted amended guidance that eliminated the accounting guidance for troubled debt restructurings while expanding disclosure requirements for certain loan refinancings and restructurings by creditors when a borrower is experiencing financial difficulty. The amended guidance also requires disclosure of current period gross charge-offs by year of origination. Refer to Forms 10-K under the heading "Provision for Credit Losses" section of Management's Discussion and Analysis of Financial Condition and Results of Operations and notes 4 and 5 of Notes to Financial Statements in Part II, Item 8 of Form 10-K.

Table 7 provides information regarding past due and nonaccrual loans by geography and major type of credit exposure.

Table 7: Past Due and Nonaccrual Loans by Geography

December 31, 2023
(In millions)

	Past due accruing loans		Nonaccrual loans - amortized cost			
	30-89 days past due	Past due 90 days or more	Nonaccrual	With no allowance	With allowance	Related allowance
Commercial and Industrial						
New York	$ 68	$ 5	$ 212	$ 110	$ 102	$ 21
Mid-Atlantic (a)	46	2	246	94	152	52
New England (b)	50	4	31	11	20	4
Other	74	—	181	58	123	15
Total commercial and industrial	238	11	670	273	397	92
Commercial Real Estate						
New York	107	6	572	451	121	33
Mid-Atlantic (a)	189	1	192	88	104	28
New England (b)	99	4	223	95	128	23
Other	80	15	56	47	9	3
Total commercial real estate	475	26	1,043	681	362	87
Residential Real Estate						
New York	251	109	114	78	36	—
Mid-Atlantic (a)	243	85	86	48	38	—
New England (b)	119	15	51	32	19	1
Other	181	86	19	12	7	—
Total residential real estate	794	295	270	170	100	1
Consumer						
New York	44	2	39	18	21	3
Mid-Atlantic (a)	78	5	100	21	79	20
New England (b)	16	—	14	7	7	1
Other	79	—	30	10	20	17
Total consumer	217	7	183	56	127	41
Total	$ 1,724	$ 339	$ 2,166	$ 1,180	$ 986	$ 221

(a) Includes Delaware, Maryland, New Jersey, Pennsylvania, Virginia, West Virginia and the District of Columbia.
(b) Includes Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island and Vermont.

Counterparty Credit Risk

Outside of core lending activities, counterparty risk at M&T arises primarily from derivatives transactions with outside firms and customers. The Company enters into derivative transactions to hedge the fair value of certain fixed rate borrowings and the interest cash flows related to certain variable rate loans. The Company also engages into non-hedging derivative transactions to meet the financial needs of customers who require interest rate swap or foreign exchange services. The Company generally mitigates the foreign exchange and interest rate risk associated with those customer activities by entering into offsetting positions with third parties. The types and amounts of these activities are subject to a well-defined series of potential loss exposure limits established by management and approved by M&T's Board of Directors. M&T maintains policies, controls and processes to manage its mark-to-market settlement and over-collateralization risks in conjunction with its entering into derivative transactions with third parties.

The Counterparty Risk Management group is responsible for a variety of risk management activities to oversee counterparty credit risk which include:

- Monitoring daily material changes in market-related metrics (stock price, public credit ratings and available credit default swap rates) of obligors.
- Daily monitoring of counterparty exposures by product.

- Monitoring compliance with Regulation F (restricts exposure to banks that are inadequately capitalized).
- Assigning internal risk ratings to each counterparty at relationship initiation and reassessing during annual or more frequent reviews.
- Reviewing all impaired securities (both individually and by investment category) regularly.
- Monitoring regularly the length of time that individual securities have been market-impaired (that is, where fair value is less than amortized cost).

In addition, the Company sets trading limits for credit facilities that it extends to qualified trading counterparties based upon an approved and validated methodology.

Credit Risk Mitigation

The Company utilizes a loan grading system which is applied to all commercial and industrial loans and commercial real estate loans. Loans with an elevated level of credit risk are classified as “criticized” and are subjected to additional scrutiny and review by credit risk personnel. The timing and extent of potential losses, considering collateral valuation and other factors, and the Company’s potential courses of action are regularly reviewed. Because collateral is a fundamental mitigant for credit risk, to the extent that loans are collateral-dependent, they oftentimes are evaluated based on the fair value of the loan’s collateral as estimated at or near the financial statement date. The main types of collateral taken by the Company include real estate, cash, depreciable assets, accounts receivable, inventory and other business-related assets. Residential real estate loans and consumer loans are generally evaluated collectively after considering such factors as payment performance and recent loss experience and trends, which are mainly driven by current collateral values in the marketplace as well as the amount of loan defaults. Refer to Part II, Item 7 of Form 10-K under the heading “Provision for Credit Losses” for further discussion on loan collateral, geographic distribution of loans and credit risk mitigation activities.

M&T utilizes legal agreements (primarily master netting agreements) that are established with counterparties to help reduce counterparty risk. Within a master netting agreement can be a Credit Support Annex, which establishes collateral posting rules for the counterparties to cover exposure in the agreement. A Credit Support Annex typically contains a few standard themes:

- Frequency of when collateral calls are made (typically daily).
- The minimum amount posted for new collateral calls (referred to as a minimum transfer amount).
- The type of collateral generally accepted by the Company which includes cash, U.S. Treasury securities and U.S. Agency securities. Other types of securities may be accepted, but only after consultation with Risk Management.

M&T’s Legal department reviews all counterparty derivative agreements before execution.

In addition, the Company clears certain derivative transactions through a clearinghouse, rather than directly with counterparties. Those transactions cleared through a clearinghouse require initial margin collateral and variation margin payments depending on the contracts being in a net asset or liability position, and will be in the form of cash, securities, or US Treasuries, as defined in the trade agreement. The amount of initial margin collateral posted by the Company was $129 million at December 31, 2023. The fair value asset and liability amounts of derivative contracts have been reduced by variation margin payments treated as settlements of those positions. Variation margin on derivative contracts not treated as settlements continues to represent collateral posted or received by the Company. As variation margin is generally posted daily, the Company's exposure to counterparty credit losses is significantly diminished.

Securities purchased under agreements to resell and securities sold under agreements to repurchase (collectively known as repurchase agreements) are treated as collateralized financing transactions and are recorded at amounts equal to the cash or other consideration exchanged. These repurchase agreements are largely with bank or broker counterparties who also engage in derivatives trading with the Company. It is generally the Company's policy to take possession of collateral pledged to secure agreements to resell to mitigate any credit risk associated with the transaction.

The Company does not hedge credit risk associated with lending, repurchase agreements or derivatives transactions beyond collateral requirements. Based on adherence to the Company's credit standards and the presence of the netting and collateral provisions, including any necessary haircuts, the Company believes that the credit risk inherent in repurchase agreement derivative contracts was not material.

Market Risk

Subpart F of Regulation Q (the MRR) establishes risk-based capital requirements for Federal Reserve Board-regulated institutions with significant exposure to market risk, provides methods for these institutions to calculate their standardized measure for market risk and establishes public disclosure requirements. The MRR applies to each banking organization that has GTAL equal to $1 billion or more, or GTAL equal to 10 percent or more of total consolidated assets as reported in the most recent quarterly Call or FR Y-9C Report. M&T reported $106 million of GTAL as of December 31, 2023. As M&T is below the MRR reportable thresholds, related disclosures and RWA calculations are not applicable. More detailed discussions of market risk and other risks associated trading activities are included in Form 10-K under the heading "Net Interest Income/Lending, Investing and Funding Activities" section of Management's Discussion and Analysis of Financial Condition and Results of Operations and note 19 of Notes to Financial Statements under the heading "Derivative financial instruments".

Securitizations

The Basel III rules define a securitization exposure as:

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

M&T's securitization activity has consisted of securitizing loans originated for sale into government issued or guaranteed mortgage-backed securities. The Company has also utilized securitization of loans and leases in certain financing transactions, in which it has retained the respective loans and leases servicing as well as the most subordinated credit exposures in the securitization trust. In these situations, the Company continues to hold risk-based capital against the securitized loans and leases and continues to report them on the Company's consolidated balance sheet as if they had not been securitized. The Company has not recognized any losses as a result of having securitized assets during the quarter ended December 31, 2023.

The below disclosures in this section refer to securitizations with transferred exposures held by the Company and the regulatory capital related to these exposures calculated in accordance with regulatory Capital Rules. The Company's securitization-related activity is investing in products created by third parties. The Company is not applying any credit risk mitigation to its securitization exposures and does not have exposure to nongovernment-related securitization guarantors. The Company does not have any synthetic securitization exposure.

In accordance with the Capital Rules, the Company utilizes the SSFA to determine RWA for its securitization exposures created by third parties, which considers the Company's seniority in the securitization structure and risk factors inherent in the underlying assets.

The Company's investments in third party non-government related securitizations at December 31, 2023 are presented in Table 8.

Table 8: Securitizations

December 31, 2023
(In millions)

Securitizations by exposure type and capital treatment are shown below (a):

	Exposure Amount	SSFA RWA	Capital Impact of RWA(b)
Collateralized mortgage obligations	$ 42	$ 275	$ 22
Other	—	—	—
Total securitization exposure	$ 42	$ 275	$ 22

Securitizations by risk-weight bands and capital treatment are shown below (a):

	Exposure Amount		SSFA RWA		Capital Impact of RWA(b)	
Securitization						
Zero to 250% risk weighting	$	4	$	2	$	—
251% to 500% risk weighting		—		—		—
501% to 1250% risk weighting		38		273		22
Total securitization exposure	$	42	$	275	$	22

(a) Table relates to the Company as an investor in the securitization.
(b) The capital impact of RWA is calculated by multiplying RWA by the minimum total capital ratio of 8%.

Equities Not Subject to MRR

Management of M&T's investment activities generally resides within the Company's Treasury Division. The Treasury Investment Policy, approved by M&T's Board of Directors, aligns with M&T's RAS and outlines the governance framework, operational guidelines, decision-making process, and investment criteria for all discretionary investment securities of the Company.

The Company had total equity exposures of approximately $3.6 billion at December 31, 2023 that consisted predominantly of BOLI and COLI separate accounts ($831 million), tax-advantaged investments ($1.5 billion) consisting largely of investments in qualified affordable housing projects and facilities that produce renewable energy, stock of the Federal Reserve Bank of New York ($578 million) and the Federal Home Loan Bank of New York ($281 million), investment related to unfunded nonqualified supplemental plans ($101 million) established to provide retirement benefits to certain senior officers, investments in mutual funds ($255 million) and preferred stock issued by government-sponsored entities ($10 million). The Company uses the simple risk-weight approach for its individual equity securities, the alternative modified look-through approach for BOLI assets held in separate accounts and the full look-through approach for investments in mutual funds. These assets are reviewed for creditworthiness and evaluated regularly for impairment.

Nonpublic equities are generally recorded either at cost or using the equity method. Details of the Company's accounting policies for investment securities and the valuation of financial instruments are provided in note 1 of Notes to Financial Statements in Part II, Item 8 of Form 10-K.

Equity investments with readily determinable fair values are measured at fair value with changes in fair value recognized in the consolidated statement of income. Net unrealized gains on such equity securities totaled $4 million during the fourth quarter of 2023. Those gains included changes in the value of the Company's holdings of Fannie Mae and Freddie Mac preferred stock.

Equities in mutual funds maintained in the trading account are reported at fair value. Changes in fair value are recorded in trading account and non-hedging derivative gains in the Company's consolidated statement of income.

There were no material realized gains or losses arising from the sales or liquidations of equity securities during the quarter ended December 31, 2023.

Table 9 summarizes the Company's equities not subject to the MRR.

Table 9: Equities Not Subject to MRR

December 31, 2023
(In millions)

	Nonpublic	Public	Total
Fair value	$ 3,242	$ 369	$ 3,611
Latent revaluation gains (losses)(a)	—	—	—
Fair value	$ 3,242	$ 369	$ 3,611

(a) Management believes that any latent revaluation gains or losses that may exist are not material.

The RWA and associated capital requirements for equities not subject to the MRR, calculated using the 8% minimum total risk-based capital ratio, follow.

	Exposure Amount	RWA	Capital Impact of RWA
Not subject to risk weight	$ —	$ —	$ —
0%	578	—	—
20%	281	56	4
100%	1,565	1,565	125
Full look-through approach	361	142	12
Alternative modified look-through approach	826	244	20
Total capital requirements for equity securities	$ 3,611	$ 2,007	$ 161

Forward-Looking Statements

This document and Management's Discussion and Analysis of Financial Condition and Results of Operations and other sections within Form 10-K contain forward-looking statements regarding the Company within the meaning of the Private Securities Litigation Reform Act of 1995. Any statement that does not describe historical or current facts is a forward-looking statement, including statements based on current expectations, estimates and projections about the Company's business, management's beliefs and assumptions.

Statements regarding the potential effects of events or factors specific to the Company and/or the financial industry as a whole, as well as national and global events generally, on the Company's business, financial condition, liquidity and results of operations may constitute forward-looking statements. Such statements are subject to the risk that the actual effects may differ, possibly materially, from what is reflected in those forward-looking statements due to factors and future developments that are uncertain, unpredictable and in many cases beyond the Company's control.

Forward-looking statements are typically identified by words such as "believe," "expect," "anticipate," "intend," "target," "estimate," "continue," or "potential," by future conditional verbs such as "will," "would," "should," "could," or "may," or by variations of such words or by similar expressions. These statements are not guarantees of future performance and involve certain risks, uncertainties and assumptions which are difficult to predict and may cause actual outcomes to differ materially from what is expressed or forecast.

While there can be no assurance that any list of risks and uncertainties is complete, important factors that could cause actual outcomes and results to differ materially from those contemplated by forward-looking statements include the following, without limitation, as well as the risks more fully discussed in Item 1A "Risk Factors" of this Form 10-K: economic conditions and growth rates, including inflation and market volatility; events and developments in the financial services industry, including industry conditions; changes in interest rates, spreads on earning assets and interest-bearing liabilities, and interest rate sensitivity; prepayment speeds, loan originations, loan concentrations by type and industry, credit losses and market values on loans, collateral securing loans, and other assets; sources of liquidity; levels of client deposits; ability to contain costs and expenses; changes in the Company's credit ratings; the impact of the People's United acquisition; domestic or international political developments and other geopolitical events, including international conflicts and hostilities; changes and trends in the securities markets; common shares outstanding, common stock price volatility; fair value of and number of stock-based compensation awards to be issued in future periods; the impact of changes in market values on trust-related revenues; federal, state or local legislation and/or regulations affecting the financial services industry, or M&T and its subsidiaries individually or collectively, including tax policy; regulatory supervision and oversight, including monetary policy and capital requirements; governmental and public policy changes; political conditions, either nationally or in the states in which M&T and its subsidiaries do business; the outcome of pending and future litigation and governmental proceedings, including tax-related examinations and other matters; changes in accounting policies or procedures as may be required by the FASB, regulatory agencies or legislation; increasing price, product and service competition by competitors, including new entrants; technological developments and changes; the ability to continue to introduce competitive new products and services on a timely, cost-effective basis; the mix of products and services; protection and validity of intellectual property rights; reliance on large customers; technological, implementation and cost/financial risks in large, multi-year contracts; continued availability of financing; financial resources in the amounts, at the times and on the terms required to support M&T and its subsidiaries' future businesses; and material differences in the actual financial results of merger, acquisition, divestment and investment activities compared with M&T's initial expectations, including the full realization of anticipated cost savings and revenue enhancements.

M&T provides further detail regarding these risks and uncertainties in its Form 10-K for the year ended December 31, 2023, including in the Risk Factors section of such report, as well as in other SEC filings. These are representative of the factors that could affect the outcome of the forward-looking statements. In addition, as noted, such statements could be affected by general industry and market conditions and growth rates, general economic and political conditions, either nationally or in the states in which M&T and its subsidiaries do business, and other factors.

Forward-looking statements speak only as of the date made, and M&T does not assume any duty and does not undertake to update forward-looking statements.

Appendix A

M&T Bank Corporation
Pillar 3 Regulatory Capital Disclosure Cross-reference Sheet
For the Quarter Ended December 31, 2023

In compliance with the Pillar 3 Regulatory Capital Disclosure Requirements, M&T has provided the following summary of the required disclosure locations. All documents referenced are as of and for the year ended December 31, 2023.

Table	Disclosure Requirement	Disclosure Location
Scope of Application		
Qualitative: (a)	The name of the top corporate entity in the group to which the Risk-Based Capital Standards (subpart D) apply.	**Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Overview
(b)	A brief description of the differences in the basis for consolidating entities for accounting and regulatory purposes, with a description of those entities: (1) That are fully consolidated; (2) That are deconsolidated and deducted from total capital; (3) For which the total capital requirement is deducted; and (4) That are neither consolidated nor deducted (for example, where the investment in the entity is assigned a risk weight in accordance with this subpart).	Not applicable. M&T does not have differences in the basis of consolidation for accounting and regulatory purposes.
(c)	Any restrictions, or other major impediments, on transfer of funds or regulatory capital within the group.	**Form 10-K:** •Part 1-Capital Requirements (Unaudited) •Part 1-Distributions (Unaudited) •Part 1-Transactions with Affiliates (Unaudited) •Note 24-Regulatory matters (Audited)
Quantitative: (d)	The aggregate amount of surplus capital of insurance subsidiaries included in the regulatory capital of the consolidated group.	**Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Regulatory Capital Ratios
(e)	The aggregate amount by which actual regulatory capital is less than the minimum regulatory capital requirement in all subsidiaries with regulatory capital requirements and the name(s) of the subsidiaries with such deficiencies.	Not applicable. Actual total capital exceeds the minimum total capital requirements.
Capital Structure		
Qualitative: (a)	Summary information on the terms and conditions of the main features of all regulatory capital instruments.	**Form 10-K:** •Part 1-Capital Requirements (Unaudited) •MD&A-Capital (Unaudited) •Note 9-Borrowings (Audited) •Note 10-Shareholders' equity (Audited)
Quantitative: (b)	The amount of CET1 capital, with separate disclosure of: (1) Common stock and related surplus; (2) Retained earnings; (3) Common equity minority interest; (4) Accumulated other comprehensive income (loss); and (5) Regulatory adjustments and deductions made to CET1 capital.	**FR Y-9C (Unaudited):** •Schedule HC-R-Regulatory Capital
(c)	The amount of tier 1 capital, with separate disclosure of: (1) Additional tier 1 capital elements, including additional tier 1 capital instruments and tier 1 minority interest not included in CET1 capital; and (2) Regulatory adjustments and deductions made to tier 1 capital.	**FR Y-9C (Unaudited):** •Schedule HC-R-Regulatory Capital
(d)	The amount of total capital, with separate disclosure of: (1) Tier 2 capital elements, including tier 2 capital instruments and total capital minority interest not included in tier 1 capital; and (2) Regulatory adjustments and deductions made to total capital.	**FR Y-9C (Unaudited):** •Schedule HC-R-Regulatory Capital

Table	Disclosure Requirement	Disclosure Location
Capital Adequacy		
Qualitative: (a)	A summary discussion of the bank holding company's approach to assessing the adequacy of its capital to support current and future activities.	**Form 10-K:** •Part 1-Capital Requirements (Unaudited) •MD&A-Capital (Unaudited) •Note 10-Shareholders' equity (Audited) •Note 24-Regulatory matters (Audited) **Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Internal Capital Adequacy Assessment Process
Quantitative: (b)	RWA for: (1) Exposures to sovereign entities; (2) Exposures to certain supranational entities and MDBs; (3) Exposures to depository institutions, foreign banks, and credit unions; (4) Exposures to PSEs; (5) Corporate exposures; (6) Residential mortgage exposures; (7) Statutory multifamily mortgages and pre-sold construction loans; (8) HVCRE loans; (9) Past due loans; (10) Other assets; (11) Cleared transactions; (12) Default fund contributions; (13) Unsettled transactions; (14) Securitization exposures; and (15) Equity exposures.	**Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Table 2-RWA
(c)	Standardized market RWA as calculated under subpart F of this part.	Not applicable.
(d)	CET1 1, tier 1 and total risk-based capital ratios: (1) For the top consolidated group; and (2) For each depository institution subsidiary.	**Form 10-K:** •Note 24-Regulatory matters (Audited) **Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Table 1-Regulatory Capital Ratios
(e)	Total standardized RWA.	**Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Table 2-RWA
Capital Conservation Buffer		
Quantitative: (a)	At least quarterly, the bank holding company must calculate and publicly disclose the capital conservation buffer as described under §.11.	**FR Y-9C (Unaudited):** •Schedule HC-R-Regulatory Capital
(b)	At least quarterly, the bank holding company must calculate and publicly disclose the eligible retained income of the bank holding company, as described under §.11.	**FR Y-9C (Unaudited):** •Schedule HC-R-Regulatory Capital **Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Regulatory Capital Ratios
(c)	At least quarterly, the bank holding company must calculate and publicly disclose any limitations it has on distributions and discretionary bonus payments resulting from the capital conservation buffer framework described under §.11 including the maximum payout amount for the quarter.	**FR Y-9C (Unaudited):** •Schedule HC-R-Regulatory Capital **Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Regulatory Capital Ratios
General Qualitative Disclosure Requirement		
	For each separate risk area, the bank holding company must describe its risk management objectives and policies, including: strategies and processes; the structure and organization of the relevant risk management function; the scope and nature of risk reporting and/or measurement systems; policies for hedging and/or mitigating risk and strategies and processes for monitoring the continuing effectiveness of hedges/mitigants.	See the references to the qualitative disclosures described below for each respective Pillar 3 disclosure requirement for the location of these disclosures for each risk area. In addition, see the Corporate Governance section of M&T's website at https://ir.mtb.com/. **Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Risk Management Framework and Governance

Table	Disclosure Requirement	Disclosure Location
Credit Risk General Disclosures		
Qualitative: (a)	The general qualitative disclosure requirement with respect to credit risk (excluding counterparty credit risk disclosed) including the: (1) Policy for determining past due or delinquency status; (2) Policy for placing loans on nonaccrual; (3) Policy for returning loans to accrual status; (4) Definition of and policy for identifying impaired loans (for financial accounting purposes); (5) Description of the methodology that the bank holding company uses to estimate its allowance for credit losses, including statistical methods used where applicable; (6) Policy for charging-off uncollectible amounts; and (7) Discussion of the bank holding company's credit risk management policy.	**Form 10-K:** •MD&A-Provision for Credit Losses (Unaudited) •Note 1-Significant accounting policies (Audited) •Note 3-Investment securities (Audited) •Note 4-Loans and leases (Audited) •Note 5-Allowance for credit losses (Audited) •Note 22-Commitments and contingencies (Audited) **Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Credit Risk General Disclosures •Counterparty Credit Risk •Credit Risk Mitigation
Quantitative (b)	Total credit risk exposures and average credit risk exposures, after accounting offsets in accordance with GAAP, without taking into account the effects of credit risk mitigation techniques (for example, collateral and netting not permitted under GAAP), over the period categorized by major types of credit exposure. For example, bank holding companies could use categories similar to that used for financial statement purposes. Such categories might include, for instance: (1) Loans, off-balance sheet commitments, and other non-derivative off-balance sheet exposures; (2) Debt securities; and (3) OTC derivatives.	**Form 10-K:** •MD&A-Table 4 Average Balance Sheets and Taxable-equivalent Rates (Unaudited) •Note 3-Investment securities (Audited) •Note 4-Loans and leases (Audited) •Note 5-Allowance for credit losses (Audited) •Note 19-Derivative financial instruments (Audited) •Note 22-Commitments and contingencies (Audited) **FR Y-9C (Unaudited):** •Schedule HC-B-Securities •Schedule HC-L-Derivatives and Off-Balance-Sheet Items
(c)	Geographic distribution of exposures, categorized in significant areas by major types of credit exposure.	**Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Table 3-Loans and Leases, Net of Unearned Discount •Table 4-State and Municipal Securities Exposure
(d)	Industry or counterparty type distribution of exposures, categorized by major types of credit exposure.	**Form 10-K:** •MD&A-Provision for Credit Losses (Unaudited) **FR Y-9C (Unaudited):** •Schedule HC-B-Securities •Schedule HC-L-Derivatives and Off-Balance-Sheet Items **Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Credit Risk General Disclosures •Counterparty Credit Risk •Credit Risk Mitigation
(e)	By major industry or counterparty type: (1) Amount of impaired loans for which there was a related allowance under GAAP; (2) Amount of impaired loans for which there was no related allowance under GAAP; (3) Amount of loans past due 90 days and on nonaccrual; (4) Amount of loans past due 90 days and still accruing; (5) The balance in the allowance for credit losses at the end of each period, disaggregated on the basis of the bank holding company's impairment method. To disaggregate the information required on the basis of impairment methodology, an entity shall separately disclose the amounts based on the requirements in GAAP; and (6) Charge-offs during the period.	**Form 10-K (Audited):** •Note 4-Loans and leases •Note 5-Allowance for credit losses
(f)	Amount of impaired loans and, if available, the amount of past due loans categorized by significant geographic areas including, if practical, the amounts of allowance related to each geographical area, further categorized as required by GAAP.	**Form 10-K :** •MD&A-Provision for Credit Losses (Unaudited) •Note 5-Allowance for credit losses (Audited) **Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Table 7-Past Due and Nonaccrual Loans by Geography Nonaccrual and past due loans are aggregated by loan type for purposes of determining the allowance for credit losses.
(g)	Reconciliation of changes in the ALLL.	**Form 10-K (Audited):** •Note 5-Allowance for credit losses
(h)	Remaining contractual maturity delineation (for example, one year or less) of the whole portfolio, categorized by credit exposure.	**Form 10-K (Unaudited):** •MD&A-Liquidity Risk •MD&A- Market Risk and Interest Rate Sensitivity **FR Y-9C (Unaudited):** •Schedule HC-B-Securities •Schedule HC-R-Regulatory Capital Part II. Risk-Weighted Assets •Schedule HC-L-Derivatives and Off-Balance-Sheet Items **Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Table 6-Remaining Contractual Maturities by Credit Exposure

Table	Disclosure Requirement	Disclosure Location
General Disclosure for Counterparty Credit Risk-Related Exposures		
Qualitative: (a)	The general qualitative disclosure requirement with respect to OTC derivatives, eligible margin loans, and repo-style transactions, including a discussion of: (1) The methodology used to assign credit limits for counterparty credit exposures; (2) Policies for securing collateral, valuing and managing collateral and establishing credit reserves; (3) The primary types of collateral taken; and (4) The impact of the amount of collateral the bank holding company would have to provide given a deterioration in the bank holding company's own creditworthiness.	**Form 10-K (Audited):** •Note 1-Significant accounting policies •Note 19-Derivative financial instruments •Note 21-Fair value measurements **Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Counterparty Credit Risk •Credit Risk Mitigation
Quantitative (b)	Gross positive fair value of contracts, collateral held (including type, for example, cash, government securities), and net unsecured credit exposure. A bank holding company also must disclose the notional value of credit derivative hedges purchased for counterparty credit risk protection and the distribution of current credit exposure by exposure type.	**Form 10-K (Audited):** •Note 19-Derivative financial instruments **FR Y-9C (Unaudited):** •Schedule HC-L-Derivatives and Off-Balance-Sheet Items **Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Counterparty Credit Risk •Credit Risk Mitigation
(c)	Notional amount of purchased and sold credit derivatives, segregated between use for the bank holding company's own credit portfolio and in its intermediation activities, including the distribution of the credit derivative products used, categorized further by protection bought and sold within each product group.	Not applicable.
Credit Risk Mitigation		
Qualitative: (a)	The general qualitative disclosure requirement with respect to credit risk mitigation including: (1) Policies and processes for collateral, valuation and management; (2) A description of the main types of collateral taken by the bank holding company; (3) The main types of guarantors/credit derivative counterparties and their creditworthiness; and (4) Information about (market or credit) risk concentrations with respect to credit mitigation.	**Form 10-K:** •MD&A-Provision for Credit Losses (Unaudited) •Note 1-Significant accounting policies (Audited) •Note 3-Investment securities (Audited) •Note 4-Loans and leases (Audited) •Note 5-Allowance for credit losses (Audited) •Note 19-Derivative financial instruments (Audited) •Note 21-Fair value measurements (Audited) **Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Credit Risk Mitigation
Quantitative (b)	For each separately disclosed credit risk portfolio, the total exposure that is covered by eligible financial collateral, and after the application of haircuts.	**Form 10-K:** •MD&A-Provision for Credit Losses (Unaudited) •Note 9-Borrowings (Audited) •Note 19-Derivative financial instruments (Audited) **Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Credit Risk Mitigation
(c)	For each separately disclosed portfolio, the total exposure that is covered by guarantees/credit derivatives and the RWA amount associated with that exposure.	**Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Table 5-Guarantees

Table	Disclosure Requirement	Disclosure Location
Securitization		
Qualitative: (a)	The general qualitative disclosure requirement with respect to a securitization (including synthetic securitizations), including a discussion of: (1) The bank holding company's objectives for securitizing assets, including the extent to which these activities transfer credit risk of the underlying exposures away from the bank holding company to other entities and including the type of risks assumed and retained with resecuritization activity; (2) The nature of the risks (e.g. liquidity risk) inherent in the securitized assets; (3) The roles played by the bank holding company in the securitization process and an indication of the extent of the bank holding company's involvement in each of them; (4) The processes in place to monitor changes in the credit and market risk of securitization exposures, including how those processes differ for resecuritization exposures; (5) The bank holding company's policy for mitigating the credit risk retained through securitization and resecuritization exposures; and (6) The risk-based capital approaches that the bank holding company follows for its securitization exposures including the type of securitization exposure to which each approach applies.	**Form 10-K (Audited):** •Note 1-Significant accounting policies •Note 20- Variable interest entities and asset securitizations **Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Securitizations
(b)	A list of: (1) The type of securitization SPEs that the bank holding company, as sponsor, uses to securitize third-party exposures. The bank holding company must indicate whether it has exposure to these SPEs, either on- or off-balance sheet; and (2) Affiliated entities: (i) That the bank holding company manages or advises; and (ii) That invest either in the securitization exposures that the bank holding company has securitized or in securitization SPEs that the bank holding company sponsors.	**Form 10-K (Audited):** •Note 1-Significant accounting policies •Note 20- Variable interest entities and asset securitizations **Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Securitizations
(c)	Summary of the bank holding company's accounting policies for securitization activities, including: (1) Whether the transactions are treated as sales or financings; (2) Recognition of gain-on-sale; (3) Methods and key assumptions applied in valuing retained or purchased interests; (4) Changes in methods and key assumptions from the previous period for valuing retained interests and impact of the changes; (5) Treatment of synthetic securitizations; (6) How exposures intended to be securitized are valued and whether they are recorded under subpart D of this part; and (7) Policies for recognizing liabilities on the balance sheet for arrangements that could require the bank holding company to provide financial support for securitized assets.	**Form 10-K (Audited):** •Note 1-Significant accounting policies •Note 20-Variable interest entities and asset securitizations •Note 21-Fair value measurements **Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Securitizations
(d)	An explanation of significant changes to any of the quantitative information since the last reporting period.	Not applicable.
Quantitative (e)	The total outstanding exposures securitized by the bank holding company in securitizations that meet the operational criteria provided in §.41 (categorized into traditional and synthetic securitizations), by exposure type, for securitizations of third-party exposures for which the bank acts only as sponsor.	**Form 10-K (Audited):** •Note 20- Variable interest entities and asset securitizations **Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Securitizations
(f)	For exposures securitized by the bank holding company in securitizations that meet the operational criteria in §.41 (1) Amount of securitized assets that are impaired/past due categorized by exposure type; and (2) Losses recognized by the bank holding company during the current period categorized by exposure type.	**Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Securitizations
(g)	The total amount of outstanding exposures intended to be securitized categorized by exposure type.	Not applicable.
(h)	Aggregate amount of: (1) On-balance sheet securitization exposures retained or purchased categorized by exposure type; and (2) Off-balance sheet securitization exposures categorized by exposure type.	**Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Table 8-Securitizations

Table	Disclosure Requirement	Disclosure Location
(i)	(1) Aggregate amount of securitization exposures retained or purchased and the associated capital requirements for these exposures, categorized between securitization and resecuritization exposures, further categorized into a meaningful number of risk weight bands and by risk-based capital approach (e.g. SSFA); and (2) Exposures that have been deducted entirely from tier 1 capital, credit enhancing I/Os deducted from total capital (as described in §.42(a)(1), and other exposures deducted from total capital should be disclosed separately by exposure type.	**Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Table 8-Securitizations M&T does not have any securitization exposures that have been deducted from capital.
(j)	Summary of current year's securitization activity, including the amount of exposures securitized (by exposure type), and recognized gain or loss on sale by exposure type.	**Form 10-K (Audited):** •Note 9-Borrowings •Note 20- Variable interest entities and asset securitizations **Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Securitizations
(k)	Aggregate amount of resecuritization exposures retained or purchased categorized according to: (1) Exposures to which credit risk mitigation is applied and those not applied; and (2) Exposures to guarantors categorized according to guarantor creditworthiness categories or guarantor name.	**Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Securitizations
Equities Not Subject to MRR		
Qualitative: (a)	The general qualitative disclosure requirement with respect to equity risk for equities not subject to subpart F of this part, including: (1) Differentiation between holdings on which capital gains are expected and those taken under other objectives including for relationship and strategic reasons; and (2) Discussion of important policies covering the valuation of and accounting for equity holdings not subject to subpart F of this part. This includes the accounting techniques and valuation methodologies used, including key assumptions and practices affecting valuation as well as significant changes in these practices.	**Form 10-K (Audited):** •Note 1-Significant accounting policies •Note 21-Fair value measurements **Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Equities Not Subject to MRR
Quantitative: (b)	Value disclosed on the balance sheet of investments, as well as the fair value of those investments; for securities that are publicly traded, a comparison to publicly-quoted share values where the share price is materially different from fair value.	**Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Equities Not Subject to MRR
(c)	The types and nature of investments, including the amount that is: (1) Publicly traded; and (2) Nonpublicly traded.	**Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Table 9-Equities Not Subject to MRR
(d)	The cumulative realized gains (losses) arising from sales and liquidations in the reporting period.	**Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Equities Not Subject to MRR
(e)	(1) Total unrealized gains (losses). (2) Total latent revaluation gains (losses). (3) Any amounts of the above included in tier 1 or tier 2 capital.	**Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Table 9-Equities Not Subject to MRR
(f)	Capital requirements categorized by appropriate equity groupings, consistent with the bank holding company's methodology, as well as the aggregate amounts and the type of equity investments subject to any supervisory transition regarding regulatory capital requirements.	**Pillar 3 Regulatory Capital Disclosures (Unaudited):** •Table 9-Equities Not Subject to MRR
Interest Rate Risk for Non-trading Activities		
Qualitative: (a)	The general qualitative disclosure requirement, including the nature of interest rate risk for non-trading activities and key assumptions, including assumptions regarding loan prepayments and behavior of non-maturity deposits, and frequency of measurement of interest rate risk for non-trading activities.	**Form 10-K (Unaudited):** •MD&A-Liquidity Risk •MD&A- Market Risk and Interest Rate Sensitivity
Quantitative: (b)	The increase (decline) in earnings or economic value (or relevant measure used by management) for upward and downward rate shocks according to management's method for measuring interest rate risk for non-trading activities, categorized by currency (as appropriate).	**Form 10-K (Unaudited):** •MD&A-Liquidity Risk •MD&A- Market Risk and Interest Rate Sensitivity