



**SunTrust Banks, Inc.**  
**Liquidity Coverage Ratio Disclosure**

For the Quarter Ended

December 31, 2018

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## Company Overview

SunTrust Banks, Inc. (“SunTrust” or the “Company”), headquartered in Atlanta, Georgia, is a leading provider of financial services. SunTrust is driven by our purpose of *Lighting the Way to Financial Well-Being* – helping instill a sense of confidence in the financial circumstances of our clients, communities, teammates, and owners is at the center of everything we do. The Company was incorporated in the State of Georgia in 1984 and through its subsidiaries offers a full line of financial services for consumers, businesses, corporations, institutions, and not-for-profit entities, both through branches and through other national delivery channels. In addition to deposit, credit, mortgage banking, and trust and investment services offered through its principal banking subsidiary, SunTrust Bank (the “Bank”), the Company’s other subsidiaries provide asset and wealth management, securities brokerage, and capital markets services.

The Bank is a member of the Federal Reserve System, and the Company and the Bank are regulated and supervised by the Federal Reserve Board (FRB) and the Georgia Department of Banking and Finance. The Federal Deposit Insurance Corporation (FDIC) also has jurisdiction over certain activities of the Bank as an insured depository institution. The Company’s non-bank subsidiaries are regulated and supervised by various other regulatory bodies, including the Securities and Exchange Commission and the Financial Industry Regulatory Authority. The Company and its subsidiaries record transactions and report results in accordance with U.S. GAAP.

## Liquidity Coverage Ratio Overview

In September 2014, the Federal Reserve Board, Office of the Comptroller of the Currency, and the FDIC approved rulemaking that established a quantitative minimum Liquidity Coverage Ratio (LCR) for large, internationally active banking organizations, and a less stringent LCR (“modified LCR”) for bank holding companies with less than \$250 billion in total assets, such as the Company.

The LCR requires a banking entity to maintain sufficient liquidity to withstand an acute 30-day liquidity stress scenario and is measured as high-quality, liquid assets (HQLA) to total net cash outflows (TNCO). The LCR became effective for the Company on January 1, 2016, and full compliance of 100% was required beginning January 1, 2017. Since implementation, the Company has met compliance with the regulatory standards and, at December 31, 2018, its LCR was above the 100% regulatory requirement.

On December 19, 2016, the FRB published the final rule, Regulation WW, which requires the Company to publicly disclose both quantitative and qualitative information about certain components of its LCR calculation in a standardized tabular format. In order to facilitate an understanding of the Company’s liquidity profile, the disclosure includes factors that meaningfully impact the reported LCR.

On October 31, 2018, the FRB released a draft proposal designed to tailor the application of the enhanced prudential standards. Under the proposal, four categories of standards would be applied to U.S. banking organizations based on size, complexity and other risk-based factors. If the proposal is enacted as is, the Company, on a standalone basis, would be classified as Category IV and would no longer be subject to the mandatory LCR. However, on February 7, 2019, SunTrust and BB&T Corporation announced their intent to merge; if approved, the combined company would likely be classified as a Category III institution and remain subject to the LCR.

## Liquidity Coverage Ratio Results

Period<sup>(1)</sup>: 10/31/2018 to 12/31/2018

In millions of U.S. Dollars

|   | Average Unweighted Amount <sup>(2)</sup> | Average Weighted Amount                        |
|---|--|--|
| <b>High-Quality Liquid Assets</b>   |  |  |
| <b>1 Total eligible high-quality liquid assets (HQLA), of which:</b>  | <b>31,464</b>                            | <b>29,521</b>                                  |
| 2 Eligible level 1 liquid assets  | 18,514                                   | 18,514   |
| 3 Eligible level 2A liquid assets   | 12,949                                   | 11,007   |
| 4 Eligible level 2B liquid assets   | -  | -  |
| <b>Cash Outflow Amounts</b>   |  |  |
| <b>5 Deposit outflow from retail customers and counterparties, of which:</b>  | <b>104,698</b>                           | <b>7,293</b>                                   |
| 6 Stable retail deposit outflow   | 64,011                                   | 1,920  |
| 7 Other retail funding outflow  | 30,998                                   | 3,100  |
| 8 Brokered deposit outflow  | 9,688                                    | 2,273  |
| <b>9 Unsecured wholesale funding outflow, of which:</b>   | <b>53,723</b>                            | <b>18,762</b>                                  |
| 10 Operational deposit outflow  | 26,360                                   | 6,520  |
| 11 Non-operational funding outflow  | 27,113                                   | 11,993   |
| 12 Unsecured debt outflow   | 250                                      | 250  |
| <b>13 Secured wholesale funding and asset exchange outflow</b>  | <b>8,757</b>                             | <b>2,573</b>                                   |
| <b>14 Additional outflow requirements, of which:</b>  | <b>71,864</b>                            | <b>10,085</b>                                  |
| 15 Outflow related to derivative exposures and other collateral requirements  | 717                                      | 717  |
| 16 Outflow related to credit and liquidity facilities including unconsolidated structured transactions and mortgage commitments | 71,147                                   | 9,368  |
| <b>17 Other contractual funding obligation outflow</b>  | <b>276</b>                               | <b>276</b>                                     |
| <b>18 Other contingent funding obligations outflow</b>  | <b>12,121</b>                            | <b>365</b>                                     |
| <b>19 Total Cash Outflow</b>  | <b>251,439</b>                           | <b>39,354</b>                                  |
| <b>Cash Inflow Amounts</b>  |  |  |
| <b>20 Secured lending and asset exchange cash inflow</b>  | <b>1,584</b>                             | <b>162</b>                                     |
| <b>21 Retail cash inflow</b>  | <b>758</b>                               | <b>379</b>                                     |
| <b>22 Unsecured wholesale cash inflow</b>   | <b>356</b>                               | <b>194</b>                                     |
| <b>23 Other cash inflows, of which:</b>   | <b>372</b>                               | <b>372</b>                                     |
| 24 Net derivative cash inflow   | 250                                      | 250  |
| 25 Securities cash inflow   | 121                                      | 121  |
| 26 Broker-dealer segregated account inflow  | -  | -  |
| 27 Other cash inflow  | -  | -  |
| <b>28 Total Cash Inflow</b>   | <b>3,071</b>                             | <b>1,107</b>                                   |
| <b>29 HQLA Amount</b>   |  | <b>Average Amount<sup>(3)</sup><br/>29,521</b> |
| 30 Total Net Cash Outflow Amount Excluding the Maturity Mismatch Add-On   |  | 26,773   |
| 31 Maturity Mismatch Add-On   |  | -  |
| <b>32 Total Net Cash Outflow Amount<sup>(4)</sup></b>   |  | <b>26,773</b>                                  |
| <b>33 Liquidity Coverage Ratio (%)</b>  |  | <b>110%</b>                                    |

<sup>(1)</sup> The values shown reflect the average of the month-end value for each month of the quarter reported.

<sup>(2)</sup> The Average Unweighted Amount represents the balance before regulatory HQLA haircuts and cash outflow and inflow rates are applied.

<sup>(3)</sup> The amounts reported in this column may not equal the calculation of those amounts using component amounts reported in rows 1-28 due to technical factors such as the application of the level 2 liquid asset caps, the total inflow cap, and for depository institution holding companies subject to subpart G, the application of the modification to total net cash outflows.

<sup>(4)</sup> Total Net Cash Flow Amount of 26,773 is calculated as Total Cash Outflow (39,354) minus Total Cash Inflow (1,107) multiplied by 70%. The 70% modifier is applied per subpart G.

## Liquidity Coverage Ratio Components

### Composition of HQLA

High-quality liquid assets, the numerator of the LCR, include excess reserves and unencumbered highly liquid and readily marketable assets issued or guaranteed by an entity whose obligations have a proven record as a reliable source of liquidity, as defined by Regulation WW. These assets can be quickly converted into cash to meet liquidity demands during a stress scenario.

Per the regulation, Level 1 liquid assets are included in the Company's HQLA total without a cap and without haircuts. The Company's Level 2A liquid assets are included with a haircut of 15% applied to the fair value amount, and are limited to 40% of HQLA.

The Company's average month-end weighted HQLA amount, which takes into consideration the above-mentioned haircuts for Level 2 assets, was approximately \$30 billion in the fourth quarter of 2018. Of this amount, 63% consisted of Level 1 liquid assets, which includes excess cash deposited at the Federal Reserve Bank (21%), U.S. Treasury debt (21%), and Level 1 agency mortgage backed securities (58%). The remaining 37% of the Company's HQLA consisted entirely of Level 2A liquid assets, the majority of which were comprised of Level 2A agency mortgage backed securities. The Company did not hold any Level 2B HQLA assets for the fourth quarter of 2018.

### Composition of TNCO

Total net cash outflows, the denominator of the LCR, represent the amount of cash that the Company, per standardized regulatory inflow and outflow rates, expects to flow in and out over a 30-day stress period.

Key contributors to TNCO are non-operational funding, credit and liquidity facilities, and operational deposits. Non-operational funding and operational deposits originate primarily from wholesale deposit clients and consist of funds deposited to meet operating needs and those funds deposited above operating levels. Credit and liquidity facilities represent the undrawn/unfunded portion of lending commitments including lines and letters of credit. The Company's weighted total cash outflow amount was approximately \$39 billion in the fourth quarter of 2018. Of this amount, 30% consisted of non-operational funding outflow, 24% consisted of outflow related to credit and liquidity facilities including unconsolidated structured transactions and mortgage commitments and 17% consisted of operational deposit outflow. The weighted total cash inflow amount was approximately \$1 billion, with the majority comprised of retail cash inflow and net derivative cash inflow.

### Derivatives Exposure and Potential Collateral Calls

As part of its asset-liability management strategy, the Company uses derivative instruments to help manage market risk exposures. The Company's outflow related to derivative exposures and other collateral requirements amounted to 2% of total cash outflows in the fourth quarter of 2018.

Refer to the "Liquidity Risk Management" section of the Company's Form 10-K and Form 10-Q for additional information regarding its liquidity profile.

### Main Drivers of and Changes in LCR

The LCR value as shown on page 2 reflects the average month-end value of HQLA and TNCO amounts

during the quarter. For the quarterly period ending December 31, 2018, the Company's average month-end LCR was 110%.

The Company's LCR is principally driven by the amount and mix of HQLA and TNCO. These components are, in turn, impacted by market volatility, such as an increase or decrease in interest rates which affects the valuation of HQLA, and by changes in balance sheet composition, including large corporate client withdrawals or deposits which can affect cash balances and TNCO.

Changes in the Company's HQLA amounts during the quarter were driven by fluctuations in U.S. interest rates that impacted the fair value of the Company's investment securities portfolio, variations in the securities pledged against the Company's public fund deposits and changes in the Company's average month-end cash on deposit with the Federal Reserve Bank.

Changes in the Company's TNCO amounts during the quarter were driven primarily by unsecured wholesale funding, which constituted 48% of the weighted cash outflow amount. Non-operational deposit funding contributes to the majority of unsecured wholesale funding outflow amount.

## **Liquidity Management**

### **Overview**

The Company's Corporate Treasury function assesses liquidity needs that may occur in both the normal course of business and during times of unusual, adverse events, considering both on and off-balance sheet arrangements and commitments that may impact liquidity in certain business environments.

Corporate Treasury primarily monitors and manages liquidity risk at the Company and Bank levels. For SunTrust, liquidity requirements at the non-bank subsidiaries are relatively immaterial and as such, they ultimately rely upon the Company as a source of liquidity. Corporate Treasury also monitors liquidity developments of, and maintains a regular dialogue with the Company's broker dealer, SunTrust Robinson Humphrey.

### **Concentration of Funding Sources**

The Company's primary source of funds is a large client deposit base which provides relatively stable and low-cost funding. Client deposits are predominantly comprised of consumer and commercial deposits originated primarily from the Bank's retail and wholesale client base.

As part of its funding strategies, the Company also maintains access to diversified sources for both secured and unsecured short-term wholesale funding, including money market instruments such as Fed Funds, Eurodollars, and repurchase agreements. Term funding consists primarily of Federal Home Loan Bank (FHLB) advances and Global Bank Notes. Under its Global Bank Note program, the Bank may issue senior or subordinated debt with various terms.

### **Governance**

The Company maintains a comprehensive liquidity risk governance structure in keeping with regulatory guidance and industry best practices. The Company's Board of Directors, through the Board Risk

Committee (BRC), oversees liquidity risk management and establishes liquidity risk appetite. The BRC reviews and approves risk policies to establish these limits and regularly reviews reports prepared by senior management to monitor compliance with these policies and limits. The Board charges the CEO with determining corporate strategies in accordance with its established risk appetite, and the CEO is a member of the Company's Asset-Liability Committee (ALCO), which is the executive level committee with oversight of liquidity risk management. The ALCO monitors the Company's liquidity and compliance with liquidity risk limits and reviews and approves liquidity management strategies. Market Risk Management (MRM) conducts independent oversight and governance of liquidity risk management activities. Further, the internal audit function conducts an independent assessment of the adequacy of internal controls, including procedural documentation, approval processes, reconciliations, and other mechanisms employed by liquidity risk management and MRM to ensure that liquidity risk is consistent with applicable policies, procedures, laws, and regulations.

### **Stress Testing**

Per regulatory guidance and Regulation YY, the Corporate Treasury function conducts liquidity stress tests that assess liquidity needs that may arise from one or more stress events such as severe economic recessions, short-term financial market disruptions, and credit rating downgrades. In particular, a ratings downgrade could adversely impact the cost and availability of some of the Company's liquid funding sources. Factors that may affect the Company's credit ratings include, but are not limited to, the credit risk profile of its assets, the level and stability of its earnings, the liquidity profile of the Bank and the Company, the economic environment, and the adequacy of the Company's capital base.

### **Risk Mitigation**

The Company mitigates liquidity risk by maintaining diverse borrowing resources to fund projected cash needs and structuring its liabilities to avoid maturity concentrations. The Company also tests liquidity risk that may arise from a range of potential adverse circumstances in its contingency funding scenarios. These stress scenarios inform the amount of contingency liquidity sources the Company maintains as a liquidity buffer to ensure it can meet its obligations in a timely manner even under adverse contingency liquidity events.

Refer to the "Liquidity Risk Management" section of the Company's Form 10-K and Form 10-Q for additional information regarding its liquidity risk management framework.

## Forward-Looking Statements

These disclosures contain forward-looking statements. Statements regarding projected capital levels, liquidity composition, cash outflows and inflows, macroeconomic conditions, the Company's proposed merger with BB&T, and the classification of the combined company after the closing of the merger with respect to the tailoring of the enhanced prudential standards are forward-looking statements. Also any statement that does not describe historical or current facts is a forward-looking statement. These statements often include the words "believes," "expects," "anticipates," "estimates," "intends," "plans," "goals," "targets," "initiatives," "potential" or "potentially," "probably," "projects," "outlook" or similar expressions or future conditional verbs such as "may," "will," "should," "would," and "could." Such statements are based upon the current beliefs and expectations of management and on information currently available to management. Such statements speak as of the date hereof, and the Company does not assume any obligation to update these statements or to update the reasons why actual results could differ from those contained in such statements in light of new information or future events. Forward-looking statements are subject to significant risks and uncertainties. Investors are cautioned against placing undue reliance on such statements. Actual results may differ materially from those set forth in the forward-looking statements. We list some of the factors that could cause actual results to differ materially from those described in the forward-looking statements in Item 1A of Part I of our 10-K and in other periodic reports that we file with the SEC.