

Exhibit A – Principles-Based Bond Definition Implementation Questions and Answers

Appendix A – Summary of Securities for Application under Question 10

Bank Debt/Capital & Hybrid Securities Matrix	Bank Issuers					All Issuers	
	Sr. Unsecured OpCo Debt	Sr. Unsecured HoldCo Debt	Tier 2 Capital (Subordinated Debt)	Additional Tier 1 Capital		Debt Issued for Partial Equity Treatment from NRSROs	Debt Issued for Partial Equity Treatment from NRSROs
				Debt Form	Perpetual Preferred Form		
In scope of "hybrid securities" definition in Q&A?	No	Yes*	Yes*	Yes*	Yes*	Yes	Yes
Issuer Can Cancel Interest (or Dividend) Non-Cumulatively w/out Default**	No	No	No	Yes	Yes	Yes	No
Regulator Can Force Cancellation of Interest (or Dividends) Non-Cumulatively w/out Default	No	No***	No***	Yes	Yes	No	No
Regulator Can Force Write-down or Equity Conversion of Debt	No	Yes	Yes	Yes	Yes	No	No
Proposed Accounting Treatment	SSAP 26 Bond Schedule D, Part 1	SSAP 26 Bond Schedule D, Part 1	SSAP 26 Bond Schedule D, Part 1	SSAP 41 Capital Notes Section of Schedule BA	SSAP 32 Preferred Stock Schedule D, Part 2	SSAP 21 Non-Bond Section of Schedule BA	SSAP 26 Bond Schedule D, Part 1

*Bank regulators require a specific amount of debt that is subject to "bail-in" during a resolution. Additional Tier 1 Capital, Tier 2 Capital and Total Loss Absorbing Capacity (the latter of which includes Sr. Unsecured HoldCo Debt) are all subject to bail-in requirements and count towards various solvency ratio tests.

**Older versions of bank capital exist where the Issuer can defer interest on a cumulative basis without triggering a default. These securities would be treated as SSAP 26 Schedule D, Bonds, as would any security with cumulative interest features.

***Interest amount can be cancelled or reduced following a write-down of debt in resolution scenario only.