RELEASE NOTES

SHARED NATIONAL CREDIT PROGRAM

REPORTING INSTRUCTIONS

June 2023

SNC Business Office
SUMMARY OF UPDATES

6/30/2023

Troubled Debt/ASU 2022-02 designation:

Reporting requirements include a field for credits designated Troubled Debt Restructure or, for reporters that have adopted ASU 2022-02, credits that meet the reporting requirements under ASU 2022-02 (Y/N). All reporters should apply their internal Troubled Debt Restructure/ASU 2022-02 status (Y/N) to all reported credits.

Troubled Debt Restructuring Flag:

Does the reporting entity identify the credit as either Troubled Debt Restructuring or, for reporters that have adopted ASU 2022-02, credits reportable under ASU 2022-02 (Y/N). For additional information, refer to the FR Y-9C glossary entry for “Troubled Debt Restructuring” and/or the FR Y-9C supplemental instructions on “Accounting for Loan Modifications to Borrowers Experiencing Financial Difficulties”.

Leveraged Lending Flag:

Does the reporting entity identify the credit as Leveraged (Y or N). The definition of leveraged lending should agree with the criteria established by the reporting bank, but for SNC reporting, any de-minimis in the leveraged lending definition should be applied relative to global exposure and not an individual bank’s hold amount.

Loan charge-offs between SNC reviews

In the quarter following a mandated charge-off, the Committed Exposure Global and the Utilized Exposure Global should be reported as the full amount prior to the mandated-charge off and with the appropriate split ratings. In the subsequent quarters following a mandated charge-off, the Committed Global Exposure and the Utilized Exposure Global should be reported net of all SNC review mandated charge-offs. Subsequent charge-offs recognized by the reporting bank between SNC reviews should not be netted from the committed or utilized exposures, but subsequent charge-offs recognized by the reporting bank should be reflected in the internal credit risk ratings submitted by the bank.

35. Committed Exposure Global (in whole dollars): The current amount the obligor is legally allowed to borrow according to the credit agreement. This would reflect any reductions in the commitment amount resulting from SNC exam mandated charge-offs.

36. Utilized Exposure Global (in whole dollars): The current amount that has been drawn and not repaid plus the contingent liability created under a sublimit i.e. for letters of credits that have been issued but not drawn. This would also reflect any reductions in the commitment amount resulting from SNC exam mandated charge-offs.
12/31/2022

New Credit Purpose codes:

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>26</td>
<td>Dealer Floorplan</td>
</tr>
<tr>
<td>27</td>
<td>Equipment Leasing</td>
</tr>
<tr>
<td>28</td>
<td>Non-Purpose Loan Collateralized by Securities</td>
</tr>
<tr>
<td>29</td>
<td>Bridge Financing</td>
</tr>
<tr>
<td>30</td>
<td>Capital Call Subscription</td>
</tr>
</tbody>
</table>

9/20/2022

**Lowest Rated Pass (LRP)**
The internal rating bucket(s) one or more notches above the Special Mention equivalent. Consider at least one notch above the Special Mention equivalent for risk rating systems with less than 10 internal Pass buckets. Consider at least two notches above the Special Mention equivalent for risk rating systems with 10 or more internal Pass buckets.

**Basic Reporter vs Expanded Reporter**

The majority of institutions are considered Basic Reporters. All institutions should follow these Basic Reporter instructions unless they have an agreement with their primary federal regulator to provide additional information on credits they not only agent but also participate in. Those particular institutions should follow the Expanded Reporter instructions.

**Cumulative Charge Offs**

The instructions as they read now state the following:

2. **Loan charge-offs between SNC reviews**

The Utilized Exposure Global should be reported net of all SNC review mandated charge-offs. Subsequent charge-offs recognized by the reporting bank between SNC reviews should not be netted from the utilized exposures. Subsequent charge-offs recognized by the reporting bank should be reflected in the internal credit risk ratings submitted by the bank.

**For example:**

Legal commitment and utilized exposure - $1,000,000,000

Previous SNC mandated charge-offs - $200,000,000

Subsequent reporting bank charge-offs (global amount) – 200,000,000
Reportable Utilized Exposure Global $ 800,000,000  
($1 billion minus $200 million mandated charge-offs)

Credit Exposure Internal Risk Rating and Regulatory Credit Risk Rating would be 75% substandard and 25% loss ($600 million and $200 million)

Note that the Cumulative Charge-offs is the share of charge-offs, SNC mandated and non-mandated, recognized by the reporting bank over the life of the credit.

Cumulative Charge-offs assuming a 10% hold by the reporting bank (mandated $200 million charge-off plus the subsequent $200 million charge-off times 10%) - $40,000,000

9/10/2021
New Credit Type:

Value: 21  
Code: RC-RBL  
Name: REVOLVING CREDIT – RESERVE BASED

8/26/2020
Updated contact information

6/16/2020
Added following clarification for the Rated Flag field and the associated Ratings Matrix:

56. Rated Flag: Does the reporting entity rate this credit internally (Y or N). Report Y if the Reporting Institution has either an internal credit rating or internal obligor rating. Report N if the Reporting Institution does not internally rate the credit or the obligor. If the Reporting Institution does not rate the credit or obligor internally but applies a rating from another source, such as a public rating agency or exam results, please report N.
The chart below provides a diagram of the rating options:

<table>
<thead>
<tr>
<th>Credit Exposure Internal Risk Rating</th>
<th>Obligor Internal Risk Rating</th>
<th>Concordance Rating</th>
<th>Rated Flag</th>
</tr>
</thead>
<tbody>
<tr>
<td>Internal Rating Exists</td>
<td>Internal Rating Exists</td>
<td>Use Credit Exposure Internal Risk Rating</td>
<td>Y</td>
</tr>
<tr>
<td>Internal Rating Exists</td>
<td>No Internal Rating Exists</td>
<td>Use Credit Exposure Internal Risk Rating</td>
<td>Y</td>
</tr>
<tr>
<td>No Internal Rating Exists (HFS, TA, SA, NH or NR)</td>
<td>Internal Rating Exists</td>
<td>Use Obligor Internal Risk Rating</td>
<td>Y</td>
</tr>
<tr>
<td>No Internal Rating Exists</td>
<td>No Internal Rating Exists</td>
<td>Input 100 percent Lowest Rated Pass</td>
<td>N</td>
</tr>
</tbody>
</table>

Applied to Basic / Expanded Reporter Instructions

5/19/2020

Added following clarification for the **Obligor Name** field:

14. Name: Full legal name of the obligor. *An exception to this is for mutual fund obligors where the structure permits access to the facility by individual mutual funds under a mutual fund company umbrella. In this case, report the name as a family of funds (for example, ABC Investments Family of Funds).*

* Applied to Basic / Expanded Reporter Instructions