Morgan Stanley

Basel III Pillar 3 Disclosures Report

For the Quarterly Period Ended June 30, 2025

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BASEL III PILLAR 3 DISCLOSURES REPORT

For the quarterly period ended June 30, 2025

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1. Morgan Stanley

Morgan Stanley is a global financial services firm that, through its subsidiaries and affiliates, provides a wide variety of products and services to a large and diversified group of clients and customers, including corporations, governments, institutions, and individuals. Unless the context otherwise requires, the terms "Morgan Stanley" or the "Firm" mean Morgan Stanley (the "Company") together with its consolidated subsidiaries.

Morgan Stanley was originally incorporated under the laws of the State of Delaware in 1981, and its predecessor companies date back to 1924. The Firm is a financial holding company under the Bank Holding Company Act of 1956, as amended (the "BHC Act"), and is subject to the regulation and oversight of the Board of Governors of the Federal Reserve System (the "Federal Reserve").

The Firm conducts its business from its headquarters in and around New York City, its regional offices and branches throughout the United States of America ("U.S."), and its principal offices in London, Tokyo, Hong Kong, and other world financial centers. The basis of consolidation for accounting and regulatory purposes is materially the same. The Federal Reserve establishes capital requirements for the Firm, including well-capitalized standards, and evaluates the Firm's compliance with such capital requirements. The Office of the Comptroller of the Currency (the "OCC") establishes similar capital requirements and standards for the Firm's U.S. bank subsidiaries Morgan Stanley Bank, National Association. ("MSBNA") and Morgan Stanley Private Bank, National Association. ("MSPBNA"), (collectively, "U.S. Bank Subsidiaries").

At June 30, 2025, the Firm's insurance subsidiaries surplus capital included in the total capital of the consolidated group was $50 million. At June 30, 2025, none of the Firm's subsidiaries had capital less than the minimum required capital amount. For descriptions of the Firm's business, see "Business" in Part I, Item 1 of the 2024 Form 10-K.

Economic and Market Conditions

In the second quarter of 2025, the economic environment reflected varied market conditions. Early in the quarter there was economic uncertainty and market volatility driven by global trade concerns that influenced client confidence and investor sentiment. The latter part of the quarter was characterized by a steady rebound in capital markets. Ongoing geopolitical uncertainty, trade policy changes, inflation, as well as the timing and pace of central bank actions have impacted and could continue to impact capital markets and the Firm's businesses. For more information on economic and market conditions, and the potential effects of geopolitical events and acts of war or aggression on the Firm's future results, refer to "Risk Factors" and "Forward-Looking Statements" in the 2024 Form 10-K.

2. Capital Framework

In December 2010, the Basel Committee on Banking Supervision ("Basel Committee") established a new risk-based capital, leverage ratio, and liquidity framework, known as "Basel III." In July 2013, the U.S. banking regulators issued a final rule to implement many aspects of Basel III ("U.S. Basel III"). The Firm, MSBNA, and MSPBNA became subject to U.S. Basel III beginning on January 1, 2014. On February 21, 2014, the Federal Reserve and the OCC approved the Firm, MSBNA, and MSPBNA's respective use of the U.S. Basel III advanced internal ratings-based approach for determining credit risk capital requirements and advanced measurement approaches for determining operational risk capital requirements (the "Advanced Approach") to calculate and publicly disclose their risk-based capital ratios beginning with the second quarter of 2014, subject to the "capital floor" discussed below. As a U.S. Basel III Advanced Approach banking organization, the Firm is required to compute risk-based capital ratios using both (i) standardized approaches for calculating credit risk weighted assets ("RWA") and market risk RWA (the "Standardized Approach"); and (ii) an advanced internal ratings-based approach for calculating credit risk RWA, an advanced measurement approach for calculating operational risk RWA, and an advanced approach for market risk RWA calculated under U.S. Basel III. For a further discussion of the regulatory capital framework applicable to the Firm and other regulatory developments, see "MD&A—Liquidity and Capital Resources —Regulatory Requirements —Regulatory Developments and Other Matters" in the Firm's Quarterly Report on Form 10-Q for the quarter ended June 30, 2025 ("Form 10-Q") and in Part II, Item 7 of the 2024 Form 10-K, respectively.

U.S. Basel III requires banking organizations that calculate risk-based capital ratios using the Advanced Approach, including the Firm, to make qualitative and quantitative disclosures regarding their capital and RWA on a quarterly basis ("Pillar 3 Disclosures"). This report contains the Firm's Pillar 3 Disclosures for its credit, market and operational risks for the quarter ended June 30, 2025, in accordance with the U.S. Basel III, 12 C.F.R. § 217.171 through 217.173 and 217.212.

The Firm's Pillar 3 Disclosures are not required to be, and have not been, audited by the Firm's independent registered public accounting firm. Some measures of exposures contained in this report may not be consistent with accounting principles generally accepted in the U.S. ("U.S. GAAP"), and may not be comparable with measures reported in the Form 10-Q and 2024 Form 10-K.

3. Capital Structure

The Firm has issued a variety of capital instruments to meet its regulatory capital requirements and to maintain a strong capital base. These capital instruments include common stock that qualifies as Common Equity Tier 1 ("CET1") capital, non-cumulative perpetual preferred stock that qualifies as Additional Tier 1 capital, and subordinated debt that qualifies as Tier 2 capital, each under U.S. Basel III. For a discussion of the Firm's capital instruments, see Note 13 (Borrowings and Other Secured Financings) and Note 17 (Total Equity) to the consolidated financial statements in Part II, Item 8 of the 2024 Form 10-K, and Note 12 (Borrowings and Other Secured Financings) and Note 16 (Total Equity) to the consolidated financial statements, as well as "MD&A—Liquidity and Capital Resources—Regulatory Requirements—Regulatory Capital Requirements" in the Form 10-Q.[1]

4. Capital Adequacy

Capital strength is fundamental to the Firm's operation as a credible and viable market participant. To assess the amount of capital necessary to support the Firm's current and prospective risk profile, which ultimately informs the Firm's capital distribution capacity, the Firm determines its overall capital requirement under normal and stressed operating environments, both on a current and forward-looking basis. For a further discussion of the Firm's required capital framework, see "MD&A—Liquidity and Capital Resources—Regulatory Requirements—Attribution of Average Common Equity According to the Required Capital Framework" in the Form 10-Q.

In determining its overall capital requirement, the Firm classifies its exposures as either "banking book" or "trading book." Banking book positions, which may be accounted for at amortized cost, lower of cost or market, fair value or under the equity method, are subject to credit risk capital requirements which are discussed in Section 5 "Credit Risk" and Section 6 "Equities Not Subject to Market Risk Capital Rule" included herein. Trading book positions represent positions that the Firm holds as part of its market-making and underwriting businesses. These positions, which reflect assets or liabilities that are accounted for at fair value, and certain banking book positions which are subject to both credit risk and market risk charges, (collectively, "covered positions") as well as certain non-covered positions included in Value-at-Risk ("VaR"), are subject to market risk capital requirements, which are discussed in Section 9 "Market Risk" included herein. Some trading book positions, such as derivatives, are also subject to counterparty credit risk capital requirements. Credit and market risks related to securitization exposures are discussed in Section 7 "Securitization Exposures" included herein.

1. Regulatory requirements, including capital requirements and certain covenants contained in various agreements governing indebtedness of the Firm may restrict the Firm's ability to access capital from its subsidiaries. For discussions of restrictions and other major impediments to transfer of funds or capital, see "Risk Factors—Liquidity Risk" in Part I, Item 1A, "Quantitative and Qualitative Disclosures about Risk—Country and Other Risks—Liquidity Risk" in Part II, Item 7A, and Note 16 (Regulatory Requirements) to the consolidated financial statements in Part II, Item 8 of the 2024 Form 10-K. For further information on the Firm's capital structure in accordance with U.S. Basel III, see "MD&A—Liquidity and Capital Resources—Regulatory Requirements" in the Form 10-Q.

The following table presents components of the Firm's RWA in accordance with the Advanced Approach:

Risk-weighted assets by U.S. Basel III exposure category

$ in millions		At June 30, 2025[1]
Credit risk RWA:		
Wholesale exposures	$	194,515
Retail exposures:		
Residential mortgage		4,042
Revolving		313
Other retail		5,590
Securitization exposures		19,019
Cleared transactions		5,098
Equity exposures		27,528
Other assets[2]		42,271
Credit valuation adjustment		40,477
Total credit risk RWA[3]	$	338,853
Market risk RWA:		
Regulatory VaR	$	8,801
Regulatory stressed VaR		14,916
Incremental risk charge		3,342
Comprehensive risk measure		623
Specific risk:		
Non-securitizations		19,651
Securitizations		10,953
Total market risk RWA[4]	$	58,286
Total operational risk RWA		105,452
Total RWA	$	502,591

1. For information on the Firm's credit risk RWA, market risk RWA and operational risk RWA rollforward from December 31, 2024 to June 30, 2025, see "MD&A—Liquidity and Capital Resources—Regulatory Requirements—RWA Rollforward" in the Form 10-Q.
2. Amount reflects assets not in a defined category of $40,571 million, non-material portfolios of exposures of $943 million and unsettled transactions of $757 million.
3. In accordance with U.S. Basel III, credit risk RWA, with the exception of Credit Valuation Adjustment ("CVA") and certain products under 12 C.F.R. § 217.124, reflect a 1.06 multiplier.
4. For more information on the Firm's measure for market risk and market risk RWA, see Section 9 "Market Risk" herein.

The following tables present the risk-based capital ratios for the Firm, MSBNA and MSPBNA under both the Advanced and Standardized approaches. For further information, see "MD&A—Liquidity and Capital Resources—Regulatory Requirements—Regulatory Capital Requirements" in the Form 10-Q.

Regulatory Capital

	At June 30, 2025	
$ in millions	**Standardized Approach**	**Advanced Approach**
Morgan Stanley		
CET1 capital	$ 78,690	$ 78,690
Tier 1 capital	$ 88,358	$ 88,358
Total capital	$ 99,653	$ 98,844
Total RWA	$ 523,307	$ 502,591
CET1 capital ratio	15.0%	15.7%
Tier 1 capital ratio	16.9%	17.6%
Total capital ratio	19.0%	19.7%
Adjusted average assets	$ 1,307,049	N/A
Tier 1 leverage ratio	6.8%	N/A
Supplementary leverage exposure	N/A	$ 1,618,497
SLR	N/A	5.5%
Morgan Stanley Bank, N.A.		
CET1 capital ratio	20.5%	23.6%
Tier 1 capital ratio	20.5%	23.6%
Total capital ratio	21.3%	24.1%
Tier 1 leverage ratio	10.4%	N/A
SLR	N/A	7.7%
Morgan Stanley Private Bank, N.A.		
CET1 capital ratio	25.7%	48.3%
Tier 1 capital ratio	25.7%	48.3%
Total capital ratio	26.4%	48.8%
Tier 1 leverage ratio	7.5%	N/A
SLR	N/A	7.3%

Risk Management Objectives, Structure and Policies

For a discussion of the Firm's risk management objectives, structure and policies, including its risk management strategies and processes, the structure and organization of its risk management function, the scope and nature of its risk reporting and measurement systems, and its policies for hedging and mitigating risk and strategies and processes for monitoring the continuing effectiveness of hedges and mitigants, see "Quantitative and Qualitative Disclosures about Risk—Risk Management" in the Form 10-Q.

Capital Conservation Buffer, Countercyclical Capital Buffer and Global Systemically Important Bank Surcharge and Stress Capital Buffer

As of June 30, 2025, under the U.S. Basel III Advanced Approach, the Firm, MSBNA, and MSPBNA continue to be subject to the capital conservation buffer and the countercyclical capital buffer ("CCyB"). In addition, the Firm is also subject to the global systemically important bank ("G-SIB") surcharge. Collectively, these buffers apply above the respective minimum risk-based capital ratio requirements. As of June 30, 2025, the aggregate of the minimum buffers required to be maintained under the Advanced Approach is 5.5%, representing the sum of 2.5% CET1 capital conservation buffer, up to a 2.5% CET1 CCyB (currently set by Federal Reserve at zero), and a CET1 G-SIB capital surcharge (currently at 3%).

Under the U.S. Basel III Standardized Approach, the Firm is subject to the Stress Capital Buffer ("SCB"), as well as the CET1 G-SIB capital surcharge and any applicable CET1 CCyB. The SCB is the greater of (i) the maximum decline in the Firm's CET1 capital ratio under the severely adverse scenario over the supervisory stress test measurement period plus the sum of the four quarters of planned common stock dividends divided by the projected RWAs from the quarter in which the Firm's projected CET1 capital ratio reaches its minimum in the supervisory stress test and (ii) 2.5%.

The aggregate of the minimum buffers applicable to the Standardized Approach is 9.0%, representing the sum of SCB (currently at 6.0%), up to a 2.5% CET1 CCyB (currently set by the Federal Reserve at zero), and a CET1 G-SIB capital surcharge (currently at 3%). For the 2025 capital planning and stress test cycle, the Firm submitted its capital plan and company-run stress test results to the Federal Reserve on April 7, 2025. On June 27, 2025, the Federal Reserve published summary results of its supervisory stress tests of each large BHC, in which the post stress CET1 decline in the severely adverse scenario decreased 90 basis points from the prior year annual supervisory stress test, from 4.6% to 3.7%. Following the publication of the supervisory stress test results, the Firm announced that it expects, under current regulatory standards, to be subject to an SCB of 5.1% from October 1, 2025 through September 30, 2026. In addition to the projected decline in the Firm's CET1 ratio in the severely adverse scenario, the Firm's expected SCB incorporates the dividend add-on component. Together with other features of the regulatory capital framework, this expected SCB would result in an aggregate Standardized Approach CET1 ratio of 12.6%. Generally, the Firm's SCB is determined annually based on the results of the supervisory stress test. For additional information, see "MD&A—Liquidity and Capital Resources—Regulatory Requirements—Capital Plans, Stress Tests and the Stress Capital Buffer" in the 2024 Form 10-K.

A firm's SCB is subject to revision each year, with effect from October 1, to reflect the results of the Federal Reserve's annual supervisory stress test and revisions to a firm's four quarters of planned common stock dividends. The Federal Reserve has discretion to recalculate a firm's SCB outside of the October 1 annual cycle in certain circumstances.

The SCB does not change the regulatory capital requirements under the Advanced Approach, the Tier 1 leverage ratio, or the SLR. Failure to meet applicable Advanced Approach, Standardized Approach, or leverage capital requirements, inclusive of capital buffers would result in restrictions on the Firm's ability to make capital distributions, including the payment of dividends and the repurchase of stock, and to pay discretionary bonuses to executive officers.

At June 30, 2025, the Firm's CET1 capital available to meet the minimum buffer requirement is 11.2% under the Advanced Approach and 10.5% under the Standardized Approach. On this basis, the Firm is not subject to payout ratio limitations on its eligible retained income of $4,679 million, which is defined as the greater of (i) its net income for the four preceding quarters, net of any distributions and associated tax effects not already reflected in net income, and (ii) the average of its net income over the preceding four quarters.

For further information on the minimum risk-based capital ratios, see "MD&A—Liquidity and Capital Resources—Regulatory Requirements—Regulatory Capital Requirements" in Part II, Item 7 of the 2024 Form 10-K.

Total Loss-Absorbing Capacity

The Federal Reserve has established external total loss-absorbing capacity ("TLAC"), eligible long-term debt ("LTD") and clean holding company requirements for top-tier BHCs of U.S. G-SIBs ("covered BHCs"), including the Parent Company. These requirements include various restrictions, such as requiring eligible LTD to be issued by the covered BHC and be unsecured, have a maturity of one year or more from the date of issuance and not contain certain embedded features, such as a principal or redemption amount subject to reduction based on the performance of an asset, entity or index, or a similar feature.

For a further discussion of TLAC requirements and on the Firm's TLAC ratios, see "MD&A—Liquidity and Capital Resources—Total Loss-Absorbing Capacity, Long-Term Debt and Clean Holding Company Requirements" in the Form 10-Q and 2024 Form 10-K.

5. Credit Risk

5.1. Credit Risk: General Disclosures

Credit risk refers to the risk of loss arising when a borrower, counterparty, or issuer does not meet its financial obligations to the Firm. The Firm primarily incurs credit risk exposure to institutions and individuals through its Institutional Securities and Wealth Management business segments. In order to help protect the Firm from losses, the Credit Risk Management Department establishes Firm-wide practices to evaluate, monitor, and control credit risk exposure at the transaction, obligor, and portfolio levels. The Credit Risk Management Department generally approves extensions of credit, evaluates the creditworthiness of the Firm's counterparties and borrowers on a regular basis, and helps ensure that credit exposure is actively monitored and managed. For a further discussion of the Firm's credit risk and credit risk management framework, see "Quantitative and Qualitative Disclosures about Risk—Risk Management—Credit Risk" and "Quantitative and Qualitative Disclosures about Risk—Risk Management— Country Risk" in Part II, Item 7A of the 2024 Form 10-K. For a discussion of the Firm's risk governance structure, see "Quantitative and Qualitative Disclosures about Risk—Risk Management—Overview—Risk Governance Structure" in Part II, Item 7A of the 2024 Form 10-K.

The following tables present certain of the Firm's on- and off-balance sheet positions for which the Firm is subject to credit risk exposure. These amounts do not include the effects of certain credit risk mitigation techniques (*e.g.*, collateral and netting not permitted under U.S. GAAP), equity investments that also would be subject to credit risk capital calculations, and amounts related to items that are deducted from regulatory capital.

The following tables are presented on a U.S. GAAP basis and reflect amounts by product type, region (based on the legal domicile of the counterparty), remaining contractual maturity and counterparty or industry type.

Credit Risk Exposures by Product Type and Geographic Region

	At June 30, 2025					
$ in millions	Americas	Europe, Middle East and Africa	Asia	Netting	Total	Quarterly Average[1]
Product Type						
Cash[2]	$ 61,677	$ 29,244	$ 18,209	$ —	**$ 109,130**	$ 102,578
Derivative and other contracts[3]	193,037	135,799	30,149	(318,180)	**40,805**	40,171
Investment securities	163,573	—	—	—	**163,573**	162,164
Securities financing transactions[3, 4]	499,384	122,213	59,444	(434,327)	**246,714**	265,506
Loans[5]	293,405	27,784	8,125	—	**329,314**	318,935
Other[6]	35,249	17,450	8,944	—	**61,643**	63,524
Total on-balance sheet	**$ 1,246,325**	**$ 332,490**	**$ 124,871**	**$ (752,507)**	**$ 951,179**	**$ 952,878**
Commitments[7]	$ 261,354	$ 129,428	$ 20,325	$ —	**$ 411,107**	$ 407,075
Guarantees[8]	10,622	302	4	—	**10,928**	10,386
Total off-balance sheet	**$ 271,976**	**$ 129,730**	**$ 20,329**	**$ —**	**$ 422,035**	**$ 417,461**

Remaining Contractual Maturity Breakdown by Product Type

	At June 30, 2025				
	Years to Maturity				
$ in millions	Less than 1	1-5	Over 5	Netting	Total
Product Type					
Cash[2]	$ 109,130	$ —	$ —	$ —	**$ 109,130**
Derivative and other contracts[3]	153,025	89,596	116,364	(318,180)	**40,805**
Investment securities	31,148	60,215	72,210	—	**163,573**
Securities financing transactions[3, 4]	680,110	931	—	(434,327)	**246,714**
Loans[5]	174,985	71,972	82,357	—	**329,314**
Other[6]	33,953	8,150	19,540	—	**61,643**
Total on-balance sheet	**$ 1,182,351**	**$ 230,864**	**$ 290,471**	**$ (752,507)**	**$ 951,179**
Commitments[7]	$ 259,756	$ 137,998	$ 13,353	$ —	**$ 411,107**
Guarantees[8]	6,152	2,217	2,559	—	**10,928**
Total off-balance sheet	**$ 265,908**	**$ 140,215**	**$ 15,912**	**$ —**	**$ 422,035**

Distribution of Exposures by Product Type and Counterparty or Industry Type

	At June 30, 2025					
	Wholesale[9]					
$ in millions	Bank[10]	Sovereign	Corporate and Other[11]	Retail	Netting	Total
Product Type						
Cash[2]	$ 24,161	$ 58,527	$ 26,442	$ —	$ —	**$ 109,130**
Derivative and other contracts[3]	64,320	8,813	285,852	—	(318,180)	**40,805**
Investment securities	—	160,569	3,004	—	—	**163,573**
Securities financing transactions[3, 4]	38,886	31,566	610,589	—	(434,327)	**246,714**
Loans[5]	30	22	159,636	169,626	—	**329,314**
Other[6]	1,129	1,648	58,866	—	—	**61,643**
Total on-balance sheet	**$ 128,526**	**$ 261,145**	**$ 1,144,389**	**$ 169,626**	**$ (752,507)**	**$ 951,179**
Commitments[7]	$ 84,945	$ 1,473	$ 312,676	$ 12,013	$ —	**$ 411,107**
Guarantees[8]	—	—	10,928	—	—	**10,928**
Total off-balance sheet	**$ 84,945**	**$ 1,473**	**$ 323,604**	**$ 12,013**	**$ —**	**$ 422,035**

1. Average balances are determined using daily balances where available. In the absence of daily balances, monthly balances are utilized. If neither daily nor monthly balances are available, quarter-end balances are applied.
2. Amounts consist of cash and cash equivalents.
3. For further discussions of master netting agreements and collateral agreements, see Note 6 (Derivative Instruments and Hedging Activities) and Note 8 (Collateralized Transactions) to the consolidated financial statements in Part II of the 2024 Form 10-K.
4. Amounts reflect Securities purchased under agreements to resell and Securities borrowed.
5. Amounts reflect loans held for investment, loans held for sale, and banking book loans at fair value, as well as margin lending and employee loans.
6. Amounts primarily reflect Customer and other receivables, premises, equipment and software costs and banking book U.S. government and agency securities at fair value.
7. Amounts reflect outstanding letters of credit and other financial guarantees issued by third-party banks to certain of the Firm's counterparties, lending commitments, forwards starting securities purchased under agreement to resell and securities borrowed, and central counterparty commitments. For a further discussion of the Firm's commitments, see Note 14 (Commitments, Guarantees and Contingencies) to the consolidated financial statements in Part II, Item 8 of the 2024 Form 10-K.
8. Amounts reflect standby letters of credit and other financial guarantees issued by the Firm to certain counterparties, liquidity facilities and client clearing guarantees. For a further discussion of the Firm's guarantees, see Note 14 (Commitments, Guarantees and Contingencies) to the consolidated financial statements in Part II, Item 8 of the 2024 Form 10-K.
9. Amounts also include securitization exposures.
10. Bank counterparties primarily include banks and depository institutions.
11. Corporate and Other counterparties include exchanges and clearing houses.

5.2. Credit Risk: General Disclosure for Allowance for Credit Losses and Past Due Loans

The Firm provides loans and lending commitments predominantly within its Institutional Securities and Wealth Management business segments. The Firm accounts for loan and lending commitments using the following categories: held for investment, held for sale, and fair value. The allowance for credit losses ("ACL") represents an estimate of current expected credit losses ("CECL") over the entire life of the loans and lending commitments held for investment. For a discussion of the Firm's ACL calculated under the CECL methodology, see Note 2 (Significant Accounting Policies) to the consolidated financial statements in Part II, Item 8 of the 2024 Form 10-K.

For the Firm's loan disclosures (including current and comparable prior period loan information by product type), such as ACL, reconciliation of changes in ACL, credit quality indicators, past due and nonaccrual, see Note 2 (Significant Accounting Policies) to the consolidated financial statements in Part II, Item 8 of the 2024 Form 10-K and Note 9 (Loans, Lending Commitments and Related Allowance for Credit Losses) to the consolidated financial statements in the Form 10-Q.

For a discussion of the Firm's determination of placing loans on nonaccrual status, returning of loans to accrual status, methodology for estimating ACL and, charge-offs of uncollectible amounts, see Note 2 (Significant Accounting Policies) to the consolidated financial statements in Part II, Item 8 of the 2024 Form 10-K.

Actual losses on loans held for investment are recorded as net charge-offs. For net charge-offs/recoveries recorded on loans held for investment for the six months ended June 30, 2025, see Note 9 (Loans, Lending Commitments and Related Allowance for Credit Losses) to the consolidated financial statements in the Form 10-Q.

For a discussion on the factors impacting the loss experience in the preceding period and comparison of the estimates to actual outcomes over the longer term, see Note 2 (Significant Accounting policies) and Note 9 (Loans, Lending Commitments and Related Allowances for Credit Losses) to the consolidated financial statements in Part II, Item 8 of the 2024 Form 10-K.

5.3. Portfolios Subject to Internal Ratings-Based Risk-Based Capital Formulas

The Firm utilizes its internal ratings system in the calculation of RWA for the purpose of determining U.S. Basel III regulatory capital requirements for wholesale and retail exposures, as well as other internal risk management processes such as determining credit limits.

Internal Ratings System Design

As a core part of its responsibility for the independent management of credit risk, the Credit Risk Management Department maintains a control framework to evaluate the risk of obligors and the structure of credit facilities (for loans, derivatives, securities financing transactions, etc.), both at inception and periodically thereafter. For both wholesale and retail exposures, the Firm has internal ratings methodologies that assign a Probability of Default ("PD") or a rating mapped to PD as well as a Loss Given Default ("LGD"). These risk parameters, along with Exposure at Default ("EAD"), are used to compute credit risk RWA under the Advanced Approach. Internal credit ratings serve as the Credit Risk Management Department's assessment of credit risk, and the basis for a comprehensive credit limits framework used to control credit risk. The Firm uses quantitative models and judgment to estimate the various risk parameters related to each obligor and/or credit facility. Internal ratings procedures, methodologies, and models are all independently and formally governed, and models and methodologies are reviewed by a separate model risk management oversight function.

The Credit Risk Management Department employs a PD scale that reflects the long-run "through the cycle" average one-year default probability of counterparties in every rating category. The LGD is an estimate of the expected economic loss incurred by the Firm during an economic downturn in the event of default by an obligor within a one-year horizon, or an estimate of the long-run default-weighted average economic loss incurred by the Firm in the event of default by an obligor within a one-year horizon, whichever is greater, expressed as a percentage of EAD. The estimation of LGD considers all the costs of workout and collections net of recoveries (adjusted for time value of money). EAD is the estimated amount due at the time of default, expected during economic downturn conditions, if the default occurs within a one-year horizon. EAD for certain products may be reduced by certain credit risk mitigants. Contingent liabilities, such as undrawn commitments and standby letters of credit, are considered in determining EAD.

Internal Ratings System Process

The performance of the overall internal ratings system is monitored on a quarterly basis. This involves a review of key performance measures that include rating overrides, the accuracy ratio and a comparison of internal ratings versus applicable agency ratings. The review results and conclusions are reported to corresponding credit risk governance committees. The overall effectiveness of the internal ratings system is assessed annually and the evaluation results go through a rigorous challenge process by various governance committees before they are presented to the Firm's Board of Directors.

Wholesale Exposures

Wholesale exposures refer to credit exposures that are evaluated and rated on an individual basis. Wholesale exposures may be to companies, sovereigns, individuals, trusts, funds, or Special Purpose Entities/Special Purpose Vehicles that may arise from a variety of business activities, including, but not limited to, entering into swap or other derivative contracts under which counterparties have obligations to make payments to the Firm; extending credit to clients through various lending commitments; providing short-term or long-term funding that is secured by physical or financial collateral whose value may at times be insufficient to fully cover the loan repayment amount; and posting margin and/or collateral and/or deposits to clearing houses, clearing agencies, exchanges, banks, securities companies and other financial counterparties.

The Credit Risk Management Department rates wholesale counterparties based on an analysis of the obligor and industry- or sector-specific qualitative and quantitative factors. The ratings process typically includes an analysis of the obligor's financial statements; evaluation of its market position, strategy, management and legal and environmental issues; and consideration of industry dynamics affecting its performance. The Credit Risk Management Department also considers securities prices and other financial markets to assess financial flexibility of the obligor. The Credit Risk Management Department collects relevant information to rate an obligor. If the available information for an obligor is limited, a conservative rating is assigned to reflect uncertainty arising from the limited information.

Retail Exposures

Retail exposures generally include exposures to individuals and exposures to small businesses that are managed as part of a pool of exposures with similar risk characteristics, and not on an individual exposure basis. The Firm incurs retail exposure credit risk within its Wealth Management residential mortgage business by making single-family residential mortgage loans in the form of conforming, nonconforming, or home equity lines of credit ("HELOC"). In addition, the Firm grants loans to certain Wealth Management employees primarily in conjunction with a program to recruit such employees. The primary source of the Firm's retail exposure is concentrated in two of three U.S. Basel III retail exposure categories: Residential Mortgages and Other Retail Exposures. The third U.S. Basel III retail category, Qualifying Revolving Exposures, is not currently relevant to the Firm as it has no assets related to this category.

Retail exposures consist of many small loans, thereby making it generally inefficient to assign ratings to each individual loan. Individual loans, therefore, are segmented and aggregated into pools. The Credit Risk Management Department develops the methodology to assign PD, LGD, and EAD estimates to these pools of exposures with similar risk characteristics, using factors such as the Fair Isaac Corporation ("FICO") scores of the borrowers.

Internal Ratings System Exposures

The following table provides a summary of the distribution of Internal Ratings-Based Advanced Approach risk parameters that the Firm uses to calculate credit risk RWA for wholesale and retail exposures. The table also provides average risk-weighted values across obligor types and rating grades.

		At June 30, 2025					
$ in millions	**PD Band (%)**	**Average PD (%)[1]**	**Average LGD %[1, 2]**	**Undrawn Commitment**	**EAD[2]**	**Average Counterparty EAD[3]**	**Average risk weight (%)**
Subcategory							
Wholesale							
Exposures	0.00 ≤ PD < 0.35	0.06%	43.35%	$ 112,235	$ 449,695	$ 27,757	20.99%
	0.35 ≤ PD < 1.35	0.76%	43.27%	20,734	51,351	239	84.90%
	1.35 ≤ PD < 10.00	4.67%	42.77%	20,998	30,455	132	150.57%
	10.00 ≤ PD < 100.00	28.11%	39.84%	1,361	3,643	83	233.15%
	100 (Default)	100.00%	N/A	141	2,473	83	106.00%
Sub-total				$ 155,469	$ 537,617	$ 28,294	
Residential							
Mortgages	0.00 ≤ PD < 0.15	0.12%	15.81%	$ —	$ 71,690	$ 2	4.58%
	0.15 ≤ PD < 0.35	0.34%	81.63%	266	415	2	51.24%
	0.35 ≤ PD < 1.35	0.42%	24.68%	125	683	1	19.92%
	1.35 ≤ PD < 10.00	5.48%	34.14%	2	364	2	113.22%
	10.00 ≤ PD < 100.00	38.12%	32.56%	4	102	1	171.40%
	100 (Default)	100.00%	N/A	—	128	2	106.00%
Sub-total				$ 397	$ 73,382	$ 10	
Other Retail							
Exposures	0.00 ≤ PD < 1.50	0.47%	21.28%	$ —	$ 389	$ 21	25.85%
	1.50 ≤ PD < 3.00	2.01%	75.60%	—	88	24	156.65%
	3.00 ≤ PD < 5.00	4.71%	52.00%	—	43	43	176.29%
	5.00 ≤ PD < 8.00	6.21%	53.87%	—	4,484	2	86.38%
	8.00 ≤ PD < 100.00	8.24%	100.00%	—	542	243	225.88%
	100 (Default)	100.00%	N/A	—	167	2	106.00%
Sub-total				$ —	$ 5,713	$ 335	
Total				**$ 155,866**	**$ 616,712**	**$ 28,639**	

N/A—Not Applicable

1. Amounts reflect the effect of eligible guarantees and eligible credit derivatives.
2. Under U.S. Basel III, credit risk mitigation in the form of collateral may be applied by either reducing EAD or adjusting the LGD, and the approach must be applied consistently by product type.
3. Amounts represent the weighted average EAD per counterparty within the respective PD band, weighted by its pro rata EAD contribution.

5.4. General Disclosure for Wholesale Counterparty Credit Risk of Derivative Contracts, Repo-Style Transactions, and Eligible Margin Loans

Counterparty Credit Risk Overview

Counterparty credit exposure arises from the risk that parties are unable to meet their payment obligations under derivative contracts, repo-style transactions, and eligible margin loans. Derivative contracts, repo-style transactions and eligible margin loans have a risk of increased potential future counterparty exposure from changes in movements in market prices and other risk factors. Potential future exposure is mitigated using netting and collateral agreements. For the Advanced Approach, the Firm uses the internal models methodology ("IMM") to compute an exposure that includes the mitigating effects of netting and collateral in valuing over-the-counter ("OTC") and exchange-traded derivative contracts and repo-style transactions. For securities financing transactions, the Firm uses either IMM or the collateral haircut approach ("CHA") as prescribed in the U.S. Basel III rules. The use of netting, collateral, IMM and CHA is discussed further below, in addition to other counterparty credit risk management practices.

Derivative Contracts

The Firm actively manages its credit exposure through the application of collateral arrangements and readily available market instruments such as credit derivatives. The use of collateral in managing derivative risk is standard in the market place, and is governed by appropriate documentation such as the Credit Support Annex to the International Swaps and Derivatives Association, Inc. ("ISDA") documentation. In line with these standards, the Firm generally accepts only cash, government bonds, corporate debt, and main index equities as collateral. The Firm has policies and procedures for reviewing the legal enforceability of credit support documents in accordance with applicable rules.

Repo-Style Transactions

Repo-style transactions include securities sold under agreements to repurchase ("repurchase agreements"), securities purchased under agreements to resell ("reverse repurchase agreements"), securities borrowed transactions and securities loaned transactions. The Firm enters into repo-style transactions to, among other things, acquire securities to cover short positions and settle other securities obligations, to accommodate customers' needs and to finance the Firm's inventory positions. The Firm manages credit exposure arising from such transactions by, in appropriate circumstances, entering into master netting agreements and collateral agreements with counterparties that provide the Firm, in the event of a counterparty default (such as bankruptcy or a counterparty's failure to pay or perform), with the right to net a counterparty's rights and obligations under such agreement, and liquidate and set off collateral held by the Firm against the net amount owed by the counterparty. Under these agreements and transactions, the Firm either receives or provides collateral, including U.S. government and agency securities, other sovereign government obligations, corporate and other debt, and corporate equities.

Eligible Margin Loans

The Firm also engages in customer margin lending and securities-based lending to its Institutional Securities and Wealth Management clients that allow clients to borrow against the value of qualifying securities. This lending activity is included within Trading Assets, Loans or Customer and other receivables in the consolidated balance sheets. The Firm monitors required margin levels and established credit terms daily and, pursuant to such guidelines, requires customers to deposit additional collateral or reduce positions, when necessary.

Netting

The Firm recognizes netting in its estimation of EAD where it has a master netting agreement in place and other relevant requirements are met. The ISDA Master Agreement is an industry-standard master netting agreement that is typically used to document derivative transactions. The Firm generally uses the ISDA Master Agreement and similar master netting agreements to document derivative and repo-style transactions. For a discussion of the Firm's master netting agreements, see Note 6 (Derivative Instruments and Hedging Activities) and Note 8 (Collateralized Transactions) to the consolidated financial statements in the Form 10-Q.

Collateral

The Firm may require collateral depending on the credit profile of the Firm's counterparties. There is an established infrastructure to manage, maintain, and value collateral on a daily basis. Collateral held is managed in accordance with the Firm's guidelines and the relevant underlying agreements.

For a discussion of the Firm's use of collateral as a credit risk mitigant, including with respect to derivatives, repo-style transactions and eligible margin loans, see Note 6 (Derivative Instruments and Hedging Activities) and Note 8 (Collateralized Transactions) to the consolidated financial statements in the Form 10-Q. For further information on the Firm's valuation approaches, including those for collateral, see Note 2 (Significant Accounting Policies) and Note 4 (Fair Values) to the consolidated financial statements in Part II, Item 8 of the 2024 Form 10-K.

General Disclosure for Counterparty Credit Risk

The following table presents the exposures for derivative and other contracts and securities financing transactions, consisting of repo-style transactions and eligible margin loans, presented on a U.S. GAAP basis.

$ in millions	At June 30, 2025
Derivative and Other Contracts:	
Gross positive fair value	$ 358,985
Counterparty netting benefit	(274,832)
Net current credit exposure	$ 84,153
Securities collateral	(15,258)
Cash collateral	(43,348)
Net exposure (after netting and collateral)	**$ 25,547**
Securities Financing Transactions:	
Repo-Style Transactions:	
Gross notional exposure	$ 681,041
Net exposure (after netting and collateral)	4,766
Eligible Margin Loans:	
Gross notional exposure[1]	$ 134,972

1. At June 30, 2025, the fair value of the collateral held exceeded the carrying value of margin loans.

The following table is presented on a U.S. GAAP basis and reflects the notional amount of outstanding credit derivatives at June 30, 2025, used to hedge the Firm's own portfolio and those undertaken in connection with client intermediation activities.

	At June 30, 2025			
	Hedge Portfolio		Intermediation Activities	
$ in millions	Purchased	Sold	Purchased	Sold
Credit derivative type				
Credit default swaps	$ 38,140	$ 11,811	$ 255,894	$ 257,318
Total return swaps	766	883	23,868	13,366
Credit options	—	—	167,821	159,753
Total	**$ 38,906**	**$ 12,694**	**$ 447,583**	**$ 430,437**

For a further discussion of the Firm's credit derivatives, see "Quantitative and Qualitative Disclosures about Risk—Credit Risk—Derivatives" and Note 6 (Derivative Instruments and Hedging Activities) to the consolidated financial statements in the Form 10-Q.

Internal Models Methodology

The Firm has been approved by its primary regulators to use IMM to estimate counterparty exposure for regulatory capital purposes. Under IMM approach, the Firm uses simulation models to estimate the distribution of counterparty exposures at specified future time horizons. The simulation models project potential values of various risk factors that affect the Firm's counterparty portfolio (*e.g.*, interest rates, equity prices, commodity prices, and credit spreads) under a large number of simulation paths, and then determine possible changes in counterparty exposure for each path by re-pricing transactions with that counterparty under the projected risk factor values. A counterparty's expected positive exposure profile is determined from the resulting modeled exposure distribution to estimate EAD in calculating credit risk RWA for regulatory capital ratio purposes. For a small population of exposures not modeled under this simulation method, the Firm calculates EAD for regulatory capital purposes using a generally more conservative but less risk-sensitive method. The internal models incorporate the effects of legally enforceable netting and collateral agreements in estimating counterparty exposure.

Collateral Haircut Approach Methodology

For certain eligible margin loans, EAD is adjusted to reflect the risk mitigating effect of financial collateral in line with the CHA as prescribed in the U.S. Basel III rules. Other counterparty credit risk management practices are discussed further below.

The table below presents the Advanced Approach EAD and RWA by methodology used for the Firm's determination of regulatory capital for derivatives and other contracts and securities financing transactions, excluding default fund contributions.

	At June 30, 2025					
	Internal Models Methodology		Collateral Haircut Approach Methodology		Total	
$ in millions	EAD	RWA	EAD	RWA	EAD	RWA
Derivative and other contracts[1]	$ 124,304	$ 56,066	$ —	$ —	**$ 124,304**	**$ 56,066**
Repo-style transactions[1] and eligible margin loans	49,420	11,456	3,296	4,290	**52,716**	**15,746**
Total	**$ 173,724**	**$ 67,522**	**$ 3,296**	**$ 4,290**	**$ 177,020**	**$ 71,812**

1. Amount includes client exposures related to cleared activity.

Other Counterparty Credit Risk Management Practices

Credit Valuation Adjustment

CVA refers to the fair value adjustment to reflect counterparty credit risk in the valuation of OTC derivative contracts. U.S. Basel III requires the Firm to calculate RWA for CVA.

The Firm establishes a CVA for OTC derivative transactions based on expected credit losses given the probability and severity of a counterparty default. The adjustment is determined by evaluating the credit exposure to the counterparty and by taking into account the market value of a counterparty's credit risk as implied by credit spreads, and the effect of allowances for any credit risk mitigants such as legally enforceable netting and collateral agreements.

CVA is recognized in profit and loss on a daily basis and effectively represents an adjustment to reflect the credit component of the fair value of the derivatives receivable. Given that the previously recognized CVA reduces the potential loss faced in the event of a counterparty default, exposure metrics are reduced for CVA.

Credit Limits Framework

The Firm employs an internal comprehensive and global Credit Limits Framework as one of the primary tools used to manage credit risk levels across the Firm. The Credit Limits Framework includes single-name limits and portfolio concentration limits by country, industry, and product type. The limits within the Credit Limits Framework are calibrated to the Firm's risk tolerance and reflect factors that include the Firm's capital levels and the risk attributes of the exposures managed by the limits. Credit exposure from internal models, including stress models, is actively monitored against credit limits, and excesses are identified and escalated in accordance with established governance standards. In addition, credit limits are evaluated and reaffirmed annually or more frequently as necessary.

Additional Collateral Requirements Due to Credit Rating Downgrade

For a discussion of the additional collateral or termination payments that may be called in the event of a future credit rating downgrade of the Firm, see "MD&A—Liquidity and Capital Resources—Balance Sheet—Credit Ratings" in the Form 10-Q.

Wrong-Way Risk

The Firm incorporates the effect of specific wrong-way risk in its calculation of the counterparty exposure. Specific wrong-way risk arises when a transaction is structured in such a way that the exposure to the counterparty is positively correlated with the PD of the counterparty; for example, a counterparty writing put options on its own stock or a counterparty collateralized by its own or related party stock. The Firm considers specific wrong-way risk when approving transactions. The Firm also monitors general wrong-way risk, which arises when the counterparty PD is correlated with general market or macroeconomic factors. The credit assessment process identifies these correlations and manages the risk accordingly.

5.5. Credit Risk Mitigation

Overview

In addition to the use of netting and collateral for mitigating counterparty credit risk discussed above, the Firm may seek to mitigate credit risk from its lending and derivatives transactions in multiple ways, including through the use of guarantees and hedges. At the transaction level, the Firm seeks to mitigate risk through management of key risk elements such as size, tenor, financial covenants, seniority and collateral. The Firm actively hedges its lending and derivatives exposure through various financial instruments that may include single-name, portfolio, and structured credit derivatives. Additionally, the Firm may sell, assign, or syndicate funded loans and lending commitments to other financial institutions in the primary and secondary loan market.

In connection with its derivative and other contracts and securities financing transaction activities, the Firm generally enters into master netting agreements and collateral arrangements with counterparties. These agreements provide the Firm with the ability to demand collateral, as well as to liquidate collateral and offset receivables and payables covered under the same master netting agreement in the event of a counterparty default. For further information on the impact of netting on the Firm's credit exposures, see "Collateral" in Section 5.4 herein and "Quantitative and Qualitative Disclosures about Risk—Risk Management—Credit Risk" in Part II, Item 7A of the 2024 Form 10-K.

Loan Collateral Recognition and Management

Collateralizing loans significantly reduces the credit risk to the Firm. As part of the credit evaluation process, the Credit Risk Management Department assesses the ability of obligors to grant collateral. The Credit Risk Management Department may consider the receipt of collateral as a factor when approving loans, as applicable.

Loans secured by customer margin accounts, a source of credit exposure, are collateralized in accordance with internal and regulatory guidelines. The Firm monitors exposure against required margin levels daily and pursuant to such guidelines, requires customers to deposit additional collateral or reduce

positions, when necessary. Factors considered in the review of margin loans are the amount of the loan, the intended purpose, the degree of leverage being employed in the account and the amount of collateral, and overall evaluation of the portfolio to ensure proper diversification or, in the case of concentrated positions, appropriate liquidity of the underlying collateral or potential risk reduction strategies. Additionally, transactions relating to restricted positions require a review of any legal impediments to liquidation of the underlying collateral. Underlying collateral for margin loans is reviewed with respect to the liquidity of the proposed collateral positions, valuation of securities, historic trading range, volatility analysis and an evaluation of industry concentrations.

With respect to first and second mortgage loans, including HELOC loans, a loan evaluation process is part of the framework of the credit underwriting policies and collateral valuation. Loan-to-collateral value ratios are determined based on independent third-party property appraisal/valuations, and the security lien position is established through title/ownership reports.

Guarantees and Credit Derivatives

The Firm may accept or request guarantees from related or third parties to mitigate credit risk for wholesale obligors. Such arrangements represent obligations for the guarantor to make payments to the Firm if the counterparty fails to fulfill its obligation under a borrowing arrangement or other contractual obligation. The Firm typically accepts guarantees from corporate entities and financial institutions within its Institutional Securities business segment, and individuals and their small- and medium-sized domestic businesses within its Wealth Management business segment. The Firm may also hedge certain exposures using credit derivatives. The Firm enters into credit derivatives, principally through credit default swaps, under which it receives or provides protection against the risk of default on a set of debt obligations issued by a specified reference entity or entities. A majority of the Firm's hedge counterparties are banks, broker-dealers, insurance, and other financial institutions.

The Firm recognizes certain eligible credit derivatives and guarantees for the reduction of capital requirements under the Advanced Approach. At June 30, 2025, the aggregate EAD amount of the Firm's wholesale exposure hedged by such eligible credit derivatives or guarantees, excluding CVA hedges, was $34,053 million.

6. Equities Not Subject to Market Risk Capital Rule

Overview

The Firm occasionally makes equity investments that may include business facilitation or other investing activities. Such investments are typically strategic investments undertaken by the Firm to facilitate core business activities. The Firm may also make equity investments and capital commitments to public and private companies, funds, and other entities. Additionally, the Firm sponsors and manages investment vehicles and separate accounts for clients seeking exposure to private equity, infrastructure, mezzanine lending, and real estate-related and other alternative investments. The Firm may also invest in and provide capital to such investment vehicles.

Valuation for equity investments not subject to market risk capital rule

The Firm's equity investments include investments in private equity funds, real estate funds, and hedge funds (which include investments made in connection with certain employee deferred compensation plans), as well as direct investments in equity securities, which are presented on a U.S. GAAP basis.

The Firm applies the Alternative Modified Look-Through Approach for equity exposures to investment funds. Under this approach, the adjusted carrying value of an equity exposure to an investment fund is assigned on a pro rata basis to different risk weight categories based on the information in the fund's prospectus or related documents. For all other equity exposures, the Firm applies the Simple Risk-Weight Approach ("SRWA"). Under SRWA, the RWA for each equity exposure is calculated by multiplying the adjusted carrying value of the equity exposure by the applicable regulatory prescribed risk weight.

The following table consists of U.S. GAAP amounts disclosed in the Firm's balance sheet of investments and the types and nature of investments, capital requirements by appropriate equity groupings, realized gains/(losses) from sales and liquidations in the reporting period, unrecognized gains/(losses) related to investments carried at cost and unrealized gains/(losses) included in Tier 1 and/or Tier 2 capital.

$ in millions	At June 30, 2025 Total On-balance Sheet[1]	Risk Weight %	RWA[2]
Type of Equity Investments			
Simple Risk-Weight Approach:			
Exposures in the 0% risk weight category	$ 604	0%	$ —
Exposures in the 20% risk weight category	235	20%	50
Community development equity exposures	5,287	100%	6,701
Non-significant equity exposures	9,420	100%	10,478
Significant investments in unconsolidated financial institutions[3]	2,930	250%	7,534
Publicly traded equity exposures	—	300%	—
Non-publicly traded equity exposures	126	400%	581
Exposures in the 600% risk weight category	209	600%	1,061
Sub-total	$ 18,811	N/A	$ 26,405
Equity exposures to investment funds:			
Alternative Modified Look-Through Approach	1,245	N/A	1,123
Total Equities Not Subject to Market Risk Capital Rule	$ 20,056	N/A	$ 27,528
Quarter-to-date realized gains/(losses) from sales and liquidations[4]			$ 68
Total unrealized gains/(losses) on equity securities reflected in AOCI[4]			(1)
Unrecognized gains/(losses) related to investments carried at cost[4]			(3)
Unrealized gains/(losses) included in Tier 1 and/or Tier 2 capital			—

N/A—Not Applicable

1. The total on-balance sheet amount reflects $14,818 million and $5,238 million of non-publicly traded and publicly traded investments, respectively, at June 30, 2025. The on-balance sheet amounts are presented on a U.S. GAAP basis, which include investments in the Firm's own capital instruments and investments in the capital instruments of unconsolidated financial institutions that are subject to capital deductions under U.S. Basel III. At June 30, 2025, the amount of Equities Not Subject to Market Risk Capital Rule that was deducted from Total capital was $954 million, which also includes certain deductions applicable under the Volcker Rule. For a discussion of the Firm's deductions under the Volcker Rule, see "Business—Supervision and Regulation—Financial Holding Company—Activities Restrictions under the Volcker Rule" in Part I, Item 1 of the 2024 Form 10-K. For further information on the Firm's valuation techniques related to investments, see Note 2 (Significant Accounting Policies) to the consolidated financial statements in Part II, Item 8 of the 2024 Form 10-K.
2. In accordance with U.S. Basel III, RWA reflect a 1.06 multiplier and include both on- and off-balance sheet equity exposures.
3. Under the Advanced Approach, significant investments in unconsolidated financial institutions in the form of common stock, which are not deducted from CET1, are assigned a 250% risk weight.
4. For the quarter ended June 30, 2025.

7. Securitization Exposures

A securitization exposure is defined (in line with the U.S. Basel III definition) as a transaction in which:

- All or a portion of the credit risk of the underlying exposures is transferred to third parties, and has been separated into two or more tranches reflecting different levels of seniority;
- Performance of the securitization depends upon the performance of the underlying exposures;
- All or substantially all of the underlying exposures are financial exposures; and
- Underlying exposures are not owned by an operating company or certain other issuers.

Securitization exposures include on- or off-balance sheet exposures (including credit enhancements) that arise from a traditional securitization or synthetic securitization (including a re-securitization transaction); or an exposure that directly or indirectly references a securitization exposure (*e.g.*, a credit derivative). A re-securitization is a securitization which has more than one underlying exposure and in which one or more of the underlying exposures is itself a securitization exposure.

On-balance sheet exposures include securitization notes purchased and loans made to securitization trusts. Off-balance sheet exposures include liquidity commitments and derivatives (including tranched credit derivatives and derivatives for which the reference obligation is a securitization).

Securitization exposures are classified as either traditional or synthetic. In a traditional securitization, credit risk is transferred other than through the use of credit derivatives or guarantees. Typically, the originator establishes a special purpose entity ("SPE") and sells assets (either originated or purchased) off its balance sheet into the SPE, which issues securities to investors. In a synthetic securitization, credit risk is transferred through the use of credit derivatives or guarantees.

The Firm engages in securitizations primarily as a trading activity, except for (i) the AFS securities portfolios, for which the Firm purchases mostly highly rated tranches of ABS securitizations not sponsored by the Firm, and (ii) warehouse loans and liquidity commitments to client sponsored SPEs.

The Firm retains securities issued in some of the securitization transactions it sponsors, and it purchases securities issued in securitization transactions sponsored by others as part of its trading inventory. These interests are included in the consolidated balance sheets at fair value with mark-to-market changes reported in net income.

For further information on securitization transactions in which the Firm holds any exposure in either the banking book or the trading book, see Note 15 (Variable Interest Entities and Securitization Activities) to the consolidated financial statements in Part II, Item 8 of the 2024 Form 10-K and Note 14 (Variable Interest Entities and Securitization Activities) to the consolidated financial statements in the Form 10-Q.

7.1. Accounting and Valuation

For a discussion of the Firm's accounting and valuation techniques related to securitizations, see Note 2 (Significant Accounting Policies), Note 4 (Fair Values) and Note 15 (Variable Interest Entities and Securitization Activities) to the consolidated financial statements in Part II, Item 8 of the 2024 Form 10-K and Note 14 (Variable Interest Entities and Securitization Activities) to the consolidated financial statements in the Form 10-Q.

7.2. Securitization and Resecuritization Exposures in the Banking Book

The following table presents the total outstanding exposures securitized by the Firm as a sponsor for which the Firm has retained credit or counterparty exposures in the banking book as securitizations at June 30, 2025. This table is primarily comprised of synthetic securitizations and transactions in which the Firm transferred assets and entered into a derivative transaction with the securitization SPE. For residential mortgage and commercial mortgage transactions, these derivatives are interest rate and/or currency swaps. Traditional securitization exposures reflect unpaid principal balances of the underlying collateral, and synthetic securitization exposures reflect notional amounts.

	At June 30, 2025		
	Traditional		
$ in millions	Amounts Sold by the Firm	Amounts Sold by Third Parties in Transactions Sponsored by the Firm	Synthetic
Exposure type			
Commercial mortgages	$ —	$ —	$ —
Residential mortgages	186	—	—
Corporate debt	—	—	8,057
Asset-backed and other	—	—	—
Total	**$ 186**	**$ —**	**$ 8,057**

The following table is presented on a U.S. GAAP basis and reflects a summary of the Firm's securitization activity during 2025, regardless of whether the Firm retained credit or counterparty exposure, including the amount of exposures securitized (by exposure type), and the corresponding recognized gain or loss on sale. This table includes assets transferred by unaffiliated co-depositors into these transactions.

	Six Months Ended June 30, 2025		
$ in millions	Amounts Sold by the Firm	Recognized Gain/(Loss) on Sale	Amounts Sold by Third Parties in Transactions Sponsored by the Firm
Exposure type			
Commercial mortgages	$ 5,226	$ 66	$ 10,854
Residential mortgages	2,621	42	—
Corporate debt	281	—	—
Asset-backed and other	1,999	14	—
Total	**$ 10,127**	**$ 122**	**$ 10,854**

The following table is presented on a U.S. GAAP basis and reflects a summary of the Firm's securitization activity during 2025, for those transactions in which the Firm has not retained an interest, including the amount of exposures securitized (by exposure type), and the corresponding recognized gain or loss on sale. This table includes assets transferred by unaffiliated co-depositors into these transactions.

	Six Months Ended June 30, 2025		
$ in millions	**Amounts Sold by the Firm**	**Recognized Gain/(Loss) on Sale**	**Amounts Sold by Third Parties in Transactions Sponsored by the Firm**
Exposure type			
Commercial mortgages	$ 4,014	$ 51	$ 8,499
Residential mortgages	337	1	—
Corporate debt	—	—	—
Asset-backed and other	216	6	—
Total	**$ 4,567**	**$ 58**	**$ 8,499**

For information on securities held in the Firm's trading book, see "Securitization and Resecuritization Exposures in the Trading Book" in Section 7.3 herein.

During the quarter ended June 30, 2025, the Firm did not recognize any credit losses relating to retained senior or subordinate tranches in the banking book. The Firm did not have any impaired/past due exposures or losses on securitized assets.

In addition, the Firm may enter into derivative contracts, such as interest rate swaps with securitization SPEs. These derivative transactions generally represent senior obligations of the SPEs, senior to the most senior beneficial interest outstanding in the securitized exposures and are included in the Firm's consolidated balance sheets at fair value.

The following table is presented on a U.S. GAAP basis and reflects the outstanding exposures intended to be securitized:

$ in millions	**At June 30, 2025**
Exposure type	
Commercial mortgages	$ 1,339
Residential mortgages	2,471
Corporate debt	2
Asset-backed and other	419
Total	**$ 4,231**

The following table presents the aggregate EAD amount of the Firm's outstanding on- and off-balance sheet securitization positions by underlying exposure type:

	At June 30, 2025		
$ in millions	**On-balance sheet**	**Off-balance sheet**	**Total**
Exposure type			
Commercial mortgages	$ 20,215	$ 1,255	**$ 21,470**
Residential mortgages	1,267	27	**1,294**
Corporate debt	24,674	20,584	**45,258**
Asset-backed and other[1]	2,556	5,446	**8,002**
Total	**$ 48,712**	**$ 27,312**	**$ 76,024**

1. Amounts primarily reflect student loans, auto receivables, municipal bond liquidity facilities and consumer loan receivables.

The following tables present the aggregate EAD amount of securitization exposures retained or purchased and the associated RWA for these exposures, categorized between securitization and re-securitization exposures. In addition, these exposures are further categorized into risk weight bands and by risk-based capital approaches. The Firm employs the Supervisory Formula Approach and the Simplified Supervisory Formula Approach to calculate counterparty credit capital for securitization exposures in the Firm's banking book. The Supervisory Formula Approach uses internal models to calculate the risk weights for securitization exposures. The Simplified Supervisory Formula Approach is a simplified version of the Supervisory Formula Approach under which the risk weights for securitization exposures are determined using non-modeled inputs. In those cases where the Firm does not apply either of the Supervisory Formula Approach or the Simplified Supervisory Formula Approach, the securitization exposures will be assigned to the 1,250% risk weight category.

	At June 30, 2025					
	Securitizations					
	Supervisory Formula Approach		Simplified Supervisory Formula Approach		1,250% Risk Weight Category	
$ in millions	EAD	RWA	EAD	RWA	EAD	RWA
Risk Weight						
0% to <=20%	$28,043	$ 5,816	$39,358	$ 8,344	$ —	$ —
>20% to <=100%	2,934	1,532	2,396	912	—	—
>100% to <=500%	570	804	464	760	—	—
>500% to <1250%	4	32	6	56	—	—
1250%	—	—	1	9	8	103
Total	**$31,551**	**$ 8,184**	**$42,225**	**$10,081**	**$ 8**	**$ 103**

	At June 30, 2025					
	Re-securitizations					
	Supervisory Formula Approach		Simplified Supervisory Formula Approach		1,250% Risk Weight Category	
$ in millions	EAD	RWA	EAD	RWA	EAD	RWA
Risk Weight						
0% to <=20%	$ 2,002	$ 425	$ —	$ —	$ —	$ —
>20% to <=100%	$ —	$ —	$ 238	$ 223	$ —	$ —
>100% to <=500%	$ —	$ —	$ —	$ 1	$ —	$ —
>500% to <1250%	$ —	$ —	$ —	$ —	$ —	$ —
1250%	$ —	$ —	$ —	$ —	$ —	$ 2
Total	**$ 2,002**	**$ 425**	**$ 238**	**$ 224**	**$ —**	**$ 2**

At June 30, 2025, the amount of exposures that was deducted from Tier 1 common capital, representing the after-tax gain on sale resulting from securitization was $24 million.

The following table presents the aggregate EAD amount of re-securitization exposures retained or purchased, categorized according to exposures to which credit risk mitigation is applied and those not applied.

$ in millions	At June 30, 2025
Re-securitization exposures:	
Re-securitization exposure to which credit risk mitigation is applied	$ —
Re-securitization exposure to which credit risk mitigation is not applied	2,240
Total re-securitization exposures retained or purchased	**$ 2,240**
Total re-securitization exposure to guarantors	$ —
Total re-securitization exposure not to guarantors	2,240
Total re-securitization exposures retained or purchased	**$ 2,240**

The credit risk of the Firm's securitizations and re-securitizations is controlled by actively monitoring and managing the associated credit exposures. The Firm evaluates collateral quality, credit subordination levels, and structural characteristics of securitization transactions at inception and on an ongoing basis, and manages exposures against internal concentration limits.

7.3. Securitization and Resecuritization Exposures in the Trading Book

The Firm also engages in securitization activities related to commercial and residential mortgage loans, corporate bonds and loans, municipal bonds and other types of financial instruments. The Firm records such activities in the trading book.

The following table presents the Net Market Value of the Firm's aggregate on- and off-balance sheet securitization positions by exposure type, inclusive of hedges, in the trading book:

	At June 30, 2025
$ in millions	Net Market Value[1]
Exposures	
Commercial mortgages	$ 1,093
Residential mortgages	855
Corporate debt[2]	751
Asset-backed securitizations and other	248
Total	**$ 2,947**

1. Net Market Value represents the fair value for cash instruments and the replacement value for derivative instruments.
2. Amount includes correlation trading positions that are not eligible for Comprehensive Risk Measure ("CRM") surcharge. For more information on CRM, see "Comprehensive Risk Measure" in Section 9.1 included herein.

The Firm closely monitors the price, basis and liquidity risk in the covered securitization and resecuritization positions that are held in the trading book. Each position falls into at least one or more trading limits that have been set to limit the aggregate, concentration and basis risk in the portfolio to acceptable levels. Holdings are monitored against these limits on a daily basis.

The inherent market risk of these positions are captured in various risk measurement models including Regulatory VaR, Regulatory stressed VaR and stress loss scenarios which are calculated and reviewed on a daily basis. Further, the Firm regularly performs additional analysis to comprehend various risks in its securitization and resecuritization portfolio, and changes in these risks. Analysis is performed in accordance with U.S. Basel III to understand structural features of the portfolio and the performance of underlying collateral.

The Firm calculates the standard specific risk regulatory capital for securitization and resecuritization positions under the Simplified Supervisory Formula Approach. Under this approach, a risk weight assigned to each position is calculated based on a prescribed regulatory methodology. The resulting capital charge represents the higher of the total net long or net short capital charge calculated after applicable netting.

In addition, the Firm uses a variety of hedging strategies to mitigate credit spread and default risk for the securitization

and resecuritization positions. Hedging decisions are based on market conditions, and are evaluated within the Firm's risk governance structure.

8. Interest Rate Risk Sensitivity Analysis

The Firm believes that the net interest income sensitivity analysis is an appropriate representation of the Firm's 'Wealth Management business segment' interest rate risk for non-trading activities. For information on the interest rate risk sensitivity analysis, see "Quantitative and Qualitative Disclosures about Risk—Market Risk—Non-Trading Risks—Wealth Management Net Interest Income Sensitivity Analysis" in the Form 10-Q.

9. Market Risk

Market risk refers to the risk that a change in the level of one or more market prices, rates, indices, implied volatilities (the price volatility of the underlying instrument imputed from option prices), correlations or other market factors, such as market liquidity, will result in losses for a position or portfolio. Generally, the Firm incurs market risk as a result of trading, investing and client facilitation activities, principally within its Institutional Securities business segment where the substantial majority of the Firm's market risk capital is required. In addition, the Firm incurs trading-related market risk within its Wealth Management business segment. The Firm's Investment Management business segment incurs principally non-trading market risk primarily from investments in real estate funds and private equity vehicles. For a further discussion of the Firm's market risk and market risk management framework, see "Quantitative and Qualitative Disclosures about Risk—Risk Management—Market Risk" and "Quantitative and Qualitative Disclosures about Risk—Risk Management—Country Risk" in Part II, Item 7A of the 2024 Form 10-K.

The following table presents the Firm's measure for market risk and market risk RWA in accordance with the Advanced Approach, categorized by component type. RWA for market risk are computed using either regulator-approved internal models or standardized methods that involve applying risk-weighting factors prescribed by regulators. Pursuant to U.S. Basel III, multiplying the measure for market risk by 12.5 results in market risk RWA.

	At June 30, 2025	
$ in millions	**Measure for Market Risk**	**RWA[1]**
Components of measure for market risk and market risk RWA		
Regulatory VaR[2]	$ 704	$ 8,801
Regulatory stressed VaR[3]	1,193	14,916
Incremental risk charge[3]	267	3,342
Comprehensive risk measure[3, 4]	50	623
Specific risk:		
Non-securitizations[5]	1,572	19,651
Securitizations[6]	876	10,953
Total market risk	**$ 4,662**	**$ 58,286**

1. For information on the Firm's market risk RWA roll-forward from December 31, 2024 to June 30, 2025, see "MD&A—Liquidity and Capital Resources—Regulatory Requirements—Regulatory Capital Requirements" in the Form 10-Q.
2. Per regulatory requirements, the daily average of the previous 60 business days from the period-end date is utilized in the regulatory capital calculation.
3. Per regulatory requirements, the weekly average of the previous 12 weeks from the period-end date is utilized in the regulatory capital calculation.
4. Amount represents the greater of the modeled component and the 8% surcharge computed under the Standardized approach. As of the most recent reporting date, RWA from the CRM modeled charge was $325 million and the surcharge was $623 million. For more information on CRM, see "Comprehensive Risk Measure" in Section 9.1 included herein.
5. Non-securitization specific risk charges calculated using regulatory-prescribed risk-weighting factors for certain debt and equity positions. The prescribed risk-weighting factors are generally based on, among other things, the Organization for Economic Cooperation and Development's country risk classifications for the relevant home country (in the case of public sector and depository institution debt positions), the remaining contractual maturity and internal assessments of creditworthiness. Additionally, amounts include a De Minimis RWA for positions not captured in the VaR model.
6. For information on market risk related to securitizations, see Section 7.3 "Securitization and Resecuritization Exposures in the Trading Book" included herein.

9.1. Model Methodology, Assumptions and Exposure Measures

Regulatory VaR

The Firm estimates VaR using an internal model based on historical simulation for general market risk factors and Monte Carlo simulation for name-specific risk in bonds, loans and related derivatives. The model constructs a distribution of hypothetical daily changes in the value of trading portfolios based on the following: historical observation of daily changes in key market indices or other market risk factors; and information on the sensitivity of the portfolio values to these market risk factor changes. The Firm's VaR model uses one year of historical data.

The Firm utilizes the same VaR model for risk management purposes as well as regulatory capital calculations. The portfolio of positions used for the Firm's VaR for risk management purposes ("Management VaR") differs from that used for regulatory capital requirements ("Regulatory VaR"), as it contains certain positions that are excluded from Regulatory VaR. Examples include counterparty CVAs and loans that are carried at fair value and associated hedges.

For regulatory capital purposes, Regulatory VaR is computed at a 99% level of confidence over a 10-day time horizon. The Firm's Management VaR is computed at a 95% level of confidence over a one-day time horizon, which is a useful indicator of possible trading losses resulting from adverse daily market moves. For more information about the Firm's Management VaR model, related statistics and limit monitoring process, see "Quantitative and Qualitative Disclosures about Risk—Market Risk" in Part II, Item 7A of the 2024 Form 10-K and the "Quantitative and Qualitative Disclosures about Risk—Market Risk" in the Form 10-Q.

The following table presents the period-end, daily average, and high and low Regulatory VaR by risk category for a 10-day holding period for the quarter ended June 30, 2025. Additionally, the daily average Regulatory VaR for a one-day holding period is shown for comparison. The metrics below are calculated over the calendar quarter and therefore may not coincide with the period applied in the regulatory capital calculations.

99% Regulatory VaR
Quarter Ended June 30, 2025

	One-Day Holding Period	10-Day Holding Period			
$ in millions	Daily Average[1]	Period End	Daily Average[1]	High	Low
Interest rate	$ 32	$ 106	$ 102	$ 170	$ 64
Credit spread	38	176	120	210	65
Equity price	43	134	135	273	93
Foreign exchange rate	35	105	109	183	52
Commodity price	27	83	86	123	66
Less: Diversification benefit[2, 3]	(102)	(318)	(322)	N/A	N/A
Total Regulatory VaR	**$ 73**	**$ 286**	**$ 230**	**$ 331**	**$ 155**

N/A–Not Applicable

1. The daily average shown is calculated over the entire quarter. Per regulatory requirements, the daily average of the previous 60 business days from the period-end date is utilized in the regulatory capital calculation.
2. Diversification benefit equals the difference between the total Regulatory VaR and the sum of the component VaRs. This benefit arises because the simulated one-day losses for each of the components occur on different days; similar diversification benefits also are taken into account within each component.
3. The high and low VaR values for the total Regulatory VaR and each of the component VaRs might have occurred on different days during the quarter, and therefore the diversification benefit is not an applicable measure.

Regulatory Stressed VaR

Regulatory stressed VaR is calculated using the same methodology and portfolio composition as Regulatory VaR. However, Regulatory stressed VaR is based on a continuous one-year historical period of significant market stress, appropriate to the Firm's portfolio. The Firm's selection of the one-year stressed window is evaluated on an ongoing basis.

The following table presents the period-end, weekly average, and high and low Regulatory stressed VaR for a 10-day holding period for the quarter ended June 30, 2025. Additionally, the weekly average Regulatory stressed VaR for a one-day holding period is shown for comparison. The metrics below are calculated over the calendar quarter and therefore may not coincide with the period applied in the regulatory capital calculations.

99% Regulatory Stressed VaR
Quarter Ended June 30, 2025

	One-Day Holding Period	10-Day Holding Period			
$ in millions	Weekly Average[1]	Period End	Weekly Average[1]	High	Low
Total Regulatory stressed VaR	$ 125	$ 559	$ 396	$ 559	$ 242

1. The weekly average shown is calculated over the entire quarter. Per regulatory requirements, the weekly average of the previous 12 weeks from the period-end date is utilized in the regulatory capital calculation.

Incremental Risk Charge

The Incremental Risk Charge ("IRC") is an estimate of default and migration risk of unsecuritized credit products in the trading book. The IRC also captures recovery risk, and assumes that average recoveries are lower when default rates are higher. A Monte Carlo simulation-based model is used to calculate the IRC at a 99.9% level of confidence over a one-year time horizon. A constant level of risk assumption is imposed which ensures that all positions in the IRC portfolio are evaluated over the full one-year time horizon.

The IRC model differentiates the underlying traded instruments by liquidity horizons, with the minimum liquidity horizon set to 3 months. Lower rated issuers receive longer liquidity horizons of between 6 and 12 months. In addition to the ratings-based liquidity horizon, the Firm also applies liquidity horizon penalties to positions that are deemed concentrated.

The following table presents the period-end, weekly average, and high and low IRC for the quarter ended June 30, 2025. The metrics below are calculated over the calendar quarter and therefore may not coincide with the period applied in the regulatory capital calculations.

	Quarter Ended June 30, 2025			
$ in millions	Period End	Weekly Average[1]	High	Low
Total Incremental Risk Charge	$ 267	$ 261	$ 432	$ 175

1. The weekly average shown is calculated over the entire quarter. Per regulatory requirements, the weekly average of the previous 12 weeks from the period-end date is utilized in the regulatory capital calculation.

Comprehensive Risk Measure

CRM is an estimate of risk in the correlation trading portfolio, taking into account credit spread, correlation, basis, recovery and default risks. A Monte Carlo simulation-based model is used to calculate the CRM at a 99.9% level of confidence over a one-year time horizon, applying the constant level of risk assumption.

All positions in the CRM portfolio are given a liquidity horizon of 6 months.

Positions eligible for CRM are also subject to an 8% capital surcharge, which is reflected in "Comprehensive risk measure" in the "Components of measure for market risk and market risk RWA" table in Section 9 herein.

Correlation Trading Positions

A correlation trading position is a securitization position for which all or substantially all of the value of the underlying exposure is based on the credit quality of a single company for which a two-way market exists, or on commonly traded indices based on such exposures for which a two-way market exists on the indices. Hedges of correlation trading positions are also considered correlation trading positions. For the quarter ended June 30, 2025, the Firm's aggregate CRM eligible correlation trading positions had a Net Market Value of $690 million, which is comprised of net long market values of $350 million and net short market values of $340 million. The net long and net short market values are inclusive of netting permitted under U.S. Basel III.

The following table presents the period-end, weekly average, and high and low CRM for the quarter ended June 30, 2025. The metrics below are calculated over the calendar quarter and therefore may not coincide with the period applied in the regulatory capital calculations.

	Quarter Ended June 30, 2025			
$ in millions	Period End	Weekly Average[1]	High	Low
Comprehensive Risk Measure Modeled	$ 16	$ 26	$ 38	$ 14
Comprehensive Risk Measure Surcharge	46	50	101	40

1. The weekly average shown is calculated over the entire quarter. Per regulatory requirements, the weekly average of the previous 12 weeks from the period-end date is utilized in the regulatory capital calculation.

9.2. Model Limitations

The Firm uses VaR and Stressed VaR as components in a range of risk management tools. Among their benefits, VaR models permit estimation of a portfolio's aggregate market risk exposure, incorporating a range of varied market risks and portfolio assets. However, VaR has various limitations, which include, but are not limited to: use of historical changes in market risk factors, which may not be accurate predictors of future market conditions, and may not fully incorporate the risk of extreme market events that are outsized relative to observed historical market behavior or reflect the historical distribution of results beyond the 99% confidence interval; and reporting of losses over a defined time horizon, which does not reflect the risk of positions that cannot be liquidated or hedged over that defined horizon.

The Firm also uses IRC and CRM models to measure default and migration risk of credit spread and correlation trading positions in the trading book. Among their benefits, these models permit estimation of a portfolio's aggregate exposure to default and migration risk, incorporating a range of market risk factors in a period of financial stress. However, the IRC and CRM models have various limitations, which include, but are not limited to: use of historical default rates, credit spread movements, correlation and recovery rates, which may not be accurate predictors of future credit environments, and may not fully incorporate the risk of extreme credit events that are outsized relative to observed historical behavior or reflect the historical distribution of results beyond the 99.9% confidence interval.

Regulatory VaR, Regulatory stressed VaR, IRC and CRM numbers are not readily comparable across firms because of differences in the firms' portfolios, modeling assumptions and methodologies. In IRC and CRM, those differences may be particularly pronounced because of the long risk horizon measured by these models as well as the difficulty in performing backtesting. These differences can result in materially different numbers across firms for similar portfolios. As a result, the model-based numbers tend to be more useful when interpreted as indicators of trends in a firm's risk profile rather than as an absolute measure of risk to be compared across firms.

9.3. Model Validation

The Firm validates its Regulatory VaR model, Regulatory stressed VaR model, IRC model and CRM model on an ongoing basis. The Firm's model validation process is independent of the internal models' development, implementation and operation. The validation process includes, among other things, an evaluation of the conceptual soundness of the internal models.

The Firm's Regulatory VaR model, Regulatory stressed VaR model, IRC model and CRM model have all been approved for use by the Firm's regulators.

9.4. Regulatory VaR Backtesting

To evaluate the reasonableness of the Firm's VaR model as a measure of the Firm's potential volatility of net revenue, the Firm regularly conducts a comparison of its 99%/one-day VaR-based estimates with hypothetical buy-and-hold trading revenue ("backtesting"). The hypothetical buy-and-hold gains or losses are defined in the U.S. Basel III as profits or losses on covered positions, as defined in Section 9.5 below, excluding fees, commissions, reserves, net interest income and intraday trading. The buy-and-hold gains or losses utilized for Regulatory VaR backtesting differs from the daily net trading revenue as disclosed in "Quantitative and Qualitative Disclosures about Risk—Market Risk" in Part II, Item 7A of the 2024 Form 10-K. For the quarter ended June 30, 2025, there was one Regulatory VaR backtesting exception. Over a 250-day period ended June 30, 2025, the Firm had two Regulatory VaR backtesting exceptions, representing the number of days where trading losses exceeded the 99% confidence level.

9.5. Covered Positions

During the quarter ended June 30, 2025, the Firm had exposures to a wide range of interest rates, credit spreads, equity prices, foreign exchange rates and commodity prices—and the associated implied volatilities and spreads—related to the global markets in which it conducts its trading activities. For more information about such exposures, see "Quantitative and Qualitative Disclosures about Risk—Risk Management—Market Risk—Trading Risks" in Part II, Item 7A of the 2024 Form 10-K.

Under U.S. Basel III, covered positions include trading assets or liabilities held by the Firm for the purpose of short-term resale or with the intent of benefiting from actual or expected price movements related to its market-making activities, as well as, foreign exchange and commodity exposure of certain banking book positions. CVA is not a covered position under U.S. Basel III and as a result, hedges to the non-covered CVA are themselves not eligible to be covered positions. However, any foreign exchange or commodity exposure of CVA hedges is a covered position.

The Firm manages its covered positions by employing a variety of risk mitigation strategies. These strategies include diversification of risk exposures and hedging. Hedging activities consist of the purchase or sale of positions in related securities and financial instruments, including a variety of derivative products (*e.g.*, futures, forwards, swaps and options). Hedging activities may not always provide effective mitigation against trading losses due to differences in the terms, specific characteristics or other basis risks that may exist between the hedge instrument and the risk exposure that is being hedged. The Firm manages the market risk associated with its trading activities on a Firm-wide basis, on a world-wide trading division level and on an individual product basis. The Firm manages and monitors its market risk exposures in such a way as to maintain a portfolio that the Firm believes is well-diversified in the aggregate with respect to market risk factors and that reflects the Firm's aggregate risk tolerance as established by the Firm's senior management.

Valuation Policies, Procedures, and Methodologies for Covered Positions

For more information on the Firm's valuation policies, procedures, and methodologies for covered positions (trading

assets and trading liabilities), see Note 2 (Significant Accounting Policies) and Note 4 (Fair Values) to the consolidated financial statements in Part II, Item 8 of the 2024 Form 10-K.

9.6. Stress Testing of Covered Positions

The Firm stress tests the market risk of its covered positions at a frequency appropriate to each portfolio and in no case less frequently than quarterly. The stress tests take into account concentration risk, illiquidity under stressed market conditions and other risks arising from the Firm's trading activities.

In addition, the Firm utilizes a proprietary economic stress testing methodology that comprehensively measures the Firm's market and credit risk. The methodology simulates many stress scenarios based on more than 25 years of historical data and attempts to capture the different liquidities of various types of general and specific risks. Event and default risks for relevant credit portfolios are also captured.

Furthermore, as part of the Federal Reserve's annual Comprehensive Capital Analysis and Review, commonly referred to as "CCAR," the Firm is required to perform annual capital stress testing under scenarios prescribed by the Federal Reserve. The stress testing results are submitted to the Federal Reserve and a summary of the results under the severely adverse economic scenario is publicly disclosed. For more information on the Firm's capital plans and stress tests, see "MD&A—Liquidity and Capital Resources—Regulatory Requirements" in Part II, Item 7 of the 2024 Form 10-K and "MD&A—Liquidity and Capital Resources—Regulatory Requirements" in the Form 10-Q.

10. Operational Risk

Operational risk refers to the risk of loss, or of damage to the Firm's reputation, resulting from inadequate or failed processes or systems, human factors (e.g., inappropriate or unlawful conduct) or external events (e.g., cyberattacks or third-party vulnerabilities) that may manifest as, for example, loss of information, business disruption, theft and fraud, legal and compliance risks, or damage to physical assets. The Firm may incur operational risk across the full scope of its business activities, including revenue-generating activities and support and control groups (e.g., IT and trade processing).

As an advanced approach banking organization, the Firm is required to compute operational risk RWA using an advanced measurement approach. The Firm has established an operational risk framework to identify, measure, monitor, and control risk across the Firm. Effective operational risk management is essential to reducing the impact of operational risk incidents and mitigating legal risks. The framework is continually evolving to account for changes in the Firm and to respond to the changing regulatory and business environment. The Firm has implemented operational risk data and assessment systems to monitor and analyze internal and external operational risk events, to assess business environment and internal control factors, and to perform scenario analysis. The collected data elements are incorporated in the operational risk capital model. The model encompasses both quantitative and qualitative elements. Internal loss data and scenario analysis results are direct inputs to the capital models, while external operational risk incidents and business environment and internal control factors are evaluated as part of the scenario analysis process. The Firm maintains governance, review, and validation processes of its advanced measurement approach framework.

The Firm uses the Loss Distribution Approach to model operational risk exposures. In this approach, loss frequency and severity distributions are separately modeled using the Firm's internal loss data experience and combined to produce an Aggregate Loss Distribution at various confidence levels over a one-year period. Regulatory Operational Risk capital is calculated at the 99.9% confidence level. The model also includes Scenario Analysis estimates to complement the Internal Loss Data model. Scenario Analysis is a forward-looking systematic process to obtain plausible high severity and low frequency estimates of operational risk losses based on expert opinion. This modeling process is performed separately on each of the units of measure. The results are aggregated across all units of measure, taking into account diversification, to determine operational risk regulatory capital.

In addition, the Firm employs a variety of risk processes and mitigants to manage its operational risk exposures. These include a strong governance framework, a comprehensive risk management program and insurance. The Firm continually undertakes measures to improve infrastructure and mitigate operational risk. The goal of the Firm's operational risk management framework is to identify and assess significant operational risks, and to ensure that appropriate mitigation actions are undertaken. Operational risks and associated risk exposures are assessed relative to the risk tolerance established by the Firm's Board of Directors and are prioritized accordingly. The breadth and range of operational risk are such that the types of mitigating activities are wide-ranging. Examples of activities include the enhancing defenses against cyberattacks, use of legal agreements and contracts to transfer and/or limit operational risk exposures; due diligence; implementation of enhanced policies and procedures; exception management processing controls; and segregation of duties. For a further discussion of the Firm's operational risk, see "Quantitative and Qualitative Disclosures about Risk—Country and Other Risks—Operational Risk" in Part II, Item 7A of the 2024 Form 10-K. See "Capital Adequacy" in

Section 4 herein for the Firm's operational risk RWA at June 30, 2025.

11. Supplementary Leverage Ratio

Minimum leverage-based capital requirements include a Tier 1 leverage ratio and a Supplementary Leverage Ratio ("SLR"). The Firm is required to maintain an SLR of 5%, inclusive of an enhanced SLR capital buffer of at least 2% in order to avoid potential limitations on capital distributions including dividends and stock repurchase, and discretionary bonus payments to executive officers. In addition, MSBNA and MSPBNA which are Insured Depository Institutions, must maintain an SLR of 6% to be considered well-capitalized.

The Tier 1 leverage ratio and SLR are capital measures that are both computed under U.S. Basel III rules, with the primary difference between the two being that the SLR denominator includes off-balance sheet exposures. The SLR denominator is calculated for each reporting period based on the average daily balance of consolidated on-balance sheet assets during the calendar quarter less certain amounts deducted from Tier 1 capital at quarter-end. The SLR denominator also includes the arithmetic mean of month-end balances during the calendar quarter of certain off-balance sheet exposures associated with derivatives (including derivatives that are centrally cleared for clients and sold credit protection), repo-style transactions and other off-balance sheet items. For more information on the supplementary leverage ratio, see "MD&A—Liquidity and Capital Resources—Regulatory Requirements—Regulatory Capital Ratios" in the Form 10-Q.

Summary comparison of accounting assets and supplementary leverage ratio

The following table presents the consolidated total assets under U.S. GAAP and the supplementary leverage exposure.

$ in millions		**At June 30, 2025**
Total consolidated assets as reported in published financial statements[1]	$	1,353,870
Adjustment for investments in banking, financial, insurance or commercial entities that are consolidated for accounting purposes but outside the scope of regulatory consolidation		—
Adjustment for fiduciary assets recognized on balance sheet but excluded from total leverage exposure		—
Adjustment for derivative exposures[2]		152,614
Adjustment for repo-style transactions[2]		18,436
Adjustment for off-balance sheet exposures[2]		116,434
Other adjustments		
a. Adjustments for deductions from tier 1 capital[3]		(22,365)
b. Adjustments for frequency calculations[4]		(492)
c. Adjustments for deductions of qualifying central bank deposits for custodial banking organizations		—
Supplementary leverage exposure	**$**	**1,618,497**

1. Total consolidated on-balance sheet assets under U.S. GAAP at quarter end.
2. Computed as the arithmetic mean of the month-end balances over the calendar quarter.
3. Includes disallowed goodwill, intangible assets, investments in covered funds, defined benefit pension plan assets, after-tax gain on sale from assets sold into securitizations, investments in the Firm's own capital instruments, certain deferred tax assets, and other capital deductions.
4. Reflects the difference between spot and average daily balance of consolidated total assets during the calendar quarter.

Supplementary leverage ratio: The following table presents the Firm's Tier 1 leverage ratio, as well as the detailed components of the SLR computation.

$ in millions		**At June 30, 2025**
On-balance sheet exposures		
On-balance sheet assets (excluding on-balance sheet assets for repo-style transactions and derivative exposures, but including cash collateral received in derivative transactions)[1]	$	1,023,736
Less: Amounts deducted from tier 1 capital[2]		(22,365)
Less: Deduction of qualifying central bank deposits for custodial banking organizations		—
Total on-balance sheet exposures (excluding on-balance sheet assets for repo style transactions and derivatives exposures, but including cash collateral received in derivative transactions)		1,001,371
Derivative disclosures		
Replacement cost for derivative exposures (net of cash variation margin)	$	72,271
Add-on amounts for potential future exposure (PFE) for derivatives[3]		147,141
Gross-up for cash collateral posted if deducted from the on-balance sheet assets, except for cash variation margin that meets qualifying criteria[3]		1,220
Less: Deductions of receivable assets for cash variation margin posted in derivative transactions, if included in on-balance sheet assets		—
Less: Exempted CCP leg of client-cleared transactions[4]		(21,033)
Effective notional principal amount of sold credit protection[3]		353,834
Less: Effective notional principal amount offsets and PFE adjustments for sold credit protection[3]		(336,684)
Total derivatives exposures	$	216,749
Repo-style transactions		
On-balance sheet assets for repo-style transactions, including the gross value of receivables for reverse repurchase transactions and the value of securities that qualified for sales treatment, and excluding the value of securities received in a security-for-security repo-style transaction where the securities lender has not sold or re-hypothecated the securities received[1]	$	644,660
Less: Reduction of the gross value of receivables in reverse repurchase transactions by cash payables in repurchase transactions under netting agreements[1]		(379,153)
Counterparty credit risk for all repo-style transactions[3]		18,436
Exposure for repo-style transactions where a banking organization acts as an agent		—
Total repo-style transactions	$	283,943
Other off-balance sheet exposures		
Off-balance sheet exposures at gross notional amounts[3, 5]	$	242,372
Less: Adjustments for conversion to credit equivalent amounts[3]		(125,938)
Total off-balance sheet exposures	$	116,434
Supplementary leverage exposure	**$**	**1,618,497**
Tier 1 capital		88,358
Supplementary leverage ratio[6]		5.5%
Tier 1 leverage ratio[7]		6.8%

1. Computed as the average daily balance of consolidated total assets during the calendar quarter.
2. Includes disallowed goodwill, intangible assets, investments in covered funds, defined benefit pension plan assets, after-tax gain on sale from assets sold into securitizations, investments in the Firm's own capital instruments, certain deferred tax assets, and other capital deductions.
3. Computed as the arithmetic mean of the month-end balances over the calendar quarter.
4. Where the Firm acts as clearing member with respect to transactions cleared on behalf of clearing member clients, the Firm does not guarantee the performance of the CCP, and therefore the trade exposure to the CCP is excluded from total leverage exposure. These amounts are reflected net in the replacement cost and PFE lines above.
5. Off-balance sheet exposures primarily include lending commitments, forward starting reverse repurchase agreements, standby letters of credit and other unfunded commitments and guarantees.
6. The Supplementary leverage ratio equals Tier 1 capital divided by the Supplementary leverage exposure.
7. The Tier 1 leverage ratio equals Tier 1 capital divided by the average daily balance of consolidated on-balance sheet assets during the calendar quarter. Tier 1 capital is adjusted for disallowed goodwill, intangible assets, investments in covered funds, defined benefit pension plan assets, after-tax gain on sale from assets sold into securitizations, investments in the Firm's own capital instruments, certain deferred tax assets, and other capital deductions in accordance with U.S. Basel III rules.

12. Disclosure Map

			For the quarterly period ended June 30, 2025
Disclosure starts on page number	**Description**	**Form 10-Q**	**Pillar 3 Report**
Basel III Pillar 3 Requirement			
Scope of Application	Business		1
	Regulatory capital framework	22	1
Capital Structure	Capital instruments	51, 52, 63, 69	2
	Restrictions and other major impediments to transfer of funds or capital		2
	Capital structure	22	2
Capital Adequacy	Required capital framework	23	2
	Credit risk, market risk and operational risk RWA	30	3
	Risk management objectives, structure and policies		4
	Minimum risk-based capital ratio	24	4
	Total Loss-Absorbing Capacity	25	5
Credit Risk	Credit risk and credit risk management framework	30	5
	Risk governance structure		5
	Master netting agreements and collateral agreements	51, 56	6
	Commitments	63	6
	Guarantees	63	6
	Reconciliation of changes in allowance for loan losses	60	8
	Credit quality indicator	58	8
	Determination of past due or delinquency status		8
General Disclosure for Wholesale Counterparty Credit Risk of Derivative Contracts, Repo-Style Transactions and Margin Lending	Use of collateral as a credit risk mitigants and master netting agreements	51, 56	11
	Valuation approaches		12
	Credit derivatives	51	12
	Additional collateral requirements due to credit rating downgrade	53	12
Credit Risk Mitigation	Impact of netting on the Firm's credit exposures	35	13
Equities Not Subject to Market Risk Capital Rule	Valuation techniques related to investments		14
	Deductions under the Volcker Rule		15
Securitization	Securitization transactions	67	15
	Accounting and valuation techniques related to securitization	67	16
Interest Rate Risk for Non-Trading Activities	Interest rate risk sensitivity analysis on non-trading activities	30	19
Market Risk	Market risk RWA	25	19
	Management VaR model, related statistics and limit monitoring process	29	20
	Daily net trading revenues	29	22
	Primary market risk exposures and market risk management	28	22
	Valuation policies, procedures and methodologies for covered positions		22
	Stress testing and Regulatory Stressed VaR	25	23
Operational Risk	Operational Risk	36	23
Supplementary Leverage Ratio	Supplementary Leverage Ratio	24	24