



ZIONS BANCORPORATION

2024 | CORPORATE RESPONSIBILITY REPORT

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LETTER FROM OUR CHAIRMAN AND CEO

One of the characteristics that truly great banks — built for the long term and deserving of their clients' trust — have in common is investing in their communities and using both their financial and human resources to make communities stronger.

In recent years, we have made substantial technology investments that included the replacement of our core systems for loans and deposits; modernization of our “front end” digital banking applications, digitizing new account opening, as well as the processes for applying for and approving virtually all consumer, mortgage and small business loans; completion of the transition to a single, uniform version of the customer relationship management system that serves as the communication hub for nearly all customer calling and internal referral activities; and building a strong data governance organization that will serve us well in an era of artificial intelligence.

All of this technology work provides infrastructure for us to make our local communities better places for those who live there. We continue to invest in our communities using both our financial and human resources to make communities stronger.

Our very structure, which we refer to as a “collection of great banks,” is designed to produce the kind of insight and caring about local needs that is usually associated with a truly exceptional community bank — paired with the capabilities of a larger regional banking institution — by keeping decision making and leadership closer to our clients and our communities.

We concentrate on serving small and mid-sized businesses across the western United States, and understand the importance the owners of these businesses place on developing a relationship with a banker who is responsive, understands a customer's business and can solve problems. During the SBA's 2024 fiscal year, Zions ranked 20th in the nation in SBA 7(a) loan approvals, the SBA's primary program for providing financial assistance to small businesses. We expect over the next two to three years to rank among the top 10 lenders in the program. I regularly remind our bankers that the greatest satisfaction they'll find in their careers won't come from managing our participation in a large, syndicated credit to a name-brand company. It will come from helping entrepreneurs who've put all their savings into starting small businesses and helping them build successful and durable businesses that not only change the owners' lives but provide jobs for countless families and build prosperous local communities.

Our mission to help build great small businesses is consistent with our vision of banking as being a very local business. Our employees volunteer tens of thousands of hours and provide leadership for numerous charities and local initiatives. For example, Zions Bank employees paint and freshen up scores of homes for their elderly, disabled and veteran neighbors every year during their Paint-a-Thon event. Our California colleagues participated in “Give Week,” during which they supported 42 nonprofit organizations engaged in financial literacy, community cleanups, sorting donations to food banks, and more. Nevada State Bank was the foundational sponsor for Junior Achievement's Inspiration Center in Las Vegas last year, tripling the organization's ability to serve Clark County School District students in one of the largest programs of its type in the country. The list goes on. I'm proud to be associated with our thousands of bankers who take to heart the notion that our bank is here for the purpose of building better neighborhoods, towns and cities — and doing so with not only our balance sheet but with our hearts, minds and shoulders.

Our LEED Platinum-certified technology and operations campus sits on a former Environmental Protection Agency Superfund site. It recently became the first building in Utah to receive the ENERGY STAR® NextGen™ certification as one of the nation's most energy-efficient, low-emissions commercial buildings. We continue efforts to decrease carbon emissions and other waste across our facilities.

We're determined to ensure we're doing all we can to provide opportunities for growth, development and leadership to every member of our team. We're committed to continue this focus on ensuring that Zions Bancorporation has a workplace where all are treated fairly in accordance with their qualifications and abilities, and that it's a place where everyone counts.

As you'll see in this report, we continue working hard to employ our resources in building strong neighborhoods and vibrant communities. I'm proud of our bankers who are helping our clients achieve their financial dreams.



A handwritten signature in black ink that reads "Harris H. Simmons". The signature is fluid and cursive, written in a professional style.

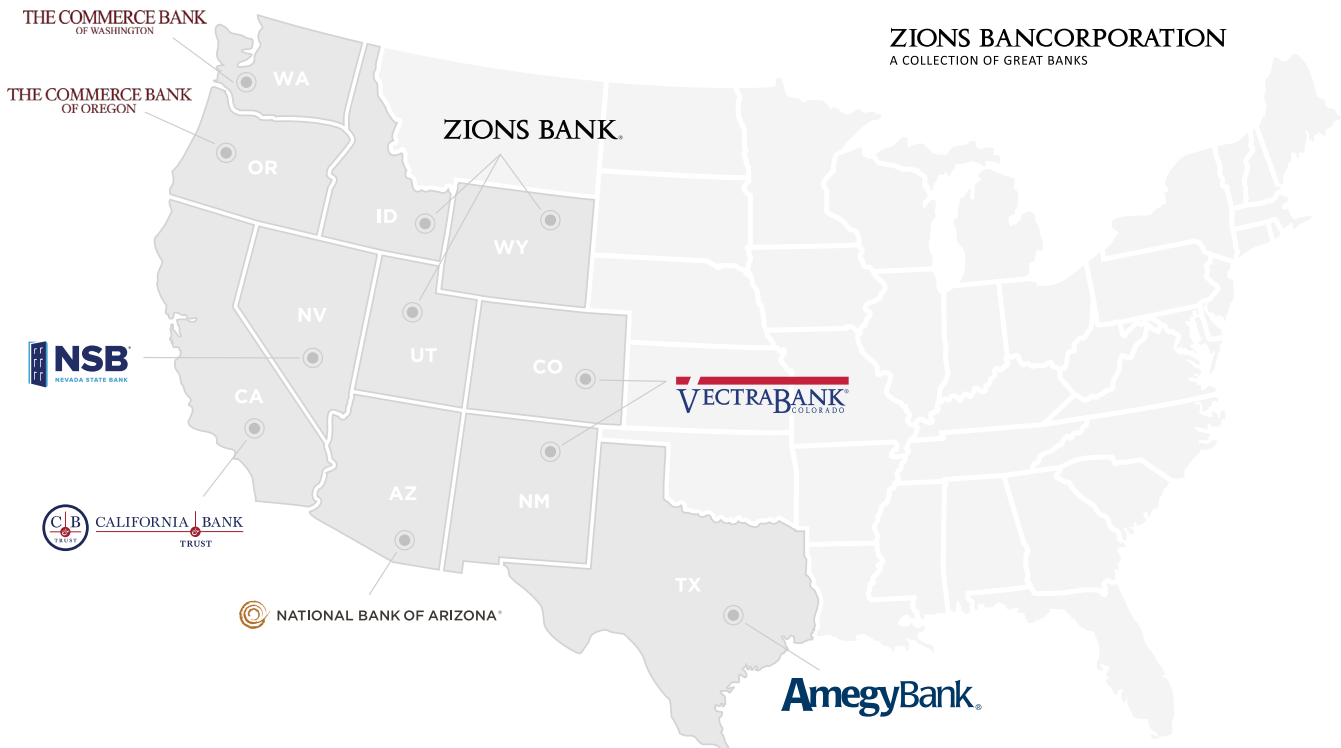
Harris H. Simmons
Chairman and CEO
Zions Bancorporation

ABOUT ZIONS BANCORPORATION

We are committed to our distinctively local approach to banking. Headquartered in Salt Lake City, Utah, Zions Bancorporation operates as a “Collection of Great Banks” with local brand names and management teams in each of our major Western markets. Our operating model is built on the premise that delivering truly great service to clients is best accomplished by having an organization that is locally oriented. This commitment to improving our communities and building strong local relationships is a key component of both our corporate strategy and our Guiding Principles.

We refer to our locally managed banking businesses as affiliates. Our affiliates and the areas they serve are shown in the map below.

All our affiliates follow shared corporate governance and responsibility principles but are given autonomy to implement those principles in different ways that local management believes best suits their business strategies and their communities’ needs.



As of December 31, 2024

FINANCIAL HIGHLIGHTS

(DOLLAR AMOUNTS IN MILLIONS, EXCEPT PER SHARE AMOUNTS)	2024/2023 CHANGE (%)	2024	2023	2022
FOR THE YEAR				
Net interest income	—	\$ 2,430	\$ 2,438	\$ 2,520
Noninterest income	3	700	677	632
Total net revenue	—	3,130	3,115	3,152
Provision for credit losses	(45)	72	132	122
Noninterest expense	(2)	2,046	2,097	1,878
Adjusted pre-provision net revenue ¹	(3)	1,131	1,171	1,312
Net income	15	784	680	907
Net earnings applicable to common shareholders	14	737	648	878
PER COMMON SHARE				
Net earnings – diluted	14	\$ 4.95	\$ 4.35	\$ 5.79
Tangible book value at year-end ¹	20	33.85	28.30	22.79
Market price – end	24	54.25	43.87	49.16
Market price – high	15	63.22	55.20	75.44
Market price – low	107	37.76	18.26	45.21
AT YEAR-END				
Assets	2	\$ 88,775	\$ 87,203	\$ 89,545
Loans and leases, net of unearned income and fees	3	\$ 59,410	\$ 57,779	\$ 55,653
Deposits	2	\$ 76,223	\$ 74,961	\$ 71,652
Common equity	15	\$ 6,058	\$ 5,251	\$ 4,453
Ratio of nonperforming assets to net loans and leases, including loans held for sale, and other real estate owned		0.50 %	0.39 %	0.27 %
Loan to total deposit ratio		78 %	77 %	78 %
PERFORMANCE RATIOS				
Return on average assets		0.88 %	77 %	1.01 %
Return on average common equity		13.1 %	13.4 %	16.0 %
Return on average tangible common equity ¹		16.2 %	17.3 %	19.8 %
Net interest margin		3.00 %	3.02 %	3.06 %
Net charge-offs to average loans and leases		0.10 %	0.06 %	0.07 %
Total allowance for credit losses to loans and leases outstanding		1.25 %	1.26 %	1.14 %
CAPITAL RATIOS AT YEAR-END				
Common equity tier 1 capital		10.9 %	10.3 %	9.8 %
Tier 1 leverage		8.3 %	8.3 %	7.7 %
Tangible common equity ¹		5.7 %	4.9 %	3.8 %
OTHER SELECTED INFORMATION				
Weighted average diluted common shares outstanding		147	148	150
Dividends declared, per share		1.66	1.64	1.58
Common dividend payout ratio ²		33.6 %	37.8 %	27.3 %
Capital distributed as a percentage of net earnings applicable to common shareholders ³		38 %	46 %	50 %
Efficiency Ratio ¹		64.2 %	62.9 %	58.8 %

¹This table includes certain non-GAAP measures. See "Non-GAAP Financial Measures" in our 2024 Year in Review for more information.

²The common dividend payout ratio is equal to common dividends paid divided by net earnings applicable to common shareholders.

³This ratio is the sum of the dollars of common dividends paid and dollars used for share repurchases for the year, divided by net earnings applicable to common shareholders.

RECOGNIZED FOR EXCELLENCE

- Zions Bancorporation received 13 Best Bank Awards for national distinction in middle market and small business banking from financial services consultant Coalition Greenwich in 2025. Coalition Greenwich annually conducts market research interviews with 25,000 businesses nationwide, evaluating more than 500 banks. Since the inception of the awards in 2009, Zions is one of only four U.S. banks to average 15 or more Best Bank awards per year.
- American Banker magazine's "Most Powerful Women in Banking" issue has recognized Zions bankers with individual awards 36 times since 2004. The magazine has also recognized Zions as a "Top Banking Team" 12 times.
- California Bank & Trust received a 2024 gold honor for corporate responsibility in the 2024 Merit Awards for Business. It has consistently been voted "Best Bank" in San Diego, Orange and Sacramento Counties by the San Diego Union Tribune, Orange County Register and Sacramento Bee.
- National Bank of Arizona has been voted No. 1 Bank in Arizona for the 21st year in Ranking Arizona magazine as well as a Best Place to work.
- Nevada State Bank has consistently been voted "Best Bank" in the Las Vegas Review-Journal, the Reno Gazette-Journal, and Elko Daily Free Press.
- Vectra Bank Colorado has received "Top Workplace" recognition from The Denver Post, and "Best Denver Commercial Bank" from the Colorado Sun Readers Poll.
- Zions Bank has been honored as a "Best Bank" by Utah Best of State Awards every year since 2005, and as Best Regional Bank in the Idaho Business Review's reader rankings.
- Amegy Bank was recognized as a "Top Workplace" by the Houston Chronicle.



COMMUNICATING WITH OUR STAKEHOLDERS

Our stakeholders include our clients, our employees, the communities we serve, and our shareholders — the owners whose capital has been entrusted to us.

SHAREHOLDERS

Throughout the year, we meet regularly with investors and actively seek their feedback on a wide variety of topics related to the conduct of our business. We strive to be transparent and responsive to the varied interests of the investor community. Our quarterly investor calls give all shareholders a convenient forum for submitting questions to management. Additionally, management presents at investor conferences and hosts small group and one-on-one meetings. The feedback received from investors and analysts at these meetings and other events is presented and discussed regularly in management and Board of Directors meetings.

CLIENTS

Our community banking model is focused on local leadership and customer relationships, and we take pride in knowing our clients and their businesses, which is reflected in our award recognitions.

In addition to day-to-day contact between our bankers and clients, we also receive feedback through regular client surveys. Our process for tracking and addressing client issues is described in this report under Fair Banking/Responsible Products.

EMPLOYEES

Our employees are given multiple channels to communicate directly with our executive management team, including our CEO and president. These include quarterly all-employee calls with open question-and-answer sections, town hall meetings, and listening sessions across our footprint. Employees are encouraged to submit questions and suggestions at any time through links on all of our Zions Bancorporation intranet sites. We also conduct a biannual all-employee survey rating satisfaction across a number of categories. Sample questions include how well groups work together effectively throughout the enterprise and availability of fair and equitable development and promotional activities for all employees. In addition to the numerical rankings, the 2025 survey responses included 7,801 individual open comments. Our process for employees to report concerns anonymously and whistleblower protection is described in this report under Ethical Practices.

COMMUNITIES

In addition to supporting our clients, our bankers are active in our communities, serving on hundreds of nonprofit and municipal boards and participating in many other activities as described in the volunteerism section later in this report.



STAKEHOLDER ASSESSMENT

The topics covered in Zions Bancorporation's Corporate Responsibility Report are based on the priorities of our major stakeholders. Feedback is received from the channels described above and through discussions with our Board and executive leadership team. The report provides transparency and accountability in our responsible business practices and strategic initiatives.

SHAREHOLDERS

Our robust governance, risk management practices and resource stewardship help investors assess the long-term sustainability and risk profile of Zions Bancorporation.

CLIENTS

This report details our work to provide quality products and services that strengthen our clients while safeguarding their data. It demonstrates our commitment to supporting the growth and well-being of our clients in our shared communities, highlighting our initiatives in small business lending, fair banking and cybersecurity. In addition, the information provided is responsive to sections of requests for proposal from potential clients.

EMPLOYEES

The report reinforces Zions' dedication to creating a positive and inclusive workplace. It includes disclosures on employee engagement and professional development programs available to all employees. By showcasing our efforts to foster a supportive work environment, we aim to attract and retain top talent who are aligned with our corporate values and represent the communities where we operate.

COMMUNITY MEMBERS

As a financial institution deeply rooted in the communities we serve, it is essential to communicate our impact on local development and sustainability. The report details our community reinvestment activities, philanthropic efforts, and partnerships with local organizations. This transparency helps build trust and strengthens our relationships with community members, reinforcing the reputation of each of our local brands as engaged and collaborative corporate citizens.



ADVANCING OUR PEOPLE



ADVANCING OUR PEOPLE

During the 1970s, Zions' motto was *"Where People Mean Everything."*

For all the changes that have taken place in this industry over the last half century, one of the great constants has been that people really do mean everything. Zions Bancorporation is proud of its extraordinary employees who bring their talents to work each day.

We know that an exceptional company can only be built by exceptional people, working together as a great team. We value our employees, and we are committed to search out, recognize and create fulfilling opportunities for outstanding people within our organization, and to reward them for their contributions to our success. Our employee tenure averages 9.07 years, compared to the industry median of 4.5 years. Our turnover is consistent with published averages for our industry.

CULTURE AND VALUES

We provide growth, development, and leadership opportunities to all employees. Our commitment is to maintain a workplace where everyone is treated with respect and fairness, based on their qualifications and abilities, ensuring that the bank is a place where everyone counts.

We embrace differences while finding common ground and focusing on things that unite us. Our Everyone Counts Council coordinates the related efforts of our affiliates and enterprise employee groups, providing executive management with recommendations for continuous improvement.

Our initiatives include employee business forums, mental and physical wellness programs, and a broad range of employee and regional events. Throughout the organization, the employee business forums, which are open to all employees, foster a sense of community and enable greater connectivity and support among employees and the communities in which we operate.

We believe that our performance is stronger when we draw upon the talents and experience of a diverse team of employees with varied backgrounds. The in-person exchange of ideas and viewpoints, in both formal and informal settings, improves productivity and cultivates a strong corporate culture while offering flexibility to balance personal needs.

The Zions Bancorporation Code of Business Conduct and Ethics notes that all employees are responsible for providing a positive working environment. Demonstrating accountability among leadership, the executive management goals set by the Compensation Committee of the Board of Directors include promoting a culture of strong civic engagement.



WORKFORCE DEMOGRAPHICS

Through Dec. 23, 2023, which is the current Equal Employment Opportunity Commission reporting year, Zions employed 9,943 colleagues (including full- and part-time employees) in the following demographic categories as disclosed on our EEO-1 report:

EEO-1 JOB CATEGORY ¹	HISPANIC OR LATINO		NOT-HISPANIC OR LATINO: MALE					
	Male	Female	White	Black or African American	Asian	Native Hawaiian or Pacific Islander	American Indian or Alaska Native	Two or More Races
EXEC/SENIOR OFFICIALS & MANAGERS	27	30	568	9	48	2	1	4
FIRST/MID OFFICIALS & MANAGERS	97	194	290	18	35	3	3	4
PROFESSIONAL	198	217	1,429	77	262	8	3	42
TECHNICIANS	7	0	5	0	1	0	0	0
SALES WORKERS	0	0	0	0	0	0	0	0
ADMINISTRATIVE SUPPORT WORKERS	283	822	524	66	83	11	8	37
CRAFT WORKERS	0	0	0	0	0	0	0	0
OPERATIVES	0	0	0	0	0	0	0	0
LABORERS & HELPERS	0	0	0	0	0	0	0	0
SERVICE WORKERS	0	0	0	0	0	0	0	0
CURRENT 2023 REPORTING YEAR TOTAL	612	1,263	2,816	170	429	24	15	87
PREVIOUS 2022 REPORTING YEAR TOTAL	620	1,290	2,977	159	424	22	18	95

EEO-1 JOB CATEGORY ¹	NOT-HISPANIC OR LATINO: FEMALE							Overall Totals
	White	Black or African American	Asian	Native Hawaiian or Pacific Islander	American Indian or Alaska Native	Two or More Races		
EXEC/SENIOR OFFICIALS & MANAGERS	223	10	32	2	1	3	960	
FIRST/MID OFFICIALS & MANAGERS	563	56	65	10	8	14	1,360	
PROFESSIONAL	977	104	212	9	7	36	3,581	
TECHNICIANS	0	0	0	0	0	0	13	
SALES WORKERS	0	0	0	0	0	0	0	
ADMINISTRATIVE SUPPORT	1,631	237	216	20	23	68	4,029	
CRAFT WORKERS	0	0	0	0	0	0	0	
OPERATIVES	0	0	0	0	0	0	0	
LABORERS & HELPERS	0	0	0	0	0	0	0	
SERVICE WORKERS	0	0	0	0	0	0	0	
Current 2022 Reporting Year Total	3,394	407	525	41	39	121	9,943	
Prior 2021 Reporting Year Total	3,616	460	535	48	43	136	10,443	

¹ "Employee Tenure in 2024." U.S. Department of Labor Bureau of Labor Statistics, 26 Sept. 2024, <https://www.bls.gov/news.release/pdf/tenure.pdf>

We do not establish or use specific demographic metrics when making hiring decisions, choosing instead to focus on tools and activities supporting our dedication to hiring, advancing and supporting an inclusive, qualified team representative of our markets. These include the following:

HIRING

- We use analytics, recruiting outreach efforts and manager training to reach a qualified group of potential applicants. These strategies are in place to secure and retain a high-performing workforce from all segments of society.
- Our Banker Development Program was created to attract and advance undergraduates and early career professionals.
- We use the Symplicity recruiting platform to increase the visibility of our postings to over 500 universities.
- We partner with Fairstream to connect through virtual career events with varied professional skill sets.
- We work closely with BankWork\$, which provides training for young adults for careers in the financial service industry. Classes are free and provide skills training, job interview practice, placement assistance and ongoing coaching to help with career advancement. Our affiliates provide financial support to keep the program running and seek to hire BankWork\$ graduates.

ADVANCING

- We provide the MyCareer site to assist employees at all levels to identify career opportunities and the experience, education and exposure needed for advancement. This resource provides a foundation for career development conversations.
- We annually conduct a formal talent review process, with the goal of identifying high potential talent and potential successors for leadership roles across the bank, and the development needed to prepare candidates for advancement, including education, experience and exposure. This process is reviewed annually with the Board of Directors as part of its succession planning discussion.
- We offer a formal Mentor Program for up-and-coming employees who are paired with senior-level mentors to focus on specific growth areas.
- In addition to the formal mentoring programs, we make available new manager programs, tuition reimbursement, education sponsorship opportunities, job shadowing and coaching.
- Our RISE services (Reflect, Investigate, Skill Up, Engage) provide individualized development planning conversations to assess needs and identify appropriate resources and opportunities.
- In 2024, we hosted a total of 624 instructor-led training events, supporting organizational capability and employee development across multiple business lines. As part of an ongoing commitment to continuous learning, Zions launched a new enterprise-wide learning platform in October 2024, providing employees with access to over 20,000 digital courses and structured learning paths. We also partner with external experts and services to deliver experiences on various industry topics, including the American Bankers Association, Pacific Coast Banking School, Stonier Graduate School of Banking and others.



In 2025, Houston Business Journal recognized Amegy Bank for its outstanding contributions to building an inclusive workplace.

- For the fourth consecutive year, Zions Bancorporation received the prestigious LearningElite Award for its outstanding performance in learning strategy, leadership commitment, learning execution, learning impact and business performance results. Additionally, our chief learning officer was honored with a Learning in Practice Award for Business Impact, underscoring the strategic influence of the bank's learning initiatives on organizational outcomes.
- Zions Bancorporation has been recognized seven years in a row by the Women Tech Council's "Shatter List," showcasing companies that are elevating women in technology roles.

SUPPORTING

- We annually conduct reviews of equity in employee compensation with biannual third-party validation. Our most recent study found that, after adjusting for relevant variables including job title and geography, there was no meaningful difference in pay levels across our workforce. We're committed to continuing this focus on ensuring that Zions Bancorporation has a workplace where all are treated fairly in accordance with their qualifications and abilities.
- To foster innovation through a broad spectrum of perspectives across every employee level, we created the "Simple, Easy, Fast, Safe" suggestion box for bankers to submit ideas to improve employee and customer experiences. Projects are tracked and an executive team meets monthly to discuss updates on the status of the progress of new initiatives.
- Our Human Resources team works to identify the right workplace accommodations to support colleagues with pregnancy, disability, religious or other accommodation needs.
- Affiliates organize internal business resource groups open to all employees to foster networking and initiatives.

MILITARY SUPPORT

Zions has signed a formal agreement with the U.S. Army to promote quality civilian jobs following military service through the Army's Partnership for Youth Success program and the Employer Partnership of the Armed Forces.

Zions Bank Military Relations maintains contact with deployed employees and their families, providing home repairs, lawn maintenance, holiday gifts, and financial assistance. The bank's military employee forum facilitates networking opportunities for service members to share information about military and veteran services, provide service to external charitable military organizations, and to build camaraderie within the bank's military and veteran employees.

We were one of the first banks in the country to offer a Military Assistance Furlough program to help minimize the financial impact of the federal sequestration on guardsmen, reservists and Department of Defense civilians. Zions modified existing loan and credit card terms for current clients and created a process to expedite the credit approval process for both new and existing clients.

Transitioning from their civilian jobs to active duty, service members may experience disruption in pay or a discrepancy between their salary and military pay. To address these issues, Zions Bancorporation implemented a pay policy that provides for differential pay to military members for up to two years and, at the bank's discretion, the possibility of extending the benefit for up to five years. The bank also implemented military paid leave benefits in which military employees are given 15 days of paid military leave. In addition to differential pay, Zions continues all benefits to its military employees on active duty for up to two years, and up to five years at the bank's discretion.

Amegy Bank's Military/Veteran's Business Resource Group and allies sponsor the Rice University Veterans Business Battle, the largest veteran-focused business plan competition in the country. It serves as a forum to connect veterans with investors, advisers and resources with the goal to lead as many veteran-owned businesses to success as possible.

Zions' ongoing support for military service members and their families garnered national recognition, including the Secretary of Defense Employer Support Freedom Award presented at the Pentagon. The Freedom Award is the Department's highest recognition given to employers for exceptional support of Guard and Reserve employees. Zions has also received the following additional awards:

- Department of Defense Patriotic Employer Award;
- Employer Support of the Guard and Reserve Pro Patria Award;
- Utah National Guard Charitable Trust donation recognition;
- Red Cross Workplace Safety Heroes Award;

- National Governors Association Distinguished Service to State Government Award;
- Named Veteran Friendly Business, Utah Department of Veterans and Military Affairs; and
- Wingman Award, Hill Air Force Base.



EMPLOYEE BENEFITS AND WELLNESS

We empower our employees to achieve optimal health — physically, emotionally, and financially. In addition to our core medical, dental, vision and retirement benefits for those regularly scheduled to work at least 20 hours per week, we offer the following enhanced benefits:

PHYSICAL AND MENTAL WELLNESS BENEFITS

- Mental health coaching and clinical therapy sessions available to employees and their dependents free of charge, regardless of whether they are covered under the Zions medical plan
- Preventive prescription drug coverage, covering 80% to 100% of preventive medication prescriptions regardless of whether individuals have met their deductible
- Free and confidential case management assistance program providing a nurse to help navigate complex medical conditions
- Diabetes/hypertension support and resources from a personal health coach
- Medically necessary health plan coverage for autism spectrum disorders and developmental delays
- LiveWell Rewards for completing preventive care and exams
- Onsite immunizations, mammograms and other preventative health screenings provided annually at select sites

FINANCIAL WELLNESS BENEFITS

- 401(k) Plan with 4.5% bank match
- Profit sharing
- Basic life insurance
- Long-term disability insurance
- Short-term disability plan offering income protection to all benefits-eligible employees for extended illnesses, injuries and pregnancies
- Tuition reimbursement
- Ambassador Program banking benefits
- Maternity and paid parental benefits available to mothers, fathers and domestic partners
- Adoption Assistance Program to help defray the costs related to adoption
- Fertility benefits to defray the costs associated with fertility services
- Little to no-interest payroll advance loan for employees who need help paying their medical expenses before meeting their deductible and out-of-pocket maximum
- Paid vacation days
- Holiday pay



California Bank & Trust has been recognized as a 2025 National Best and Brightest in Wellness and a San Diego Best and Brightest in Wellness Elite winner by the National Association of Business Resources. This distinction reflects our ongoing commitment to cultivating a workplace culture that prioritizes employee well-being through strategic wellness initiatives, comprehensive benefits and a sustained focus on mental, physical and financial health.



BUILDING STRONG COMMUNITIES



BUILDING STRONG COMMUNITIES

OUR PRODUCTS

Our Guiding Principles state that we strive to make our clients stronger by creating economic opportunity for them; our goal is to provide products and services that strengthen our clients, not weaken them. We want to be proud of the clients we're associated with, and we want them to be proud to be associated with us. We are committed to improving the quality of life for our clients on every rung of the economic ladder by enthusiastically engaging ourselves in community issues and offering creative financing solutions to challenging community needs.

New, modified or expanded products and services undergo due diligence as required by our Change, Initiatives and Technology Committee (CITC) approval process, which includes reviews to ensure that there are appropriate governance, employee training and awareness, pricing, disclosure, risk controls, monitoring, and reporting. The Change, Initiatives and Technology Committee, which reports to the Risk Oversight Committee of the Board of Directors, monitors the performance of designated initiatives post-implementation. Our marketing is governed by our Regulatory Advertising Policy, and each piece in any medium is reviewed by Compliance to ensure it accurately and understandably represents the bank's products and services.

FAIR BANKING/RESPONSIBLE PRODUCTS

We ensure that we provide fair access to quality financial services, treat our clients fairly, and comply with the substantial laws and regulations applicable to the financial services industry that require responsible product offering and marketing. Our Fair Banking Program promotes an integrated and comprehensive approach to compliance with all applicable federal and state consumer financial protection laws, regulations and guidance. The following table provides a summary of our related policies and programs to promote the best interests of our clients. Training is provided annually for relevant employees.



RESPONSIBLE MARKETING

- Fair Banking Policy
- Fair Banking Program
- Truth in Lending (Reg Z) Policy
- Regulatory Advertising Policy
- Conduct and Sales Practices Oversight Program
- CAN-SPAM Act Policy

RESPONSIBLE PRODUCT OFFERING AND SERVICE REVIEWS

- Change, Initiatives and Technology Committee Charter
- Complaint Management Policy
- Fair Banking Program
- Consumer and Small Business Account Origination Policy
- Customer Restitution Policy

FAIR DEBT COLLECTION

- Regulation F – Fair Debt Collection Practices Act Policy
- Regulation V – Fair Credit Reporting Act Policy

Management committees overseeing compliance with our comprehensive internal policies and procedures, and banking regulations report up to the Risk Oversight Committee of our board of directors. Examples include the Deposit Operations Compliance Committee and the Credit and Lending Compliance Committee. All client complaints and resolution activities are tracked centrally and monitored by our Fair Banking division, which is overseen by our chief risk officer. Regular reporting is made to management and the Risk Oversight Committee. As a national bank, we are subject to the following laws and regulations, which provide additional protection to our clients:

FAIR LENDING LAWS

- Dodd-Frank Wall Street Reform and Consumer Protection Act — prohibiting unfair, deceptive, or abusive acts or practices (UDAAP).
- Home Mortgage Disclosure Act — requiring banks to provide data on mortgage loans to help regulatory agencies and the public identify discriminatory lending patterns.
- Fair Housing Act — prohibiting discrimination in all phases of housing.
- Equal Credit Opportunity Act — protecting consumer and business applicants from discrimination in lending.
- Americans with Disabilities Act — prohibiting discrimination against individuals with disabilities.
- Community Reinvestment Act (CRA) — encouraging depository institutions to help meet the credit needs of the communities in which they operate.
- Servicemembers Civil Relief Act — protecting military personnel whose service obligations may impact their ability to meeting their previous financial commitments.

PRIVACY

- Gramm-Leach-Bliley Act — requiring financial institutions to maintain procedures to protect the privacy of sensitive customer information.
- Privacy Notice — requiring accurate disclosure of our privacy policies and practices.
- California Consumer Privacy Act — requiring covered entities to provide California residents with a number of privacy related rights.

We view compliance through the lens of doing what is right for our clients and communities and have implemented programs that support this tenet, including executive review of products and initiatives to manage risks and promote quality, fairness and responsibility. In addition, a team of trained compliance and legal professionals help our bankers to develop marketing materials that clearly describe products and any associated risks and considerations to allow clients to make informed financial decisions. These efforts are supported through ongoing training of all personnel involved in developing and offering products and services to our clients, promoting front-line accountability for fair, responsible banking. Every employee is required to complete an average of six hours of compliance training each year in addition to other job-specific training. Most contract employees are also required to complete compliance training as well as other trainings assigned by our Learning and Development team, based on their role.

In addition, an extensive client feedback and complaint procedure with independent oversight assists us in meeting the needs and expectations of our clients. The procedure includes specific steps for tracking, escalating and centralized monitoring of complaints received verbally or in writing — including electronically through channels such as online, email and social media — through our branches, customer care center, consumer-facing service providers, or a regulator or agency. For more details on our compliance programs, see Ethical Practices later in this report.

ACCESSIBLE SERVICES

We're committed to making our products and services convenient and accessible for all clients. We monitor and strive to improve accessibility and client experience, whether you bank with us online, through a branch, ATM, or over the phone. We are committed to complying with the Americans with Disabilities Act (ADA) including by:

- Accepting calls made with Telecommunications Relay Services.
- Offering tablets in our branches that pair with hearing devices and provide subtitles, voiceover, braille screen input, spoken content, zoom or magnifier options, and text magnification.
- Routinely reviewing our facilities for accessibility, paying careful attention to parking spaces, curbs, ramps, doors, entrances, safe deposit features, lobby areas and more.
- Providing one-on-one help with reading, filling out and completing forms.
- Striving to meet the technical standards and design requirements set forth by World Wide Web Consortium's (W3C) Web Content Accessibility Guidelines (WCAG).
- Requiring annual employee training on requirements of the ADA.



SOCIAL INVESTMENT

Our Wealth Management services provide a comprehensive array of planning and investment options. Clients may select to exclude certain industry types from their investment portfolios to align their investing with their environmental and social values.

BRINGING ACCESS TO UNDERSERVED MARKETS

PRODUCTS TO INCREASE BANKING ACCESS

Products to assist clients who are developing financial literacy, on fixed incomes, previously unbanked or financially distressed include our Bank On certified OnBudget Banking and OnBudget Student Banking accounts to help clients stay “on budget” in managing their financial life, with a low, flat monthly fee, and no overdraft or insufficient fund fees. Senior Advantage Checking, with a flat monthly maintenance fee, provides lower income seniors with a solid low-cost option. Anytime Checking is available to students with no monthly maintenance fee.



Zions Bancorporation’s Community Reinvestment Act-eligible mortgage product is competitively priced and can be booked as a 15-year or 30-year fixed rate loan. Designed to help low- and moderate-income borrowers, the product offers a maximum LTV of 97%, requires a 620 FICO or higher, and charges a maximum of 3% in points and fees. Loans must be made to borrowers who are at or below 80% Area Median Income, or purchasing a property that is either in a Majority Minority Census Tract or a Low- or Moderate-Income Census Tract.

Closing Cost Assistance is available for borrowers purchasing a primary/principal residence who have incomes at or less than 80% Area Median Income and either purchase a home in a Low- or Moderate-Income Census Tract or purchase in a Majority-Minority Census Tract. Assistance is available for the Affordable Home Mortgage, HomeReady, Home Possible and FHA products.

We help homebuyers navigate down payment assistance programs and obtain loan financing when down payment options and/or closing costs are a concern. We collaborate with third-party programs (e.g., the Federal Home Loan Bank-Dallas, City of Houston Housing Assistance Program), where possible, in order to maximize impact. Our affiliates also offer free homebuyer education courses and participate in homeownership forums in the communities we serve.

As part of our ongoing commitment to provide products and services that best serve our clients’ financial needs, in 2022 we eliminated NSF fees for items that are returned unpaid because of nonsufficient funds; reduced the Overdraft fee for paid items by 20%; eliminated the continuing overdraft fee; and expanded the Overdraft fee cushion from \$5 to \$30. Clients will not receive an Overdraft fee when their account is overdrawn \$30 or less at the end of the business day.

ACCESS TO CAPITAL

We are committed to make a difference for small businesses in the marketplace. Our most potent tool in creating positive change is to put our balance sheet and our bankers to work in funding the capital needs of these deserving businesses.

Zions Bancorporation’s focus on SBA lending provides a foundation for economic growth and job creation essential to the long-term health of our communities, including underserved markets.

During the SBA’s 2024 fiscal year, Zions ranked 20th in the nation in SBA 7(a) loan approvals, the SBA’s primary program for providing financial assistance to small businesses. The bank’s average loan amount — \$245,206 — demonstrates that we are meeting entrepreneurs’ appetite for modest leverage while still allowing them to grow and hire new employees.

Capital provided through Zions Bancorporation’s 7(a) loans to small businesses allowed them to create 2,080 new jobs and maintain 3,139 positions in 2024, according to SBA data.

Zions Bank received the SBA Utah District 7(a) Women-Owned Business Lender Award and the SBA Utah District Rural Lender Award.

The Commerce Bank of Washington has joined with the University of Washington's Foster School of Business Ignition Fund to provide financing for underserved businesses.

In 2024, California Bank & Trust provided a banker for the "Unlocking Growth: Small Business Access to Capital" workshop organized by the Oakland Metropolitan Chamber of Commerce and SF Lends. SF Lends is an initiative of the Office of the Treasurer & Tax Collector (TTX) and the City of San Francisco's Administrator's Office that connects small businesses to affordable loans and lines of credit for their day-to-day cashflow needs.

Zions Public Finance supports local municipalities and school districts by working to structure and issue bonds that are used to finance the building of public facilities, improve schools, and enhance the day-to-day life of residents of those communities. Zions is a primary financial adviser to municipalities and local governments in Idaho and Utah and is growing this business in the rest of our footprint — helping foster prudent use of taxpayer dollars in cities, towns and counties throughout the West.

In addition, some Zions affiliates participate in Community Development Financial Institutions Funds (CDFIs) to help generate economic growth and opportunity in some of our nation's most distressed communities.

The curriculum for our Banker Development Program for early career professionals includes a tour of Low and Moderate Income (LMI) areas and affordable housing with some of our community partners. Participants receive additional training on the Community Reinvestment Act/Community Banking.

AFFORDABLE HOUSING

The stability of a community depends the quality and affordability of its housing. Dedicated to making neighborhoods brighter, in 2024 Zions originated \$1.86 billion of community development loans, including the development of 8,624 units of affordable housing.

For decades, Zions has empowered bankers to focus on construction and permanent lending for affordable housing, including the development and preservation of affordable housing units throughout the Western United States through a variety of creative financing products such as taxable and tax-exempt construction and permanent bonds, and letters of credit. Bank funds are leveraged with public sector programs such as the low-income housing tax credit program to create high-quality rental communities. Community development loans provide much-needed affordable housing.

Our investments in CDFIs will assist in the development and preservation of affordable housing, small businesses and access to education in LMI neighborhoods across our footprint.



Zions Bank partnered with other Utah businesses and the Utah Nonprofit Housing Corporation investing in the “Utah Housing Preservation Fund,” and the “Rocky Mountain Home Fund.” These funds are aimed at helping preserve and grow Utah’s affordable housing. Zions Bank was also a platinum sponsor of the Avenues for Hope Campaign in Idaho, which strengthens housing-related nonprofits throughout Idaho to improve affordable housing options.

Nevada State Bank is a long time supporter of Nevada HAND, a nonprofit developer, builder, and manager of affordable rental homes for seniors and working families. NSB President and CEO Terry Shirey is a member of the Nevada HAND Board of Directors.

NONPROFIT INVESTMENT BANKING

The Zions Public Finance Nonprofit Group, established in 2001, provides 501(c)(3) organizations nationally with tax-exempt financing resources to meet their capital project needs including the following examples:

- HopeWest, Grand Junction, Colorado — This nonprofit provides hospice, palliative care, all-inclusive care for the elderly, and bereavement care services to people in their homes across 10,000 square miles in Western Colorado.
- The Girls’ Middle School, Palo Alto, California — Founded in 1998, this school nourishes academic growth and pioneers courses to help girls discover their strengths while respecting the contributions of others.

VOLUNTEERISM

A culture of community involvement starts at the top with Chairman and CEO Harris Simmons and our affiliate CEOs, who regularly remind employees of the bank’s Guiding Principle: “We recognize that banking is a ‘local’ business, and that to be successful, we must have very strong ties to the communities we serve and strong relationships with our customers.”

Part of our branch managers’ job description is to be involved in their communities. Employees are encouraged to be involved in local nonprofit organizations, volunteering their time and serving on boards. Our bankers gave nearly 30,000 hours of service to 1,056 charities in 2024. Employees generously contribute their time to help schools and nonprofit organizations in our neighborhoods. It’s part of what makes Zions a great place to work and a great place to bank: We give back and we make a difference.

Some of our affiliates offer paid time for employees to volunteer during business hours without having to use vacation time. Employees may volunteer at a school or nonprofit of their choice.

In addition to the volunteer hours and monetary donations described above, here are some samples of other ways our bankers are supporting nonprofits.

- Nevada State Bank was recognized with a Governor’s Points of Light silver award for its volunteer program.
- Amegy Bank received the 2024 CKW Luxe Top 20 Impact Makers Award. Impact Makers are humanitarians who are generous in their support of others, dedicated to improving lives and living conditions, and devoted to finding better ways of helping. Their achievement has made a positive impact on arts, science, education, humanitarianism or medicine across Houston.



- More than 2,100 Zions Bank employees and family members participated in the 32nd annual Paint-a-Thon, painting and beautifying homes, community centers and nonprofit organizations in Idaho, Utah and Wyoming. Over the years, Zions bankers have painted and fixed up 1,300 homes for seniors, the disabled and veterans who needed help maintaining their residences.
- During California Bank & Trust's Give Week, colleagues supported 42 separate nonprofits. Activities ranged from sorting and distributing produce at local food banks to teaching money management at local elementary schools.
- Colleagues from our headquarters location have staffed a daily Meals on Wheels route for over 25 years and colleagues from our technology center took on a new route in 2024.

FINANCIAL LITERACY

The T. Rowe Price *"Parents, Kids and Money"* survey found parents are more willing to discuss bullying, drugs and relationships with their children than the topic of finances. We are proud to provide financial literacy education tools for all ages.

Our affiliate banks publish timely and seasonal financial education articles on dozens of topics, including budgeting, credit management, prudent savings tips and scam awareness available to all in our client newsletters, social media and websites. We also provide emails, business articles, and economic and jobs reports. Employees also regularly contribute informational articles on a variety of banking, economic and fraud prevention topics in local publications including The Enterprise Business Journal, The Idaho Business Review, Eastern Idaho Business Journal, Valley Journals, and San Juan Record. In addition, below is a sample of the in-person financial literacy training provided by our bankers.

For more than 20 years, our bankers have visited local schools to teach K-12 students, helping to put them on a path to becoming smart money-managing adults during National Financial Literacy Month and throughout the school year with the Young Americans Center for Financial Education.

Amegy Bank's multi-faceted, unique financial education program engages bankers, consumers, schools and nonprofit organizations from across Texas, addressing the most crucial needs for financial literacy in the communities we serve. The strategic initiative aims to foster educational opportunities through schools and nonprofit organizations, empowering individuals to achieve their goals as savers, consumers, homebuyers and small business owners. A key component is Amegy's EnRiching Tomorrow, bringing together Texas Title 1 middle school students with first-generation entrepreneurs, including ex-pro athletes, TV personalities, and Amegy bankers for real conversations about money, dreams and success and encourages students to prioritize their education.

National Bank of Arizona bankers partnered with community centers in Phoenix to present monthly Take Control of Your Finances classes. They worked with three nonprofits, SCORE, Das Foundation and Women Business Center (CPLC) to present the financial intelligence for small businesses program.

Since 2002, Zions Bank employees have volunteered for the American Bankers Association's National Teach Children to Save program to teach nearly 200,000 K-12 students the ABCs of saving.

Colleagues across our footprint volunteer with the IRS's Volunteer Income Tax Assistance Program across our footprint to provide free income tax assistance to those in need. Many of the people who benefit from these services are senior citizens, have disabilities, earn low incomes or do not have strong English-speaking skills. Besides helping with tax preparation, volunteers assist with budgeting and overall financial literacy.

Our bankers deliver Junior Achievement's K-12 programs to foster work-readiness, entrepreneurship and financial literacy skills, as well as to use experiential learning to inspire students to dream big and reach their potential.

We collect entries for the American Bankers Association's Lights, Camera, Save! video contest. Middle and high school participants create videos that educate young people about the value of saving and using money wisely.

To help teenagers understand the perks and pitfalls of credit, bankers volunteer in high school classrooms through the American Bankers Association's Get Smart About Credit program.

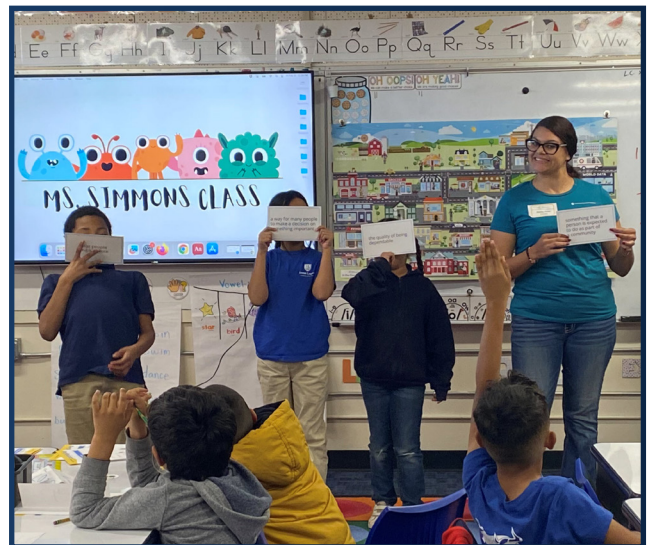
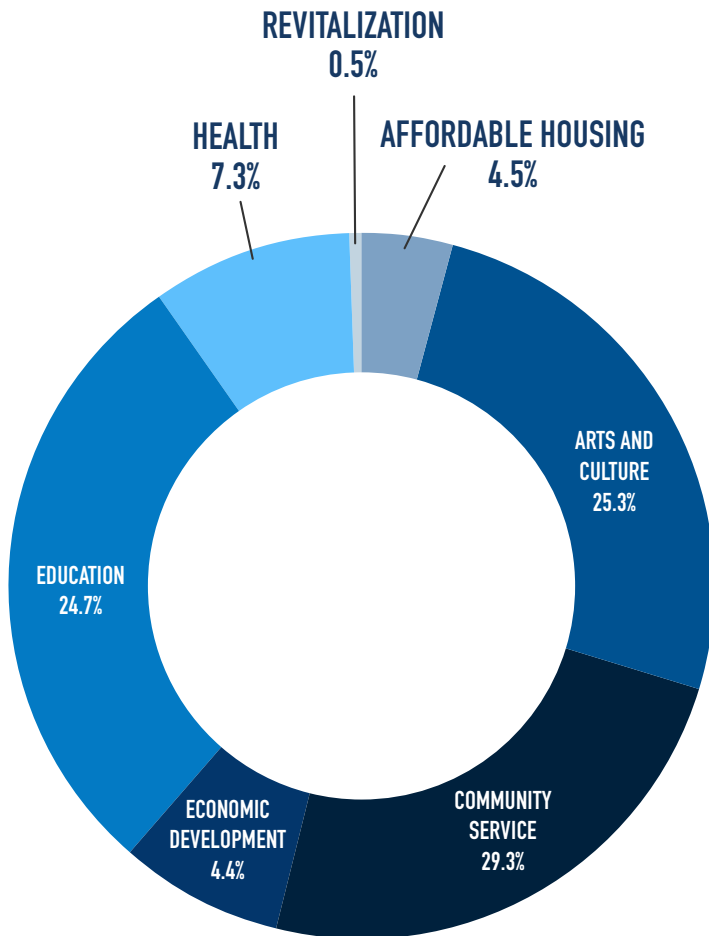
CORPORATE GIVING

Our charitable giving decisions are made by each of our affiliates in their local footprints. The local donation budgets are supplemented by funds from the Zions Bancorporation Foundation. In 2024, \$12.6 million of contributions were made to more than 1,000 charitable groups categorized as shown in the chart below.

Management earmarked \$40 million of the fees received from Paycheck Protection Program loan originations for the Zions Bancorporation Foundation in 2021 to provide for long-term charitable giving.

Surplus furniture and fixtures are donated to schools and community organizations throughout our footprint.

Affiliates provide locations for nonprofit meetings and events, as well as longer-term office and storage space for several charitable organizations. In 2024, Houston Fire Department Station 8 used an Amegy Bank facility and volunteers to store and sort gifts for 20,000 children during its Operation Stocking Stuffer toy drive.



BOLSTERING ENVIRONMENTAL SUSTAINABILITY



BOLSTERING ENVIRONMENTAL SUSTAINABILITY

By taking deliberate actions toward energy conservation and sustainability, as well as offering incentives for employees to use mass transit, financing green projects and supporting air quality efforts, Zions Bancorporation is helping bring value to benefit future generations across its footprint.

REMOTE DEPOSIT CAPTURE

Two decades ago, Zions Bancorporation was at the forefront of efforts to give electronic versions of checks the same legal validity as original paper checks. In the 1990s, Zions pioneered the development of remote deposit capture technology that allows paper checks to be deposited electronically by submitting to the depository bank a photographic image of the original check. *American Banker* magazine reported on Zions' technological innovations in a 2007 article.

Zions Bancorporation was instrumental in working with the U.S. Federal Reserve Board toward the passage of the "Check 21 Act" in 2003 that established, as U.S. law, the legal framework necessary for the widespread adoption of remote deposit capture technology. A Zions representative sat on the legislative committee that drafted the bill and testified in support of it at a Senate subcommittee hearing. Zions was the first bank to deploy this technology to commercial clients and continues to be an industry leader in offering this technology.

Remote deposit capture has had a profound effect on climate change by reducing emissions from air transport, mail and courier services across the country. The technology has eliminated the need for clients to visit a bank branch, typically via car, to deposit checks. It is estimated that visits to branches by smaller businesses using this technology have been reduced by 40%. The technology's impact continues to grow, including the spread of the technology to consumers — enabling them to deposit checks via their smartphones.

While it is impossible to gauge the total impact of remote deposit capture on the environment, Zions Bancorporation's early efforts and innovations have eliminated many millions of trips to the bank.

FOCUSED CONSERVATION

Dedicated to the long-term health of our communities and the environment, Zions Bancorporation demonstrates corporate leadership in sustainability. Zions has many examples of prudent use of resources to decrease carbon emissions and other waste:

- The Zions Technology Center's LEED Platinum certified campus opened in 2022. Located on the former Sharon Steel Mill Environmental Protection Agency Superfund site, the sustainably built campus is the bank's primary technology and operations center. It is allowing us to achieve substantial efficiencies by eliminating 11 smaller facilities, reducing related occupancy costs by more than 20% while providing our team members with an exceptional work environment. Sustainability features include the following:



The Zions Technology Center is the first building in Utah to receive the ENERGY STAR® NextGen™ certification as one of the nation's most energy-efficient, low-emissions commercial buildings.



- » Carbon use intensity for the building calculated at 27.7 kg CO₂e/ft² (well within the American Institute of Architects Committee on the Environment Awards benchmark) making this one of the most sustainable buildings in the country.
 - » 75% of the building's power comes from on-site renewable solar energy saving 4.9 million pounds of CO₂ annually. Building and ground mounted panels maximize surface area and provide microclimates for habitat restoration.
 - » 180 electric vehicle charging stations are free to employees and visitors.
 - » The campus includes proximity to public transportation, walking and bike paths, a community garden, recycling facilities and programs to minimize waste.
- Energy consumption at our Nevada data facility is certified 100% renewable. The facility has successfully completed its ISO 14001 and ISO 50001 certifications, demonstrating its adherence to the highest standards in environmental and energy management. In addition to multiple years of Net ZERO Scope 1 and Scope 2 emissions, it recycles 100% of its used UPS and generator batteries through an EPA-certified company.
 - The Vectra Bank Colorado Corporate Center is located adjacent to a light rail station, features a cutting-edge water conservation system, and one floor of its parking is designed to be converted to alternative uses as transportation needs change. It was honored with the CoStar Impact Award for "Commercial Development of the Year," highlighting projects that have transformed their markets over the past year.
 - All California Bank & Trust building projects are designed to the CAL Green standard, complying with mandatory green building standards that reduce greenhouse gasses through energy conservation measures and wise selections of interior finishes and specifications. Reductions of indoor water use by 20% and construction waste by 50% are built into all California Bank & Trust projects.
 - The Amegy Tower in Houston, Texas, built in 2017, achieved LEED Gold certification and Energy Star certification. It also uses a condensate water reclamation system for irrigation and hosts beehives on the roof of its parking garage.
 - Zions Bancorporation subsidizes employee use of public transportation.
 - Zions Bancorporation employees now have the option to recharge their electric vehicles during the workday after the bank installed electric vehicle charging stations at multiple facilities.
 - At locations across our footprint, we monitor water flow, moisture levels and rainfall to decrease sprinkler use. We have also replaced grass at many locations with water efficient desert landscaping.
 - We decreased our electricity consumption by 13% since 2014 through a combination of re-lamping and HVAC projects.
 - All electronics are reused or recycled. Toner cartridges are returned to the vendor for recycling.
 - Recycling programs are in place across the footprint based on availability in each municipality. Items collected at Zions' headquarters and Technology Center include paper, cardboard, plastic, glass and metal cans. The Technology Center's community garden includes a composting program.

GREEN PROCESSES

Zions has redesigned processes to promote electronic forms and signatures, such as replacing paper account opening and loan applications forms with digital forms. Our new account opening process accommodating digital signature cards and disclosures saves over five million sheets of paper per year. From 2019 to 2023, mortgage applications transitioned from 100% paper to 100% digital.

Digital tools for relationship managers have replaced paper client files.

Bank systems to support electronic payment of third parties have eliminated nearly 30,000 paper invoices and more than 20,000 checks each year.

In 2024, Zions updated its supply lists to include more sustainable office products. 2025 plans include rollout of an additional supplier with a broader inventory of environmentally friendly options.

FINANCING RENEWABLE ENERGY AND ENERGY EFFICIENCY

Zions Bancorporation has been investing in renewable power generation since 2009. We have nearly tripled our renewable energy portfolio since 2019.



Our unit specializing in the financing of utility-scale renewable energy projects includes industry professionals based in Los Angeles, California, working on utility-scale wind, solar, and battery storage projects across the U.S. The team also frequently provides financing to natural gas-fired power plants that are replacing much older generating facilities that are either fueled by less-efficient gas technologies or by coal.

In 2024, Zions added nearly 2.5 gigawatts of capacity to its portfolio of renewable energy investments and was ranked a top 10 Mandated Lead Arranger of loans to renewable energy projects in the U.S., among U.S.-based lenders, per Infralogic.

Zions’ diverse portfolio of numerous energy and utility investments supports a responsible and sustainable approach to energy development as the bank continues to increasingly invest in renewable energy.

In 2024, Zions’ Municipal Finance division provided over \$19.8 million of financing to municipalities and school districts across the country for projects including renewable and energy efficiency upgrades, increasing the efficiency and operations of culinary and wastewater facilities, and open space improvements.



CLIMATE RISK MANAGEMENT

Zions considers climate-related risk as part of its overall strategy, risk, financial, capital, and operational plans. Zions’ Board, executive officers and other senior personnel closely monitor and measure a range of risks, including climate risk, as part of its Risk Management Framework and with the oversight of the Board’s Risk Oversight Committee. Risk is inherent in our business. To manage inherent risk to a level that is considered safe and appropriate, the Risk Management Framework sets forth processes to encourage enterprise-wide involvement in understanding and managing risks. This allows us to align levels and types of risk that we undertake with our business strategies and our Risk Management Framework to protect the interests of our customers and shareholders. Zions also has a Climate-Related Risk Management Framework that provides a structure for assessing, understanding, measuring, monitoring, and managing climate-related risks, consistent with Zions’ overall Risk Management Framework. Zions focuses on managing climate-related risks and opportunities within its control, even where such risks or opportunities may not meet traditional financial materiality standards.

The Board oversees our overall risk management process, including climate-related risks, and monitors, reviews, and responds to reports and recommendations presented by its committees, corporate management, internal and external auditors, legal counsel, and regulators. Through this ongoing oversight, the Board obtains an understanding of and provides input into how we assess, quantify, and manage risk throughout the enterprise. The Board’s active involvement in risk oversight helps to hold our executives accountable for implementing Zions’ Risk Management Framework, policies, and practices in a manner that discourages unnecessary or excessive risk taking.

The Board and its committees receive regular reports from senior executives and other company management, including the Enterprise Risk Management Committee (ERMC) and the chief risk officer, who reports directly to the Board's Risk Oversight Committee and Zions' chief executive officer. As may be appropriate and necessary, the Board engages independent consultants to review and provide guidance and perspective to the Board to strengthen its risk oversight concerning material risks.

Risks are assessed and reported across multiple governance and risk management committees. In addition to the ERMC oversight and the efforts of the Sustainability and Climate Disclosure Working Group noted in the Governance discussion, other management committees, including the Corporate Concentration Risk Committee (CCRC), Credit Risk Committee (CRC), and Allowance for Credit Losses (ACL), monitor and report on risks, including those related to climate. The CCRC oversees credit concentration risks, looking specifically for concentrations by geographic, industry, or asset class and assessing vulnerabilities due to climate-related risks. The CRC oversees credit portfolio performance and key credit metrics. Additionally, the ACL Committee evaluates the need for reserves against these risks as part of qualitative ACL assessments, including reserves that may be necessitated by climate-related risks.

EMISSIONS DATA

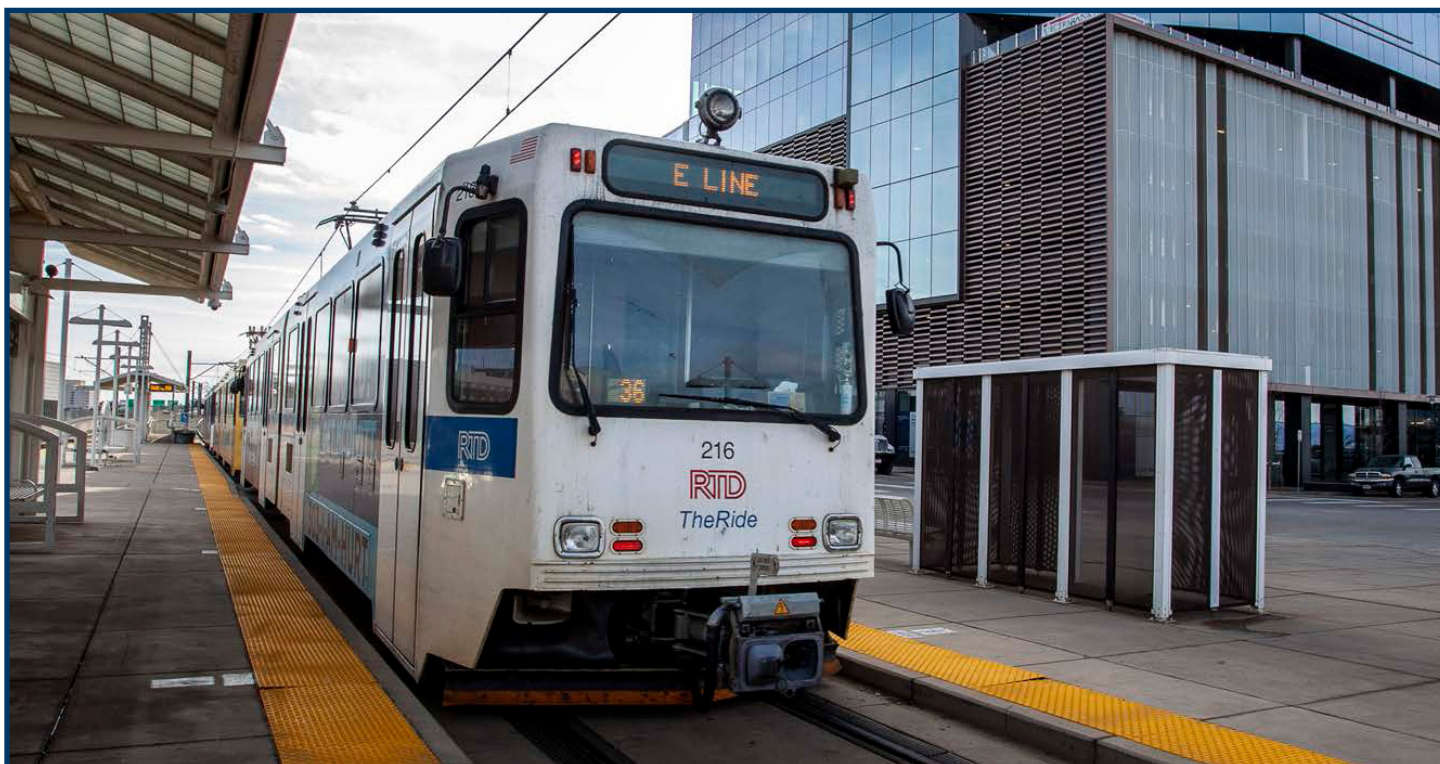
The table below presents our preliminary 2024 greenhouse gas emissions inventory.

GREENHOUSE GAS EMISSIONS (UNAUDITED) ¹ (AMOUNTS PRESENTED IN MT CO ₂ E)	2024
Fossil Gas	2,761
Other Scope 1 Sources	84
TOTAL SCOPE 1 EMISSIONS¹	2,845
Scope 2 Emissions (Location-based) ²	16,871
Scope 3 Emissions from Employee Business Travel (category 6) ³	2,828
TOTAL SCOPE 1, SCOPE 2 LOCATION-BASED AND SCOPE 3 EMISSIONS	22,544

¹ Includes data for facilities where the Bank is directly responsible for the payment of utility bills.

² Scope 2 includes GHG emissions from purchased electricity. The location-based method uses average emissions intensity from the source electric power grids.

³ Includes only Scope 3 employee travel-related GHG emissions from flights, hotels and rental cars.



UPHOLDING STRONG GOVERNANCE



UPHOLDING STRONG GOVERNANCE

We are committed to high standards of ethics and sound corporate governance, including oversight of the bank's affairs by a strong, experienced, qualified and independent board of directors. We regularly review and consider enhancements to our corporate governance guidelines and practices.

The Board's Nominating and Corporate Governance Committee oversees Zions' climate disclosures and corporate responsibility reporting, with review and approval by the Board. Additionally, the Board reviews and approves climate-related public disclosures.

DIRECTOR CONTINUING EDUCATION

The Board's Nominating and Corporate Governance Committee oversees director education and training, including recommending topics and tracking director participation. The Board regularly schedules educational presentations with management and third-party experts during its meetings to stay current on market, regulatory, and industry issues. In addition, our Board members periodically attend industry conferences, meetings with regulatory agencies, and training and educational sessions pertaining to their service on the Board and its committees.



BOARD STRUCTURE

- Comprised of 81% independent directors
- Independent lead director of the Board
- Independent Audit, Risk Oversight, Compensation, and Nominating and Corporate Governance Committees
- Regular executive sessions of independent directors
- Annual Board and committee self-assessments
- Ongoing succession planning



STOCKHOLDER RIGHTS

- Annual election of directors
- Majority voting for directors in uncontested elections
- No poison pill in effect
- Regular stockholder engagement



OTHER HIGHLIGHTS

- Director and executive stock ownership guidelines
- Pay for performance philosophy
- Broad clawback provisions in incentive plans
- No excise tax gross-ups
- Policies prohibiting hedging and limiting pledging
- CEO compensation to median employee compensation ranks among the best (lowest) of Zions' peers

CORPORATE GOVERNANCE GUIDELINES AND POLICIES

Recognizing that integrity, honesty and reliability are fundamentally important to our business, we operate within both the spirit and letter of the law. Our compliance with consumer laws and regulations is imperative to gaining and preserving customer confidence and trust. We maintain an enterprise-wide system of accountability we refer to as our three lines of defense. The first line of defense includes every employee. Everyone is expected to take ownership and promptly resolve issues within their area of responsibility. The second line of defense is our Enterprise Risk Management staff, which performs periodic testing to provide assurance of compliance with internal policies and procedures and external laws and regulations, including those described under “Our Products.” The third line of defense is Internal Audit, which provides independent assurance of the effectiveness of the first and second lines. These efforts are overseen by multiple regulatory agencies, such as the Office of the Comptroller of the Currency and Consumer Financial Protection Bureau.

In addition, elements of corporate governance are reflected in our board structure and responsibilities, and we maintain a comprehensive set of corporate governance guidelines and policies. These are adopted and updated by the Board of Directors upon the recommendation of the Nominating and Corporate Governance Committee and include the following:

- Corporate Governance Guidelines: address the Board’s structure and responsibilities, including its role in management succession planning and the evaluation and compensation of executive officers. The guidelines also address the expected retirement age for directors
- The Code of Business Conduct and Ethics: applies to all employees and officers, including the CEO, president and COO, CFO, and controller. It details employee responsibilities to act with fidelity to our owners, the shareholders of the bank; comply with laws and regulations; avoid or ethically handle conflicts of interests or the appearance of conflicts, which could destroy the trust vested in us by our shareholders and clients; maintain the integrity of our financial data and the quality of our public disclosures, which are critical for public companies and financial institutions; maintain confidentiality and privacy in order to protect our clients; and provide a safe, positive working environment honoring fairness and respect for all.
- The Code of Ethics for Directors: promotes honest and ethical conduct; protection of the bank’s business interests, including corporate opportunities, assets and confidential information; the avoidance and ethical handling of conflicts of interest; and compliance with laws and regulations.
- Related-party Transactions Policy: prohibits certain transactions between the bank and its directors, executive officers, and 5% shareholders without necessary disclosure and approval or ratification.
- Stock Ownership and Retention Guidelines: specify the amounts of common shares expected to be held by the bank’s executive officers and directors.
- Pledging, Speculative and Hedging Arrangements Policy: prohibits hedging and restricts pledging of bank stock by directors or executive officers.
- Incentive Compensation Clawback Policy: allows the bank to, among other actions, recapture prior incentive compensation or cancel all or a portion of long-term incentive awards granted to an employee.

The above guidelines and policies are posted in the Corporate Governance section on www.zionsbancorporation.com, which also includes Board committee charters and information concerning purchases and sales of our equity securities by our executive officers and directors. More information about our corporate governance practices can be found in our annual proxy statement, also posted on our website and available at SEC.gov.

DATA SECURITY AND CUSTOMER PRIVACY

We have always prioritized the safety and security of our clients’ funds and privacy of information. We adhere to the three lines-of-defense model, including first line (Enterprise Information Security division) responsibility, oversight from dedicated second line (Risk Management) cybersecurity and technology oversight, and regular Internal Audit (third line) coverage of cybersecurity and related functions. Our Information Security Policy defines the security structure used to protect the bank from cyber and information security threats and to mitigate associated risks. Our Information Security Policy is approved by the Board of Directors. The Board and its Risk Oversight Committee receive comprehensive reporting to assist with their oversight of information technology and cybersecurity on a quarterly basis, or more frequently as needed. We formally measure our cybersecurity standards and maturity with the National Institute of Standards and Technology (NIST) Cybersecurity Framework. Our cybersecurity program maturity and adherence to framework is formally evaluated by independent consultants on a biannual basis and the results are delivered to executive management and the Board of Directors. It is also reviewed by our regulators. The Board periodically directs the Bank to engage independent consultants to

review and provide guidance and perspective to the Board on further strengthening the bank's cybersecurity and technology programs, and directors participate in continuing education on these topics. In addition, the bank engages consultants at both the strategic level and at the technology implementation level to assist in better managing these risks.

We have integrated governance practices related to our use of artificial intelligence into our risk frameworks and culture. We strategically align with the NIST AI Risk Management Framework, which documents guiding principles for AI practices. Our practices are designed to adhere to industry standards and regulations while providing the benefits of AI to our customers and employees.

The Enterprise Information Security division derives its authority from the Board of Directors and includes the following dedicated cybersecurity teams:

- Risk Assessment;
- Awareness and Engagement;
- Strategy and Governance;
- Identity and Access Management;
- Threat Intelligence;
- Cybersecurity Operations Center;
- Data Protection;
- Security Architecture and Engineering;
- Vulnerability Management; and
- Endpoint Protection.

Our dedicated information technology and information security staff is paired with continued investments in cybersecurity protection to help guard against an evolving threat environment. Our primary regulator, the Office of the Comptroller of the Currency, reviews Zions' internal controls with respect to applicable laws and regulatory guidance. Management oversees self-assessments of the internal control environment with respect to financial reporting and safeguarding client information. Vulnerability assessments are performed both internally and with independent qualified third parties. We conduct regular testing of our robust incident response plan.

Our Regulatory Compliance Framework specifically identifies privacy as a dedicated focus. It is the documented governance structure for ensuring privacy management and controlling and mitigating privacy risks through compliance with applicable privacy laws, rules and regulations, and our related policies and procedures. The framework applies to all bank employees and is considered in our strategy, business decisions, activities and engagements with third parties.

Privacy compliance is overseen by the Compliance Risk Management Privacy Office. The Privacy Office mitigates privacy risk through collaborative oversight of bank procedures, control documentation, control testing, quality assurance routines and ongoing advisory services, including risk identification and remediation activities in partnership with process owners. These efforts are focused on, but not limited to, the following items:

The screenshot displays the California Bank Trust website. At the top, there is a navigation bar with the FDIC logo and text: "FDIC Insured - Backed by the full faith and credit of the U.S. Government". Navigation links include "About", "Locations", "Customer Service", and "Set My Location". The main menu includes "PERSONAL", "BUSINESS", "WEALTH", "Products", "Services", and "Community", along with a search icon and a "Sign in" button.

The main content area features a dark blue banner with the text: "Help Protect Your Online Information". Below this, it states: "3 quick and simple ways to help ensure your banking information doesn't fall into the wrong hands while you're online." and includes a "Learn More" button.

Overlaid on the right side is a white sign-in form titled "Sign in to Personal Banking". It contains fields for "Username" and "Password", a "Remember Me" checkbox, and a "Forgot Username or Password" link. A yellow "Sign in" button is at the bottom of the form, with an "Enroll Now >" link below it.

- Participating in the bank's Change, Initiatives and Technology Committee approval process to ensure privacy is considered in new products and services;
- Developing processes to obtain personal information through lawful and transparent means with explicit consent of the individual where required and to limit use of such information to the stated purpose;
- Maintaining a Response Program Policy, which addresses our incident response program and the requirement to discover, investigate and provide timely notification in the case of a privacy data breach situation;
- Requiring annual employee training on privacy management;
- Providing clear and accessible mechanisms for individuals to raise concerns about privacy;
- Verifying clear and accessible processes allowing individuals to access their accounts to delete, rectify, complete or amend personal information;
- Confirming regular privacy risk assessments and audits, including internal and external vulnerability scans and penetration tests, on the bank's technologies and practices affecting personal information;
- Maintaining a Right to Financial Privacy Act Policy and ensuring appropriate procedures for evaluating and responding to law enforcement or government information requests;
- Not renting, selling or providing personal data to third parties for purposes other than completing transactions or providing services; and
- Deleting all information in accordance with our Corporate Records Management Policy.

All employees undergo comprehensive annual training on information security and safeguarding client information. Specific role-based training is also provided. The Zions Bancorporation Employee Handbook (policy) specifically identifies every employee's responsibility to secure and use all bank information in alignment with the bank's documented Data Governance Data Classification Standards. It is a requirement of the bank that each employee read and attest to their understanding of this obligation annually.

In accordance with the California Consumer Privacy Act as amended by the California Consumer Rights Act, Zions Bancorporation has developed a Data Rights Program, which provides a process and channels for consumers, clients, contractors and employees to be aware of the collection and use of their personal information, as well as their rights regarding access and control of such information.

The bank's Privacy Notice provides clear terms relative to the collection, use, sharing and retention of personal information including information transferred to third parties. The Privacy Notice is provided to all consumer clients upon establishing a new consumer relationship or account with the bank and is available on the bank's affiliate websites for consideration prior to the consumer providing any nonpublic personal information. This Privacy Notice explains how we collect, use and share information. The Privacy Notice also provides consumer clients with instructions on how they can limit certain types of information-sharing.

In addition, the bank posts on its websites an Online/Digital Privacy Statement, identifying types of personal information collected in the digital environment and the third parties this information may be shared with; how users can request changes to any of the personal information that was collected; how the bank will notify users of changes/updates to the Online/Digital Privacy Statement; the effective date of the Online/Digital Privacy Statement; how the bank responds to the "Do Not Track" requests of users; and whether other third parties may collect personally identifiable information about users through the bank's service.

The sharing of any client information in response to any legally mandated requests is governed by our Records Management Policy and Regulatory Exam Risk Management Program.

ETHICAL PRACTICES

Our Guiding Principles state that we recognize that our business involves a great degree of public trust and must always be conducted with integrity and decency. We are fair and forthright in our dealings with others. And we strive to treat people — whether they be clients, employees, shareholders or even competitors — with respect and appreciation.

These principles are codified and reinforced with required annual compliance training for all employees. All bank intranet sites include a link to our Risk/Ethics Hotline where employees may anonymously report any violations of policies, laws or regulations, or seek guidance without fear of retribution. Submissions are received by a third-party provider and reported quarterly to the Audit Committee of the Board of Directors.

The following table provides a sample of our related policies and programs, which are reinforced in our Employee Handbook with performance regularly reviewed by our Compliance and Internal Audit Departments:

BRIBERY AND ANTI-CORRUPTION

- Code of Business Conduct & Ethics
- Foreign Corrupt Practices Act Policy
- Enterprise Fraud Risk Management Program

ANTI-MONEY LAUNDERING

- Anti-Money Laundering Program
- Anti-Money Laundering Due Diligence and High-risk Customers Policy
- Anti-Money Laundering High-Risk Products and Services Policy
- Anti-Money Laundering Monitoring and Reporting Policy

WHISTLEBLOWER PROTECTION

- Code of Business Conduct & Ethics

COMPLIANCE PROGRAM

- Regulatory Compliance Framework
- Compliance Assurance Program
- Compliance Monitoring and Control Testing Program
- General Compliance Risk Assessment Program

Our Risk Management Framework and three lines of defense — employees, compliance and internal audit — incorporate accountability in all aspects of regulatory compliance risk management using the reporting of key risk indicators, ongoing monitoring and control testing. Internal Audit reviews compliance with each of the policies and programs every one to three years based upon risk assessment.

Our Supplier Code of Conduct, found on our website at www.zionsbancorporation.com, reinforces the importance that our suppliers align with our core values and work together with us as partners to make a positive, long standing impact on our local community and environment. It also includes a link to report any complaints or concerns regarding unethical supplier behavior. We expect our suppliers to adhere to the same high standards as our employees as outlined in the Zions Code of Business Conduct & Ethics.

RISK MANAGEMENT

Our growth strategy is driven by key factors while adhering to defined risk parameters. The key elements of our strategy reflect our prudent risk-taking philosophy. We generate revenue by taking prudent and appropriately priced risks. These factors are outlined in our Risk Management Framework. Our Board of Directors has established an Audit Committee, a Compensation Committee, and a Risk Oversight Committee of the Board; approved a Risk Management Framework; and appointed an Enterprise Risk Management Committee (ERMC) to oversee and implement the Risk Management Framework. The ERMC is comprised of senior management and is chaired by the chief risk officer. Our most material risk exposure has traditionally come from the acceptance of credit risk inherent in extensions of credit to clients. In addition to credit risk, these committees also monitor the following level one risk areas: market and interest rate risk; liquidity risk; strategic and business risk; operational risk; technology risk; cybersecurity risk; capital/financial reporting risk; compliance risk (including regulatory risk); and reputational risk, as outlined in our risk taxonomy. Additional governance and oversight include Board-approved policies and management committees with direct focus on these specific risk categories as more fully described in our Form 10-K under Item 1A. Risk Factors.

POLITICAL CONTRIBUTIONS AND ACTIVITIES

Zions Bancorporation does not contribute corporate funds in connection with any federal or state election, and as a national bank is prohibited by law from doing so. Our policies reflect this prohibition. Even where permitted by law, Zions does not use corporate funds for election-related contributions to political candidates, candidate campaign committees, political parties or super PACs.

The Zions Bancorporation Political Action Committee is funded entirely by voluntary contributions from eligible employees. No bank funds are contributed to the PAC. Donation decisions are made by a committee of employees in each participating affiliate market. Disclosure of PAC activity is available at [FEC.gov](https://www.fec.gov).

As described in our Employee Handbook and Code of Business Conduct and Ethics, our employees are encouraged to be informed participants in political activities and involved in electing the qualified candidates of their choice for public office on their own time in accordance with their own desires, making it clear that they are participating as individuals and not on behalf of the bank. Employee political contributions are not reimbursed by Zions.

Zions and its affiliates belong to several trade associations and coalitions and pays dues where required. Membership in these organizations serves as a resource of industry information and frequently serves to promote our public policy goals. Zions does not agree with every position taken by each trade association to which we belong, but believe that the majority of the positions taken by the organizations to which we belong are consistent with Zions' public policy goals.

The bank may make contributions to a non-candidate, non-partisan 527 organization to the extent permitted by applicable law. Any payments to 527 organizations shall only be used for operational and administrative purposes and not to support or oppose any U.S. federal, state or local candidates or campaigns.

INVESTMENTS

As detailed in Zions Bancorporation's Trading Policy, the bank is prohibited from engaging in proprietary trading, as defined by the Volcker Rule section of the Dodd-Frank Act, subject to certain exemptions. Exempted securities in which transactions may be completed for the bank's own account include, but are not limited to, obligations of the United States or those guaranteed by an agency of the United States including, but not limited to the Government National Mortgage Association, the Federal Home Loan Mortgage Corporation, the Federal National Mortgage Association, a Federal Home Loan Bank, the Federal Agricultural Mortgage Corporation, or a Farm Credit System Institution; repurchase and reverse repurchase agreements; investment grade-equivalent obligations of any state or political subdivision thereof, including any municipal security; and an obligation of the FDIC, or any entity formed on behalf of the FDIC.

INDEX TO GOVERNANCE, ENVIRONMENTAL AND SOCIAL DISCLOSURES AND DISCUSSIONS

	Disclosure	Disclosure Location/Response
1.0	GENERAL	
1.1	Name of the organization and location of headquarters	Zions Bancorporation, N.A., Salt Lake City, Utah
1.2	Location of operations/markets served	Operations through eight separately managed and branded segments, primarily located in Arizona, California, Colorado, Idaho, Nevada, New Mexico, Oregon, Texas, Utah, Washington and Wyoming
1.3	Brands (“affiliates”)	2024 Corporate Responsibility Report, “About Zions Bancorporation”; 2024 Form 10-K: Amegy Bank, California Bank & Trust, National Bank of Arizona, Nevada State Bank, The Commerce Bank of Washington/The Commerce Bank of Oregon, Vectra Bank, and Zions Bank URLs for affiliates: www.amegybank.com , www.calbanktrust.com , www.nbarizona.com , www.nsbank.com , www.tcbwa.com , www.tcboregon.com , www.vectrabank.com , www.zionsbank.com
1.4	Ownership and legal form	National Banking Association organized under the laws of the United States. https://www.zionsbancorporation.com
1.5	Directors and Officers	https://www.zionsbancorporation.com/ ; 2025 Proxy Statement
1.6	Tier 1 capital buffer	2024 Corporate Responsibility Report — Financial Highlights
1.7	Leverage ratio	2024 Corporate Responsibility Report — Financial Highlights
1.8	Asset quality	2024 Corporate Responsibility Report — Financial Highlights; 2024 Form 10-K (throughout), including Management’s Discussion and Analysis of Financial Conditions and Report of Operations — Credit Risk Management
2.0	GOVERNANCE	
2.1	Values, principles, standards and norms of behavior	2024 Corporate Responsibility Report; www.zionsbancorporation.com , “Corporate Governance”: Code of Business Conduct and Ethics for Employees, Code of Ethics for Directors, Corporate Governance Guidelines, Related Party Transaction Policy
2.2	Channels for advice and ethics issues	2024 Corporate Responsibility Report, “Communicating with Stakeholders”; www.zionsbancorporation.com , “Corporate Governance”: Code of Business Conduct and Ethics for Employees, Code of Ethics for Directors, Corporate Governance Guidelines; 2025 Proxy Statement, “Communicating with the Board of Directors”
2.3	Governance structure	www.zionsbancorporation.com , “Corporate Governance”; 2025 Proxy Statement, “Governance and Compensation Summary,” “Corporate Governance”
2.4	Composition of the Board and its committees	Independent Lead Director; diverse board membership; independent board committees with oversight of governance, risk, audit and compensation issues; www.zionsbancorporation.com , “Corporate Governance”; 2025 Proxy Statement
2.5	Nominating and selecting the Board of Directors	2025 Proxy Statement, “Proposal 1” and “Corporate Governance”; www.zionsbancorporation.com , “Corporate Governance”: Nominating and Corporate Governance Committee Charter
2.6	Board of Directors Assessment	Ongoing performance assessments; 2025 Proxy Statement, “Proposal 1” and “Corporate Governance”; www.zionsbancorporation.com , “Corporate Governance”: Board Committee Charters; Code of Ethics for Directors
2.7	Conflicts of Interest/Anti-bribery/Anti-corruption	2024 Corporate Responsibility Report; www.zionsbancorporation.com , “Corporate Governance”: Code of Business Conduct and Ethics for Employees, Code of Ethics for Directors, Corporate Governance Guidelines, Related Party Transaction Policy
2.8	Compensation of Directors and Officers	2025 Proxy Statement (throughout)
2.9	Stakeholder Engagement	2024 Corporate Responsibility Report, “Communicating with Stakeholders”; www.zionsbancorporation.com , “Investor Relations” and “Corporate Governance”; 2025 Proxy Statement, “Shareholder Outreach” and “Communicating with the Board of Directors”

3.0	ENVIRONMENTAL AND SOCIAL	
3.1	Identifying and managing environmental and social risks and impacts	2024 Corporate Responsibility Report; 2024 Form 10-K, “Item 1A. Risk Factors”, “Item 7. Management’s Discussion and Analysis of Financial Conditions and Report of Operations — Credit Risk Management, — Operational Risk Management”
3.2	Board oversight of environmental, social and governance issues	2024 Corporate Responsibility Report, “Upholding Strong Governance”; 2024 Form 10-K (throughout); www.zionsbancorporation.com , “Corporate Governance”: Risk Oversight Committee Charter; Audit Committee Charter; Corporate Governance Guidelines; Code of Ethics for Directors
3.3	Nondiscrimination	2024 Corporate Responsibility Report (throughout), including “Culture and Values”, “Affiliate Resources,” and “Fair Banking”; www.zionsbancorporation.com , “Corporate Governance”: Code of Business Conduct and Ethics for Employees, Code of Ethics for Directors, Corporate Governance Guidelines; Nominating and Corporate Governance Committee Charter;
3.4	Employees; Human capital development	2024 Corporate Responsibility Report (throughout), including “Letter from our Chairman and CEO”, “Communicating with Stakeholders—Employees,” “Advancing our People,” “Culture and Values”; www.zionsbancorporation.com , “Corporate Governance”: Code of Business Conduct & Ethics for Employees; careers.zionsbank.com , “Benefits”
3.5	Community involvement and investment	2024 Corporate Responsibility Report (throughout), including “Building Strong Communities,” “Bringing Access to Underserved Markets,” “Volunteerism,” and “Corporate Giving”
3.6	Product Governance – Responsible product offering and marketing practices; compliance programs	2024 Corporate Responsibility Report (throughout), including “Our Products,” “Fair Banking/Responsible Products,” “Bringing Access to Underserved Markets,” and “Affordable Housing”; 2024 Form 10-K, “Item 1. Business — Description of Business, — Products and Services and — Supervision and Regulation” and Item 7. Management’s Discussion and Analysis of Financial Condition and Results of Operations — Operational, Technology, and Cyber Risk Management
3.7	Environmental sustainability and responsibility	2024 Corporate Responsibility Report, including “Bolstering Environmental Sustainability,” “Remote Deposit Capture,” Green Processes,” and “Environmental Risk Management”
3.8	Environmental compliance	During 2024, the bank was not assessed any fines or penalties for non-compliance with environmental laws and regulations that had a material adverse effect on its operations.
3.9	Data privacy and security	2024 Corporate Responsibility Report, “Data Security and Customer Privacy”; https://www.zionsbank.com/pdfs/privacy_notice.pdf ; 2024 Annual Report on Form 10-K, “Item 7. Management’s Discussion and Analysis of Financial Condition and Results of Operations — Operational, Technology, and Cyber Risk Management”; 2025 Proxy Statement, “Board Involvement in Risk Oversight”

We recognize that banking is a local business, and that to be successful, we must have very strong ties to the communities we serve and strong relationships with our customers.

- ZIONS BANCORPORATION GUIDING PRINCIPLES

