DISCOVER FINANCIAL SERVICES

Basel III Regulatory Capital Disclosures

For the Quarterly Period Ended March 31, 2017

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Except as otherwise indicated or unless the context otherwise requires, "Discover Financial Services," "Discover," "DFS," "we," "us," "our," and "the Company" refer to Discover Financial Services and its subsidiaries.

Disclosure Road Map

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Overview

Introduction

Discover Financial Services ("DFS" or the "Company") is a direct banking and payment services company. We were incorporated in Delaware in 1960. We are a bank holding company ("BHC") under the Bank Holding Company Act of 1956 as well as a financial holding company under the Gramm-Leach-Bliley Act and therefore are subject to oversight, regulation and examination by the Board of Governors of the Federal Reserve System (the "Federal Reserve"). We provide direct banking products and services and payment services through our subsidiaries. We offer our customers credit card loans, private student loans, personal loans, home equity loans and deposit products. We operate the Discover Network, the PULSE network ("PULSE"), and Diners Club International ("Diners Club"). The Discover Network processes transactions for Discover-branded credit cards and provides payment transaction processing and settlement services. PULSE operates an electronic funds transfer network, providing financial institutions issuing debit cards on the PULSE network with access to ATMs domestically and internationally, as well as point-of-sale terminals at retail locations throughout the U.S. for debit card transactions. Diners Club is a global payments network of licensees, which are generally financial institutions, that issue Diners Club branded charge cards and/or provide card acceptance services.

Our main banking subsidiary, Discover Bank, offers credit card loans, student loans, personal loans and home equity loans as well as certificates of deposit, savings and checking accounts and other types of deposit accounts. Discover Bank is chartered and regulated by the Office of the Delaware State Bank Commissioner, and is also regulated by the Federal Deposit Insurance Corporation (the "FDIC"), which insures its deposits up to applicable limits and serves as the bank's primary federal banking regulator.

Basel III and Regulatory Capital Disclosure Report

The Federal Reserve, the Office of the Comptroller of the Currency ("OCC") and the FDIC adopted risk-based capital standards under Basel III ("Basel III rules") and replaced Basel I regulatory capital calculations for banking organizations in July 2013. The effective date of the Basel III rules, for the Company, was January 1, 2015 with various phase-in or transitional requirements becoming effective through 2019. This timing is based on the Company being classified as a "Standardized Approach" bank, defined as a U.S. banking organization with consolidated total assets over $50 billion but not exceeding $250 billion and consolidated total on-balance sheet foreign exposures less than $10 billion. One such phase-in requirement is the capital conservation buffer. This is an additional capital requirement on top of the minimum risk-weighted assets ("RWA") ratios designed to absorb losses during periods of economic stress. The conservation buffer became effective January 1, 2016.

The Basel III rules substantially revised the risk-based capital requirements applicable to each impacted BHC and their depository institution subsidiaries including, but not limited to, a new minimum capital ratio of common equity tier 1 ("CET1") to RWA, raising the minimum ratio of tier 1 capital to RWA and establishing a capital conservation buffer. See Note 11: Capital Adequacy of the Quarterly Report on Form 10-Q for the quarterly period ended March 31, 2017 ("1Q17 Form 10-Q") for a detailed discussion of Basel III requirements.

The Basel III rules are designed to establish a more risk-sensitive approach to capital management and require the Company to publicly disclose certain qualitative and quantitative information regarding its capital structure and adequacy, credit risk and related mitigation policies, securitizations, equity exposures, operational risk, and other matters. The qualitative and quantitative information included are commonly referred to as the "Pillar 3 Disclosures." The U.S. regulators have required the Pillar 3 Disclosures, with an expressed objective of improving market discipline and encouraging sound risk management practices. This report provides the required disclosures or references to other publicly-available documents where they are located and includes information on the methodologies used to calculate RWA.

This report should be read in conjunction with the Company's Annual Report on Form 10-K for the year ended December 31, 2016 ("2016 Form 10-K"), 1Q17 Form 10-Q, Federal Reserve FR Y-9C form for the year-to-date period ended March 31, 2017 and Discover Bank's Call Report ("Call Report") for the year-to-date period ended March 31, 2017, which include important information on risk management policies and practices and regulatory capital ratios. A disclosure road map is contained herein.

Scope of Application

Basis of Consolidation

The basis of consolidation used for regulatory reporting is the same as that used under U.S. Generally Accepted Accounting Principles ("GAAP"). See Note 1: Background and Basis of Presentation in the 2016 Form 10-K for details on the Company's principles of consolidation.

Capital in Subsidiaries

At March 31, 2017, the Company did not have any subsidiaries whose regulatory capital was less than the minimum required regulatory capital amount. The Company does not have any insurance subsidiaries subject to the Basel III rules.

Restrictions on Capital

The Federal Reserve requires a BHC to inform and consult with the Federal Reserve before declaring and paying any dividends that would cause an institution to be inadequately capitalized. The declaration and payment of future dividends are subject to the discretion of our board of directors and the Federal Reserve’s non-objection to our annual capital plan. The amount and size of any future dividends and share repurchases will depend upon our results of operations, financial condition, capital levels, cash requirements, future prospects, regulatory review and other factors as further described in "Business — Supervision and Regulation — Capital, Dividends and Share Repurchases" in the 2016 Form 10-K. Holders of our shares of common stock are subject to the prior dividend rights of holders of our preferred stock or the depositary shares representing such preferred stock outstanding, and if full dividends have not been declared and paid on all outstanding shares of our preferred stock in any dividend period, no dividend may be declared or paid on or set aside for payment on our common stock. Banking laws and regulations and our banking regulators may limit or prohibit our payment of dividends on or our repurchase of our stock at any time. There can be no assurance that we will declare and pay any dividends on or repurchase our stock in the future. At March 31, 2017, the Company was "well-capitalized" as defined in Regulation Y.

Discover Financial Services, our parent holding company, depends on dividends, distributions and other payments from its subsidiaries, particularly Discover Bank, to fund dividend payments, share repurchases, payments on its obligations, including debt obligations, and to provide funding and capital as needed to its operating subsidiaries. Banking laws and regulations and our banking regulators may limit or prohibit our transfer of funds freely, either to or from our subsidiaries, at any time. These laws, regulations and rules may hinder our ability to access funds that we may need to make payments on our obligations or otherwise achieve strategic objectives. For more information, see "Business — Supervision and Regulation — Capital, Dividends and Share Repurchases" in the 2016 Form 10-K.

The Federal Deposit Insurance Act ("FDIA") imposes various requirements on insured depository institutions. For example, the FDIA requires, among other things, the federal banking agencies to take "prompt corrective action" in respect of depository institutions that do not meet minimum capital requirements. The FDIA sets forth the following five capital tiers: "well-capitalized," "adequately capitalized," "undercapitalized," "significantly undercapitalized" and "critically undercapitalized." A depository institution's capital tier will depend upon how its capital levels compare with various relevant capital measures and certain other factors that are established by regulation. At March 31, 2017, Discover Bank met all applicable requirements to be deemed "well-capitalized."

The FDIA also prohibits any depository institution from making any capital distributions (including payment of a dividend) or paying any management fee to its parent holding company if the depository institution would thereafter be "undercapitalized." "Undercapitalized" institutions are subject to growth limitations and are required to submit a capital restoration plan. For a capital restoration plan to be acceptable, among other things, the depository institution's parent holding company must guarantee that the institution will comply with the capital restoration plan. For more information on FDIA regulations, see "Business — Supervision and Regulation — FDIA" in the 2016 Form 10-K.

Capital Structure

Regulatory Capital Instruments

The Company's regulatory capital instruments consist of common stock, preferred stock and subordinated debt. The following table presents components of the Company's capital structure on a transitional basis (dollars in millions):

	March 31, 2017
Common stock	$ 6
Additional paid-in capital	3,979
Retained earnings	15,568
Accumulated other comprehensive (loss) income	(155)
Treasury stock	(8,693)
Common shareholder's equity	10,705
Less: Deductions for goodwill and intangible assets, net of deferred tax liabilities	359
Less: Deductions for AOCI related adjustments	(155)
Common equity tier 1	10,501
Perpetual non-cumulative preferred stock	560
Tier 1 capital	11,061
Qualifying subordinated debt	250
Other elements of tier 2 capital	996
Tier 2 capital	1,246
Total capital	$ 12,307

The dividend rights of holders of our common stock are conditional to prior dividend rights of holders of our preferred stock or the depositary shares representing such preferred stock outstanding. Our preferred stock is redeemable at the Company's option, subject to regulatory approval, either (i) in whole or in part on any dividend payment date on or after December 1, 2017 or (ii) in whole but not in part, at any time within 90 days following a regulatory capital event (as defined in the certificate of designations for the preferred stock). For additional details related to the Company's common and preferred stock, refer to Note 13: Common and Preferred Stock of the 2016 Form 10-K.

The following table presents the terms and conditions of the Company's qualifying subordinated debt (dollars in millions):

	Issuance Date	Interest Rate	Interest Rate Terms	Maturity	Par
At March 31, 2017					
Discover Bank					
Subordinated bank notes due 2019	November 16, 2009	8.70%	Fixed	November 18, 2019	$ 200
Subordinated bank notes due 2020	April 15, 2010	7.00%	Fixed	April 15, 2020	$ 500

Both tranches of the subordinated debt entered a five year amortization period and therefore are subject to a haircut for capital inclusion, in accordance with the Basel III rules. In addition, the subordinated debt is subject to a Basel III provision that limits its amount that can be included on the BHC level. That limitation is imposed on capital instruments issued by a consolidated bank subsidiary of BHC as availability of this capital might be limited to the BHC.

Regulatory Capital Ratios

For the Company's capital ratios and related components, as of March 31, 2017, see Note 11: Capital Adequacy in the 1Q17 Form 10-Q and Schedule HC-R in the 1Q17 FR Y-9C report.

Capital Adequacy

Capital Planning and Management

Discover's capital planning and management framework is designed to ensure that the Company maintains sufficient capital consistent with its risk profile and all applicable regulatory standards and guidelines. The framework encompasses forecasting capital levels, establishing capital targets, monitoring capital adequacy against targets, maintaining appropriate contingency capital plans and identifying strategic options to deploy excess capital.

The Company's capital distributions are subject to regulation by the Federal Reserve under the Comprehensive Capital Analysis and Review ("CCAR") process. A component of that regulation is submitting an annual capital plan to the Federal Reserve that includes an assessment of the Company's expected uses and sources of capital over a nine quarter planning horizon and the Dodd-Frank Act Stress Test ("DFAST"). A primary intent of the CCAR process is to ensure that BHCs have sufficient capital levels to operate under periods of economic and financial stress.

CCAR and the Federal Reserve's capital planning rules apply to BHCs with $50 billion or more in total consolidated assets, including Discover Financial Services. Our ability to make capital distributions, including our ability to pay dividends or repurchase shares of our common stock, is subject to the Federal Reserve's review and non-objection of our annual capital plan. Beginning with the 2017 cycle, the Federal Reserve may only object to a large and noncomplex BHC's capital plan submission, including Discover Financial Services', if the Federal Reserve determines that the company "has not demonstrated an ability to maintain capital above each minimum regulatory capital ratio on a pro forma basis under expected and stressful conditions throughout the planning horizon."

The DFAST requirements are very similar to those of the CCAR process. The stress test includes multiple scenarios; in this case: (i) baseline, (ii) adverse and (iii) severely adverse. DFAST regulations require BHCs to publish a company-run stress test twice a year. Results from our annual company-run stress tests are reported to the appropriate regulators and published on the Company's website. Our most recent company-run stress test results were published on October 6, 2016. For more information on assessment of the Company's capital adequacy, see Note 11: Capital Adequacy in the 1Q17 Form 10-Q.

Standardized Approach Risk-Weighted Assets

RWA are an institution's assets and off-balance-sheet exposures, weighted according to the risk categories prescribed in the Basel III rules. Percentage of RWA is used to determine minimum capital requirements.

The following table presents components of Discover's RWA in accordance with the standardized approach, subject to transitional provisions (dollars in millions):

	March 31, 2017
On-balance sheet:	
Exposure to depository institutions and foreign banks	$ 333
Exposures to GSE[1] and PSE[2]	146
Credit card receivable	58,853
Personal and student loans receivable	15,713
Residential mortgage exposure	226
Retail exposure	74,792
Past due exposure[3]	1,280
Equity exposures	470
Other exposures[4]	2,603
Off-balance sheet:	
Off-balance sheet derivatives	5
Off-balance sheet commitments	30
Allowance for loan losses excluded from RWA	(1,268)
Total standardized risk-weighted assets	$ 78,391

(1) Government -sponsored entity ("GSE")
(2) Public sector entity ("PSE")
(3) Includes 90 days past due and non-accruing loans.
(4) Includes $146 million of business card receivables classified as commercial loans under regulatory guidelines.

Risk-Based Capital Ratios

For CET1, tier 1 and total risk-based capital ratios as of March 31, 2017, as calculated under the Basel III Standardized Approach framework for Discover Financial Services and Discover Bank, see Note 11: Capital Adequacy in the 1Q17 Form 10-Q.

Capital Conservation Buffer

Per the Basel III rules, effective January 1, 2016, the Company and its Bank subsidiary are subject to a capital conservation buffer. Under this requirement, a covered institution will be subject to limitations on its ability to make distributions of capital or make discretionary bonus payments unless it maintains a buffer of capital, composed solely of CET1, sufficient to exceed each of the minimum regulatory capital ratios applicable to the institution by more than 2.5%. The capital conservation buffer will be gradually phased-in with an initial buffer requirement for calendar year 2016 of 0.625%. The buffer requirement will then increase by annual increments of 0.625% until it reaches the fully phased-in amount of 2.5% on January 1, 2019. The capital conservation buffer is a complementary requirement to the Prompt Corrective Action ("PCA") framework described in Basel III rules.

The Company and its Bank subsidiary each maintained a buffer of CET1 capital sufficient to meet the capital conservation buffer requirements as of March 31, 2017. For Discover Financial Services' capital conservation buffer, see

Schedule HC-R Part I in the 1Q17 FR Y-9C report. For Discover Bank's capital conservation buffer, see Schedule RC-R Part I in the 1Q17 Call Report.

The Company's eligible retained income at March 31, 2017 was ($27) million. The Company is not subject to any limitations on distributions and discretionary bonus payments resulting from the capital conservation buffer framework.

Credit Risk: General Disclosures

Credit Risk Management Objectives and Policies

Credit risk management is a critical component of our management and growth strategy. Credit risk refers to the risk of loss arising from borrower default when borrowers are unable or unwilling to meet their financial obligations to us. Our credit risk arising from consumer lending products is generally highly diversified across millions of accounts without significant individual exposures. We manage credit risk primarily based on customer segments and product types. See "Business — Credit Risk Management" and "Business — Risk Management" in the 2016 Form 10-K for more information regarding how we define and manage our credit and other risks.

Past Due and Impaired Loans

For the Company's significant accounting policies regarding past due, non-accrual and impaired loans and charge-offs of uncollectible amounts, see Note 2: Summary of Significant Accounting Policies in the 2016 Form 10-K and Note 4: Loan Receivables in the 1Q17 Form 10-Q.

Allowance for Loan Losses

For the Company's significant accounting policies regarding the allowance for loan losses, see Note 2: Summary of Significant Accounting Policies in the 2016 Form 10-K.

Credit Risk Exposures

The following table presents the major types of credit exposure relevant to the Company (dollars in millions):

	March 31, 2017	QTD Average
Cash and cash equivalents[1]	$ 911	$ 1,126
Loans held for investment ("LHFI")[2]	$ 75,853	$ 76,185
Unused commitments[3]	$ 188,323	$ 186,316
Debt securities	$ 1,718	$ 1,731

(1) Excludes cash held with the Federal Reserve.
(2) Includes credit card, student, personal and other loans.
(3) Primarily includes credit cards.

Virtually all of the Company's unused commitments are unconditionally cancellable and receive zero conversion factor for the purpose of capital risk-based calculations.

The following table presents the geographic distribution of the loans held for investment (dollars in millions):

	LHFI[1]	Unused commitments[2]
At March 31, 2017		
California	$ 6,721	$ 18,542
New York	5,994	12,571
Texas	6,025	14,870
Florida	4,425	12,253
Pennsylvania	4,251	10,325
Illinois	4,200	10,644
Ohio	3,172	8,461
New Jersey	3,058	7,106
Michigan	2,216	5,676
Massachusetts	2,061	5,138
Other States	33,730	82,737
Total United States	$ 75,853	$ 188,323

(1) Includes credit card, student, personal and other loans.
(2) Primarily includes credit cards.

All debt securities held by the Company are issued by domestic parties. Cash and cash equivalents held in accounts located outside of U.S. by all Discover entities amounted to $85 million as of March 31, 2017.

The following table presents the counterparty type distribution of credit exposures (dollars in millions):

	Retail	Sovereign (including GSE)	Banks & Brokerage companies[1]	Other
At March 31, 2017				
Cash and cash equivalents[1]	$ —	$ —	$ 911	$ —
LHFI	$ 75,660	$ —	$ —	$ 193
Unused commitments	$ 187,410	$ —	$ —	$ 913
Debt securities	$ —	$ 1,718	$ —	$ —
Loans past due 90 days and non-accruing	$ 61	$ —	$ —	$ —
Loans past due 90 days and still accruing[2]	$ 634	$ —	$ —	$ 1

(1) Excludes cash held with the Federal Reserve.
(2) Includes purchased credit-impaired ("PCI") loans.

The following table presents the remaining contractual maturity delineation of the LHFI portfolio[1] (dollars in millions):

	March 31, 2017
One year or less	$ 52,205
Over one year through five years	$ 13,111
Over five years	$ 10,317

(1) Includes fixed rate credit cards in the over one year through five years classification per Call Report guidelines and excludes loans in non-accrual status.

See the following references to the Company's 1Q17 Form 10-Q for quantitative information regarding credit risk exposures, which are presented in accordance with U.S. GAAP.

Loan Receivables

- See Note 4: Loan Receivables for information on loans outstanding, non-accrual, delinquent, impaired and PCI loans, and charge-offs during the period. Discover does not identify impaired or past due loans by significant geographic area.

Allowance for Loan Losses

- See Note 4: Loan Receivables for a reconciliation of changes in the allowance for loan losses and for a disaggregation of the allowance for loan losses by impairment methodology.

Counterparty Credit Risk-Related Exposures: General Disclosures

Counterparty Credit Risk Exposures

With respect to derivatives, counterparty credit risk is the risk that the counterparty to a derivative transaction could default before final settlement of the transaction's cash flows. For derivatives, the Company's counterparty credit risk arises primarily from interest rate swap transactions and foreign exchange forward transactions. For non-cleared transactions, the Company has master netting arrangements and minimum collateral posting thresholds with its derivative counterparties for these fair value and cash flow hedge interest rate swaps and foreign exchange forward contracts. For cleared transactions, the Company trades through clearing members of a central counterparty (CCP) exchange such that all positions traded through the CCP clearing member are netted and collateralized per the rules of the exchange.

Effective in first quarter 2017, certain cash collateral amounts associated with derivative positions that are cleared through a CCP exchange are now legally characterized as settlement of the derivative positions. This change results in such collateral amounts being reflected as offsets to the associated derivatives balances recorded in other assets or in accrued expenses and other liabilities, instead of as collateral in other assets or deposits. There is no change to the presentation in the consolidated statements of financial condition of collateral related to positions that are not cleared. For more information on the Company's counterparty credit risk-related exposures for derivatives, see Note 15: Derivatives and Hedging Activities in the 1Q17 Form 10-Q.

With respect to securities repurchase and reverse repurchase transactions, counterparty credit risk is the risk that the counterparty to a transaction could default before the securities and cash (plus interest) in the transaction have been returned to their original owners. For securities repurchase and reverse repurchase transactions, the Company's counterparty credit risk arises from its use of securities repurchase and reverse repurchase agreements with major broker-dealer counterparties or central banks using primarily U.S. Treasury and/or Agency securities as collateral.

Methodology Used to Assign Counterparty Credit Limits

The process for approving a counterparty's credit risk exposure limit is guided by: core credit policies, procedures and standards as well as the experience and judgment of credit risk professionals. The process applies to all investment and hedging activities conducted by the Company's Treasury group and includes the determination of maximum potential exposure to each counterparty after taking into account market volatility, netting agreements and collateral support as appropriate.

Internal ratings are assigned to each counterparty and reflect a range of factors including the financial condition of the counterparty, the strength of its management, the business profile of the counterparty and the regulatory environment facing the counterparty. These factors are taken into consideration in setting counterparty credit exposure limits, which drive internal approval levels.

Credit risk analysts conduct daily monitoring of exposures versus limits and any resulting issues are escalated per policy to risk officers and senior management as appropriate.

Policies for Securing, Valuing and Managing Collateral and Establishing Credit Reserves

The Company's policies and procedures cover management and governance of financial assets (including securing and valuing collateral) utilized for the purpose of mitigating counterparty credit risk. Specifically, the Company's Corporate Risk Management group considers standard eligibility criteria and market value haircuts for any collateral used to reduce estimated net exposures in the Company's transactions. Industry standard legal agreements combined with internal reviews for legal enforceability are employed to ensure that the Company's rights to collateral are appropriately protected.

Where collateral is used to offset estimated net exposure, the current market value of collateral is monitored on a regular basis. Margin procedures have been established by the Company's Treasury group for managing margin calls in order to maintain an appropriate level of collateral coverage in light of market value fluctuations and CCP exchange rules. Trades are reconciled on a daily basis, consistent with regulatory guidance and industry best practice, and margin dispute processes are in place. Counterparty credit risk arising from derivative transactions, and securities repurchase and reverse repurchase transactions is mitigated through these margining processes and the regular monitoring of exposures.

Primary Types of Collateral for Derivatives Exposures

Cash collateral and U.S. Treasury securities are used to secure the net open exposure of non-cleared derivative transactions. Cleared transactions are settled on a daily basis with cash according to CCP exchange rules.

Impact of Downgrade in Creditworthiness on Derivatives Collateral

Some of the Company's agreements with derivatives counterparties contain provisions that require DFS or Discover Bank to post additional collateral if a specified minimum credit rating is not maintained with certain major credit rating agencies.

Because the credit rating of DFS did not meet all of these specified thresholds at March 31, 2017, DFS has an additional $4 million of collateral posted with one of its derivative counterparties at March 31, 2017.

Discover Bank's credit rating met all specified ratings thresholds set by its derivatives counterparties at March 31, 2017. However, if Discover Bank's credit rating were reduced by one ratings notch, Discover Bank would be required to post additional collateral with its derivatives counterparties, which, as of March 31, 2017, would have been $50 million.

Credit Risk Mitigation

As part of its risk management activities, Discover uses various risk mitigants to manage portions of the credit risk in its portfolios. Credit risk mitigation is important to the Company in the effective management of its credit risk exposures. A majority of the Company's assets are comprised of credit card receivables, with unfunded commitments that are unconditionally cancelable.

The sole asset category of the Company that benefits from collateral in order to reduce capital requirements are loans, secured by 1-4 family residential properties. As of March 31, 2017, the decrease in RWA as a result of collateral held against those loans was $25 million, which represents only 0.03% of total RWA and has no impact on Discover's capital ratios.

As of March 31, 2017, Discover does not utilize credit derivatives as a risk mitigation tool.

Securitization

Securitization Activities

The Company engages in credit card and student loan securitization activities. The Company's securitizations are accounted for as secured borrowings and the trusts are treated as consolidated subsidiaries of the Company. The assets of the Company's consolidated variable interest entities ("VIEs") are restricted from being sold or pledged as collateral for other borrowings and the cash flows from these restricted assets may be used only to pay obligations of the trusts. The related debt issued by all securitization trusts is reported in long-term borrowings.

The Company accesses the term credit card asset securitization market through the Discover Card Master Trust I ("DCMT") and the Discover Card Execution Note Trust ("DCENT"), which are trusts into which credit card loan receivables are transferred (or, in the case of DCENT, into which beneficial interests in DCMT are transferred) and from which DCENT issues notes to investors. Student loan trust receivables underlying third-party investors' interests are recorded in PCI loans. See Note 5: Credit Card and Student Loan Securitization Activities in the 1Q17 Form 10-Q for more information on the Company's credit card and student loan securitization activities.

The total outstanding principal amount of assets securitized by Discover does not meet operational criteria as defined in the Basel III rules. The underlying assets are reconsolidated in the balance sheet and accordingly risk weighted based on their balance sheet classification for Basel III purposes. In addition, Discover did not hold investments in asset-backed securities subject to Basel III securitization disclosure requirements as of March 31, 2017. As a result, Table 8 of disclosure requirements under section 217.63 is not applicable to Discover at this time.

Equities Not Subject to Market Risk Rule

Overview

Discover makes investments in equities with objectives of: (i) generating capital gains; (ii) fostering strategic relationships; and (iii) fulfilling Community Reinvestment Act requirements. None of the Company's equity investments are publicly traded or are included in tier 1 or tier 2 capital.

The following table presents the carrying value and fair value of the Company's equity investments (dollars in millions):

	Carrying Value	Fair Value
At March 31, 2017		
Equity investments	$ 722	$ 722

Risk Weighting

The Company utilizes different approaches in calculating RWA for equity exposures not subject to market risk capital rules. Simplified Risk-Weight Approach ("SRWA") is used to risk weight community development and non-significant equity exposures. Under SRWA, adjusted carrying value for each type of equity exposure is multiplied by the prescribed risk weight. The adjusted carrying value for an on-balance sheet exposure is the carrying value of the exposure. Equity investments are considered non-significant if the aggregate adjusted carrying value of the exposures does not exceed 10 percent of a banking organization's total capital.

Alternative Modified Look-Through Approach is used to calculate RWA amounts for equity exposures to investment funds. Using the Alternative Approach, the adjusted carrying value of an equity exposure to an investment fund is assigned on a pro-rata basis to the different risk weight categories based on the investment limits in the fund's prospectus, partnership agreement, or similar contract that defines the fund's permissible investments. It is assumed the fund invests to the maximum extent permitted under its investment limits in the exposure type with the highest applicable risk weight and continues to make investments in order of the exposure type with the next highest applicable risk weight, until the maximum total investment is reached. The assignment of the pro-rata investment limits risk weights for all exposure types within the fund will not exceed 100 percent.

The following table presents the Company's equity exposures not subject to the Basel III market risk capital rule, using the Simplified Risk-Weight Approach and the Alternative Modified Look-Through Approach (dollars in millions):

	Risk Weight %	Exposure	RWA
At March 31, 2017			
Community development equity exposure	100%	$ 319	$ 319
Non-significant equity exposure	100%	53	53
Modified look-through		350	98
Total equity exposure not subject to the Basel III market risk capital rule		$ 722	$ 470

Interest Rate Risk for Non-Trading Activities

For information on the Company's interest rate risk related to non-trading activities, see "Quantitative and Qualitative Disclosures About Market Risk" in the 1Q17 Form 10-Q.