

2016 GOVERNMENT AFFAIRS ANNUAL REPORT

Regions engages in all levels of public policy advocacy on behalf of the company, our employees, our shareholders and our customers. Part of that advocacy includes engagement in the electoral process through the use of legally permissible corporate political contributions. Included in this report is the Regions Policy on Political Contributions, a list of contributions made in 2016 and a list of the portion of our trade association dues that are attributable to lobbying expenses for those associations where our dues and other payments exceed \$25,000 annually.

REGIONS POLICY ON POLITICAL CONTRIBUTIONS

Philosophy

This [Policy on Political Contributions](#) ("Policy") and the [Code of Business Conduct and Ethics](#) ("Code of Conduct") have been approved by the Executive Council to govern and promote the highest standards of behavior by our company and our associates with regard to political activities and to ensure compliance with all current applicable federal and state campaign finance laws. Like most public companies however, Regions recognizes that decisions made by governmental agencies and lawmakers can have a significant impact on our company, our operations, our stockholders, customers and associates. Accordingly, we monitor, track and express our views to lawmakers and regulators on a variety of issues that affect our business. The political contributions are made to candidates and organizations that share Regions' business principles and objectives without regard for the private political preferences of executives and not on a partisan basis, and are disclosed according to state and federal laws and regulations.

Corporate Political Contributions

Regions is prohibited by law from making contributions or expenditures in connection with any federal and some state elections. Regions may make corporate contributions in states where permissible under law. These contributions may be directed to state party organizations, and candidates for statewide offices, state legislatures, and, in rare instances, local offices. Also, where legally permitted, Regions may make independent expenditures or corporate contributions in connection with state and local ballot initiatives and referenda on important policy issues that are likely to impact our business and our stakeholders. However, Regions does not make contributions to other political entities organized under Section 527 of the Internal Revenue Code or to special interest lobbying groups organized under Section 501(c)(4) of the Internal Revenue Code to support political activities, even when legally permissible. Regions will disclose semi-annually its independent expenditures and corporate political giving on its website.

The Director of Government Affairs may approve contributions up to \$5,000 upon recommendation by the Manager of State Government Affairs, and in amounts exceeding \$5,000 in consultation with the General Counsel and another member of the Executive Council, and a Regional President.

Policies for Associates

Regions provides an opportunity for its associates to participate in the political process by joining one of Regions' voluntary employee political action committees ("PAC") which allows associates to pool their financial resources to support federal and state candidates who support effective legislation important to Regions and its stockholders. The political contributions made by a PAC are funded entirely by the voluntary contributions of our associates. Any Regions associate who contributes to a PAC may request a PAC contribution for a candidate or a committee. Information about associates' contributions through a PAC to political candidates, political parties or committees and other political organizations is publicly available, with certain information disclosed online with the Federal Election Commission. Regions also is required to comply with federal and state laws regarding the disclosure of certain lobbying activities and such disclosures are available for public review.

Regions Trade Association Memberships

Regions and its subsidiaries belong to several trade associations and coalitions ("Trade Associations") and pays dues where required. Membership in these Trade Associations serves as a resource of industry information for Regions and often serves to promote our public policy goals. While Regions may not agree with every position taken by each Trade Association to which we belong, Regions believes that the majority of the positions taken by the Trade Associations are overwhelmingly consistent with Regions' public policy goals. Each year, Regions will request from the Trade Associations to which it pays more than \$25,000 in annual dues and payments a report of the portion of Regions' dues and payments that would not be deductible under the Internal Revenue Code. Regions will list semi-annually on its corporate website those entities and will disclose the amounts of the payments to each of those entities that would not be deductible.

Board Oversight

Management will provide an annual report to the Risk Committee of the Regions Financial Corp. and Regions Bank Boards of Directors regarding corporate contributions and non-deductible portions of the Trade Associations' dues. Any amendments to this Policy must be approved by the Executive Council. The company semi-annually will post a "Government Affairs Annual Report," that shows corporate political activity on regions.com.

2016 Corporate Political Contributions

Candidate/Campaign	State/Chamber	Position	2016 Contribution
Committee to Elect Chris Blackshear	Alabama	House Financial Services	\$1,000
Casey Cagle for Lt. Gov	Georgia	Lt. Governor	\$2,500
Ralston for Representative	Georgia	Speaker of the House	\$2,500
Florida Grown	Florida	Commissioner of Agriculture	\$10,000
Friends of Delbert Hosemann	Mississippi	Secretary of State	\$1,000
Frank Brocato for Mayor	Alabama	Mayor	\$5,000
Committee to Elect Charles Henderson	Alabama	Jeffco DA	\$500
Friends of Jim Hood	Mississippi	Attorney General	\$1,000
Citizens for Tishaura O. Jones	Missouri	St. Louis City Treasurer	\$1,500

Inaugural Funds			2016 Contribution
Trump for America	United States	President	\$5,000

State Party Committees	2016 Contribution
Missouri Republican Party	\$1,000
MHD Committee for Responsive Government	\$2,500
Florida Democratic Party	\$5,000
Florida Republican Senatorial Campaign Committee	\$7,500
Republican Party of Florida	\$10,000
Georgia Conservatives Fund, Inc.	\$10,000

State Trade Association PACs	2016 Contribution
Alabama Bankers Association PAC	\$5,000
Georgia Bankers Association PAC	\$2,500
Mississippi Bankers Association PAC	\$2,500
Florida Bankers Association PAC	\$2,500
Arkansas Bankers Association	\$2,500
Missouri Bankers Association PAC	\$2,500
Louisiana Bankers Association PAC	\$2,500
Indiana Bankers Association PAC	\$2,500
South Carolina Bankers Association PAC	\$2,500
Illinois Bankers Association PAC	\$2,500

Trade Group Memberships

According to the requirements of Section 162(e)(1) of the Internal Revenue Code, trade associations to which Regions pays membership dues must provide Regions with the percentage of those dues that are attributable to lobbying expenses. A list of such trade associations to which Regions paid annual dues of more than \$25,000 in 2016 and the portion of those dues that were nondeductible under Section 162(e)(1) of the Internal Revenue Code are provided below.

Association	Total non-deductible expense
Alabama Bankers Association	\$16,200
American Bankers Association	\$39,402
Arkansas Bankers Association	\$4,306
Baton Rouge Area Chamber	\$6,000
Birmingham Business Alliance	\$25,000
Business Council of Alabama	\$22,500
Consumer Bankers Association	\$57,000
Electronic Payments Coalition	\$40,000
Financial Services Roundtable	\$46,125
Florida Bankers Association	\$21,875
Georgia Bankers Association	\$11,812
Greater New Orleans, Inc.	\$7,000
Illinois Bankers Association	\$5,867
Indiana Bankers Association	\$5,000
Louisiana Bankers Association	\$17,915
Metro Atlanta Chamber	\$2,585
Mississippi Bankers Association	\$14,000
Missouri Bankers Association	\$3,210
Nashville Area Chamber of Commerce	\$3,400
South Carolina Bankers Association	\$3,868
Tennessee Bankers Association	\$15,750
Texas Bankers Association	\$5,500
United States Chamber of Commerce	\$22,500