



## VERIFICATION OPINION DECLARATION GREENHOUSE GAS EMISSIONS

To: The Stakeholders of Regions Financial Corporation

Apex Companies, LLC (Apex) was engaged to conduct an independent verification of the greenhouse gas (GHG) emissions reported by Regions Financial Corporation (Regions) for the period stated below. This verification opinion declaration applies to the related information included within the scope of work described below.

The determination of the GHG emissions is the sole responsibility of Regions. Regions is responsible for the preparation and fair presentation of the GHG emissions statement in accordance with the criteria. Apex's sole responsibility was to provide independent verification on the accuracy of the GHG emissions reported, and on the underlying systems and processes used to collect, analyze and review the information. Apex is responsible for expressing an opinion on the GHG emissions statement based on the verification. Verification activities applied in a limited level of assurance verification are less extensive in nature, timing and extent than in a reasonable level of assurance verification.

### **Boundaries of the reporting company GHG emissions covered by the verification:**

- Operational Control
- USA
- Exclusions:
  - Locations where Regions does not have ownership over utility accounts (326 locations in 2024)
  - Combustion of propane and distillate fuel oil #2; determined to be *de minimis*

**Types of GHGs:** CO<sub>2</sub>, N<sub>2</sub>O, CH<sub>4</sub>, HFCs

### **GHG Emissions Statement:**

- **Scope 1:** 6,198 metric tons of CO<sub>2</sub> equivalent
- **Scope 2 (Location-Based):** 50,691 metric tons of CO<sub>2</sub> equivalent
- **Scope 2 (Market-Based):** 51,422 metric tons of CO<sub>2</sub> equivalent
- **Scope 3:**
  - **Business Travel (air travel, rental cars, and reimbursed personal car use):** 4,823 metric tons of CO<sub>2</sub> equivalent

Data and information supporting the Scope 1, Scope 2 and Scope 3 GHG emissions statement were mostly historical in nature and were in some cases estimated.

### **Global Warming Potential (GWP) and primary emission factor data sets**

- GWP: Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report (AR-6)
- United States Environmental Protection Agency (USEPA) Emission Factor Hub, released 2025
- USEPA Emissions & Generation Resource Integrated Database (eGRID), 2025 (2023 data)
- Utility-specific emission factors
- Green-e Residual Mix Emissions Rates (2022 data), released 2024
- USEPA Environmentally-Extended Input-Output (EEIO) Supply Chain GHG Emission Factors\_v1.2

- United Kingdom (UK) Department for Environment Food & Rural Affairs (DEFRA), *UK Government GHG Conversion Factors for Company Reporting, 2024*

**Period covered by GHG emissions verification:**

- January 1, 2024 to December 31, 2024

**Criteria against which verification conducted:**

- World Resources Institute (WRI)/World Business Council for Sustainable Development (WBCSD) Greenhouse Gas (GHG) Protocol Corporate Accounting and Reporting Standard (Scope 1 and 2)
- WRI/WBCSD Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard

**Reference Standard:**

- ISO 14064-3 Second Edition 2019-04: Greenhouse gases -- Part 3: Specification with guidance for the verification and validation of greenhouse gas statements

**Level of Assurance and Qualifications:**

- Limited
- This verification used a materiality threshold of  $\pm 5\%$  for aggregate errors in sampled data for each of the above indicators.

**GHG Verification Methodology:**

Evidence-gathering procedures included but were not limited to:

- Interviews with relevant personnel of Regions and their consultant;
- Review of documentary evidence produced by Regions;
- Review of Regions data and information systems and methodology for collection, aggregation, analysis and review of information used to determine GHG emissions; and
- Audit of sample of data used by Regions to determine GHG emissions.

**Verification Opinion:**

Based on the process and procedures conducted, there is no evidence that the GHG emissions statement shown above:

- is not materially correct and is not a fair representation of the GHG emissions data and information; and
- has not been prepared in accordance with the WRI/WBCSD GHG Protocol Corporate Accounting and Reporting Standard (Scope 1 and 2), and WRI/WBCSD Greenhouse Gas Protocol Corporate Value Chain Accounting and Reporting Standard (Scope 3).

It is our opinion that Regions has established appropriate systems for the collection, aggregation and analysis of quantitative data for determination of these GHG emissions for the stated period and boundaries.



**Statement of independence, impartiality and competence**

Apex is an independent professional services company that specializes in Health, Safety, Social and Environmental management services including assurance with over 30 years history in providing these services.

No member of the verification team has a business relationship with Regions, its Directors or Managers beyond that required of this assignment. We conducted this verification independently and to our knowledge there has been no conflict of interest.

Apex has implemented a Code of Ethics across the business to maintain high ethical standards among staff in their day-to-day business activities.

The verification team has extensive experience in conducting assurance over environmental, social, ethical and health and safety information, systems and processes, and has over 20 years combined experience in this field and an excellent understanding of Apex's standard methodology for the verification of greenhouse gas emissions data.

**Attestation:**

A blue ink signature of Jessica Jacobs, written in a cursive style.

Jessica Jacobs, Lead Verifier  
ESG Program Manager  
Apex Companies, LLC  
Cincinnati, Ohio

A blue ink signature of Mary E. Armstrong-Friberg, written in a cursive style.

Mary E. Armstrong-Friberg, Technical Reviewer  
ESG Senior Program Manager  
Apex Companies, LLC  
Cleveland, Ohio

August 21, 2025

*This verification opinion declaration, including the opinion expressed herein, is provided to Regions Financial Corporation and is solely for the benefit of Regions Financial Corporation in accordance with the terms of our agreement. We consent to the release of this declaration by you to the public or other organizations without accepting or assuming any responsibility or liability on our part to any other party who may have access to this declaration.*