

Below are the responses of Citizens Financial Group, Inc. (“CFG”) to the follow-up questions received from the Federal Reserve Board (“FRB”) in a letter dated October 5, 2021. The FRB’s questions are repeated in bold type, and the responsive information immediately follows each question. The information below has been provided by CFG, and where relevant, Investors Bancorp, Inc. (“Investors”).

1. In Public Exhibit 8 of the application, Investors reported zero dollar amounts for the below financial stability data items. Please confirm that these values are known to be zero, as opposed to unable to be calculated because information is not retained in the regular course of business (which could be reported as “Information not available,” if applicable).

a. Assets valued using Level 3 measurement inputs (as defined by FR Y-15, Schedule D, Item 10).

As noted in the response to question #18 of the FRB’s initial information request letter, dated September 28, 2021 (the “Initial FRB Letter”), which response was submitted to the FRB on October 8, 2021, Investors does not have any assets that are priced on a recurring basis on its balance sheet using Level 3 measurement inputs as defined by FR Y-15, Schedule D, Item 11 and, therefore, the value is zero.¹

Investors does have mortgage servicing rights (“MSR”) that, once owned by CFG, will become part of CFG’s MSR portfolio. CFG’s MSR portfolio is a Level 3 asset priced on a recurring basis. The estimated fair value of Investors’ MSR as of June 30, 2021 is \$11.9 million.

b. Foreign claims on an ultimate risk basis (as defined by FR Y-15, Schedule E, Item 1).

The amount of foreign claims on an ultimate risk basis is zero.

c. Total cross-jurisdictional liabilities (as defined by FR Y-15, Schedule E, Item 4).

Investors does not have any foreign offices, U.S. dollar liabilities to foreign residents or foreign currency liabilities to foreign residents. As a result, Investors has no cross-jurisdictional liabilities as defined by FR Y-15, Schedule E, Item 4.

¹ Please note that the question above refers to FR Y-15, Schedule D, Item “10.” However, Item 10 refers to “Total adjusted trading, AFS and equity securities with readily determinable fair values not held for trading” dealing exclusively with Level 1 and Level 2 assets. This response assumes reference was intended to be made to Item 11, as Level 3 assets are referred to in Item 11, “Assets valued for accounting purposes using Level 3 measurement inputs”).

2. Public Exhibit 8 contains other items for which Investors reported “N/A”. Please clarify whether these values are known to be zero or unable to be calculated because information is not retained in the regular course of business.

i. Payments activity (as defined by FR Y-15, Schedule C, Item 2).

Aggregate payment activity made over last four quarters (the third quarter of 2020 through the second quarter of 2021) is \$57.9 billion.

ii. Assets held as a custodian on behalf of customers (as defined by FR Y-15 Schedule C, Item 3).

Investors does not act as a custodian on behalf of customers and, therefore, the amount of assets held as custodian on behalf of customers is zero.

iii. Total underwriting activity (as defined by FR Y-15, Schedule C, Item 6).

As noted in the response to question 17.c. of the Initial FRB Letter, Investors is not involved in underwriting activities as defined by FR Y-15, Schedule C, Item 6 and, therefore, the value is zero.