

FIFTH THIRD BANCORP

Information Disclosure Policy for Employees, Officers and Directors

1. Scope of this Policy

This policy applies to all directors, regional directors, officers and employees of Fifth Third Bancorp and its subsidiaries. This policy covers any and all disclosures of MNPI about us. Capitalized terms used in this policy and not defined herein shall have the meanings assigned to such terms in the Company's Enterprise Insider Trading and Ethical Investing Policy.

2. Limitations on Disclosure of MNPI

- You are not permitted to disclose MNPI about Fifth Third to anyone outside of Fifth Third, unless you are an authorized officer as designated by our Disclosure Council and you are acting within the scope of the authority granted to you by that Council.
- You may disclose MNPI about Fifth Third only to Fifth Third directors, regional directors, officers and employees who have a "need to know" such information in the course of performing their duties.
- You must adhere to the terms of the Company's Enterprise Insider Trading and Ethical Investing Policy.
- Only specifically authorized Fifth Third officers may participate in speaking engagements¹ (including, but not limited to speeches or panel discussions) or talk to, or otherwise communicate with, securities analysts, institutional investment managers, stockholders, the media and/or other potential investors or securities professionals about our strategic plans, significant organizational or administrative matters, results of operations, financial information or other MNPI. You are not so authorized unless and until you have been specifically authorized by Fifth Third's Disclosure Council. See Section 6.1 of Fifth Third Bancorp's Code of Business Conduct & Ethics for guidelines and requirements for ensuring Responsible Communications about Fifth Third.

¹ Speeches, presentations or appearances on a panel required approval if the speaker was invited or volunteered to discuss a subject matter related to his or her role as an employee of Fifth Third.

- If you believe that MNPI may have been disclosed by an unauthorized person, whether intentionally or inadvertently, you must immediately contact the Legal Department.

3. **Objectives of this Policy**

The objectives of this policy are to ensure that communications to the public about Fifth Third:

- are factual and accurate;
- are disseminated widely and on a timely basis so that all investors have relatively equal access to the information contained in them; and
- meet all legal requirements.

Nothing in this policy is intended to preclude or dissuade employees from engaging in activities protected by state or federal law, including the National Labor Relations Act, such as discussing wages, benefits, or other terms and conditions of employment, or raising complaints about working conditions for their own and their fellow employees' mutual aid or protection.

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Any questions about the content of this policy or to otherwise clarify its application should be directed to the Legal Department.