Delivering on Our Purpose

Huntington

2019 ESG REPORT

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Huntington Board of Directors
front row, L-R: Robert S. Cubbin, Ann B. (Tanny) Crane, Richard W. Neu, Gina D. France
back row, L-R: Alanna Y. Cotton, Stephen D. Steinour, Kenneth J. Phelan, Lizabeth Ardisana, Steven G. Elliott, Katherine M. A. (Allie) Kline, John C. (Chris) Inglis, J. Michael Hochschwender, David L. Porteous, Kathleen H. Ransier (not pictured: Peter J. Kight)

INTRODUCTION

Executive Message

To our fellow shareholders, customers, colleagues, and community members – **Welcome.**

2019 was a successful year for Huntington. We managed through significant economic uncertainty and delivered strong financial performance by maintaining disciplined risk management, striving to serve the needs of our stakeholders, and remaining focused on our corporate social responsibility. Our deep commitment to sustainability, social impacts and ethics, and leadership enabled Huntington to deliver on our purpose of making people's lives better, helping businesses thrive, and strengthening the communities we serve. Our purpose drives our performance and our commitment to corporate social responsibility and sustainability is an integrated part of how our businesses operate and how we serve our colleagues, customers, and communities. Huntington's social responsibility and our Environmental, Social & Governance (ESG) program and performance are also important for our investors as they focus more on how their money is invested for the long term. Huntington's ESG commitments are an extension of our corporate values and drive our daily actions. Since beginning our ESG journey, each year we have advanced our commitments. While we are pleased to share our progress, we also acknowledge that there is much more to do to ensure economic and environmental sustainability and social equity.

Investing in Customers and Communities

The foundation of our Fair Play banking strategy, forged more than a decade ago, continues to drive our economic strength and value creation model. Providing transparent and fair services to our customers, offering innovative products to the economically disadvantaged, and increasing customer financial literacy are part of our investment in our customers and communities. In 2019, we invested in an omnichannel customer experience and enhanced our educational and digital capabilities. Consumers and businesses alike are using The Hub – Huntington's digital banking solutions – for important financial tasks including managing their cash flow and detecting unusual account activity. Helping small businesses thrive remained a priority for Huntington in 2019. We were the nation's top Small Business Administration (SBA) 7(a) lender by volume for the second consecutive year.*

We also have a history of strong community involvement and supportive civic leadership. Our $16.1 billion Community Development Plan in support of affordable housing, homeownership, and neighborhood transformation is well ahead of our five-year goal. Our innovative public / private partnerships and investments in affordable housing, including the groundbreaking $100 million Housing Action Fund with the City of Columbus and other corporate and community partners, continue to make a significant impact that is replicable in other communities.

Commitment to Strong Governance

Our well-rounded, skilled, and diverse Board is highly engaged and provides sound oversight of our ESG program and performance. The Board and the Executive Leadership Team regularly evaluate evolving standards and guidelines, including the Sustainability Accounting Standards, the Task Force on Climate-related Financial Disclosures, and the United Nations Sustainable Development Goals. On a regular basis, the Board's Nominating and Corporate Governance Committee critically reviews Huntington's ESG performance management framework against our ambitions throughout the year.

In 2019, we welcomed three new directors to the Board, bringing additional depth of experience in digital and mobile technology, consumer marketing and brand development, product innovation, and risk management. With these three additions, 40% of our Board is diverse in terms of race or gender, better reflecting our colleagues, customers, and communities.

* Huntington is #1 in the nation in number of SBA 7(a) loans from October 1, 2017 to September 30, 2019. Source: U.S. Small Business Administration (SBA)

Stepping Up in a Time of Crisis

This report comes during a prolonged period of a pandemic with extended economic uncertainties. We share deep empathy with those impacted by COVID-19 and offer our gratitude to the healthcare professionals and essential workers, including our own Huntington colleagues, who have remained on the front lines during the pandemic. We have an incredibly important role to play during this time. Guided by our purpose, our first priority was, and continues to be, the health and safety of our colleagues and customers. We quickly implemented employee relief benefits, such as paid emergency leave and emergency childcare time off. We are pleased with our ability to effectively adapt our businesses to meet the current challenges and adjust to changing customer needs. Our colleagues have done a wonderful job continuing to serve our customers through branch locations, operations centers, our customer solutions call center, and online banking.

In addition, we quickly partnered with SBA at the national level to support our small business community, as well as continuing to serve our other commercial customers and consumers. The many relief measures we implemented in the early days of the pandemic have helped to reduce the economic burden on individuals, families, communities, and businesses. During the first two months of the pandemic in the U.S., we supported non-profit safety net services and payment deferrals helped more than 51,000 consumer, 3,000 business banking, and 700 commercial customers manage through these difficult times.

As we write this letter, we are on the road to recovery from COVID-19. We are taking actions now so we can look back on this crisis and be proud of how we came together as an organization and with our partners to make things better for all. We believe we will emerge from this crisis with renewed strength and continue to deliver for our stakeholders. We look forward to sharing more about these efforts and outcomes in next year's ESG report.

> Our purpose is to make people's lives better, help businesses thrive, and strengthen the communities we serve.

Focus on Risk Management

Starting at the Board level with our Risk Oversight Committee, every year we reevaluate and reinforce our risk management protocols. In 2019, we created our Global Risk Assessment Group overseen by our Chief Risk Officer. This in-house "think tank" assesses the risk landscape with comprehensive analysis, in collaboration with other areas of our organization, on topics ranging from climate change to disruptive technologies to geopolitical risks. At Huntington, we expect everyone to understand and own risks.

Support for Our People

We have an aspiration of becoming a Category of One institution, an organization unique in the combination of its culture and performance. This journey begins with our colleagues. We continue to make colleague-first investments. Effective May 2020, we implemented a bank-wide minimum wage increase from $16 per hour to $17 per hour. We are one of the few banks in the country to offer an on-premises, pre-imbursed college degree program for eligible colleagues. We also invested in our Leadership Development Framework in 2019 by adding five new year-long development experiences for all levels of Huntington leaders. In addition, we promoted 86 internal candidates to senior and executive leader roles in the company.

Huntington is deeply committed to the concept of equity with our colleagues and the community. In 2019, the average annual base pay for women was 99% of their male colleagues with the same job titles and the annual base pay among minority colleagues in the bank was 98% of the salary of their non-minority counterparts. These numbers are the result of consistent reviews of our compensation programs and an unwavering commitment to non-discriminatory pay practices. We strive to engage, develop, retain, and attract talent from all backgrounds to be reflective of the communities and markets we serve. At the end of 2019, 66% of our workforce was gender or racially diverse. We have set an aspirational goal to reach 50% gender and racial diversity in our middle and executive management ranks by the end of 2021. Our gender and racial diversity for management is currently at 43% – a sign that we have made progress with more work to do.

We believe we can have a significant impact on economic inclusion through our supply chain as well. By working with minority-owned businesses, we can improve the economic conditions across our footprint and ensure our supplier base reflects the demographics of the communities we serve. In 2019, our total spending with diverse suppliers reached $143.5 million, representing 25% of our total spend. This far exceeds the industry average of approximately 9%.

Our Environmental Progress

We are focused on understanding the impact of climate-related and environmental risks on our businesses in the short, medium, and long term to enable us to make informed strategic and business decisions. Climate change is a real issue for our colleagues, customers, investors, and the communities we serve. Accordingly, we have a responsibility to reduce Huntington's carbon footprint and we are on track to meet or exceed our multi-year Environmental Footprint Commitment to reduce greenhouse gas emissions, water usage, and landfill waste. We are both proud of our decade-long participation in the Carbon Disclosure Project and humbled by our colleague engagement – the "Green Team" – in environmental efforts. We have increased investment in environmental sustainability-focused projects and Renewable Energy Finance, and applied an ESG lens on wealth management. We have much more to do and are committed to identifying and proactively addressing climate-related and environmental risks to our businesses.

In closing, we remain resolute in advancing our ESG program and performance. Thank you for your ongoing support and commitment to our shared progress.

Stephen D. Steinour
Chairman, President and
Chief Executive Officer

David L. Porteous
Lead Director,
Board of Directors

INTRODUCTION

About This Report

This 2019 ESG report is Huntington's fourth report on our ESG commitments, results to date, and aspirations. It covers the period from January 1, 2019, to December 31, 2019, except where noted. Consistent with our 2018 ESG report, this report takes an expanded view of ESG reporting by incorporating our economic impact for our stakeholders, in addition to reporting on our continuing ESG performance.

In creating this report, we have relied on the results of our 2017 ESG materiality assessment, and we referenced established sustainability/ESG reporting frameworks, ratings, and rankings, such as the Global Reporting Initiative (GRI), Sustainability Accounting Standards (SASB), and the Task Force on Climate-related Financial Disclosures (TCFD). We have incorporated updated programs, enhanced data disclosures (including previous-year comparisons), and renewed commitments throughout this report. Our greenhouse gas reporting has been reviewed by a third-party engineering firm, which has verified its accuracy and reliability. For more information on the third-party assurance, see page 79 in the Appendix. The Appendix also contains a comprehensive list of links to our policies and codes.

We would suggest reviewing this report as a companion to our annual report. Together, these reports demonstrate our commitment to transparency and engagement with our stakeholders. We hope you enjoy learning more about our latest ESG efforts and progress, and we welcome your feedback at corporate.responsibility@huntington.com.

About Huntington*

Huntington Bancshares Incorporated is a regional bank holding company headquartered in Columbus, Ohio, with $114 billion of assets and a network of 868 branches, including 12 Private Client Group offices, and 1,448 ATMs across seven Midwestern states. Founded in 1866, The Huntington National Bank and its affiliates provide consumer, small business, commercial, treasury management, wealth management, brokerage, trust, and insurance services. Huntington also provides vehicle finance, equipment finance, national settlement, and capital market services that extend beyond its core states. Visit huntington.com for more information.

*as of 3/31/2020

INTRODUCTION

Our Approach to ESG

We are committed to doing the right thing for our shareholders, customers, colleagues, and communities – what we call **"Looking Out for People."**

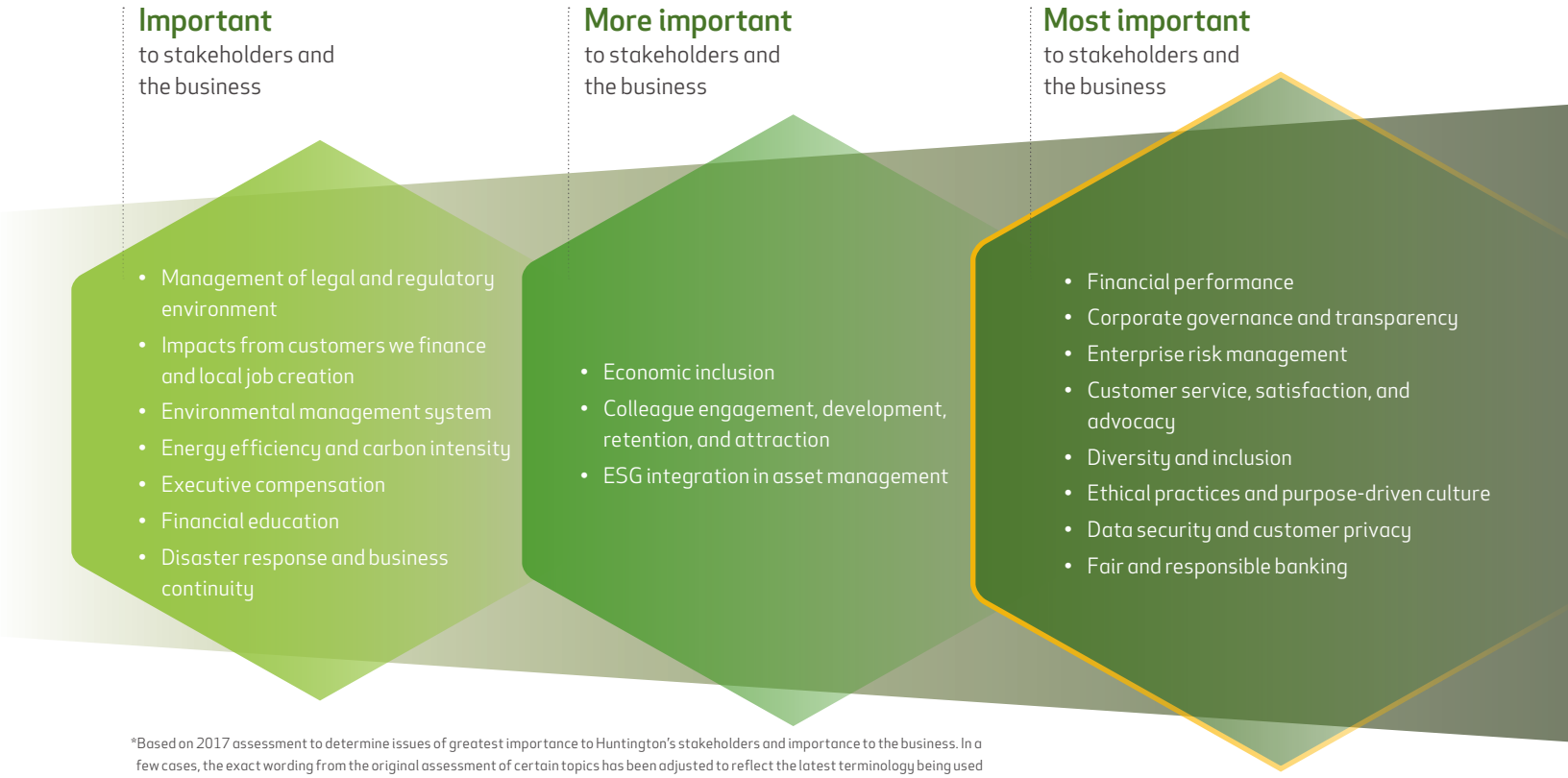
At Huntington, we focus on the environmental, social, and governance (ESG) issues that are most important to our business and our stakeholders.

As reflected in this report, we approach ESG with a purpose-focused strategy that leverages our economic impact. As a public company, our economic impact begins with our commitment to delivering sustainable, long-term shareholder value through top-tier performance, while maintaining an aggregate moderate-to-low risk appetite and well-capitalized position. As a regional bank, our economic impact includes helping individuals and families reach their goals of financial stability and homeownership; providing businesses, especially small and mid-sized businesses, with the resources to grow; serving and uplifting the under-banked; and working in partnership to create prosperous and resilient communities.

Because we believe in **"delivering on our purpose,"** our enterprise ESG commitment is closely integrated with our core performance objectives. Our ESG performance management framework ensures ESG considerations that are most material to our stakeholders are integrated into all relevant Board Committee agendas for meaningful discussion, awareness, and governance actions. The Executive Leadership Team (ELT) is accountable for executing the ESG ambition approved by the Board, including setting and delivering on short- and long-term performance goals made public in our annual ESG report.

ESG PROGRAM FRAMEWORK

FOCUSING OUR REPORTING ON MATERIAL TOPICS*



*Based on 2017 assessment to determine issues of greatest importance to Huntington's stakeholders and importance to the business. In a few cases, the exact wording from the original assessment of certain topics has been adjusted to reflect the latest terminology being used in the company and industry.

Materiality Assessment Process and Outcomes

To ensure that we focus our ESG strategic commitment on opportunities that are most important to our key stakeholders, and that our reporting aligns with those priorities, Huntington completed a materiality assessment during 2017. We deliberately took an integrated approach to conducting our assessment by directly considering our risk management priorities, overall corporate strategy, and purpose. We focused on evaluating topics based on both their importance to key stakeholders and to Huntington, and our ability to impact those topics.

The assessment clearly defines Huntington's most important stakeholder and business priorities as: financial performance; corporate governance and transparency; enterprise risk management; customer service, satisfaction, and advocacy; diversity and inclusion; ethical practices and purpose-driven culture; data security and customer privacy; and fair and responsible banking.

Read more about our materiality assessment process and outcomes in our 2018 ESG report.

Stakeholder Engagement

Driven by our purpose and guided into action through our core values, we are focused on ensuring top-tier performance and creating long-term value for our stakeholders. At its heart, our strategy is differentiated through our relentless focus on customer experience, supported by a robust risk management culture and by a distinguished customer- and community-centric mindset. We believe this shared-value approach to responsible growth, delivered by our inclusive and highly engaged colleagues, has allowed us to retain and develop deeper relationships with our customers, expand our relationships across our footprint, and reinvest in community development for the markets we serve.

For information on how we engage with our key stakeholders on ESG topics, see page 73 in the Appendix.

Alignment with United Nations Sustainable Development Goals

We have identified five United Nations (UN) Sustainable Development Goals (SDGs) on which we believe we can have a direct impact and influence and that align with our priorities. Our alignment with these goals reflects our intention to demonstrate a mindful, macro-conscious approach to impacting our stakeholders and the world around us.

The five goals that we are focused on, and our actions that support these goals, are summarized as follows:

1. No Poverty

Our commitments to financial education, to serving the under-banked, and economic inclusion programs give us a platform to help reduce poverty and drive economic empowerment for all. We have specific programs in place to put homeownership in reach for many more families, to invest significantly in affordable housing, and to provide micro-loans as low as $5,000 to help fledgling entrepreneurs move forward with their plans. We are a leader in engaging our local communities to partner toward growth and resilience.

8. Decent Work and Economic Growth

Effective May 2020, we implemented a bank-wide minimum wage increase from $16 per hour to $17 per hour, and we have a strong, ongoing focus on colleague engagement, development, retention, and attraction. For our customers and communities, we work hard every day to promote investments in economic growth and prosperity, most notably through our position as the #1-ranked U.S. Small Business Administration lender in our markets.*

10. Reduced Inequalities

We believe our commitments to economic inclusion, diversity & inclusion in our workforce, and supplier diversity will help to reduce inequalities in our workplace, for our customers, and in our communities. Our 25% spend with diverse-owned companies in 2019 far exceeds the financial industry average, and we have outlined clear commitments to expand diversity among our colleagues.

11. Sustainable Cities and Communities

Fair and responsible banking is a critical component of living and working in sustainable cities and communities. We are tireless advocates for our customers and contribute to the vitality of our communities, most notably through our transformative $16.1 billion five-year community development plan and through over 31,500 hours of volunteer service in 2019.

13. Climate Action

In 2019, we added Climate Action as a goal. Our Board work included focused discussions on our environmental policies and strategic efforts in the context of climate change. Our ELT is engaged in supporting advancements to positively impact both our direct and indirect role influencing climate change. We established our new Global Risk Assessment Group that conducted a comprehensive review of climate change risk and how it affects our stakeholders. Our Energy Sustainability Director led the organization in growing our results with more ambitious and longer-term goals for greenhouse gas emissions reduction.

* Source: U.S. Small Business Administration (SBA) from October 1, 2008 to September 30, 2019. Huntington is #1 in the nation in number of SBA 7(a) loans for fiscal year ending September 30, 2019.

2019

Awards and Recognitions

Customer Service and Reputation

J.D. Power & Associates

- Ranked highest in Customer Satisfaction with Mobile Banking Apps in the **2019 U.S. Banking Mobile Apps Satisfaction Study** by J.D. Power.*
- Ranked highest in Customer Satisfaction with Online Banking in the **2019 U.S. Online Banking Satisfaction Study** by J.D. Power.*

Excellent – Reputation Ranking with Customers by American Banker

2019 Greenwich Associates Awards

Excellence Awards for U.S. Small Business Banking

- National:
  - » Overall Satisfaction
  - » Likelihood to Recommend
  - » Cash Management – Overall Satisfaction
- Regional:
  - » Midwest – Overall Satisfaction
  - » Midwest – Likelihood to Recommend
  - » Midwest – Cash Management – Overall Satisfaction

Workplace

2019 Forbes Awards

- Best Employers for New Grads 2019
- Best-In-State Banks
- World's Best Banks

Best Employers for Diversity
2nd Consecutive Year

Best Employers for Women
2nd Consecutive Year

Received 100% score on the Human Rights Campaign Foundation Corporate Equality Index – the leading national measurement of LGBTQ corporate support – 2014–2019

Best Workplaces for Diversity™ 2019 by Great Place to Work

Received 100% score on the Disability Equality Index – 2017-2019

2019 Best Places to Work by the Disability Equality Index

Great Place to Work Certification by Great Place to Work (August 2019-August 2020)

Best Employers: Excellence in Health & Well-being by National Business Group on Health

Best Places to Work for LGBTQ Equality
by the Human Rights Campaign Foundation

Fortune 100 Best Places to Work for Diversity 2019**

Training Top 125 Award
by Training magazine

Community

Bronze Level President's Volunteer Service Award in recognition of financial education facilitation with Junior Achievement

Good Together Technology Donor of the Year Award by Sage Sustainable Electronics

America's Most Responsible Companies 2020
by *Newsweek*

*For J.D. Power 2019 award information, visit jdpower.com/awards

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2019

ESG Highlights

Driving Economic Impact and Enhancing Our Communities

$952 million
in community development loans and investments

1,499 families in mortgage distress assisted through the Home Savers Program

#1 originator in SBA 7(a) loans

190 community development loans supporting affordable housing

93% to goal in year 3 of 5-year
$16.1 billion
community development plan

23.8% of branches in low-to-moderate income neighborhoods

Unwavering Commitment to Diversity, Equity, and Inclusion

40%
board diversity

43% middle and executive management diversity

24.6% diverse spend with an economic impact of 1,992 jobs supported representing $103 million in supported wages

66%
total workforce diversity

99%
average base pay for women colleagues with the same job titles as men

98%
average base pay for minority colleagues with the same job titles as non-minorities

Delivering on Our Environmental Commitment

Updated our 2022 environmental goals

Indicator	Updated 2022 Goal
Reduce Water Use	15% ↓
Reduce Landfill Waste	25% ↓
Reduce Paper Printing	25% ↓

Mid-Term Goal
Reduce Greenhouse Gas Emissions by
31% by 2027

Long-Term Goal
Reduce Greenhouse Gas Emissions by
41% by 2037

All goals are benchmarked against a 2017 baseline.

Managing Risk Responsibly

100%
of colleagues completed risk and developmental training

Strengthened our cybersecurity leadership team and increased cyber support staff by **60%**

Recognition for Our Progress

Newsweek 2020 Most Responsible Companies

One of *Forbes* Best Employers for Diversity and Women

Economic

Company Overview and Financial Impact

CUSTOMER FOCUS AND IMPACT

Customer Advocacy, Experience, and Satisfaction

BUSINESS FOCUS AND IMPACT

Business and Commercial Banking

COMMUNITY FOCUS AND IMPACT

Investing in Communities
Affordable Housing and Homeownership
Community Outreach and Philanthropic Investments

WE'RE FOR PEOPLE®

Huntington colleagues are committed to creating shared value for our shareholders, customers, communities, and each other.

ECONOMIC

Company Overview and Financial Impact

At Huntington, our business model and approach to generating sustainable returns are anchored by the concept of shared value. We are committed to our purpose of **making lives better, helping businesses thrive, and strengthening the communities we serve**. By remaining focused on this pursuit, we are able to achieve long-term financial success.

Our goal is to build sustainable long-term shareholder value:

- Through consistent organic growth;
- While maintaining an aggregate moderate-to-low risk appetite;
- While minimizing earnings volatility through the cycle; and
- With disciplined capital management.

OUR PURPOSE AND VALUES

Every day, our colleagues fulfill our purpose and drive performance by embodying our core values:

Can-Do Attitude: We enthusiastically work and succeed together.

Service Heart: We work with an inclusive spirit, putting ourselves in each other's shoes to better understand how we can help.

Forward Thinking: We are always looking ahead for ways to be the very best.

Our colleagues' efforts to better serve our customers and their financial needs, in turn, enable the strength and growth of our communities and the success of our business.

Long-Term Value Creation

To drive sustained shareholder value through economic cycles, we continue to build on **several key advantages that differentiate us in our markets:**

- Our talented, diverse colleague base that embodies our purpose and values
- Our purpose-driven culture that looks out for people
- Our "Welcome" brand promise that promotes inclusiveness in all that we do
- Strong relationships with our customers and our ability to provide them with exceptional experiences
- Our distinguished products and services driven by our innovative mindset
- Our commitment to community involvement and leadership
- Our strong financial position, which allows us to continue to invest in our future

Our ESG foundation and commitments are thoroughly integrated into our performance objectives and core business strategies. By facilitating sustainable, long-term value creation, we are looking out for our shareholders, colleagues, customers, and communities.

Financial Highlights

The Midwest is known for its humility, hard work, and for taking on challenges that come our way. 2019 ended up being the kind of year where these traits proved invaluable. What began as a year of healthy growth and an expectation of multiple interest rate increases very quickly evolved into a global marketplace facing significant economic uncertainty, market volatility, and falling interest rates. Huntington was able to manage through these challenges and deliver sound financial performance because of our commitment to the values and goals outlined throughout this report.

Despite these headwinds, we reported our fifth consecutive year of record net income. Earnings per common share grew six percent and reached their highest levels since the Global Financial Crisis. We believe our return on key metrics such as profitability ratios, return on average assets, and return on average common equity continue to compare favorably with our peers.

We remain focused on creating shared value for our stakeholders through superior financial performance. Disciplined financial execution, coupled with scale achieved both organically and through acquisitions, positions Huntington as a stable, sustainable financial institution, and allows us to create meaningful economic value across our footprint.

FINANCIAL HIGHLIGHTS AND TRENDS

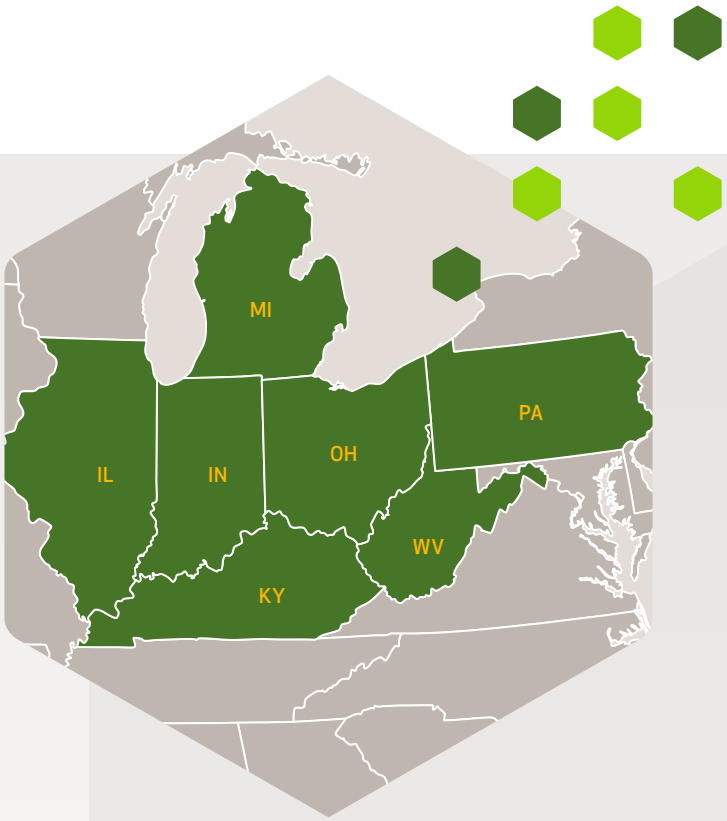
(in millions, except per share amounts)

		2017	2018	2019
Balance Sheet	Total Assets	$104,185	$108,781	$109,002
	Total Loans and Leases	$70,117	$74,900	$75,404
	Total Deposits	$77,041	$84,774	$82,347
	Total Equity	$10,814	$11,102	$11,795
Income Statement	Total Revenue*	$4,359	$4,540	$4,693
	Net Income	$1,186	$1,393	$1,411
	EPS	$1.00	$1.20	$1.27

*fully-taxable equivalent

2019 Market Presence

Our "Welcome" brand promise centers around our inclusive, relationship-building capabilities designed to best meet each customer's specific needs. Across our seven-state footprint, we serve our customers through a banking network of more than 800 retail branches as well as digital, telephone, and ATM banking capabilities.



Our geographic footprint

REGIONAL HEADQUARTERS:

- Columbus, Ohio
- Chicago, Illinois
- Indianapolis, Indiana
- Detroit, Michigan
- Grand Rapids, Michigan
- Akron, Ohio
- Canton, Ohio
- Cincinnati, Ohio
- Cleveland, Ohio
- Toledo, Ohio
- Pittsburgh, Pennsylvania
- Charleston, West Virginia

EXTENDED FOOTPRINT PRODUCTS:

- Asset Finance
- Auto
- Corporate
- Food & Agriculture
- Franchise
- Healthcare
- Marine & RV
- National Settlements
- Sponsor Finance
- Huntington Technology Finance

OHIO
Branches: **424**
Deposits: **$51.9**
Loans: **$40.7**
ATMs: **835**

ILLINOIS
Branches: **35**
Deposits: **$2.5**
Loans: **$6.2**
ATMs: **36**

MICHIGAN
Branches: **277**
Deposits: **$17.1**
Loans: **$17.1**
ATMs: **383**

PENNSYLVANIA
Branches: **45**
Deposits: **$4.2**
Loans: **$7.2**
ATMs: **65**

WEST VIRGINIA
Branches: **25**
Deposits: **$2.2**
Loans: **$2.0**
ATMs: **45**

INDIANA
Branches: **40**
Deposits: **$3.8**
Loans: **$5.7**
ATMs: **72**

KENTUCKY
Branches: **10**
Deposits: **$0.6**
Loans: **$2.8**
ATMs: **12**

Dollar figures in billions
Represents funded and unfunded loan and lease commitments.

Over 150 years
of serving the financial needs of our customers

15,664
Colleagues

$109B
Assets

868
Branches

1,448
ATMs

WE'RE FOR PEOPLE®

Our customers guide us in making banking easier. We listen at their kitchen tables and share life moments to understand their needs.

ECONOMIC
Customer Focus and Impact

Customer Advocacy, Experience, and Satisfaction

Everything we do at Huntington revolves around serving our customers, helping them meet life's moments and plan for the future – whether it be in their business, in their personal lives, or for their family. This purpose compels us to continually innovate to serve customers in new, convenient ways, but to also remain grounded in sound and fair banking principles.

We strive to support our markets and communities in a responsible manner, contributing to an environment of economic stability and sustainable growth. **Huntington will not discriminate against any person on the basis of age, race, gender, sexual orientation, religion, national origin, mental or physical handicap, or any other protected class.** We conduct business only with customers that we reasonably believe to be of good reputation and to have acquired funds through legitimate means. You can read more on these commitments in the appendix.

> At Huntington, our advocacy is about putting yourself in someone else's shoes, looking out for them, and being a champion for our customers.
>
> - Carrie Birch, Customer Advocacy Director

Our policies relating to fair, responsible, and inclusive lending are overseen by the Board-level Community Development and Risk Oversight committees. These committees review the company's compliance with standards, including Unfair, Deceptive, or Abusive Acts and Practices (UDAAP) requirements. We are committed to transparent banking, financial practices, and prudence in all dealings with our customers.

Our commitment to fair, responsible, and inclusive banking is demonstrated through our focus on these four areas:

1 Product Development and Marketing

- Identify the needs of customers and develop products and tools to meet those needs
- Communicate and market those products so that customers are aware of them and their advantages

2 Sales and Service

- Identify customer needs and look out for them by building optimal consumer relationships

3 Complaint Management

- Utilize data analytics to identify opportunities for improving customer experience

4 Compliance

- Ensure we adhere to regulations and to regulatory expectations using a risk-based approach

We strive to offer products and services that are transparent, competitive, and fair. Key offerings include:

- **Asterisk-Free Checking®** involves no fees to open the account, no costs to maintain it, and no minimum balance requirement.
- **24-Hour Grace®** overdraft fee relief comes free with all consumer Checking, Savings, and Money Market deposit accounts.
- **All Day Deposit℠** provides the convenience to deposit funds until midnight through ATMs or the Huntington Mobile App.
- **Huntington Heads Up®** offers real-time insights into spending and savings to help consumers make more informed decisions with their money.
- **The Hub** delivers a suite of digital banking tools such as Spend Analysis, Spend Setter℠, and Look Ahead Calendar℠ to help customers better understand their financial position. For Business Banking customers, Cash Flow Forecast and Cash Position help to predict upcoming cash conditions.
- **Business Banking Online platform** provides additional tools which fit industry-specific needs and global operations.

Responsible Banking Includes Keeping Our Planet at the Forefront of the Commercial Decisions We Make

Regardless of the business segment, all commercial loans that are secured by real estate assets must have adequate environmental due diligence. When these loans are evaluated, any potential or real environmental risk issues associated with the collateral must be evaluated. Both the Huntington Real Estate Technical Services group and the Environmental Risk Team are involved in evaluating potential environmental concerns, assessing the level of risk, and interpreting the policy to assist in the mitigation of risk.

Our Entire Product Development Process Revolves Around Our Customers

Throughout every step in our product development lifecycle, we maintain a consistent focus on looking out for our customers and their needs.

Product Clarity: Huntington takes great care in deciding what products, services, and benefits we offer to our customers. We work hard to ensure that our products and services are useful and beneficial to our target markets, that they are not confusing for customers to understand, and that terms are clearly explained and disclosed. All products, whether they are new, modified or expanded, are carefully reviewed by the Products and Services Risk Committee before release.

Fair Pricing: Offering products and services in a responsible manner requires an initial review of our pricing and fee structures to ensure we are both competitive and fair. Evaluating our pricing and fees is a continual process to ensure that what was once fair remains so in light of any changes to the product, expenses, the way it is offered, or the marketplace as a whole.

Honest Marketing: We carefully consider how to present our products, services, and benefits to our audiences. Advertising content must support our brand promise while also including the necessary disclosures. We review all materials to ensure they are fair, honest, and respectful to consumers.

Responsible Lifecycles: Sometimes, being fair and responsible means we discontinue a product, service, or benefit, particularly when we determine that the fees we need to charge, based on processing or risks, become prohibitive or excessive to customers. We may also stop offering a product or service when customers are no longer able to reasonably access, utilize, or receive the benefits. A change in the regulatory environment may also require us to stop offering a product or service.

Listening to Our Community Partners

Enterprise outreach and listening sessions with community development and local non-profit partners continued in 2019. Since launching these forums, they have become integral to providing a better understanding of the unmet financial needs in low- to moderate-income communities. These meetings have resulted in numerous enhancements to our products and services and now serve as a continuous feedback loop for product development and execution. We are active in this area in all our markets and are proud to be an industry leader.

Targeted Customer Resource Groups Provide Support Where It Is Needed Most

We support economic opportunity for all. This means holding ourselves to heightened standards to ensure access to quality banking services for all our customers. Our Customer Resource Groups provide dedicated outreach, financial wellness training, and specialized products and services to vulnerable populations in our footprint, including:

- Service members and veterans
- Youth and students
- Aging population
- Non-English speaking individuals
- Those with disabilities
- Those with limited financial literacy
- Unbanked or underbanked persons
- Financially distressed customers

For more information about our community outreach and assistance efforts, see the Community Focus and Impact section of this report, beginning on page 26.

Looking Out for Those Who Look Out for Us

Huntington prides itself on a strong commitment and service to the unique needs of the members of the military. In 2019, we introduced several new tools and solutions designed to make their lives easier.

Direct Military Service Lines: We learned through our customer feedback channels that veterans, service members, and their families benefit greatly from consistent, personalized support. In November, we launched a customized toll-free number for service members in the U.S. and an international number for service members and their families stationed overseas. This number connects them directly with members of our customer service team that are specially trained to answer military family questions.

Enhanced VA Loan Benefits: We offer Department of Veterans Affairs (VA) loans with special options including low fixed rates, low down payment options, and flexible sources for down payments as well. For veterans and active personnel that elect to finance a home with a VA loan, we limit all closing costs to $500. If these military customers choose another mortgage loan type, we pay the appraisal fee for qualified borrowers.

Special SBA Loan Benefit: In November, we began waiving all closing costs on SBA loans up to $350,000 for qualified veteran-owned businesses. It's another way we're looking out for those who sacrifice so much for this nation.

We are proud to support our active servicemembers through the Servicemembers Civil Relief Act (SCRA), which gives military members a wide range of protections and benefits while on active duty. More information on the SCRA is available in the appendix of this report.

Huntington is deeply committed to hiring and supporting veterans and our active-duty colleagues. For more information on these benefits, see page 60 of this report.

Supporting Veteran-Owned Businesses

In 2019, we began waiving all closing costs for veterans receiving qualified SBA loans

Returning to a Place to Call Home

We welcomed home 333 families with VA loans in 2019 totaling $57M

Customer Tools Make Banking Easy

SPEND SETTER℠ | SAVINGS GOAL GETTER℠ | HUNTINGTON HEADS UP® | CASH FLOW FORECAST

Customer Support and Advocacy

The only thing constant in life is change. At Huntington, we understand to fulfill our purpose of helping people, we must continually adapt, not just to broad changes in technology or the economy, but on a personal level with our customers. We must be there to support them throughout the course of their lives as their needs change.

Huntington approaches customer experience and service with the same forward-thinking mindset encompassed in our company's core values. Our goal is to provide superior customer experiences that are viewed as a differentiating competitive factor that can drive top-quartile performance and place ourselves in a Category of One. The Customer Experience Innovation Team seeks opportunities to introduce improved, and entirely new, customer experiences aligned with where customers are and where they want to be in the future.

Over the last several years, we've transformed the way we ideate new solutions and develop new products for customers. We have refined our customer-focused approach by co-designing certain products and services with our customers. This doesn't happen just in focus groups and surveys, but also in one-on-one conversations around kitchen tables and inside small businesses. We spend time listening side-by-side with a variety of customers, reviewing potential new solutions, and observing the ways in which current solutions fall short of expectations. These human-centered design principles have allowed us to gain deeper insights and find more innovative and relevant solutions.

Once a new product or service launches, this work continues. We've recently added tools to create a more robust and continuous feedback loop. This level of engagement with our customers allows us to understand what drives satisfaction during some of their key interactions with us, such as account opening, mortgage origination, and personal interactions at a branch. This led to two new introductions in 2019, the **Financial Health Quiz** and **Huntington Heads Up®**.

The **Financial Health Quiz** is a short, customer-facing survey, which looks at information specific to each customer to guide them toward more customized and efficient banking solutions. This represents a paradigm shift within a broader retail banking world that has often centered on a sales process. When customer solutions are focused on what's best for the bank, satisfaction can suffer. Our human-centered design process allows us to uncover insights that improve the retail bank experience.

These insights include the anxiety and discomfort many consumers feel during in-person banking interactions. Interestingly, we also uncovered a significant amount of anxiety that our bankers felt during this process. Through our work with customers and our colleagues, we found a way to reorient the entire interaction around the customer in a way that felt comfortable and personal, but not over-reaching or intrusive. The ideal conversation flow was then captured and facilitated in what we call the Financial Health Quiz – a conversation guide that puts the customers' needs at the center of the conversation, uncovering insights about their goals and aspirations that allow Huntington colleagues to make relevant and personalized product and service recommendations.

The quiz also creates a roadmap for follow-up visits and conversations, so we can continue to coach and guide the customer long after they walk out of the branch. Our knowledge of a customer's long-term financial goals and priorities can be leveraged to provide real-time notifications and custom communications. They may be delivered through email, social media posts, or through targeted push notifications within The Hub. The ultimate end goal is to proactively guide customers to achieve their financial goals and to adjust with them throughout various life moments, whether that means saving for college, buying a first home, or making sure they are on track for retirement.

Huntington Heads Up® is a digital, mobile engagement system that delivers personalized financial insights to customers. It too originates from conversations with our customers. They shared stories of checking their accounts multiple times each day. When asked what exactly they were expecting to find, their answers were often vague. They said they were just looking to make sure there weren't any surprises. This led us to believe we could alleviate their anxiety by offering real-time account monitoring that delivers customized alerts that customers care about; alerts include duplicate transactions, unusual spending patterns, or a transaction at a new merchant. We also use these messages to keep customers updated on how they are doing with budgets they've created or goals they've set. Now our customers have one less thing to worry about because they know that we are helping them watch their account.

The Financial Health Quiz – a conversation guide that puts the customers' needs at the center of the conversation, uncovering insights about their goals and aspirations

An Innovative Mindset

This was a year of significant, impactful investment in digital technologies to support our goal of sustainable growth. By implementing new technologies, we're better able to live our purpose at Huntington, helping others and strengthening communities by improving the customer experience and offering increased security and convenience. Additionally, this increased efficiency allows us to cut down on wasted time and resources and allows our colleagues to spend more time focused on talking with our customers, understanding their needs, and finding solutions.

The Huntington Innovation Program

In 2019, we implemented a multi-pronged Innovation Program designed to help drive growth, efficiency, and improvement of the customer experience in a disciplined, sound, and safe manner. The program was designed to encourage external innovation by continuously monitoring industry trends and identifying meaningful business opportunities and partnerships, as well as internal innovation by fostering new ways of thinking throughout the bank.

Forward Thinking Is a Key Value

Always look ahead for ways to be the very best. Use energy and time each day to innovate, explore, and improve.

Innovation Process

A defined process is essential to promote adoption and achieve success. At Huntington, we want to drive a deep curiosity within our colleagues and help them focus on new possibilities. Our process focuses on three I's: Ideate, Incubate, and Implement. Along this path, we seek to sponsor innovative ideas with the goal of commercialization.

Exploring New Technologies

We are constantly evaluating new and disruptive technologies and business models to understand their feasibility and any potential risks. Whether this leads to forming new teams to investigate innovative technologies or building, buying, or forging partnerships around them, we work with internal stakeholders to identify priorities and then focus efforts on specific verticals, such as payments and deposits, to find opportunities. We support this effort with robust risk management to ensure our goal of enhanced speed and agility is achieved in a disciplined, sound, and safe manner.

In 2019, we laid out our vision for a Huntington Innovation Lab. The lab is designed to be customer-centric, accelerating ideas designed to improve the lives of customers. The lab will draw on both internal and external resources and consist of considerable technological support where strategists, business model creators, and technologists can sit side by side developing new customer solutions. We've also organized several small-scale events and forums designed to foster new ideas for business challenges, and encourage colleagues and community partners to collaborate, solve problems, and support an innovative culture.

Mobilizing Colleagues

We are utilizing a variety of communication tools, learning and development trainings, and enterprise resource coaching to continuously drive an innovation mindset among colleagues and provide resources for them to succeed. In 2020, we will look to more formally administer this process through a cloud-based idea generation platform.

Performance Management

Innovation in the form of a forward-thinking mindset has always been a part of Huntington's core values. In creating a true innovative culture, we are adding several metrics into employee reviews, including financial metrics from implemented ideas, the time to move concepts through the innovation process, customer service metrics, and metrics from our internal Voice Survey. We will continue to expand and develop forms of recognition and support for colleagues around innovation in 2020.

More Control to Consumers with Akoya

In 2019, Huntington joined 10 other member banks on the Akoya platform. Akoya is a technology startup that provides a network-based solution for the sharing of financial data between banks and data recipients, such as third-party financial apps, at a customer's request. These sort of data interchanges are increasingly crucial for customers who employ multiple providers with separate technology ecosystems to serve their financial needs. A customer may have a checking account with one institution, be saving for a child's education with another institution, and be monitoring their retirement in a third account. Akoya makes it easier for customers to access this data quickly and conveniently.

Developed by Fidelity Investments, Akoya creates a safer, more transparent way for users to grant access to their financial data using a secure application programming interface, or API. Akoya is aligned with industry standards, including the Financial Data Exchange, a nonprofit consortium of companies dedicated to advancing secure digital standards for banking. Earlier this year, Akoya was spun out as a separate company, with Huntington and other member institutions serving as co-owners. We look forward to a continued partnership to facilitate safer, more efficient customer data access.

Digital Empowers Customers and Colleagues

A renewed focus was placed on a digital experience for customers in 2019. Digital experiences place the customer at the center of a transaction, leveraging various platforms from ATMs and in-person banking to digital applications, to offer a full suite of banking tools however a customer wishes to access them. A cross-functional, collaborative team of more than 100 engineers, project managers, and colleagues within the branch network came together to focus on solving problems within the customer experience. The diverse experience of this team allowed for greater increases in productivity, meaning products to help consumers could be moved from concept to completion in half the time.

The team focused its initial effort on the origination of checking accounts, a key product in the lives of most of our customers. Digital innovations here have produced tangible results, improving the customer experience and giving our colleagues greater ability to speak with customers, understand the issues they are facing, and be effective in providing solutions.

In 2019, the team's efforts resulted in:

28% ↑ in digital service enrollment

50% ↓ in the time to open an account

An increase in paperless origination, bringing us closer to our long term goal of 75% paperless origination, which would save

20 million pieces of paper a year

WE'RE FOR PEOPLE®

From mom and pops to startups, our customers inspire us to build new tools to tackle the challenges of running a small business.

ECONOMIC
Business Focus and Impact

Business and Commercial Banking

Businesses are the engine of growth and prosperity for people and communities across the country. We understand that as a financial institution, our support, nurturing, and guidance of businesses large and small are powerful ways we can live our purpose of looking out for others.

Executing on this commitment strengthens not only our business, but the markets and livelihoods of people within our footprint. Our products, services, and resources are not only designed for the unique needs of each business, they are designed to grow with them as well. From aligning with the needs of an entrepreneur, to our largest commercial customer, our specially trained colleagues effectively guide our customers toward the most beneficial business solution.

We originate loans for businesses of all sizes, including capabilities specifically tailored to support small and medium-sized enterprises (SME), even including those with lending needs as low as $5,000. What's more, our support for businesses goes well beyond funding. Our array of business banking resources aids them in decision-making across key areas and ultimately supports sustainable growth in their bottom line.

We are the nation's largest originator of SBA 7(a) loans by volume for two years running.

We are the nation's largest originator of Small Business Administration 7(a) loans by volume. 2019 marked our second consecutive year as the country's leading financial institution and our 11th consecutive year leading all financial institutions in our footprint. The 7(a) loan program is the SBA's primary program for providing financial assistance to small businesses that may not yet be ready for traditional financing. Huntington's historical leadership in SBA lending has helped thousands of small business owners and entrepreneurs turn their dreams into reality. It's also created new employment opportunities for people in our communities.

2019 SMALL BUSINESS LENDING HIGHLIGHTS

	Loan Volume (Total)		Loan Amount (Total)	
Geography	Huntington*	% Market Share	Huntington	Top Competitor Total
Ohio	1,615	56%	$282,578,100	$40,861,800
Michigan	1,048	50%	$141,533,100	$54,215,900
Illinois	250	14%	$42,367,000	$128,974,300
Indiana	236	23%	$46,314,600	$31,149,700
Western Pennsylvania	173	37%	$35,998,100	$16,175,100
Wisconsin	79	7%	$32,165,100	$81,675,400
Florida	76	2%	$35,361,500	$119,414,000
Kentucky	67	15%	$15,503,500	$13,655,00
West Virginia	41	28%	$5,455,000	$7,570,000

*SBA loans subject to SBA eligibility. Huntington is the #1 SBA 7(a) lender in the number of loans in the region made up of Illinois, Indiana, Kentucky, Ohio, Michigan, West Virginia, Western Pennsylvania and Wisconsin. Source: U.S. Small Business Administration (SBA) from October 1, 2008 to September 30, 2019. Huntington is #1 in the nation in number of SBA 7(a) loans for fiscal year ending September 30, 2019.

ACTIVE MICROFINANCE LOANS IN 2019

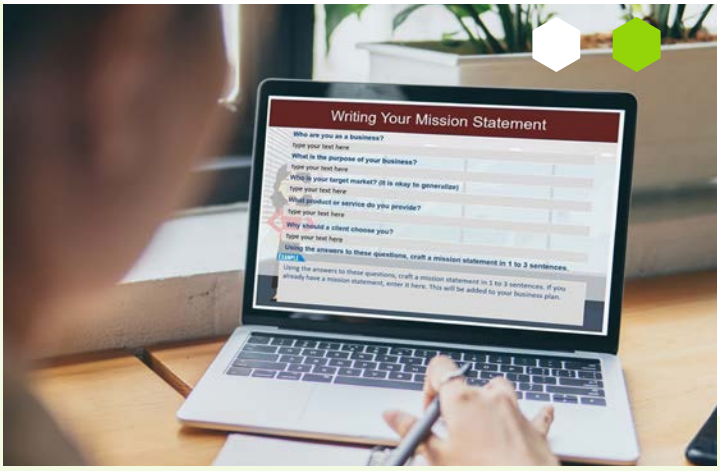
Loan Size	Units	Total Value of Loans	Average Loan Size
Less than $10,000	361	$2,993,346	$8,292
$10K-$25K	1,858	$39,324,093	$21,165
$25K-$50K	2,546	$107,739,503	$42,317
$50K-$75K	797	$51,483,551	$64,597
$75K-$100K	1,254	$120,199,455	$95,853
$100K-$250K	2,095	$372,103,473	$177,615
Grand Total	**8,911**	**$693,843,421**	**$77,864**

Connecting Entrepreneurs to Opportunity

When it comes to helping small businesses, we have a passion for providing them with financial support and preparing them for the road ahead. In 2019, we enhanced our capability to support small businesses by introducing a number of critical tools.

We partnered with Operation HOPE to develop a new **Financial Education Platform**. The platform is meant to provide entrepreneurs a free step-by-step guide to beginning a business. The jump from individual consumer to small business owner can be a difficult one, so we began with the basics. From vocabulary and mission statement through an operating budget, the entrepreneur has the ability to learn at their own pace, consulting with industry resources along the way. After completing the process, they will have a completed business plan that can help them move closer toward funding their dream. The Operation HOPE Financial Education Platform will be available on our small business resource page for customers, non-customers, and anyone thinking about starting a business to use. We will also be sharing this with those who do not currently qualify for bank lending to help them continue to build a more robust business model for nonprofit support or future endeavors.

Huntington is proud to be Operation HOPE's launch partner. The educational tool is open to anyone, not just Huntington customers. Founded in 1992, Operation HOPE is a global nonprofit focused on disrupting poverty and empowering inclusion for low- and moderate-income youth and adults. Huntington is pleased to help promote its mission of making free enterprise and capitalism work for the underserved.



In 2019, we launched new business checking products for our small and medium-sized businesses that can provide features such as Business Security Suite at no cost to help alleviate the significant challenges faced by small businesses related to fraud. The suite utilizes a variety of tools to identify any fraudulent, altered, or counterfeit checks presented for payment, including:

- ACH Positive Pay
- Check Positive Pay
- Reverse Positive Pay
- Check Block

We recognize that the profit margins of many small businesses place a burden on the entrepreneur when choosing which products and services are an absolute necessity. They should not have to make this choice for the safety of their small business. Protecting our customers from these risks is another way in which we look out for them and make it easier for them to manage and grow their business.

Through our dynamic **Business Banking** operations, we seek to be a bank of choice to our business customers. One of the ways we do that is by maintaining a powerful online platform. Our Business Banking Hub is free to business customers and includes:

- Financial reporting tools;
- Modules for managing payables and receivables;
- Purchase and expense management programs;
- Fraud protection resources; and
- Additional solutions to fit industry-specific needs or global operations.

While 2018 marked the first full year of our newly implemented Business Solutions Service team, 2019 was the year the team became an integral part of our small business process. They work directly with branch managers across our network to provide a personalized level of service to our SME business loan applicants. The team acts as subject matter and process experts to help the branches guide small businesses as they explore our lending, treasury, merchant, and deposit products. They also act as a concierge for the borrower on the processing of all business banking lending requests in excess of $100,000, coordinating all underwriting, loan closing, and funding directly with the customer. Team members provide an "extra set of eyes" throughout the process, from application to close, and are accessible to those who may have questions. With one of the largest branch networks in

our footprint, we continue to invest in our Business Solutions Service team, providing branch managers with a dedicated liaison between small businesses and our "microlending" branch operations. In doing so, we enable sustainable solutions for our business customers and an improved product mix for our own business.

In 2019, we also launched a Dedicated Business Relationship Manager team to provide ongoing support to our growing small business customer base. This internal, centralized group focuses on the needs of existing customers, providing ever-ready access to a financial professional familiar with their individual account information, business performance numbers, and industry-specific information to help the small business owner make well-informed decisions. We support our customers as they grow and expand within the communities where we live and work.

Building a Healthy Business

In 2019, Huntington introduced its first practice-specific health care finance team dedicated to helping private health care and medical practices. Focusing on businesses with less than $20 million in annual revenue, the team is uniquely attuned to the needs of dentists, physicians, and veterinarians, who face particular challenges and opportunities when it comes to building their businesses. The specialty business banking unit offers specialized loan products for targeted purposes including equipment finance, relocation, remodeling, and practice acquisition and startup. These businesses are often run as sole proprietorships and require unique expertise to help with their specializations. Huntington is able to offer the innovative products and expert advice to help these businesses to succeed.

> "We're happy to be part of the Huntington family. It's been a wonderful experience, and I would certainly recommend it to any other professional that was looking ahead and assessing their needs.
>
> - Dr. Laurinda Morris of The Animal Care Center in Granville, Ohio

Factoring ESG into Investment Decisions

Huntington was an early adopter of many ESG-focused analytical tools and practices in wealth management. Since the early days of ESG investing, we have continued to incorporate factors of responsible investing into a variety of our methods.

For years, we've worked with clients to understand their values on an individual basis and ensure they are reflected in their investments. In 2019, we began to introduce ESG ratings from some of the most respected providers into our screening categories for portfolio managers in our private banking practice. Often, this allows our investment managers to introduce ESG investing concepts and recommendations.

As we position ourselves directionally for the future of ESG investing, we will continue to consult research, international guidance such as the UN Sustainable Development Goals, and regulators in the formulation of our strategies and disclosure.

Our Approach Balances Small Business Risk and Opportunity

Huntington's processes, policies, and procedures around small business lending ensure that risk considerations are always at the forefront of the decisions we make for all stakeholders in the lending process. We evaluate our lending to ensure it aligns with our organizational risk appetite as well as its appropriateness for our small business customers. Every small business customer goes through an identical fair lending triage process, from application to recommended solutions. Additionally, an added layer of protection with the federal government exists through FDIC protective measures. As the risk profile of our bank changes, as the economic environment changes, and as our customers evolve, the SBA products we provide shift to adapt to these variations. By providing products that are nimble, supplemental to traditional credit vehicles, and aligned with our risk appetite, we are confident that we are creating relationships for the bank in a way that reduces our overall risk, while helping small businesses thrive.

WE'RE FOR PEOPLE®

Listening to our community partners helps us learn more about people, their needs, and how we can help transform our communities.

ECONOMIC
Community Focus and Impact

Investing in Communities

Huntington has earned a reputation for strong community involvement and innovative civic leadership. This means developing and fostering relationships with local leaders to better understand the most pressing needs of the communities across our footprint, bringing partners to the table to address those needs, and listening to our stakeholders to better understand the unique needs in each neighborhood.

Creating Economically Integrated Communities

We support the creation of thriving, economically inclusive communities because it's the right thing to do as neighbors and the right thing to do as a company. As a Midwestern bank, the scars of recessions and economic slowdowns are apparent and close to home, so we pay particularly close attention to investing in communities that have not seen the full benefit of America's economic prosperity.

In 2019, Huntington provided **community development loans and investments totaling nearly $1.5 billion.** Our broad approach utilizes investments in mortgage lending, the development of affordable housing, transportation, and the support of small and medium-sized businesses – all of which are critical in creating healthy, diverse, and stable communities. Our work is focused on benefiting low-to-moderate income regions across the Midwest.

FIVE-YEAR COMMUNITY DEVELOPMENT PLAN UPDATE

5-Year Goal		Progress
$6.6 Billion	Small-business lending within low-to-moderate income areas	Year 1: $2.1 Billion Year 2: $2.1 Billion Year 3: $1.6 Billion
$5.7 Billion	Single-family mortgage lending in low-to-moderate income areas.	Year 1: $1.6 Billion Year 2: $1.7 Billion Year 3: $2.3 Billion
$3.7 Billion	Community growth lending and investment targeting affordable housing and community-based loan funds.	Year 1: $1.1 Billion Year 2: $986 Million Year 3: $1.4 Billion
$30 Million	Economic impact, including 10 new branches and dedicated community development colleagues in low-to-moderate income and majority-minority areas.	Year 1: $5.9 Million Year 2: $16.7 Million Year 3: $6.2 Million
$25 Million	Additional grants and philanthropy primarily targeting housing and small-business credit service access.	Year 1: $5.9 Million Year 2: $5.3 Million Year 3: $8.7 Million

Total

$16.1 Billion

93% to goal overall in year 3

A More Prosperous Midwest

Launched in 2016 in partnership with the National Community Reinvestment Coalition, Huntington's Five-Year Community Development Plan is a transformative commitment to enable vibrant communities and drive economic opportunity in the markets we serve. The plan leverages $16.1 billion of resources and services to increase affordable housing, homeownership, and neighborhood transformation. In our third year, we made significant progress toward our goals.

A New Strategy to Support Equitable Growth

Within Huntington, the Portfolio Strategy and Review Committee holds the responsibility for reviewing, no less than semi-annually, the portfolio of investments and lending of the Huntington Community Development Corporation (HCDC). In 2019, the decision to amend the charter of the

COMMUNITY DEVELOPMENT LOANS & INVESTMENTS 2017 – 2019

2017
184 Loans Totaling $863 Million
70 Investments Totaling $326 Million

2018
237 Loans Totaling $721 Million
63 Investments Totaling $265 Million

2019
190 Loans Totaling
$770 Million
47 Investments Totaling
$182 Million

organization was made to streamline internal business processes and adopt industry best practices. The key changes include:

- Adopting industry-standard index ratings for assets;
- Standardizing and centralizing our asset management to align with our corporate accounting methods;
- Increasing reporting efforts on all assets to quarterly from semi-annually; and
- Adopting a monthly meeting between the HCDC and the Bank's accounting team to assess assets and HCDC activity appropriately.

With the changes adopted near the end of 2019, we are looking forward to seeing the impacts of improved operational processes and a greater ability to onboard, monitor, and make decisions with regard to investments according to performance. Overall, the impact from this effort will reduce operational risk and improve collaboration across the bank.

Strong Partnerships Foster Results

Huntington utilizes its strong community partners to guide our investments, allowing us to achieve the most beneficial community outcomes and return for our shareholders. Across our footprint, we maintain close relationships with a diverse set of organizations so that we best understand the unique needs of each area.

Huntington National Community Advisory Council

One critical element of our community outreach is the active engagement of our National Community Advisory Council (NCAC). Launched in 2017, the NCAC is comprised of 20 community partners from across our footprint. The Council represents interests in affordable housing, community development, non-profit services, and advancing small businesses and economic opportunity for all. The NCAC provides a vital connection between the bank and key members of the communities we serve. The Council is highly engaged, advising on the identification of challenges and opportunities in the marketplace, sharing and refining best practices, and capturing and executing on community development opportunities.

The Council meets regularly and shares its insights directly with bank leadership. The Council reviews progress on the 5 year, $16.1 billion Huntington Community Plan, provides insight on future strategies, services, products, and emerging issues, and advocates for Huntington's community stakeholders.

> "Partners like Huntington have allowed me to honor my son's memory in a way that adds value to our community and hopefully sets a new standard in this country for opioid treatment and recovery."
>
> - Mike, Huntington customer

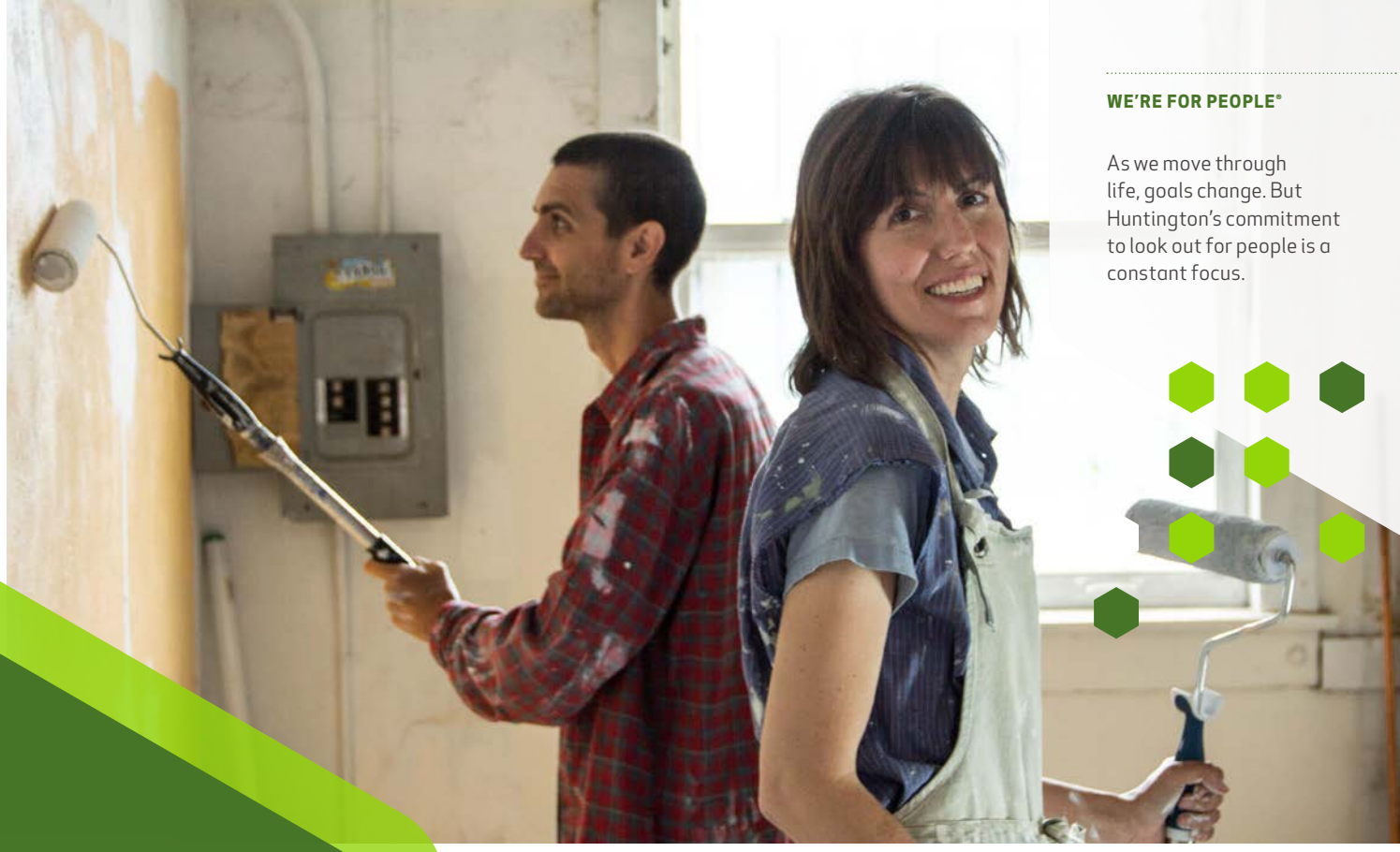
Tackling the Toughest Problems

The opioid epidemic has had an indelible impact on communities across the country, but nowhere moreso than Midwestern states such as West Virginia, Ohio, and Michigan. In 2018, more than 2,000 people died from an opioid overdose across Michigan, accounting for more than three quarters of that state's drug overdose deaths.*

Our customer Mike lost his son, Andy, to an overdose in 2010. In the time since, he has committed to creating supportive recovery housing to give people space and time to completely break the addiction cycle. Working with The Michigan Association of Treatment Court Professionals, Michigan State Housing Development Authority, the Michigan Department of Health and Human Services, and the Michigan Governor, the HCDC made a $14 million Low Income Housing Tax Credit (LIHTC) investment in the 50-unit Permanent Supportive Housing property, Andy's Place. In addition to the equity investment, Huntington facilitated an $8 million construction loan facility for the development of the property.

Other selected investments in communities include two projects in Grand Rapids, Michigan: The Plaza Franklin and Dwelling Place Grandville Limited Dividend Housing Associations. HCDC invested more than $17 million in the two projects, which include 48 apartment units in the city's Roosevelt Park neighborhood. Huntington also provided an $850,000 construction LIHTC loan facility for each project in its further partnership with eight organizations working to strengthen the health, education, and economic outcomes for residents of this predominately Latino community.

*Source: Michigan.gov: https://www.michigan.gov/opioids/0,9238,7-377-88139---,00.html



WE'RE FOR PEOPLE®

As we move through life, goals change. But Huntington's commitment to look out for people is a constant focus.

ECONOMIC
Community Focus and Impact

Affordable Housing and Homeownership

Home is more than a place – it is where some of life's biggest moments happen, and we are committed to putting homeownership within reach for more people. Through both traditional and innovative financial tools, as well as financial education and the service of our colleagues, we provide access to housing to people throughout our footprint.

One of the critical roles the financial industry plays is facilitating homeownership. It is vital not just for personal financial security, but for the economic and social stability of entire communities. In 2019, Huntington continued to serve low-to-moderate income (LMI) areas through active community partnerships and unique lending programs, putting homeownership in reach for those who need it most. Huntington works hard to create accessible mortgage options, supported by trained lending professionals and financial education programs that help these residents succeed.

2019 IMPACT AT A GLANCE

5,171
Community Development Homeownership Loans in 2019

$380K
in closing costs for VA loans were waived in 2019, totaling more than $4.3MM since 2017.

$5.2MM
in closing costs waived for buyers in LMI regions, with more than $27MM waived since 2015.

Housing values are often deeply depreciated in LMI areas, limiting traditional mortgage options. We assist through products for first-time homebuyers, home-equity improvement loans, emergency relief for residents who could use a helping hand, and more. For example, products including Community Access Mortgage loans are designed to support LMI borrowers or those purchasing or refinancing properties in LMI regions. We are also looking to expand certain products for LMI borrowers to offer greater flexibility and impact.

We understand the long-term benefits of serving as a catalyst for change in these neighborhoods. Through our revitalization efforts, we've seen whole neighborhoods in Detroit, Akron, and Cincinnati come alive with the renovation of depreciated and neglected homes. With additional streetscaping, lighting, and public/private transportation solutions made possible by state and local governments, forgotten neighborhoods can once again become vibrant, productive, and safer places.

Because many lower-income residents have limited experience with bank-based lending, respectful and comprehensive financial education is key to their success. We're committed to providing traditionally unbanked and underbanked residents with options that put their dream of owning a home within reach.

Stronger Communities through Homeownership

For those most in need, homeownership can be life-changing. Through our Family Not a File internal campaign, we highlight some of the most remarkable stories. We want to empower each Huntington colleague with the understanding that by working to incorporate our values and purpose, we can make positive impacts on the lives of our customers. Additionally, Huntington Home Savers addresses the needs of customers having difficulty meeting their mortgage obligations. In 2019, Home Savers helped 1,499 customers, many of whom were able to stay in their homes.

HOME SAVERS IMPACT

Year	Customers Assisted
2017	2,145
2018	1,655
2019	1,499

$1.7B
Home Saver Modified Loan Portfolio

In 2019, Huntington community lenders facilitated 174 homebuyer education and financial literacy classes with 62 nonprofits, serving nearly 2,000 potential homeowners.

A Place to Call Home in the Storm

In May 2019, violent storms ravaged sections of the Midwest, spawning hundreds of tornadoes across the middle of the country. In Dayton, Ohio, several powerful tornadoes touched down, injuring hundreds of people and leveling homes and businesses across the region.

Huntington quickly reached out to the Federal Home Loan Bank of Cincinnati (FHLB) to uncover resources for disaster relief and mobilized a coalition of nonprofit organizations and banks to participate in the FHLB's Disaster Reconstruction Program. The Program provided resources to assist homeowners with grants for repair as well as grants for new home purchases. By partnering with local nonprofit organizations, including Rebuild Dayton Together and County Corp, we have been able to assist 21 families' return to life at home.

In addition to the recovery program, Huntington donated $100,000 for recovery efforts. Huntington colleagues also distributed food , water, and cleaning supplies to communities in need.

Creating a Second Chance

Our Second Look program reviews applications for home equity loans and mortgages that otherwise would have been denied. We explore alternative avenues to approve an application, which is particularly helpful in creating solutions for low- and moderate-income borrowers and borrowers located in low- and moderate-income areas. In fact, we performed Second Look reviews on more than 15,000 applications in 2019, which helped 871 families achieve their homeownership goals. This includes 273 borrowers either with low- or moderate-incomes or who were located in low- or moderate-income areas within our footprint.

SECOND LOOK PROGRAM 2019 IMPACT

$113.5MM
Total Equity Impact

273
Total LMI Borrowers or Tracts

871
Total Units Impacted

$24.9MM
Total LMI Equity

Committed to Affordable Housing in Ohio

Huntington committed $200 million to the Ohio Capital Corporation for Housing (OCCH) in 2019 to ensure affordable housing continues for those most vulnerable. Over the past 10 years, Huntington has committed more than $750 million to the OCCH.

Coming Together to Address Affordable Housing in Ohio

In 2019, Huntington partnered with the City of Columbus, Ohio, and others to launch a $100 million Housing Action Fund to address the need for affordable housing in Franklin County, Ohio. The fund will be administered by the nonprofit Affordable Housing Trust, which will offer low-cost loans to developers who commit to specific affordability requirements to preserve and increase the number of units across the county. Huntington led the drive to found the project among its initial investors.

"This is a significant opportunity for banks, foundations, and corporations in Central Ohio to join in partnership with our City and County to advance a highly replicable model and innovative source of capital needed to ensure more of our families have a place to call home," said Huntington Chairman & CEO Steve Steinour.

The fund will give priority and provide incentives to housing projects where rent costs are 60 percent of the average median income or below. For a three-person household, that translates to about $1,200 a month. Through this fund, an additional 2,150 units of mixed-income rental housing will be created and preserved, better meeting the needs of a growing and economically thriving Columbus region.

Huntington colleagues join our partners to launch the Housing Action Fund.

WE'RE FOR PEOPLE®

We're committed to rolling up our sleeves and providing critical outreach and financial education to consumers – because no one is born a financial expert.

ECONOMIC
Community Focus and Impact

Community Outreach and Philanthropic Investments

We are dedicated to strengthening our communities and enhancing lives throughout our footprint. We share our time and resources – and empower our colleagues to do the same – to foster strong, vibrant neighborhoods.

Every day, our colleagues embody our Service Heart organizational value by giving generously of their time and energy to make a difference in their local communities and beyond. Year after year, we continue to be encouraged by volunteerism here at Huntington, deepening our community impact and enhancing relationships with local partners and members of our communities. Huntington believes that investments in activities such as homebuyer education, small business and workforce development, and financial education can have an outsized impact in our communities. By giving back in this way, we move our entire region forward.

In 2019, Huntington colleagues participated in a variety of volunteer opportunities, dedicating more than 31,500 hours across 1,100 organizations. From serving on boards to providing tax preparation assistance, our colleagues served our communities in meaningful ways. We continued to place an emphasis on conducting enterprise outreach and

Huntington colleagues dedicated **31,500 hours** across **1,100 organizations** in 2019

listening sessions with community development and local nonprofit partners to understand unmet financial needs.

This work pays enormous dividends in the communities we serve. The ability to make informed, effective decisions about money is key to a family's stability and to the strength of a community. Our economic empowerment programs span a broad network of support across our footprint.

Financial Wellness Education Helps Stakeholders Achieve Their Economic Aspirations

Huntington colleagues are passionate about supporting our customers through quality financial health education and engagement. Our financial empowerment strategy ensures members of our communities, at any age, have access to resources to help them make informed financial decisions. Whether we are helping kids understand the importance of saving, helping a business understand cash flow, or removing a family's barriers to homeownership, Huntington believes in the power of financial education. Many programs are done in concert with the FDIC or Small Business Administration, often paired with additional content developed by our Huntington colleagues.

> Huntington colleagues are passionate about empowering people with knowledge and skills to achieve financial security.
>
> – Carrie Rosenfelt, Community Development Manager

In 2019, we provided 12,694 hours of financial wellness training in our communities, including the following programs:

- ***Reality Days*** The program introduces middle and high school students to budgeting and financial decision-making. Check out the "Financial Empowerment for Youth" story in this section for an example.
- ***Safe Banking for Seniors*** This program provides information to help prevent elder financial exploitation. Huntington colleagues end the presentation with an interactive game of bingo that reinforces concepts and important information.
- ***Homebuyer Education*** Delivered by mortgage loan officers across our footprint, this program includes lessons on choosing the right home, budgeting, credit/lending, and a walk-through of the home buying process.
- ***Money Smart for Young Adults*** In partnership with the FDIC, Huntington volunteers provide grade-level presentations arming youth with the information they need to make smart money decisions.
- ***Money Smart for Small Business*** This program consists of workshops on critical business knowledge, including: time and financial management; recordkeeping, credit reporting, taxes, insurance, and much more.
- ***Money Smart for Adults*** Free financial education sessions on banking services, the importance of saving, consumer rights, building and keeping credit, loans, homeownership, and financial recovery.
- ***Teach a Child to Save*** This curriculum covers the importance of saving money for elementary school children and provides interactive lessons showing kids different ways to save.

We also partner with nonprofits and community development organizations that engage low-to-moderate income individuals and communities in workforce development initiatives to provide meaningful work experiences and support job readiness. In 2019, we partnered with Haven of Rest Ministry in Akron, Ohio, to provide financial literacy education and job training through its Future Story program. Future Story allows women with employment barriers to discover ways to cultivate income through job training, micro-business development, and internships.

Financial Empowerment for Youth

Reality Days, a signature Huntington financial empowerment program, introduces students to everyday financial decisions. After a classroom lesson on money management, 18 Huntington colleagues helped 90 students participate in a "Game of Life" simulation at the Boys and Girls Club of Youngstown. Each student was assigned a job, family status, and credit score. Using a simulated checking account, the students visited different tables to pay for monthly necessities including food, housing, child care, education, transportation, insurance, and clothing. This event supports workforce development, financial education, banking, and hands-on experience making monthly budgeting decisions. The program also aligns with elements of the Ohio Model Curriculum, including: Fundamentals of Economics, Working and Earning, Financial Responsibility and Money Management, Investments and Savings, Credit and Debt, as well as Risk Management.

> "Our colleagues are making a lasting impact by giving their time to help strengthen our communities. Last school year, our colleagues filled 136 volunteer spots, taught 49 classes, and impacted 1,597 students in Central Ohio.
>
> - Beth Alloway, Commercial team leader and Junior Achievement of Central Ohio board member

Empowering the Next Generation with Financial Literacy

In 2019, hundreds of Huntington colleagues participated in workshops on financial literacy and empowerment in schools and youth centers across our footprint. One way in which we do this is through our deep and meaningful partnership with Junior Achievement USA, the country's largest youth-oriented organization focused on preparing students for financial wellbeing. During the annual "JA in a Day" event, volunteers are given curriculums for a range of grade levels and provided training prior to engaging with students in schools. Through Huntington's participation, we were able to impact nearly 5,000 K-12 students.

Huntington Awarded Bronze Level President's Volunteer Service Award

Huntington was awarded a Bronze level President's Volunteer Service Award in recognition of 5,000 volunteer hours with Junior Achievement in 2019. Huntington colleagues have assisted thousands of young people across the country through Junior Achievement, giving them the opportunity to learn about money management, the importance of saving money and budgeting, the role banks serve in our communities, and the importance of setting financial goals.

VITA Volunteers Make Tax Season Less Taxing

Each year, our colleagues commit time and energy to Volunteer Income Tax Assistance (VITA) to provide free tax help to those in need in our communities. In 2019, Huntington colleagues teamed up with the United Way of Greater Cincinnati to provide free tax preparation services at two locations in the city. Additionally, Huntington colleagues helped individuals identify and avoid potential tax scams, saving them untold amounts. Similar events and partnerships were held across our footprint in cities including Columbus, Indianapolis, and Detroit.

A Focused Approach to Philanthropic Investment

We focus on four critical areas of impact when identifying opportunities for philanthropic investment: **Community and Social Services, Economic and Community Development, Community Revitalization and Stabilization,** and **Affordable Housing.**

2019 Community Reinvestment Act-Qualified Philanthropic Commitments

93 donations totaling $945,417
supported Affordable Housing programs

35 donations totaling $986,250
supported Community Revitalization and Stabilization programs

398 donations totaling $4,885,727
supported Housing and Community Services programs

128 donations totaling $1,902,820
supported Economic and Community Development programs

654 donations
for a total of **$8,720,214**
in Community Reinvestment Act-qualified contributions

Accelerating the West Virginia Economy

In 2018, Huntington announced a $1.5 million investment in Vantage Ventures, a start-up accelerator based on the West Virginia University campus. The incubator is focused on fueling economic growth in the region by attracting early-stage companies that are located in, or willing to relocate to, West Virginia, have a WVU alum as a founder, or are commercializing intellectual property developed on campus. Huntington remains committed to supporting the success of this endeavor with a five-year, $500,000 donation commitment.

West Virginia Region President Chad Prather with our partners

Standing With Detroit

In August, Huntington made a $5 million commitment, over five years, to support the City of Detroit's Strategic Neighborhoods Fund. Huntington's contribution will be focused on strengthening the Warrendale/Cody Rouge community in Detroit over the next five years and ensuring residents have healthy and welcoming neighborhoods with quality, affordable housing. As part of an effort to support youth in the community, Huntington also provided a $15,000 donation to help purchase backpacks, school supplies, and school uniforms for neighborhood children.

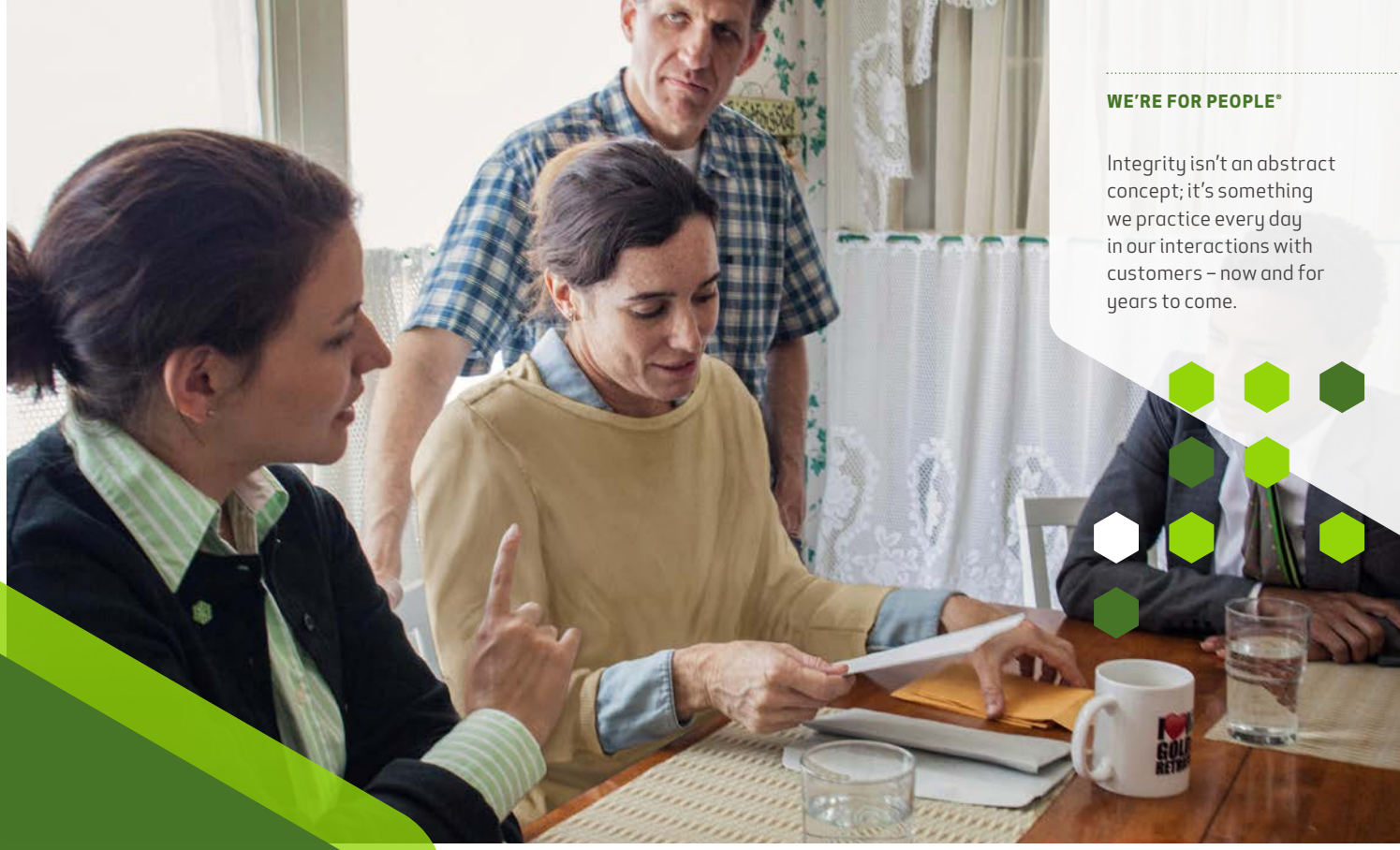
Detroit Mayor Mike Duggan and Southeast Michigan Regional President Eric Dietz

Governance

Corporate Governance and Ethics

Enterprise Risk Management

Cybersecurity and Customer Privacy



WE'RE FOR PEOPLE®

Integrity isn't an abstract concept; it's something we practice every day in our interactions with customers – now and for years to come.

GOVERNANCE

Corporate Governance and Ethics

We are committed to the long-term success of Huntington as well as those we serve through strong corporate governance and ethical business practices. Every day, we strive to operate as a disciplined, trustworthy, and moral organization.

Corporate Governance Structure

Our Board of Directors and Executive Leadership Team (ELT) are committed to executing on the bank's long-term vision. Our Board members are accomplished leaders from diverse backgrounds, bringing the perspectives, skills, and experience necessary to use independent judgment that will effectively challenge and drive continued success. Our Board members set the strategy, risk appetite, and ethical standards for the entire organization, and our ELT ensures our business and enterprise functions operate with high legal, ethical, and moral standards through clearly stated policies and procedures. Additionally, our leaders set the tone and oversee compliance with our standards, and direct the Company's financial reporting and internal controls.

Over the course of the year, we continued to experience an unprecedented rate of change in the market conditions and backdrop of our industry, highlighted by rapid technological advancements and the unique risks that accompany these advancements. We recognized the importance of a thoughtful review of our Board membership to ensure we are proactively

David Porteous and Stephen Steinour

addressing and adapting to these evolving needs, and we remain focused on Board refreshment. Each year, the Board evaluates our leadership structure and believes that having a combined Chief Executive Officer and Chairman, along with a strong, independent Lead Director, provides an efficient and effective arrangement for Huntington. In addition, the Board conducts succession planning for the CEO and other members of the ELT.

In 2019, we added three new directors to our Board, bringing additional depth of experience in technology, consumer marketing, and risk management. At the end of 2019, our Board consisted of 15 directors, comprised of our Chairman/CEO and 14 independent directors, who include our Lead Director. Importantly, our key risk and governance committees require at least three independent directors and are chaired by an independent director with the knowledge and expertise to lead the committee. As of December 31, 2019, 40% of our Board is gender or racially diverse.

Board and Leadership Commitment to ESG Priorities

Our Board is engaged and invested in the long-term sustainability of our business and aligned with shareholder interests. Huntington directors and colleagues collectively represent one of the Company's 10 largest shareholders, which drives an ownership mentality throughout the organization. Our compensation philosophy and programs are balanced, risk-appropriate, and demonstrate extended alignment with long-term, sustained

Dave Porteous, Lead Director, on Board Development Strategy

One of the Board's most important responsibilities is identifying, evaluating, and selecting candidates for Board membership. We are committed to maintaining a well-rounded, skilled and diverse Board aligned with our Company strategy to ensure overall Board effectiveness and our long-term success. Additions to the Board within the last five years demonstrate our commitment to refreshment in correlation with strategy and emerging risks.

In 2016, we appointed John C. (Chris) Inglis, a Distinguished Visiting Professor of Cyber Studies at the U.S. Naval Academy, to the Board and Technology Committee. Chris is a renowned expert and a frequent speaker on cybersecurity, a key risk for the banking industry. Three new Board members were added in 2019 to align with our strategic focus on and in recognition of the rapid changes in technology. Alanna Cotton brings to the Board an extensive background in brand development, product marketing, and innovation, and Allie Kline brings significant expertise in consumer marketing, branding, and communication. These additions will help our Board to position Huntington for further advancement of the Company's digital and mobile technology strategy, a key area of investment. Additionally, we further strengthened our risk oversight with the addition of banking and risk management expert Ken Phelan who recently served as the Chief Risk Officer for the U.S. Department of the Treasury. Ken is a highly regarded risk leader with unique, broad-based experience across a spectrum of risks.

The Nominating and Corporate Governance Committee regularly assesses the composition of the Board to assure that the appropriate knowledge, skills, and experience are represented. Candid and thorough self-assessment is also necessary to ensure that the Board and Board Committees are productively and efficiently fulfilling their duties and to shape the Board for Huntington's continued success.

40% of our Board is gender or racially diverse

About Our Board Membership

Our directors are elected annually with a majority vote standard. Biographical details for all directors are disclosed on our website. Board committee membership, director compensation, and additional information are disclosed in the annual proxy statement.

performance and shareholder interests. They provide a competitive and effective program to attract, motivate, and retain the best talent. We require that executives own a significant amount of company stock and over 1,400 colleagues have equity subject to hold-to-retirement requirements. We use a broad, diverse group of incentive metrics across our annual and long-term incentive programs and have a **Recoupment/Clawback Policy** applicable to all incentive compensation for our colleagues. Huntington's governance policies also effectively manage incentive plan risk. We monitor our incentive compensation arrangements for colleagues and strive to enhance our risk review in light of developing best practices and regulatory changes.

The underlying behaviors that are core to our ESG journey – strong risk management, serving the needs of our stakeholders, and focusing on the long-term sustainability of our businesses – have been in the forefront of our Board and ELT efforts for many years. Our ESG program is overseen by the Board's Nominating and Corporate Governance Committee, which meets regularly to ensure our ESG efforts and activities are additive. Additionally, our ESG performance management framework ensures ESG considerations that are most material to our stakeholders are integrated into all relevant Board Committee agendas for meaningful discussion, awareness, and governance actions. The ELT is accountable for executing the ESG ambition approved by the Board, including setting and delivering on short- and long-term performance goals made public in our annual ESG report.

Doing the Right Thing through Ethics and Integrity

We strive to do the right thing and are dedicated to acting with uncompromising integrity in all that we do. We recognize that every decision we make has the potential to impact the vitality of our stakeholders, and we take that responsibility very seriously.

At all levels of the organization, we set the highest standards of honesty, fairness, and accountability – and we strive to live up to them. These standards are ingrained in our purpose, supported by our culture, and serve as the cornerstone for operating in the best interest of our customers, colleagues, shareholders, and communities. How we act as an organization is equally as important as the results we achieve.

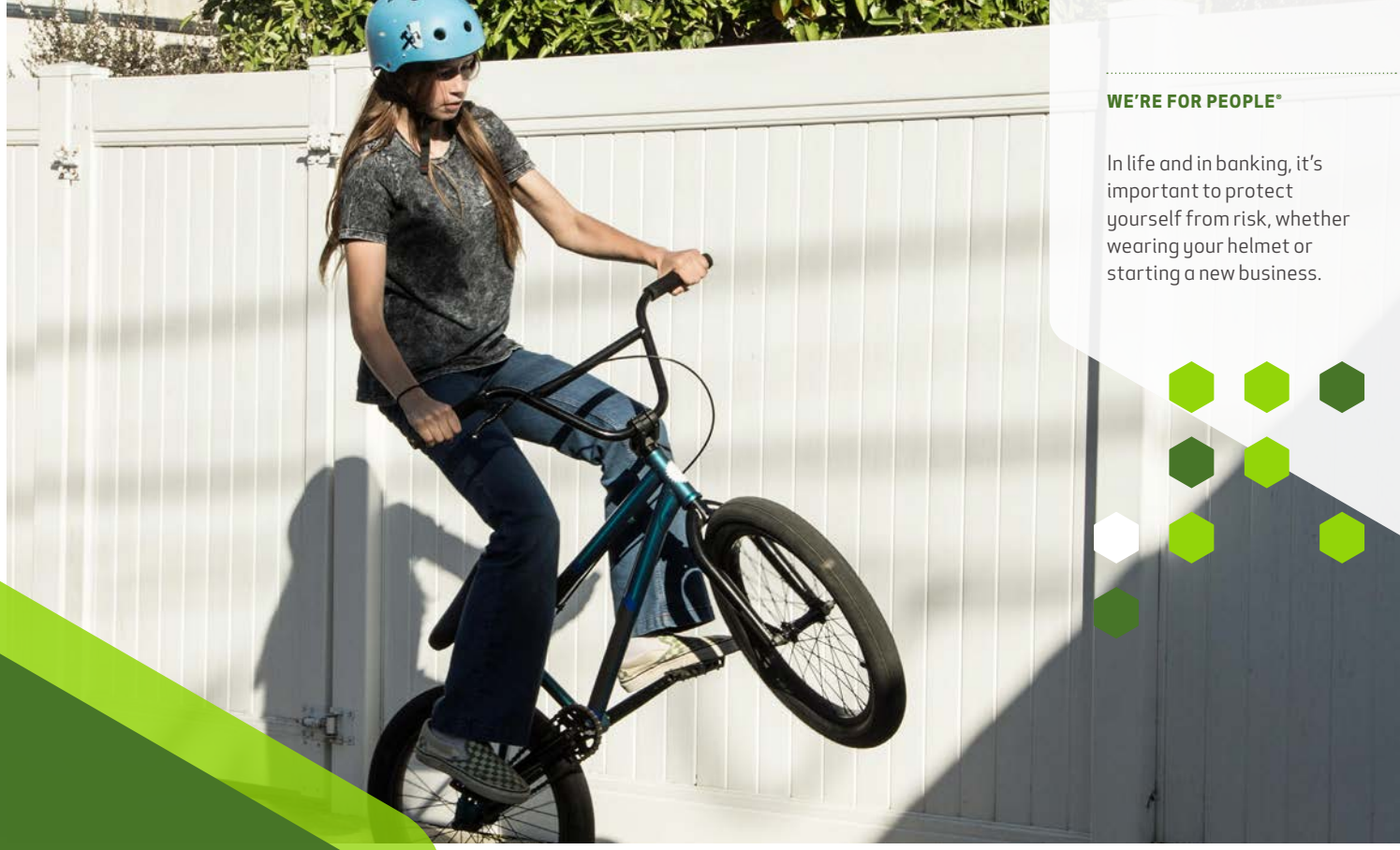
Huntington's Executive Leadership Team
front row, L-R: Julie Tutkovics, Zachary Wasserman, Jana Litsey, Mark Thompson
back row, L-R: Stephen Steinour, Richard Pohle, Sandra Pierce, Andrew Harmening, Helga Houston, Paul Heller, Richard Remiker, Rajeev Syal, Nathanael Herman

Our Code of Conduct, which was updated in 2018 and rolled out in 2019, outlines who we are and how we act. This document serves as an ethical compass and a powerful guide to decision-making across the organization. It provides guidance and resources to help avoid unethical behavior and creates a meaningful connection to our mission, vision, and values.

All Huntington colleagues are required to complete online training and certification upon receipt of the Code and every colleague must comply with the Code. Except for the provisions of the Code that are specifically applicable only to colleagues, members of the boards of directors of Huntington and its affiliates are also bound by the Code. Anyone who violates the Code or otherwise fails to follow our ethical and professional standards may be subject to disciplinary action, up to and including termination of employment or business relationship.

Reporting and Addressing Critical Concerns

Our colleagues are empowered to ask questions or report violations freely and without concern of retaliation. Our open-door practice encourages colleagues to approach any member of management with ethical questions or concerns. Colleagues may also call **Huntington's 24-hour Ethics Line (866-596-0677)** if they believe a colleague or affiliate has engaged in unethical behavior. To ensure anonymity, the Ethics Line is managed exclusively by a third-party vendor. All matters are promptly and thoroughly investigated, and internal resources are mobilized to address or escalate the issue as needed and appropriate. Over the last two years, we have fielded approximately 150 cases per year. They have been dealt with in an expedited manner.



WE'RE FOR PEOPLE®

In life and in banking, it's important to protect yourself from risk, whether wearing your helmet or starting a new business.

GOVERNANCE

Enterprise Risk Management

Our ability to protect the organization against the risks associated with ever-evolving market conditions is crucial to carrying out Huntington's mission and vision. The risk management job is continuous and owned by everyone – from our Board and ELT, down to our colleagues. Our risk management policies, processes, and procedures span the entire organization to ensure comprehensive identification, measurement, monitoring, controlling, and reporting mechanisms.

Our approach to enterprise risk management relies on effective strategies, policies, frameworks, and procedures, as well as a strong governance structure. Foundational to our approach are our seven Enterprise Risk Pillars, for which all risk management activities are designed to address.

In serving the interests of our shareholders, customers, colleagues, and communities, as set forth in our mission and vision, we are necessarily exposed to varying levels of inherent risk among our risk pillars. To ensure Huntington's risk profile is appropriate in terms of exposure and scope, our enterprise risk management functions operate within an aggregate moderate-to-low risk appetite.

Huntington's efforts are subject to board oversight and are updated through enterprise risk assessments. In addition, the concept of "everyone owns risk" is deeply rooted in our culture. Through our collaborative and accountable approach, our colleagues are engaged to align their decisions and behaviors with our organizational risk appetite. We protect ourselves from potential risks by formalizing three lines of defense:

1. **The first line of defense is made up of our individual business segments.** They are accountable for understanding and appropriately managing all the risks associated with their activities.
2. **The second line is fortified by our corporate risk management and credit administration** overseeing the company's risk-taking activities and assessing risk independently of the business units.
3. Finally, **the third line utilizes our internal audit and credit review process** to ensure that our risk governance framework is appropriate for the complexities of the bank.

Adopting a Global View in 2019

As the degree of volatility and frequency of risk issues in the markets continue to rise, it is crucial that we augment our efforts to appropriately address rising global concerns. Building upon the work we do to identify and address risks across the organization, we enhanced our enterprise risk management function to include a global focus with the creation of our **Global Risk Assessment Group**.

The team, which we characterize as our "in-house think tank," is responsible for assessing the potential impacts of the ever-changing global, national, and regional economic and political landscapes, as well as emerging threats and broader disruption trends.

Through its comprehensive analysis and collaboration with the broader risk team, this group seeks to understand the global enterprise risk management picture, identifying the "what-ifs," potential risks, vulnerabilities, and associated impacts that are in Huntington's purview. Through close examination of each business unit, the enterprise as a whole and exogenous shocks that occur, the group works to identify, measure, and address global risks associated with our own operations as well as the operations of our portfolio assets. Specifically, the team examines risks related to:

- Artificial Intelligence, machine learning, and block chain
- Availability of natural resources
- Cybersecurity threats
- Global, national, and Midwest regional market issues
- Liquidity and interest rates
- Pandemics
- Political uncertainties and the impact of the election cycle
- Social movements and matters of unrest
- Supply chain and infrastructure disruptions
- Threats posed by terrorism and international conflict
- Other emerging risks or new risk frontiers

With this thoughtful and comprehensive approach to risk management, we utilize both third-party economic data as well as our own data to develop precise, quantitative indicators and sector-specific metrics, which serve as the foundation for modeling tools we are working to develop and integrate across the organization in the near term. The team regularly provides an array of meaningful resources to our leadership, including periodic dashboards reflecting economic trends, alerts on emerging issues and the potential risks they represent, as well as deeper dives into evolving political and economic risks.

The Global Risk Assessment Group is overseen by our Chief Risk Officer, and reports to our management-level risk committee on a monthly basis, as well as our board-level Risk Oversight Committee. Along with growing the team, the Group has established defined goals and priorities for 2020 to further position Huntington for sustained success.

Our Approach to Disaster Response and Business Continuity

Huntington is built upon a foundation of strong risk management, which incorporates an aggregate moderate-to-low risk appetite and a robust risk management infrastructure. Our incorporation of ESG considerations into our core business plans and strategies reflects our assumption of sustainable business continuity within our operations.

Our risk management approach also dictates that we are prepared for more challenging times should they develop. We recognize that while we are unavoidably exposed to threats outside of our risk appetite (including socio-political, environmental, cyber, regulatory, economic, or other risk exposures), we must be prepared to handle events that pose an existential threat to our business and our stakeholders. As such, we have thorough disaster and business recovery plans in place, and review and update them regularly with the oversight of our Board and Leadership Team. This positions Huntington as a resilient institution.

Managing Third-Party Risks

Critical to aligning Huntington's risk profile with our core business strategies and overall risk appetite is the management of our third-party relationships across the organization. We maintain clearly defined third-party standards that are reflective of our culture of reliability and accountability, and regularly conduct initial and ongoing risk evaluations of our third parties. This approach better ensures ethical and legal compliance among our partner base, as well as alignment with industry best practices.

Our **Third-Party Risk Management Committee** provides centralized oversight and governance associated with third-party relationships to ensure the risks associated with our relationships are within acceptable risk parameters. The committee relies on our relationship managers in each business segment to measure, monitor, and report key risk and performance indicators we require of our third parties. The committee also administers our Third-Party Relationships Risk Management Policy, which sets the guiding principles and requirements applicable to our Third-Party Risk Management process.

Our established **Third-Party Risk Framework** is used to identify, measure, manage, mitigate, and monitor risks associated with third-party relationships. This process includes:

- Planning for the use and ongoing risk assessment/risk management of third-party relationships and alignment with Huntington strategy;
- Approval and/or oversight of the third-party risk framework;
- Due diligence and ongoing monitoring tools and reference materials for the relationships;
- Contract management expectations for executed agreements;
- Performance management and ongoing monitoring;
- Exit strategy and termination processes;
- Reporting structure, including defined exception and escalation process;
- Risk reporting; and
- Independent reviews.

Essential to the success of our third-party risk management efforts is the administration of our dedicated **Service Provider Code of Conduct**. The Code outlines our expectations for engagement in six key areas:

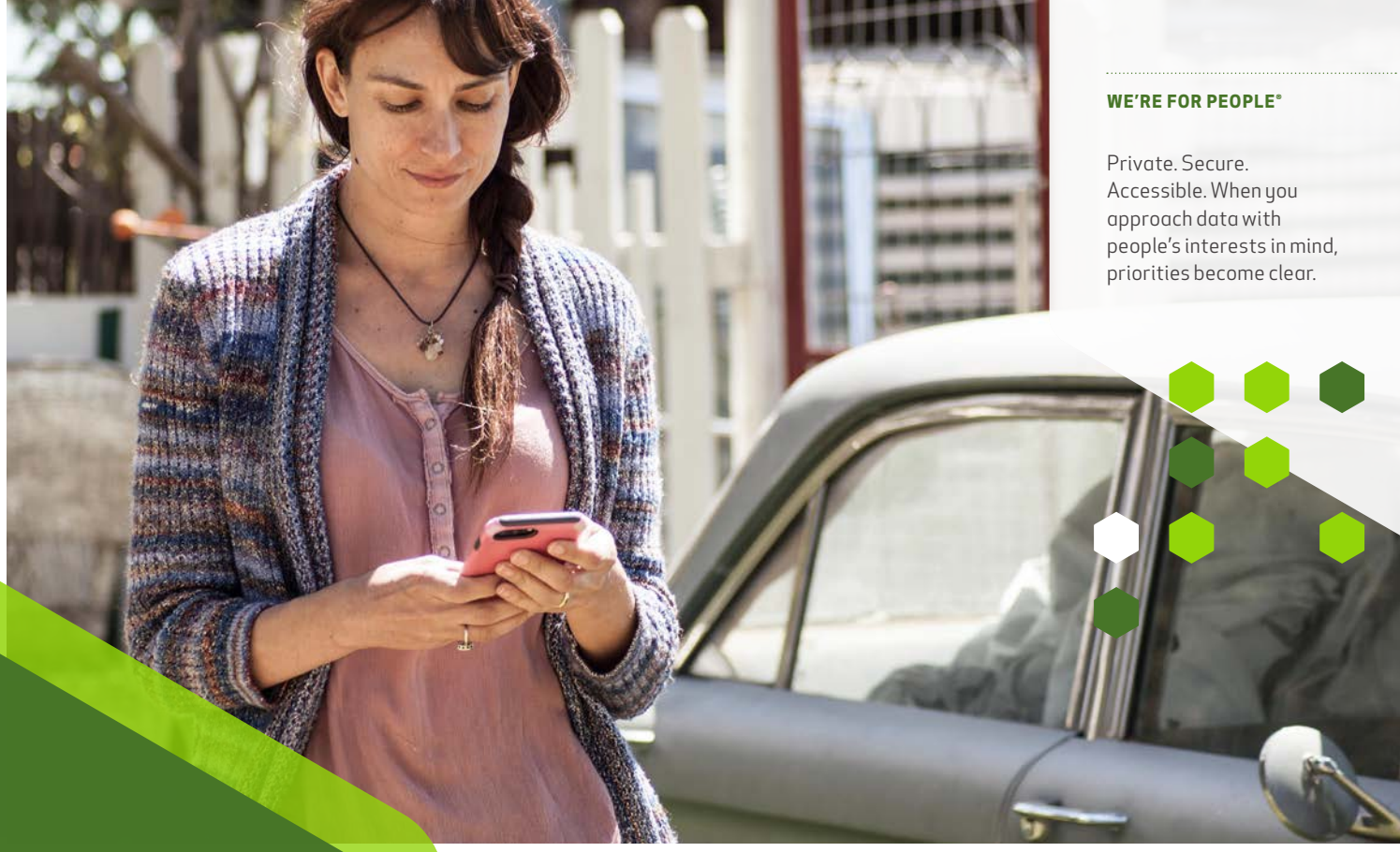
- Ethical business practices
- Labor and human rights
- Health and safety
- Diversity
- Environmental responsibility
- Privacy and confidentiality

Service providers must abide by all applicable federal, state, and local laws, rules, and regulations while assuring that all services are conducted with a high degree of professionalism and in accordance with the terms and conditions of the relationship. Colleagues and service providers may also call Huntington's 24-hour Ethics Line (866-596-0677) if they believe a colleague or affiliate has breached the Code.

Colleagues may call our anonymous, third- party **whistleblower hotline** to report ethics concerns without fear of retaliation.

866-596-0677

MANAGING RISK THROUGHOUT THE LIFECYCLE OF OUR SERVICE PROVIDERS



WE'RE FOR PEOPLE®

Private. Secure. Accessible. When you approach data with people's interests in mind, priorities become clear.

GOVERNANCE

Cybersecurity and Customer Privacy

As the risk, compliance, and best-practice landscape continues to evolve, we have clearly defined and distinguished cybersecurity and privacy as two areas of critical importance, and we have made progress on both fronts. Our cybersecurity and privacy teams closely collaborate to ensure we deliver on our commitment to look out for our customers.

CYBERSECURITY AND PRIVACY

Cybersecurity is about **protecting the confidentiality, integrity, and availability** of Huntington systems, networks, and information from digital attacks

Data / Customer Privacy is about an individual's **right to control, access, and have transparency** regarding his/her specific information. New data privacy responsibilities require us to have a deeper understanding of the personal information we possess.

While there is some overlap between the cybersecurity and privacy domains, the responsibilities and corresponding activities for each are significantly different.

Our Approach to Cybersecurity

At Huntington, we take cybersecurity seriously, as we consider cyber threats and data breaches top risks to our organization. We continue to make significant investments in our cybersecurity programs and resources. This enables a proactive approach allowing Huntington to:

1. **Prioritize our efforts:** we utilize a rigorous prioritization process to evaluate our cybersecurity initiatives relative to the risk reduction they provide, how they fit into our overall domain, and how we can leverage partnerships with our technology and privacy teams to produce the most risk mitigation; and
2. **Be agile:** we continuously evaluate and adjust our data security activities based on the evolution of the threat environment, and we consider a number of factors that weigh the likeliness a given risk will come to fruition, the value and cost of mitigation, the capacity of our resources, and our ability to handle a change in activity.

We recognize the importance of maintaining strong foundational capabilities, which we balance with the need to continue investing in innovative technologies to ensure we are further positioning ourselves for success in an ever-evolving cyber threat landscape.

We have not experienced any material losses or other material consequences relating to technology failure, cyber-attacks, or other information or security breaches.

Addressing the Cybersecurity Talent Gap

In the next few years, a projected shortfall in the cybersecurity talent pool is expected to leave over 1 million jobs open within the industry. In order to proactively address this meaningful gap, Huntington continues to look at ways to deepen the pipeline of talent in the data and cybersecurity industry, with a specific focus on the development of diverse candidates. In 2019, we partnered with local schools and nonprofit organizations to help women in several of our communities build the skills needed to be successful in a cybersecurity career. In addition, we hosted the first chapter meeting of the International Consortium of Minority Cybersecurity Professionals (ICMCP) at our Gateway location in Ohio, furthering the organization's efforts to provide resources to minorities that enable advancements in their cybersecurity careers.

Expanding Our Threat Intelligence Partnerships

In 2019, we made a concerted effort to deepen our relationships with external parties in order to gain additional insight and share best practices. Notably, we placed our Threat Intelligence Manager on site at the National Cyber-Forensics and Training Alliance (NCFTA), which leverages partnerships among financial services industry leaders, academic institutions, and law enforcement agencies to neutralize cyber-crime. As an alliance member, Huntington is able to share threat intelligence garnered from our own operations to aid law enforcement officials in their takedown efforts, as well as gain insights and drive improvements in our ability to detect and combat fraud within our organization.

2019 Progress and Milestones

During the year, we continued to make significant investments to strengthen our cybersecurity capabilities, including:

- **Implementing our structured, programmatic cybersecurity strategy,** which spans across all domains and serves to inform our current programs and activities, as well as our vision for the future of the function, with a continuous improvement mindset;
- Solidifying our cybersecurity **leadership team and growing our staff by 60%**, boosting our ability to effectively support the implementation and ongoing operations of our investments;
- **Establishing a cyber outreach function** responsible for expanding upon our customer and colleague engagement efforts to include nonprofit and government agency outreach; and
- **Increasing the frequency of colleague training** to include shorter, more frequent sessions through a multi-disciplinary approach that goes beyond standard security awareness training.

Additionally, we continued to build a focus on **access management** and made progress in our multi-year investment to improve governance and automation related to our internal identity systems. These new technologies and processes (patent pending) are designed to manage access permissions so that the right people have access to the right information and systems across the organization, and that permissions and access parameters are governed in a consistent and

centralized manner. In 2020, these efforts will continue as we work to integrate associated applications into the new, centralized capabilities.

The Evolution of Customer Privacy at Huntington

2019 marked Huntington's commitment to move beyond the traditional privacy-compliance model to a privacy framework that allows Huntington to quickly adapt and evolve to the ever-changing regulatory landscape. Driven by Huntington's customer-first values, the changing regulatory landscape, and the need to more deeply understand the data we collect, we are creating a sustainable and scalable privacy program that is customer-focused and adaptable as changes in the legal environment and consumer expectations shift.

During the year, we added the role of **Chief Privacy Officer,** who oversees the **privacy compliance team**. This team is responsible for assessing and enhancing Huntington's privacy framework, programs, and controls, as well as building relationships across the organization to integrate our privacy efforts with other strategic functions in the organization. As part of the enterprise compliance function, our Chief Privacy Officer and the privacy compliance team report to our Chief Compliance Officer and their efforts are subject to management-level and Board risk committee review.

We also continued to make progress on our **data reduction efforts** by eliminating data that are not needed for business and analytic purposes. We remain steadfast in our commitment to use the data we do need in an ethical and responsible manner. Our data collection efforts are centered on integrity and focused on looking out for our customers.

Recent Legislation Impacting the Industry

2019 was also a year of critical change in the privacy compliance landscape. Most notably, the California Consumer Privacy Act (CCPA), which took effect in January 2020, is the most expansive privacy law in the U.S., mirroring several of the requirements of the European Union's General Data Protection Regulation. The CCPA targets companies that collect and/or sell personal information, and provides California residents with privacy rights enabling them to exercise more control over their personal information. Requirements include:

- **Right to access information:** individuals have the right to know, and companies must provide access to, the categories of personal information that are collected and sold, how their information was obtained, with whom their information was shared, why their information was collected, and what specific pieces of information were collected (with some exclusions).
- **Right to deletion:** individuals are able to request that a company delete their personal information that has been collected (with some exclusions).
- **Right to opt out of sale of information:** individuals are able to direct a company to refrain from selling their personal information to third parties.

Although we do not have a physical footprint in California, we are required to comply with the requirements of the CCPA for our customer population that resides in California. We also recognize the changing regulatory landscape and that other states may adopt CCPA-like legislation. Therefore, we have put our own compliance measures in place as a result of CCPA, and we continue to study industry trends to prepare for the future. Our State Data Privacy Rights Notice augments long-established policies (including our U.S. Consumer Privacy Notice and many others that can be found in the Appendix of this report). As with all our policies, we continuously evaluate and update them on an as-needed basis.

Ensuring Future Privacy Preparedness

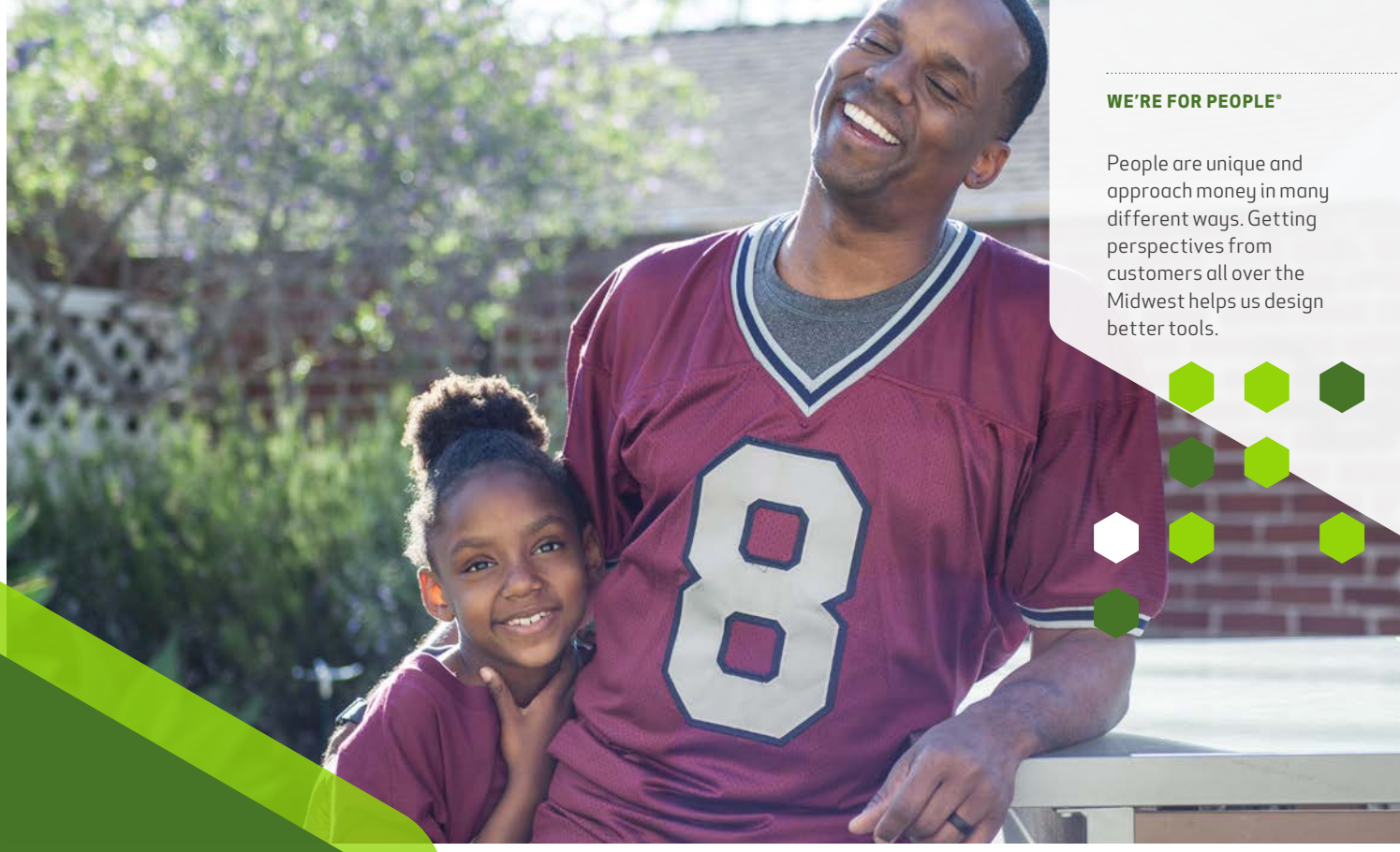
Although the recent enhancements to traditional data controls have positive impacts on data privacy rights and obligations, continued change is needed to stay ahead of trends. As we look ahead, we will continue to monitor for new legislation and are committed to taking a risk-based approach to prepare for the future. We are dedicated to ensuring sustainable alignment with new and developing privacy laws, and we are examining ways to:

- Enhance existing data inventories with an individualized, customer focus;
- Further mature data request fulfillment processes; and
- Build enhanced data privacy capabilities, including a deeper understanding of the information we have, why we have it, and how we are using it.

Social

Diversity and Inclusion

Colleague Engagement, Development, Retention, and Attraction



WE'RE FOR PEOPLE®

People are unique and approach money in many different ways. Getting perspectives from customers all over the Midwest helps us design better tools.

SOCIAL

Diversity and Inclusion

The diversity of our colleagues – the unique attributes, talents, backgrounds, and work styles that all of us bring to our roles – is a key component of our success as an organization. We understand that to support our diverse culture, we must also have inclusion, which remains a corporate strategic objective for Huntington.

At every level of our organization, from the inside out, our commitment to diversity and inclusion (D&I) demonstrates an understanding and acceptance of diverse points of view, abilities, backgrounds, and experiences. This commitment applies to every aspect of our business, and we firmly stand against discrimination and harassment of any type without regard to race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or expression, or any other characteristic protected by federal, state, or local laws.

Our Diversity and Inclusion Corporate Policy Statement serves as the foundation for promoting inclusive behaviors across our organization, and our Diversity and Inclusion Strategy and Operating Plan serves as the framework for our initiatives in four key areas: Workforce Diversity, Workplace Diversity, Supplier Diversity, and Community Engagement.

D&I STRATEGY AND OPERATING PLAN

Purpose-Driven Leadership Facilitates D&I Progress

Our D&I leadership structure is designed to ensure the alignment of diversity and inclusion initiatives with our business goals, our corporate values, and the future of Huntington. The strategy, policy, and direction of our work are set by our internal stakeholders and the Diversity and Inclusion team, which is led by our Chief Diversity and Inclusion Officer (CDIO).

Huntington's Diversity and Inclusion Strategic Council (D&ISC) focuses on supporting the business case for inclusion while aligning with our talent acquisition and corporate sourcing strategies. It also serves in an advisory role to ensure our D&I initiatives align with our business goals and corporate values. The D&ISC meetings serve as a platform to communicate strategic direction, progress on initiatives, and areas of opportunity. The Council is comprised of a leader from each business segment and internal strategic partners.

Driving Results and Accountability

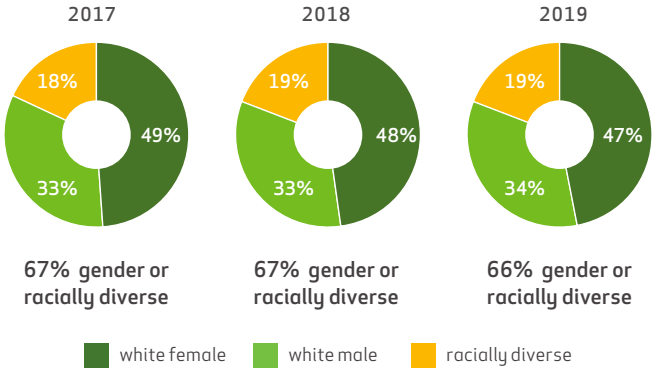
To promote diversity and inclusion with impact, we recognize the need to drive awareness of and accountability for our efforts among our leaders. Huntington has implemented an annual D&I planning process whereby our ELT members, with support from their human resources partner, D&ISC member, and the D&I Team, establish workplace and supplier diversity accountability metrics and segment-specific action plans. Each month, ELT members receive a scorecard on progress related to the established plans. Additionally, Huntington's Board of Directors' Community Development Committee receives quarterly reports regarding Huntington's D&I performance metrics.

Our monthly reporting for each ELT member details segment-level workforce diversity, including accountability data for new hires, promotions at the middle and executive management levels, and progress against our goals. A candidate diversity report is also compiled, indicating whether the interview pool for each hiring opportunity was at least 50% diverse.

Members of the Diversity and Inclusion Strategic Council

Workforce Diversity: We strive to engage, develop, retain, and attract talent from all backgrounds to be reflective of the communities and markets we serve. We work with leading universities to increase diverse participation in our intern programs, and as of December 31, 2019, our total workforce was 66% gender or racially diverse. Our talent acquisition team is focused on identifying, supporting, and promoting qualified diverse candidates in leadership roles, and we have set a stretch goal to reach 50% gender and racial diversity in our middle and executive management ranks by the end of 2021.

HUNTINGTON'S GENDER AND RACIAL DIVERSITY AT A GLANCE



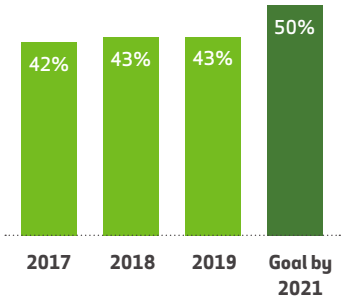
Exchanging Best Practices with Leading Organizations

In 2019, Huntington's Chief Diversity & Inclusion Officer (CDIO) joined more than 250 leaders from CEO Action for Diversity & Inclusion™ signatory companies for the coalition's second annual Chief Human Resources Officer / Chief Diversity Officer Summit, hosted by UPS. Leaders shared and discussed: best practices and real-life challenges in order to accelerate progress; tangible, ready-to-implement ideas to drive D&I activities internally and within their local communities; and new tools and strategies for better employee engagement and activation. As follow-up to the Summit, Huntington hosted a "best practice sharing" diversity and inclusion meeting with executives from another banking organization to continue the conversation.

Total Workforce[1]	2017	2018	2019
American Indian or Alaska Native	**21**	**22**	**27**
Female	11	11	14
Male	10	11	13
Asian	**448**	**506**	**552**
Female	261	291	311
Male	187	215	241
Black or African American	**1,687**	**1,756**	**1,703**
Female	1,208	1,264	1,222
Male	479	492	481
Hispanic or Latino	**435**	**449**	**479**
Female	273	284	313
Male	162	165	166
Native Hawaiian or Other Pacific Islander	**10**	**14**	**13**
Female	8	8	8
Male	2	6	5
Two or More Races	**218**	**250**	**262**
Female	148	168	170
Male	70	82	92
White	**12,681**	**12,916**	**12,501**
Female	7,633	7,634	7,271
Male	5,048	5,282	5,230
TOTAL	**15,500**	**15,913**	**15,537**

MIDDLE AND EXECUTIVE MANAGEMENT[1,2]

Combined gender and racial diversity



MIDDLE AND EXECUTIVE MANAGEMENT[1,2]

	2017	2018	2019
White Male	1,999	2,075	2,140
White Female	1,087	1,158	1,192
Diverse Male	196	221	257
Diverse Female	151	170	181
TOTAL	**3,433**	**3,624**	**3,770**

[1] If race was unknown or "did not wish to answer," race defaulted to White

[2] Huntington defines middle and executive management at a defined salary grade and above. Employees who are considered by Huntington to be middle and executive management employees are represented in these statistics and in our corporate goals.

ALIGNING WITH THE DIVERSITY OF OUR FOOTPRINT[3]

	2019 Percent Huntington Colleague Base	General Racial Representation Across Footprint Population[4]
American Indian or Alaska Native	<1%	<1%
Asian	4%	4%
Black or African American	11%	12%
Hispanic or Latino	3%	8%
Native Hawaiian or Other Pacific Islander	<1%	<1%
Two or More Races	2%	2%
White	81%	82%

[3] Percentages total more than 100% due to the Hispanic or Latino category also being included within other categories. Please see Census.gov for more details.

[4] Footprint states include Ohio, Michigan, Illinois, Indiana, Pennsylvania, Kentucky, and West Virginia. Data based on 2019 estimated population as provided by Census.gov.

Diversity and Inclusion Training

In order to ensure that Huntington colleagues are able to identify the value of, and exhibit behaviors that drive, diversity and inclusion, Huntington has implemented numerous training courses and materials for colleagues, including:

- **Diversity and Inclusion Huddles.** These huddles are intended for managers and their teams to discuss inclusive behaviors, expectations, and how actions align to Huntington values.
- **Diversity and Inclusion at Huntington.** This mandatory training course for all employees defines diversity and inclusion and outlines concepts integral to a creative, high-performing, and inclusive workplace.
- **Diversity and Inclusion Manager Guide.** This guide is intended to help managers understand their role and additional expectations for creating an inclusive culture.
- **Collaboration: Diversity in the Workplace.** This guide delivers links to curated content that supports development of the collaboration competency around understanding others and diversity in the workplace. This guide can be used by individual colleagues or by a manager to conduct a team meeting.
- **Managing a Diverse and Inclusive Workforce.** This course defines diversity and inclusion and outlines ways to build a creative, high-performing, and inclusive workforce.
- **Preventing Discrimination and Harassment for Colleagues.** This mandatory training course for all employees explains the expected behaviors for building a workplace that is free of discrimination and harassment.
- **Cultural Sensitivity and Unconscious Bias Training.** Numerous learning sessions are offered throughout the company related to identifying and understanding the potential impact of unconscious bias. Training is delivered in various ways, including as part of the new colleague onboarding process, for colleagues newly hired into manager roles, and to leaders addressing how unconscious bias can lead to undesirable outcomes.

In 2019, 100% of colleagues completed training requirements. We also launched a new online pay equity learning module, which was completed by more than 2,800 managers in preparation for 2019 year-end pay decisions.

Huntington's Unwavering Commitment to Pay Equity

Huntington is at the forefront of fostering a diverse and inclusive culture, and our pay practices are no exception. Huntington is committed to a consistent focus on pay equity regardless of an employee's gender, race, ethnicity, or membership in any other protected category. The concept of pay equity is not new and is fundamental to Huntington's pay philosophy.

Huntington thoughtfully and proactively undertakes initiatives to demonstrate and maintain its commitment to pay equity. We routinely engage in efforts to:

- Identify and implement effective practices to promote pay equity including pay analyses;
- Provide leadership education on the importance of and Huntington's commitment to pay equity;
- Further hiring practices that protect pay equity; and
- Train managers on explicit and implicit bias in compensation and promotion decisions.

We conduct pay analysis whereby we periodically assess components of employee compensation for adherence to our unwavering commitment to non-discriminatory pay practices. We also review a variety of internal factors, as well as external market data, to help ensure that we pay our colleagues without regard to their membership in any protected category. If any pay differences are not explained by legitimate, non-discriminatory factors, we promptly and appropriately address them.

Our leaders are educated on the importance of pay equity to ensure gender, race, and ethnicity are not factors in employees' salary, bonuses, and equitable awards. Huntington regularly reminds leaders to consider diversity in connection with promotions and officer title nominations, and we regularly review recommendations for promotions and officer titles to ensure equity decisions are achieved. Leaders also have guidance on making compensation decisions so that Huntington's commitment to pay equity is maintained consistently throughout the organization.

Huntington was an early supporter of the City of Columbus and Columbus Women's Commission pay equity initiatives. In 2017, Huntington signed the Columbus Commitment: Achieving Pay Equity.

In 2018, we proactively eliminated salary history inquiries from our application and interview process for all geographies in which Huntington hires, with the goal of eliminating perpetuation of pay inequities potentially experienced by diverse candidates with their prior employers. We regularly review our job application and hiring processes to ensure we are hiring the best colleagues to serve our customers regardless of race, gender, ethnicity, or membership in any other protected category.

As of December 31, 2019, the average annual base pay for our women colleagues with the same job titles as men was on average 99% of that paid to men, and the average annual base pay for minority colleagues with the same job titles as non-minorities was on average 98% of that paid to non-minorities.

SUMMARY PAY COMPARISONS (AS OF DECEMBER 31, 2019)*

	Minorities' pay as percentage of that paid to non-minorities	Women's pay as percentage of that paid to men
All non-exempt employees	98%	102%
All exempt employees	98%	97%
All employees	98%	99%

* These numbers do not consider the impact of legitimate non-discriminatory factors (such as education, experience, and seniority) that affect colleague pay.

Workplace Diversity: We are committed to creating a culture of inclusion that is welcoming and open to all. Through our Business Resource Groups (BRGs), Inclusion Councils, and dedicated leadership support, we provide our colleagues with the knowledge and resources they need to model inclusive behaviors. Over 4,800 colleagues participate in our eight BRGs that focus on specific areas of D&I and our five Inclusion Councils at our larger facilities in the Midwest.

HUNTINGTON'S INCLUSION COUNCILS

The role of Inclusion Councils is to create an inclusive, respectful, and supportive environment for all colleagues. The location-based Councils are a vital component of our inclusion strategy because they provide a forum for all colleagues to become actively engaged in the inclusion journey.

Huntington's five Inclusion Councils:

- Akron Inclusion Council (Ohio)
- Easton Inclusion Council (Columbus, Ohio)
- Gateway Inclusion Council (Columbus, Ohio)
- All-Michigan Inclusion Council
- Southern Ohio/Kentucky Inclusion Council

HUNTINGTON'S BUSINESS RESOURCE GROUPS:

BRGs are voluntary, colleague-driven groups organized around a shared interest or common diversity dimension. Huntington considers BRGs to be a vital component of our inclusion strategy because diversity of thought, when united by a common purpose, enables high performance.

The role of BRGs is to enable Huntington to attract, develop, and retain top talent by providing a forum for networking and development of each constituency and by supporting the skills development of all colleagues. They play a critical role in winning with our customers, shareholders, colleagues, and communities.

Welcome.
AdaptAbility

Welcome.
Women's Network

Welcome.
African American BRG

Bienvenidos.
Hispanic BRG

Welcome.
Asian BRG

Welcome.
Military BRG

Welcome.
LGBTA Network

Welcome.
Emerging Professionals

> **Watching *Emanuel* at the historic Lincoln Theater with colleagues and members of the community was profound to say the least. Never before have I had an organization be so intentional on creating a meaningful conversation on a sensitive subject. It's an event that I immediately shared with my family, friends, and coworkers, and it's given me perspective I never had before.**
>
> - John Popelka, Innovation Program Manager

Creating Meaningful Conversations

We believe we can foster an inclusive culture largely through ongoing conversations and awareness. In 2019, we held many discussions with our colleagues, but one in particular had significant impact.

Huntington Chief Human Resources Officer Raj Syal and Marlon Moore, CDIO, invited hundreds of colleagues and their families to preview the film *Emanuel* at the historic Lincoln Theatre in Columbus, Ohio. The film documents the true story of a white supremacist who burned a church in Charleston, South Carolina – leaving nine African Americans dead – and the days and events that followed. The documentary powerfully weaves the history of race relations in Charleston, the significance and impact of Mother Emanuel Church, and the hope that somehow emerges in the aftermath.

The response to the preview was so well-received by Huntington colleagues that the movie was shown to other colleagues across the region.

Supplier Diversity: We are committed to driving economic inclusion in our supply chain. Our D&ISC is responsible for setting the strategic direction for our supplier diversity efforts, and our sourcing practices are aimed at increasing business capacity and opportunities for diverse suppliers.

We believe our supplier base should reflect the demographics of the communities we serve, and **in 2019, our total spending with diverse suppliers reached $143.5 million, representing 25% of our total spend.** This far exceeds the 9.2% average aggregate diverse supplier spend percentage of financial services companies who participated in the Financial Services Roundtable for Supplier Diversity (FSRSD©) annual benchmarking survey.*

* published in 2019, 9.2% Tier 1 industry average was for all participating FSRSD member companies based on 2018 data.

Growing Relationships with Diverse Suppliers

We are making progress by growing relationships with key diverse suppliers. Here are a few stories from our top suppliers:

World Wide Technology

Back in 1989, Dave Steward and Jim Kavanaugh sold copiers to a few clients. They wore business suits for meeting with customers in the mornings and used a delivery van to change their business suits to blue jeans as they delivered the copiers in the afternoon. Today, World Wide Technology serves the technology needs of large public and private organizations around the globe, including many of the world's best-known financial institutions. WWT has made significant investments in innovation and cutting-edge technology to serve their clients.

B & B Maintenance

Silverio Osorio started B&B Maintenance, a janitorial business with a humble beginning in 1979. Silverio is proud that his company has always been a minority-owned company. Today, they serve customers in 22 states. They are servicing Huntington's facilities and expanding janitorial services to Great Lakes in Illinois, Wisconsin, and Pennsylvania.

Engaging a New Supplier

In 2019, we set out to select an ATM signage partner that would provide increased quality and consistency at a competitive price point. We invited eight companies, two of which were diverse and made the final round, to participate in a proposal process. As a result, we selected a diverse supplier that distinguished itself as the best choice.

2019 Supplier Diversity Highlights

TOTAL ECONOMIC IMPACT

$250 MM
U.S. GDP Contribution

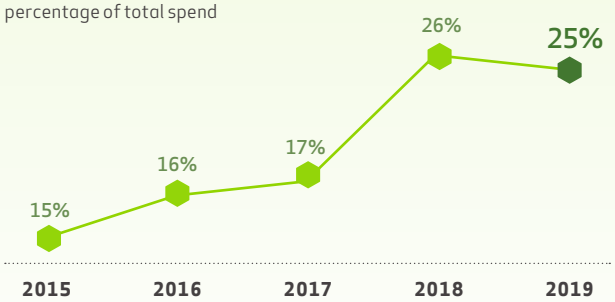
$103 MM
Supported Wages

1,992
Jobs Supported

$80.4 MM
Taxes Generated

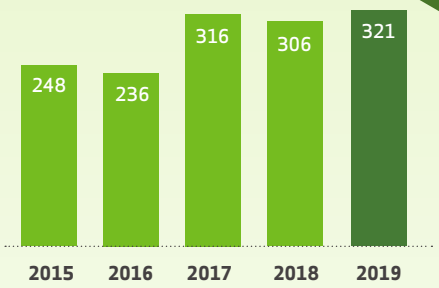
DIVERSE SUPPLIER SPEND

percentage of total spend

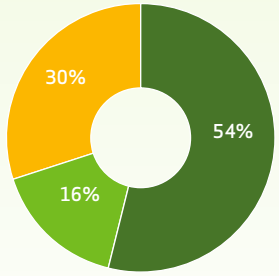


* The 9.2% Tier1 industry average is based on financial institutions who reported diverse spend to the Financial Services Roundtable for Supplier Diversity based on 2018 data.

NUMBER OF DIVERSE SUPPLIERS



PERCENTAGE BREAKDOWN OF SPEND WITH DIVERSE SUPPLIERS



We define a diverse supplier as a company that is at least 51% owned, controlled, and operated by a Minority; Woman; Veteran; Disabled; or Lesbian, Gay, Bisexual, or Transgender person. The business should have a current certification from one of the following: National Minority Development Council (NMSDC); Women's Business Enterprise National Council (WBENC); National Gay Lesbian Chamber of Commerce (NGLCC); National Veteran Owned Business Association (NaVOBA); City, State, or National Government Agency.

Minority owned | Veteran owned | Woman owned

Community Engagement: We draw on our diverse talent and inclusive culture to serve our customers and communities. Each year, we participate in a variety of community events and partnerships across our footprint, many of which are led by our BRGs. In 2019, events included the following:

- Our **Hispanic BRG** piloted a Spanish financial literacy program for both colleagues and customers in Chicago and Western Michigan. The group formalized partnerships with Big Brothers Big Sisters Hispanic Mentoring Program and with the Hispanic Support Centers in Northeast Ohio, Chicago and Central Ohio. The group also celebrated Hispanic Heritage month recognition via customer-facing channels.
- The **LGBTA Network BRG** participated in 16 regional PRIDE events across our footprint, and our Columbus, Ohio chapter won a Columbus Pride Float Award. Huntington's annual participation in PRIDE events brings together members and allies of the LGBT community and demonstrates our stance on inclusion.
- Our **Military BRG** raised over $11,000 for Disabled American Veterans, a nonprofit charity that provides support for veterans and their families, through the sale of Huntington-branded t-shirts and hoodies. These items were created in partnership with our Marketing & Branding and D&I teams.
- The **Asian BRG** connected with colleagues through participation in variety of events, including representing Huntington in Columbus' annual Asian Festival and Dragon Boat Race. The group also raised awareness through Lunch and Learns focused on health issues, young women in tech, and immigration.

Outreach to Diverse Organizations

As part of our recruitment outreach, Huntington has made a concerted effort to attract students from **Historically Black Colleges and Universities** (HBCUs). We have made annual visits to several of the top HBCUs, and in 2019, we attended the HBCU marketplace career fair in Baltimore, Maryland. Huntington makes annual contributions to the United Negro College Fund and the Urban League. We have attended the National Black MBA conference and National Minority Supplier Development conferences. We are also national members of the Women's Business Enterprise National Council and National Association of Minority and Women Owned Law Firms Advisory Council.

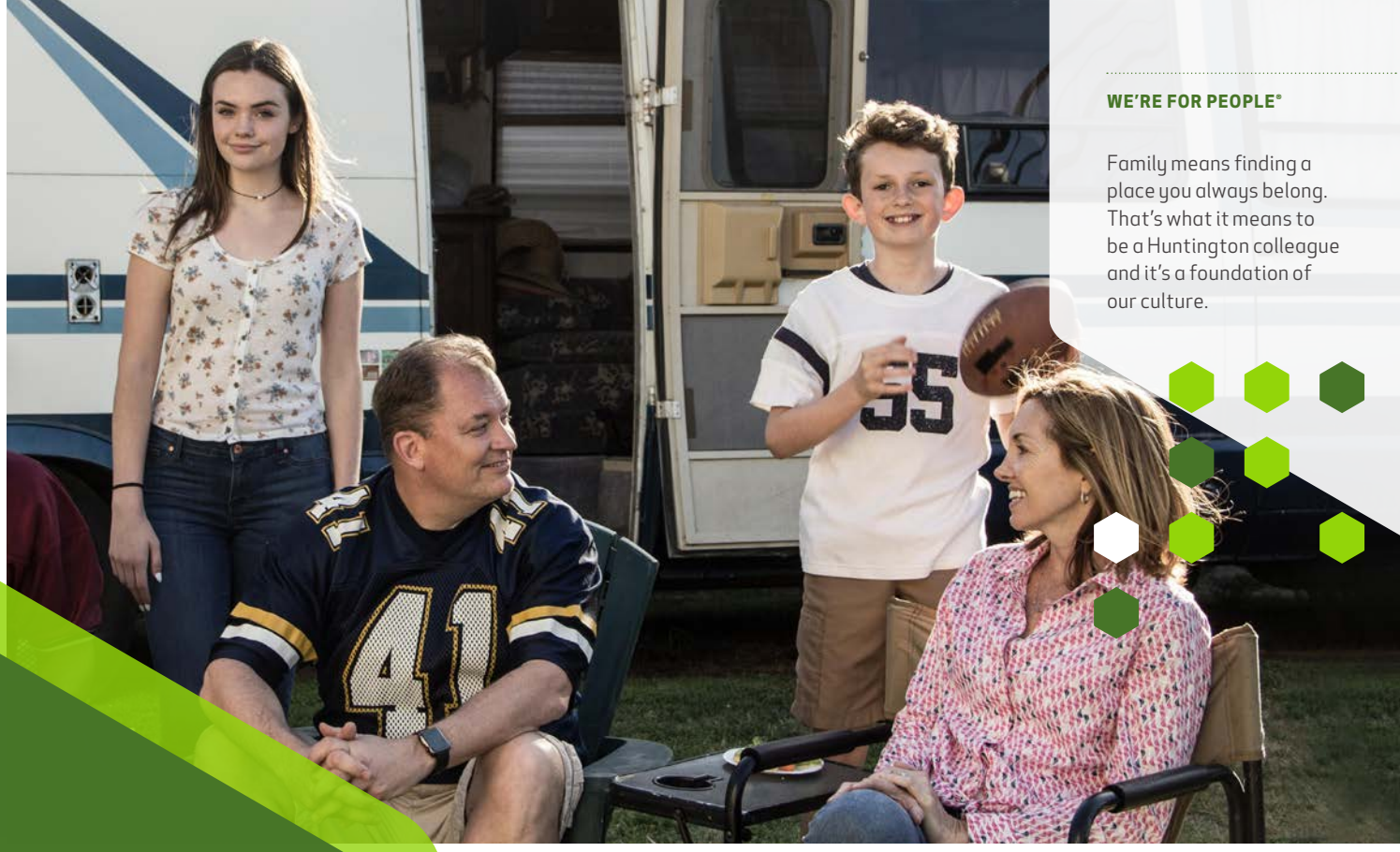
In 2018, we formed an internal HBCU Consortium, the purpose of which is to further Huntington's connection with HBCUs. This supports our goal to build strong partnerships and meet the unique needs of HBCU students by providing them with excellent internship or fulltime post-graduation opportunities at Huntington. Universities that currently participate in Huntington's HBCU Consortium include: Central State University, Wilberforce University, Howard University, Morgan State University, Hampton University, Kentucky State University, West Virginia State University, and Virginia State University.

In addition, in 2019, Huntington's CDIO Marlon Moore served on the national search committee for the next President of Central State University. As a member of the Board of Trustees, he also served as Chair of the Transition Committee.

***Fortune* 100 Best Workplaces for Diversity 2019**
(*Fortune* magazine)

Recognition for our diversity and inclusion efforts

- *Fortune* 100 Best Workplaces for Diversity 2019 (*Fortune* magazine)
- The Best Employers for Women (*Forbes*)
- The Best Employers for Diversity (*Forbes*)
- World's Best Employers (*Forbes*)
- 100% Score on the Human Rights Campaign Foundation Corporate Equality Index
- Best Places to Work for LGBTQ Equality (Human Rights Campaign Foundation)
- 100% Score on the Disability Equality Index
- Best Employer for Disability Inclusion



WE'RE FOR PEOPLE®

Family means finding a place you always belong. That's what it means to be a Huntington colleague and it's a foundation of our culture.

SOCIAL

Colleague Engagement, Development, Retention, and Attraction

We have an aspiration of becoming a Category of One institution, an organization unique in the combination of its culture and performance. Our journey starts and ends with our colleagues and engaging them in our purpose-driven culture. We believe that when we take care of our colleagues, they will in turn take care of their customers, which will drive results for our business.

Our Talent Management Strategy

Building on the work we did in 2018, we implemented our new strategy and approach to talent management in 2019. True to Huntington, our strategy starts with our purpose and is rooted in our culture. Our four key areas are:

We believe the path to exceptional company performance is an equal balance of "what we do" and "how we do it." This sentiment is reflected throughout our talent management strategy and in our aspiration to be Category of One.

ENGAGE

Starting on day one with our Welcome Experience for new hires, we place high emphasis on engaging our colleagues in our purpose-driven culture.

Since 2014, we have conducted an annual colleague engagement survey to measure our colleagues' experience while working at Huntington. The survey evaluates a variety of areas, with a strategic focus on engagement, culture, and trust.

We value the feedback our colleagues share with us and use that information to drive action. One of the ways we have taken action is with our new engagement framework. As a result of our colleague feedback, we have shifted from a "performance management" mindset to a "performance engagement" mindset. As part of this new framework, managers work alongside colleagues to have frequent conversations about our shared goals and how we can achieve them.

This new approach drives enhanced engagement by:

- Aligning development with performance, creating an increased focus on skill enrichment opportunities and career development;
- Engaging in more frequent conversations centered on performance and development; and
- Enabling managers to coach colleagues on an agreed upon set of goals.

72%
of colleagues are "highly engaged"
up 3% from 2018

87%
of colleagues are "engaged"

90th
percentile in all three indices – Engagement, Culture, and Trust

Measuring Colleague Engagement

We are proud of the culture we've created, and even more pleased that our colleagues are proud of it too, as evidenced by the results of our 2019 colleague engagement survey. Our colleagues also report having trust in our senior leadership and that they believe their behaviors and decisions reflect our core values.

While the survey results demonstrate significant improvement, we remain focused on several areas:

- Continuing to empower employees to provide feedback and showing them that their opinions are valued
- Providing clarity about career development opportunities
- Reinforcing the right behaviors to live Huntington's values

DEVELOPMENT

We are committed to fostering a growth mindset among all Huntington colleagues through specialized learning and development programs. We believe this approach sets our colleagues up for success to tackle today's challenges as well as those of tomorrow.

At the foundation of our **Enterprise Development Framework** is our vision for learning, which defines "what we do" and "how we do it." Our vision includes three pillars:

1. Maximize Performance
2. Learn and Grow
3. Protect the Bank

Our Enterprise Development Framework integrates critical points of our colleague life cycle and ensures we are developing our leaders to set the tone and behavioral foundation of our culture. These points include **Onboarding, Performance Engagement, Learning,** and **Leadership Development.**

Leaders are paramount to colleague engagement and our journey to a Category of One. We have made significant investments in learning and leadership development programs, reinforcing our commitment to developing our high potential talent into strong leaders.

Nurturing High-Potential Talent

Our high-potential talent programs empower colleagues to cultivate and accelerate their leadership skills through experiences and exposure with other leaders across the company. Identifying and developing these future leaders is critical to ensuring our pipeline is rich with talent. Huntington has six programs for high-potential talent, which target colleagues at various levels of their career path, including: diverse emerging talent, emerging talent, mid-level talent, senior leaders, executive leaders, and executive leadership team successors.

Developing Huntington Leaders

Leadership at Huntington means:

- Defining a personal purpose
- Aligning values and strengths to support our purpose
- Bringing those values to life through behaviors
- Creating a safe, inclusive, engaging, and productive environment for all

The foundation of our Leadership Development initiative includes core competencies and key programs that meet colleagues where they are in their careers while preparing them for their next leadership role.

Although we recognize each of our colleagues is on a personalized journey, our leadership development programs are designed to instill consistency across segments, build trust through meaningful relationships, and foster an environment for shared learning and collaboration.

We incorporate several learning elements including assessments, personalized online content, application and practice, networking and mentoring, senior leader involvement and coaching, and measurement. As our colleagues progress in their careers, we support them as they move through leadership levels, starting with leading one's self, to leading others, and eventually growing into higher-level team leaders.

In 2019, we also implemented a new learning platform – **Pathways**. With the transition to this platform, 75% of our learning solutions are now delivered through a digital format, and we are able to better track colleague learning hours. Pathways also plays a key role in providing our colleagues with a means to personalized learning.

> Our focus is to create a transformational learning experience for our colleagues that will ignite their development and maximize their performance. Supporting the ongoing development of our colleagues and leaders through innovative learning solutions aligns to Huntington's Purpose of looking out for people.
>
> - Donald Dennis, Senior Vice President, Colleague Learning & Leader Development

2019 COLLEAGUE LEARNING HOURS

440,219
total learning hours

28
average hours per colleague

In 2019, we spent significant effort enhancing the integrity of our tracking and measuring of learning. While the total hours consumed and hours per colleague are lower compared with 2018, we have increased confidence in the accuracy of the data.

2019 KEY TALENT METRICS

52%
of executive leaders have "ready now" successors

28
internal promotions to senior and executive leader roles

Over the last two years, we have embedded colleague development into the very fabric of our culture at Huntington. Leaders recognize the importance of robust and actionable development plans as a conduit to moving the needle on some of our most important key talent metrics – internal succession, acceleration of readiness, promotions from within, and performance. The strength of our leadership pipeline has also resulted in fewer external hires.

Leading the Country with an Innovative, Onsite Degree Program

To our knowledge, we are the only bank in the nation to offer an on-premise, pre-imbursed accelerated degree program through Exact Track. Exact Track is a partnership with Columbus State Community College and Franklin University, which offers the opportunity to earn two separate business degrees in five years while working a full-time schedule.

Convenient weeknight classes at the Huntington Gateway Center remove barriers that would otherwise prevent many from taking part, as does the pre-imbursed nature of tuition. Twenty-four colleagues made up the inaugural cohort enrolled in the program in August 2019. Exact Track is driving more engagement among colleagues from a program that is clearly valuable in workforce development and replicable for many institutions across the country. Ohio Lt. Governor Jon Husted reflected on the potential impact of this program at a launch event in July 2019: "The partnership Huntington has formed with Columbus State and Franklin University is a leading example of the type of employer engagement we need to strengthen our workforce and move our economy forward."

We look forward to sharing more outcomes as this cohort and others progress through the program.

"I'm a mother of three, I work full time, and I'm a full-time mom. They're betting on me just to have a chance, just to have a shot," said Amanda. "They took the guesswork out of it. We come to a building we know, with people we know, and we go to school. We're growing together, we're struggling together, we're going to succeed together, and at the end of the day, we'll be proud colleagues of Huntington and alumni of Franklin University and Columbus State.

Home Lending Advocate Senior Amanda Dickson never thought pursuing higher education would be possible for her, until she learned about Exact Track.

RETAIN

We make a significant investment to attract the right talent, and we are committed to creating an environment where colleagues feel valued, supported, and empowered. In 2019, we placed particular emphasis on the onboarding process, understanding that the Welcome Experience for new hires is critical to colleague retention. On day one, new colleagues build a sense of belonging and connection with other new hires while learning about our culture, commitments to the community, and diversity and inclusion efforts.

In addition, new hires are welcomed to Huntington through a few other initiatives:

- **Welcome Ambassadors:** new-hire mentors who encourage new colleagues in the Consumer Banking segment, advise them of networking opportunities, and serve as additional support for the first 90 days.
- **Welcome Academy:** regional cross-segment teams comprised of Operational Excellence and Delivery Excellence certified colleagues charged with delivering the Welcome Experience across our footprint.
- **Looking Out for New Hires:** training and resources provided to managers of new hires to ensure they are onboarding their new colleagues in a welcoming and effective way.

33%
Reduction in new-hire turnover in 2019, compared with 2017, as a result of our retention initiatives

In 2019, we also continued to leverage workforce analytics to gain insights about the colleague experience and educate our leaders. This includes developing an annual talent report, which provides key insights for managers to create a Category of One colleague experience. We have also started to use predictive workforce analytics to help us glean insights about what engages and retains colleagues, including insights into manager behaviors that drive retention and performance. Understanding these behaviors will help us better develop our managers to create a culture of engagement and retention within their organization.

Supporting Our Colleagues' Well-being

We take a holistic approach to investing in our colleagues' well-being with a focus on three areas:

- **Physical Well-being:** We strive to provide some of the best physical-wellness benefits in the industry, and in recent years we have made significant enhancements to our health benefit program, including the launch of a new colleague wellness platform, Virgin Pulse. We continue to offer wellness incentive opportunities for colleagues participating in healthy activities and preventive screenings as well as implementing healthy lifestyles. Many of these activities are offered on-site with support from our more than 40 wellness champions. We have also implemented cost savings through our medical plan for eligible employees.
- **Financial Well-being:** We offer several benefits to help colleagues manage their short-term finances while also providing opportunities for them to save for the long term, including a 401(k) plan with a match of up to 5% and 96% colleague participation, a minimum pay rate of $17/hour (effective May 2020), and multiple tiers within our medical plan to scale colleague premiums based on level of pay. We also believe pay equity is fundamental to our philosophy of fair and equitable treatment, and as such, we provide equal pay for work of equal value. We regularly review and analyze our pay practices and engage in ongoing efforts to ensure pay equity for all colleagues. Read more on our pay equity practices in Diversity and Inclusion.
- **Personal Well-being:** We support our colleagues in balancing their work and personal responsibilities and look for ways we can partner with them to address challenges as they arise. Some of our offerings to support personal well-being include: family time off (up to four weeks, often used during parental leave or adoption), caregiver leave (one to two weeks off every two years based on length of employment), expanded military benefits, and a scholarship program.

Huntington Cares

In addition, our Huntington Cares program offers financial relief when our colleagues need it most. **Since its inception in 2009, this program has helped more than 800 colleagues with grants totaling more than $1.5 million.**

Huntington Cares may assist colleagues when extra assistance is needed to cope with the loss of an immediate family member, personal tragedy, domestic violence, eviction, homelessness, or the impact of a natural disaster. To maintain confidentiality and independence, colleagues can apply through a third-party provider for a grant of up to $3,000 to help with food, shelter, and other basic needs.

ATTRACT

In addition to engaging, developing, and retaining our existing talent, we are dedicated to attracting the right talent. We place an equal emphasis on experience and behaviors to ensure we hire colleagues who will be a great cultural fit while maintaining a diverse and inclusive team. We believe that when colleagues can personally connect and find purpose in their work, they will perform better and drive value for our stakeholders.

In 2019, we focused on defining our talent brand in alignment with our aspirational goal of being a Category of One. Clearly defining our talent brand and the candidate experience has helped us attract the right talent throughout the entire recruitment process, from messaging on our new career site to new-hire onboarding.

We also integrated proactive diversity interviewing into our recruitment process. Diverse candidates who have expressed interest in being a part of Huntington meet with a hiring manager in an informational interview setting. This method represents a significant shift in thinking for hiring managers who have historically only interviewed a candidate when a position was open. As we continue to innovate our diversity recruiting strategy to meet our aggressive corporate goals, a proactive approach is critical, and we have already seen a mindset shift in our leaders with respect to proactively building a talent network.

2019 HIRING HIGHLIGHTS

- **96%** 90-Day External Hire Retention
- **71.7%** Diversity of Hires (Internal)
- **62.6%** Diversity of Hires (External)

Apprenti tech apprenticeship program creates pathway for diverse talent

In 2019, we continued our partnership with Apprenti, a nonprofit organization focused on bridging the tech talent and diversity gaps through a modern apprenticeship model. Huntington was the **first company in Ohio to offer registered apprenticeships for IT**, and the inaugural cohort consisted of five diverse individuals, including three veterans. Following completion of the apprenticeship, participants join Huntington as full-time colleagues and continue on-the-job training in IT roles.

APPRENTi
The path, the plan, your career in tech.

Internship Program Highlights

Executing a best-in-class internship program to serve as a pipeline for entry-level talent is a strategic imperative at Huntington. Starting with a robust welcome session on their first day, our interns participate in numerous programs and events throughout their time with us. In addition, they take on meaningful work and continuous improvement projects that directly impact our business. In 2019, we had 102 interns, with 61% gender or racially diverse.

Workplace Safety and Security

We believe safety and security is an all-encompassing responsibility and, furthermore, that every colleague has a role to help foster a safe and secure environment for ourselves and our customers.

We are focused on maintaining a culture of awareness, preparedness, and safety. In 2019, Huntington maintained regulatory compliance with the Bank Protection Act of 1968 and 12 CFR 21 Subpart A – Minimum Security Devices and Procedures through the following means:

- Designation of a **Chief Physical Security Officer**;
- Procedures and Training for All Colleagues; and
- Security Devices and Equipment.

The Chief Physical Security Officer is responsible for corporate oversight of physical security, crime prevention, crisis management, threat management, protective operations, environmental health and safety, and flight operations. The officer provides regulatory compliance oversight of opening and closing procedures, asset protection plans, and emergency response plans. The Chief Physical Security Officer reports to the Chief Technology and Operations Officer.

Procedures and Training for All Colleagues

Safety and security are part of colleague training from day one, during online "Welcome" sessions. We also provide mandatory annual colleague training on topics relating to robbery, preventing workplace violence, active shooter situations, emergency preparedness and response, and workplace safety. All branches conduct emergency response plan training. We also offer American Red Cross first aid, CPR and automated external defibrillator (AED) training, and we have provided additional safety and security training to more than 300 designated "safety wardens" across our geographic footprint.

Our processes and procedures include regular tabletop exercises with our crisis and emergency response teams and various public safety agencies, and our facilities hold evacuation and shelter-in-place mandatory drills. Other plans, processes, and procedures include:

- **Branch Incident Response Plan**, which is an "all-hazards" plan following national standards and best practices including the Federal Emergency Management Agency's (FEMA) Incident Command System (ICS). The plan includes flowcharts and event aids for all incidents and provides the Incident Commander with information to respond to, stabilize, and terminate an emergency.
- **Critical Facility Emergency Response Plan**, which is designed for our non-retail locations and is similar to the Branch Incident Response Plan.
- **Colleague Emergency Preparedness Guide,** which is a convenient flipchart that provides colleagues with vital fire, life safety, security, crime prevention, and emergency preparedness information.
- **Infectious Disease / Pandemic Plan** to prepare for, mitigate, respond to, and recover from a pandemic event, which includes social distancing, proper personal protective equipment (PPE), work from home and coming back to work strategies, and decontamination of work locations. Our plans follow best practices from the Centers of Disease Control (CDC) and other benchmarked public health agencies.

In 2018, Corporate Security implemented a new Active Shooter Training Program for all colleagues. This training provides participants with information on the Run/Hide/Fight methodology and how to prepare for and respond to an aggressive attacker or active shooter incident. The training program was developed with best practices from the U.S. Department of Homeland Security and the FBI. Our trainers and threat management teams have also participated in advanced active shooter training with the FBI. In 2019, we added an online active shooter training course as well.

We have revamped Huntington's Insider Threat Management Program (ITMP) to:

- Mitigate financial and reputational risk;
- Protect our data and intellectual property;
- Protect our colleagues, customers, and shareholders; and
- Enhance our ability to become even more effective at deterring and detecting the evolving threat environment.

We invested significantly in our ITMP through new industry-leading technology that incorporates risk behavior models, and we have significantly updated data protection technology to not only detect, but stop, removal of Personally Identifiable Information and Intellectual Property. The ITMP includes an Insider Threat Management Working Group (ITWG), which provides strategic program governance, guidance, and oversight through quarterly program reviews. The ITWG meets on a monthly basis to discuss strategy and oversee the program.

All branches have been inspected for risk rating, and we have implemented a wide range of situation-specific best practice security devices and equipment. Additionally, we have deployed 140 AED units and utilize signage for Tornado–Shelter in Place, Evacuation Assembly Area, AED, and Fire Extinguisher locations. We also have extensive processes and procedures in place to combat cyber threats and fraud.

The bottom line with all our training is to create awareness and equip colleagues to report any activity that can pose a threat to others.

Staying Ahead of Evolving Threats

Our focus on safety and security means the job is never done and we must continue to train, invest, and implement to stay ahead of the threats in the world around us. In 2019, we continued to invest in People, Processes, and Products:

People: In addition to our ongoing training programs, other measures implemented include extra, special-duty police officers and police cruisers stationed at critical facilities, additional executive protections, and enhanced security at Huntington Bank events.

Processes: We continued to enhance our internal processes to anticipate, prevent, and address potential threats. Our efforts included optimizing our insider threat detection program, enhancing our emergency response and drills programs, and expanding security provisions and our communications with lease owners/property management companies.

Products: We installed additional safety and security equipment including X-ray scanners, automatic detection systems, warning lights, and entry control devices. For safety and security reasons, we are not able to provide more detail about the substantial additional enhancements that we have made to ensure that every customer and colleague experience is safe, secure, and welcoming.

Environmental

2019 Environmental Highlights

Environmental Footprint

2019

Environmental Highlights

Our CDP score was a "B," placing Huntington among best in class for our peer group

Managed **698 active sites** in the U.S. Environmental Protection Agency ENERGY STAR® program

ENVIRONMENTAL PERFORMANCE SUMMARY[1,2]

Indicator	2017 (baseline)	2018	2019
Scope 1 - Direct Emissions ($MT CO_2e$)	14,341	14,190	13,709
Scope 2 - Indirect Emissions ($MT CO_2e$)	77,722	70,992	63,757
Building Energy Consumption (MWh)	219,600	208,110	191,179
Water Consumption (gallons)	109,429,769	105,326,152	99,539,001
On-Site Solar Generation (kWh)	587,100	729,566	1,331,892

INVESTING IN OUR PLANET

- Implemented 274 environmental sustainability projects, including:
  - » On-site solar array installation at our Easton facility
  - » LED lighting and high efficiency HVAC projects
  - » Eliminated polystyrene foam, plastic serviceware, and plastic bottled water across our footprint
- Increased investment in environmental sustainability-focused projects to over $17 million

CLIMATE-FRIENDLY MOBILITY INITIATIVES

- Increased the number of EV charging station ports to 39 across facilities and branches
- Piloted two new transportation/mobility programs for colleagues

Our Green Team colleague affinity group **grew membership by 41%** year over year

2017-2022 Environmental Footprint Commitments

In 2019, we continued to make progress against our 2022 sustainability goals, and as such have updated our reduction targets.

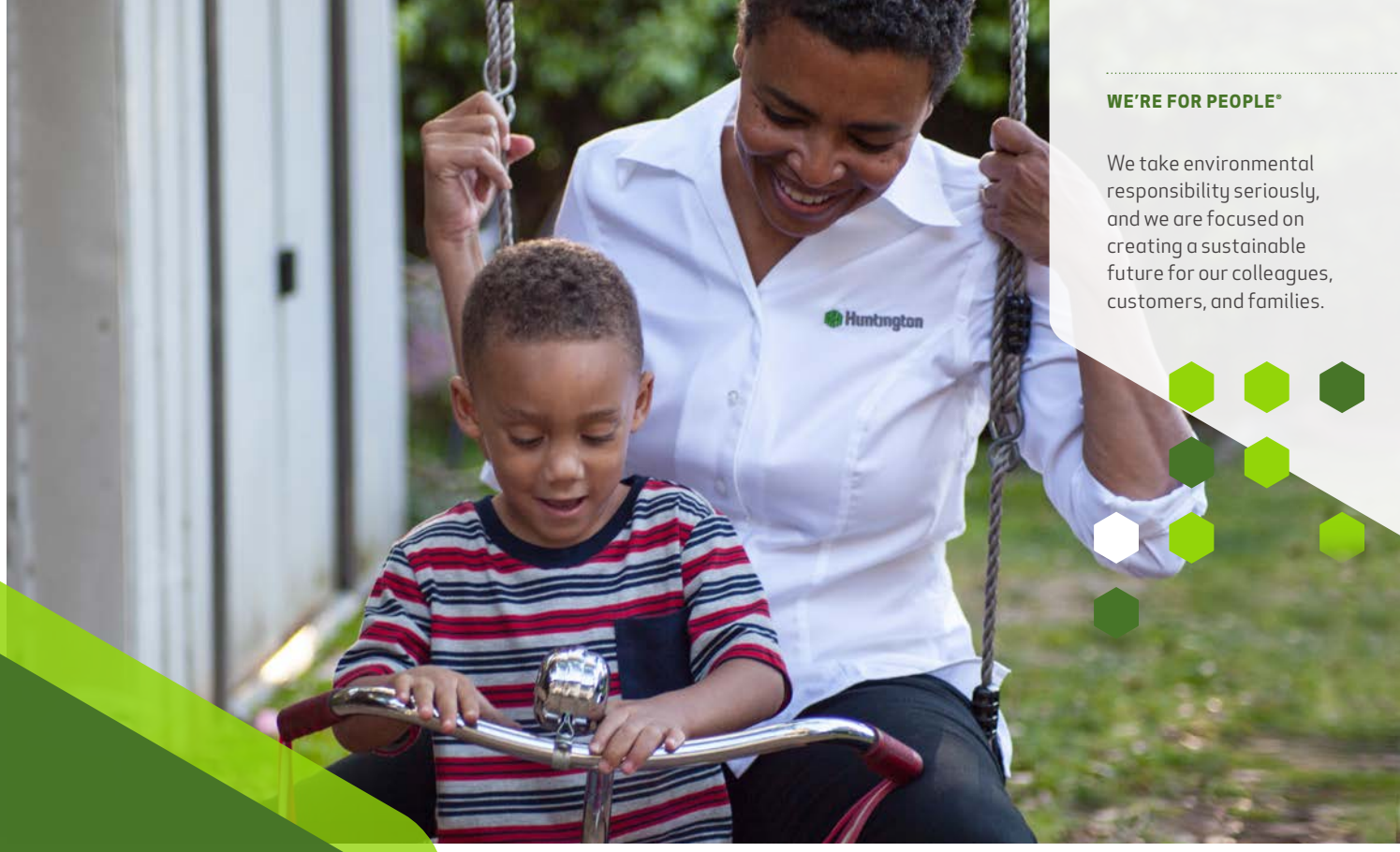
Existing Goal	2019 Progress	Updated 2022 Goal
Reduce Greenhouse Gas Emissions by 10%	↓ 16%	Set longer-term goals
Reduce Water Use by 10%	↓ 9%	15%
Reduce Landfill Waste by 10%	↓ 22%	25%
Reduce Paper Printing by 10%	↓ 17%	25%

We have established new, longer-term goals for greenhouse gas emissions reduction.

Mid-Term Goal
Reduce Greenhouse Gas Emissions by
31% by 2027

Long-Term Goal:
Reduce Greenhouse Gas Emissions by
41% by 2037

[1] 2018 data, as reported in our 2018 ESG report, have been updated in this report based on final verification.
[2] 2019 numbers should be considered estimates until verification by CDP is final.



WE'RE FOR PEOPLE®

We take environmental responsibility seriously, and we are focused on creating a sustainable future for our colleagues, customers, and families.

ENVIRONMENTAL

Environmental Footprint

Energy conservation and environmental responsibility are priorities for Huntington. We embrace responsible practices regardless of directives from legislation or the marketplace. We acknowledge that climate change is a real issue, we incorporate energy efficiency, waste reduction, and other aspects of environmental sustainability into our day-to-day activities, and we champion efforts for change today, tomorrow, and for years to come.

We are committed to creating an environmentally sustainable future through focused environmental management efforts and continued colleague engagement. We make this commitment as an extension of our corporate values that drive our everyday actions. Our approach to environmental stewardship is guided by our Environmental Policy Statement, which outlines our pledge to protect the environment, address climate change, and manage our environmental risks.

Huntington's CEO and executive leadership team lead our strategic environmental efforts, while the day-to-day decisions and activities are driven by a dedicated Energy Sustainability Department and our colleagues.

The Energy Sustainability Director has an annual responsibility to reduce Huntington's carbon footprint and monitor activities related to greenhouse gas emissions. Additional oversight of our environmental performance is provided by our Board of Directors, our Renewable Financing program, and regular evaluation of business opportunities to lessen our carbon footprint.

Huntington's Governance Structure Drives Environmental Performance

Board of Directors: monitors stakeholder demands related to climate change, and provides oversight of our ambition around ESG program strategy and alignment.

CEO and Executive Leadership Team: provides strategic direction for our environmental footprint reduction programs and drives accountability throughout the organization.

Energy Sustainability Department: ensures successful implementation of environmental efforts, studies industry best practices, and identifies areas of additional opportunity for Huntington.

Colleague Engagement: provides opportunities for colleagues to be involved in environmental efforts in various ways, by joining the "Green Team," reducing cafeteria waste and plastic bottle use, and participating in battery disposal and electronics recycling programs.

Increasing Environmental Awareness among Our Colleagues

Since 2018, monthly sustainability tips have been provided to Huntington colleagues on Huntington's intranet. The sustainability tips vary by the season and focus on energy savings and environmental best practices. The purpose of the tips is to bring awareness and educate colleagues on what they can do at the office or at home to reduce their carbon footprint and be responsible stewards of the environment.

Striving for Best-in-Class Performance

2018 was a strategically important year for continuously elevating environmental performance, including the creation of our baseline, processes, and key metrics. Building on this momentum, in 2019, we continued on our five-year journey to implement a best-in-class energy and environmental sustainability strategy, and made significant progress against our goals. Recognizing this progress and our desire to do the right thing, we have updated our 2022 goals for reducing water, landfill waste, and paper printing, compared with a 2017 baseline.

Indicator	Previous 2022 Goal	Updated 2022 Goal
Water	↓ 10%	↓ 15%
Landfill Waste	↓ 10%	↓ 25%
Paper Printing	↓ 10%	↓ 25%

In addition, we have established new, longer-term goals for greenhouse gas emissions reduction:

- Reduce Greenhouse Gas Emissions by 31% by 2027
- Reduce Greenhouse Gas Emissions by 41% by 2037

While we acknowledge that some companies have chosen to establish 2050 greenhouse gas emissions reduction goals, we are focused on aligning our new goals with efforts that tie directly to how we operate our business. This starts with our own behaviors and practices and the improvements we can make within our own footprint. For example, at our Easton facility, our largest site of operations, we have invested in a new solar array, in addition to earning ENERGY STAR certification in 2019. We have also installed 1,152 new LG bi-facial solar panels and reinstalled 206 of the existing Sharp panels.

To supplement these efforts, we plan to take a thoughtful approach to evaluating investment opportunities in renewable energy certificates and look forward to sharing more in future reports.

An overhead view of the new solar array at our Easton facility.

Huntington colleagues in Columbus gathered for a litter cleanup – one of the many cleanups our colleagues participated in throughout 2019.

Complying with U.S. and Ohio Environmental Protection Agency regulations

Huntington requires our architectural and engineering contractors to abide by all local, state, and federal codes governing building design and construction. This requirement is built into the "AIA Document A201 – 2017 General Conditions of the Contract for Construction," which is used for all construction projects. Huntington's Master Agreement contractual language is used for projects or work not covered in the AIA document.

Energy Efficiency and Carbon Intensity

Huntington's commitment to energy efficiency is demonstrated by our focus on strengthening our building and renovation strategy, standardizing equipment efficiency specifications, and concentrating on our facilities' ENERGY STAR® scores.

The U.S. Environmental Protection Agency's (EPA) ENERGY STAR program drives implementation of energy-efficient practices among organizations nationwide. We began our voluntary participation six years ago, and in 2019, Huntington achieved 60 new ENERGY STAR certifications. Huntington had 56 bank branches ENERGY STAR certified, comprising 54% of all ENERGY STAR certified bank branches across the country. This certification means these branches perform in the top 25% of similar facilities nationwide for energy efficiency and meet energy efficiency performance levels set by the EPA.

As described in our 2018 ESG Report, we implemented an internal ENERGY STAR Challenge across our regions in 2019 for our facilities teams. The challenge encouraged each team to participate in energy-related activities and improvement initiatives in their respective facilities. At the end of the year, recognitions were given to regions that made the most progress. As a result of this challenge, all regions increased their average ENERGY STAR scores.

In addition, we continued to implement energy efficiency projects across our footprint, including:

- Interior/Exterior LED lighting projects with daylight harvesting controls (94 projects completed)
- High-efficiency HVAC projects (70 projects completed)
- Window replacement projects in various locations (7 projects completed)
- Roof projects in various locations (29 projects completed)
- On-site solar array (1 project completed)

In 2019, Huntington also implemented low-cost/no-cost measures as additional ways to reduce energy consumption. These measures include modifying HVAC setpoints and schedules as well as LED lighting thresholds.

Our Latonia, Kentucky branch was one of our 56 branches to earn an ENERGY STAR certification in 2019.

Reducing Our Carbon Footprint through Smart Mobility

In our corporate headquarters city of Columbus, Huntington continues to be an active partner of Smart Columbus, an initiative focused on the reinvention of mobility in the urban environment. In 2019, we furthered the work we began in 2018, including:

- **EV Charging Stations Initiative:** Huntington has 39 electric vehicle charging station ports across the Columbus region.
- **SHARE Rideshare Pilot Program:** This convenient carpool service takes colleagues to and from work while preventing excess vehicles on the road. In 2019, 85 riders participated in the pilot program.

Our Energy Efficiency Performance

We established 2018 as our baseline year for ENERGY STAR benchmarking. This is due to the fact that EPA changed the standard for how scores are calculated beginning in 2018. Going forward, our intention is to report on current- and previous-year performance and the baseline, which for this report is also the previous year. Huntington has invested in significant personnel and data management resources to enable us to meet the updated criteria while maintaining a high level of transparency.

2019 ENERGY STAR SCORING MAKEUP

Low (1-49)	Medium (50-74)	High (75-100)
32%	42%	26%
223 locations	292 locations	183 locations

AVERAGE ENERGY STAR SCORE (BY REGION)

	2017	2018*	2019
Akron & Canton	52.12	53.00	60.29
Central OH	53.44	53.94	58.28
Corporate	72.40	74.40	72.75
East	56.88	59.38	65.35
West	47.38	50.16	59.24
Great Lakes	57.67	56.73	56.73
Michigan – Central/East	50.92	51.63	58.23
Grand Total (average)	**55.83**	**57.03**	**61.55**

*In 2018, EPA changed the standard for how ENERGY STAR scores are calculated.

AVERAGE SITE ENERGY USE INTENSITY (KBTU/FT²)

	2017	2018	2019
Akron & Canton	99.93	105.33	94.69
Central OH	95.91	102.22	94.49
Corporate	89.44	88.68	86.56
East	83.24	87.36	80.02
West	97.14	104.79	93.00
Great Lakes	95.29	99.82	102.01
Michigan – Central/East	104.08	111.24	100.41
Grand Total (average)	**95.00**	**99.92**	**93.03**

AVERAGE SOURCE ENERGY USE INTENSITY (KBTU/FT²)

	2017	2018	2019
Akron & Canton	217.10	222.91	197.18
Central OH	210.61	215.89	198.99
Corporate	205.50	206.72	199.72
East	184.48	188.66	169.48
West	227.35	236.29	204.31
Great Lakes	192.77	195.00	195.99
Michigan – Central/East	209.27	215.54	191.70
Grand Total (average)	**214.79**	**272.91**	**193.91**

In 2019, we engaged Heapy Engineering to perform a third-party assessment of our energy portfolio. Based on this assessment, Huntington has been identified as an industry leader in the following areas:

- Annual utility expenditures (per square foot)
- Annual energy and emissions (per square foot)
- Corporate efficiency targets and standards
- ENERGY STAR portfolio participation and performance
- ESG reporting and CDP performance improvement

Recognized for Leadership

The Association of Energy Engineers (AEE) annually recognizes individuals and companies for their dedication and performance in the energy industry. In 2019, Huntington Energy Sustainability Director Rebecca Karason was honored as the 2019 Energy Manager of the Year for Region III, which covers Illinois, Indiana, Iowa, Kentucky, Michigan, Ohio, and Wisconsin. Under Rebecca's leadership, Huntington has made significant progress on its corporate-wide energy usage reduction strategy, including increasing colleague engagement and additional investment in renewable energy.

Energy Sustainability Director Rebecca Karason with her 2019 Energy Manager of the Year award.

Renewable Energy Finance Provides Lending Solutions for 'Green Energy'

Huntington's Renewable Energy Finance (REF) group provides comprehensive, customized solutions for businesses innovating in the green technology market. REF uniquely positions Huntington to grow assets, diversify investments, and monetize tax benefits – all while enhancing Huntington's commitment to the environment – through four specialized offerings:

- **Energy Efficiency Contracting:** energy efficiency performance contracts that provide customers with a comprehensive set of energy efficiency measures
- **Renewable Energy Project Financing:** term loans to finance renewable energy projects owned by a third party with a commercial entity, utility, or governmental entity
- **Tax Equity Investments:** financing backed by tax credits associated with a renewable energy project
- **Federal Agency Energy Financing:** long-term financing to achieve net reduction in energy and maintenance expenditures for federal buildings.

Reducing Our Paper Usage

Started in 2012, Project Papercut is a Huntington signature initiative aimed at reducing paper consumption by encouraging colleagues to print less and offering paperless alternatives to customers. When paperless communications were not an option in 2019, at our Columbus corporate facilities alone our colleagues recycled 595 tons of paper. To expand our efforts, in 2019, Huntington Asset Finance rolled out electronic closing capabilities for leases and loans – with reducing the use of paper as one of the primary drivers of this effort.

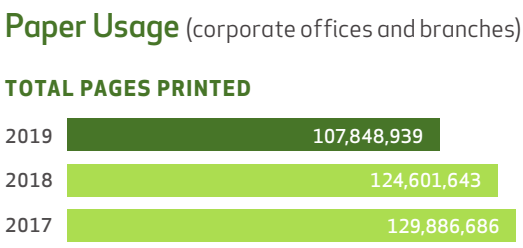
We also partner with our suppliers for paper with recycled content and source paper from certified forests (as defined by Forest Stewardship Council and Sustainable Forestry Initiative). In 2019, in line with an industry trend that started in 2017, we continued our paper sourcing shift to rely more on certified forestry content and less on paper with recycled content.

An ESG Lens on Asset Management

Huntington has been focused on responsible investing throughout our company's long history. Over time, we have expanded how we evaluate investments through the lens of environmental, social, and governance factors, particularly as more investors seek to align their portfolio with their values and beliefs. In 2020, we are improving how we think about the long-term sustainability of investments as well as how this translates to serving our customers. Read more on page 25 of the Economic section.

Paper Usage (corporate offices and branches)

TOTAL PAGES PRINTED



Reducing Our Water Usage

Huntington strives to reduce our water use with low-flow toilets and water-efficient landscaping. We make it a priority to keep our colleagues informed about water usage reduction through sustainability tips sent to their in-boxes. In 2017, we established a corporate goal to reduce our water consumption by 10% by 2022. We made significant progress in 2019, achieving a 9% reduction in our second year since setting the goal. As a result of this progress, we have updated our water consumption goal to a 15% reduction by 2022.

We acknowledge that the reduction in use of plastic water bottles may cause an increase in water usage and impact progress toward our goal, as we encourage our colleagues to utilize new water filling stations and filtered water pitchers across our footprint. However, we believe reducing plastic use is a larger priority at this time.

Huntington colleagues and family members participating in the annual "Scioto Sweep" cleanup along the Scioto River in Columbus, Ohio.

Electronics Recycling Program Impact

35,747,784 kWh

ENERGY SAVINGS

Equivalent to annual power usage for **2,799 U.S. households** per year

6,776,428 kg of CO_2 emissions

GREENHOUSE GAS REDUCTION

Equivalent to removing **4,872 cars** from the road for a year

19,570 kg

HAZARDOUS WASTE REDUCTION

Equivalent to the weight of **159 refrigerators**

Reducing Waste through More Sustainable Options

As part of our diligent environmental stewardship, in 2019, we replaced polystyrene foam and plastic serviceware products with compostable, biodegradable, and reusable options across the Huntington footprint. In addition, we removed all plastic bottled water from our cafeterias, markets, and vending machines, as well as from the supply catalogs offered to our various locations. These significant changes underpin our effort to reduce our waste to landfill. We also recognize the environmental concerns plastic presents to our environment, particularly to marine life. We are proud to make these changes and educate our colleagues with the hope that they will also carry out these practices in their personal lives.

Appendix

Appendix

This Appendix is provided as a supplement to Huntington's 2019 Environmental, Social, and Governance report. To make sure that the main report and the Appendix can be used together, we have organized both components into five sections: Introduction, Economic, Governance, Social, and Environmental. In general, information that is important to our ESG strategy and how we operate the business is addressed in the respective sections of the main report. Information that satisfies only regulatory requirements and specific requests is addressed in this Appendix. In addition, the Appendix contains links to a wide variety of key policies, charters, guidelines, codes, factsheets, and other related disclosures and documentation.

Introduction

Stakeholder Engagement: Engaging with Our Key Stakeholders

	Engagement Approach	ESG Topics of Primary Interest
Shareholders	Annual meeting, conference calls, in-person meetings, investor conferences, phone inquiries, and through the website	Financial performance; corporate governance and transparency; enterprise risk management; ESG integration in asset management; management of legal and regulatory environment; executive compensation; disaster response and business continuity
Customers	Focus groups, in branches, on the phone, research, social media, surveys, and through the website	Customer service, satisfaction, and advocacy; data security and customer privacy; fair and responsible banking; economic inclusion; ESG integration in asset management; impacts from customers we finance and local job creation; financial education; disaster response and business continuity
Colleagues	Business continuity and training exercises, colleague survey, corporate intranet, in-person meetings, learning programs, regular town halls, and special events	Financial performance; diversity and inclusion; ethical practices and purpose-driven culture; data security and customer privacy; colleague engagement, development, retention, and attraction; environmental management policy; energy efficiency and carbon intensity; disaster response and business continuity
Communities	Annual outreach, board and civic engagement, emergency response, philanthropic investments, public/private partnerships, research, social media, through the website, and volunteer opportunities	Customer service, satisfaction, and advocacy; fair and responsible banking; economic inclusion; financial education; environmental management system; energy efficiency and carbon intensity; financial education; disaster response and business continuity

Economic

Fair and Responsible Banking

Financial Education

- Credit Education
  - » Introduction to Credit Scoring
  - » FICO® Score Basics
  - » How the FICO® Works
  - » Financial Health Management
  - » Credit Inquiries and Their Effect on Your FICO® Score
  - » Myths Concerning FICO® Score
  - » Glossary of Credit Terms
- Small Business Calculators
- Small Business Resources

Military Financial Services

Servicemembers Civil Relief Act Military Banking
Military Banking

Huntington's Online Guarantee to Our Consumer Customers

In the event a problem arises with any transactions in Online Banking or Bill Pay, we have committed to our consumer customers:

1. We will replace funds that were not authorized to be removed from the customer's account through Huntington Bill Pay when the customer notifies us in a timely manner.
2. We will send our customers' payments on time, every time. If an online banking transfer or bill payment is not sent on the date you've requested, and you are charged a late fee as a result, we'll take care of it for you (as long as you schedule your payments on time with available funds, enter the correct information and comply with the terms of our Online Services Agreement).

Online Services Agreement

Our Approach to Lending

Commitment to Serving Our Communities

Huntington supports the markets and communities it serves in a responsible manner, endeavoring to contribute to an environment of economic stability and purposeful growth. Huntington will not discriminate against any person on a prohibited basis including: race, color, religion, national origin, sex, marital status, age, disability, the fact that applicant's income is derived from public assistance, or the fact that the applicant has in good faith exercised any right under the Consumer Credit Protection Act or any state law upon which an exemption has been granted by a credit bureau. We underwrite all credit applications in an impartial, consistent manner based on the type of credit request, within a moderate credit risk appetite.

Credit Risk Management

We recognize the risks and concerns inherent in our lending practices, and that certain portfolios carry higher levels of risk. Huntington has established product and industry concentration limits that are recommended by the Bank's management-level Credit Policy and Strategy Committee and approved by the Board-level Risk Oversight Committee. These concentration limits are designed to create a well-diversified credit portfolio consisting of high-quality Consumer and Commercial loans and are monitored by the Credit Administration team, who ultimately report to the Chief Risk Officer. Product and industry portfolio exposures are measured each quarter and reported to the Board's Risk Oversight Committee to ensure those exposures remain within risk tolerances.

Various colleagues within the Commercial, Consumer and Business Banking, Vehicle Finance, and Private Client Group segments of the Bank meet regularly with Credit Administration to discuss updated industry information or other topical issues related to Huntington's aggregate moderate-to-low risk appetite. Further, emerging risks are closely monitored, representing a standing agenda item for the monthly meeting of the Credit Policy and Strategy Committee. Finally, our colleagues participate in regular training designed to reinforce compliance with our stated aggregate moderate-to-low risk appetite and related rules and regulations.

As part of our risk management process for commercial and business borrowers within certain industries, we utilize industry-specific lending and credit underwriting teams, which have a broad and deep understanding of these industries and their environmental and social impacts. For Consumer borrowers, we utilize a combination of factors to determine ability to repay and the appropriateness of the product for the borrower's circumstances.

Consistent with our enterprise risk management structure, our credit risk management process is built upon three lines of defense. The first line of defense (e.g., relationship managers and other line of business personnel) owns and manages the risks we face in our day-to-day operations, including the application of heightened underwriting standards for certain industries, where applicable.

The second line of defense (e.g., credit executives, BSA/AML personnel) assesses risk and oversees the risk-taking activities of the first line of defense. Second line of defense associates need to concur with the first line's assessment of risk before a transaction can move forward to approval.

The third line of defense (e.g., internal audit and credit review) performs independent reviews and assessments of risk management practices of the first and second lines of defense. Our portfolios are examined on a regular basis to ensure compliance with existing loan and monitoring policies. In the event the third line of defense determines that an action plan must be established to mitigate an identified risk or operational issue, the first and second lines of defense, as appropriate, are tasked with developing and executing the plan within a given timeframe. The third line of defense monitors and audits the actions taken to ensure the risk has been appropriately mitigated.

Environmental

Regardless of business segment, all commercial loans secured by real estate must procure adequate environmental due diligence, that when evaluated, identifies the environmental risk issues (or the potential thereof) associated with the collateral. Both the Huntington Real Estate Technical Services group and the Environmental Risk Team are involved in evaluating potential environmental concerns, assessing the level of risk, and interpreting the policy to assist in the mitigation of risk. This includes requirements for enhanced due diligence, which can include the completion of an environmental questionnaire, a government record search, or an environmental site assessment. The extent of due diligence required is based on the risks identified during the underwriting process and the loan value.

Know Your Customer

A banking relationship with Huntington is established after the identity of a potential customer is satisfactorily determined in accordance with the Anti-Money Laundering Program Policy and the Customer Identification Program, including the U.S. Treasury Department's Office of Foreign Assets Control (OFAC) standards. In accordance with our High-Risk Customer Policy, Huntington will conduct business only with customers that it reasonably believes to be of good reputation and through proper and thorough due diligence believes to have acquired their source of funds and will derive ongoing income through legitimate means.

Consumer Lending Focus

Our consumer lending strategy focuses on prime and super-prime customers. Per our policy, we do not originate subprime loans.

Governance

Corporate Governance

Board of Directors

As of December 31, 2019, the Huntington Bancshares Incorporated Board of Directors consisted of 15 directors, comprised of our Chairman/CEO and 14 independent directors. Directors serve one-year terms, and no person shall be nominated or elected a director after having attained the age of 72 years, subject to waiver in certain exceptional circumstances. Biographical details are disclosed for all directors on our website. Board committee membership, director compensation, and additional information are disclosed in the annual proxy statement.

Board of Directors
Proxy Statement

Regulatory Compliance

Critical banking laws that we adhere to, where applicable, include, but are not limited to:

- National Bank Act of 1864*
- Federal Reserve Act of 1913*
- An Act to Amend the National Banking Laws and the Federal Reserve Act*
- Banking Act of 1933*
- Banking Act of 1935*
- Federal Deposit Insurance Act of 1950*
- Bank Holding Company Act of 1956*
- Financial Institutions Supervisory Act of 1966*
- International Banking Act of 1978*
- Financial Institutions Regulatory and Interest Rate Control Act of 1978*
- Depository Institutions Deregulation and Monetary Control Act of 1980*
- Garn-St Germain Depository Institutions Act of 1982*
- Competitive Equality Banking Act of 1987*
- Financial Institutions Reform, Recovery, and Enforcement Act of 1989*
- Crime Control Act of 1990*
- Federal Deposit Insurance Corporation Improvement Act of 1991*

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- Housing and Community Development Act of 1992*
- RTC Completion Act*
- Riegle Community Development and Regulatory Improvement Act of 1994*
- Riegle-Neal Interstate Banking and Branching Efficiency Act of 1994*
- Economic Growth and Regulatory Paperwork Reduction Act of 1996*
- Gramm-Leach-Bliley Act of 1999*
- Sarbanes-Oxley Act of 2002*
- The Check Clearing for the 21st Century Act*
- Fair and Accurate Credit Transactions Act of 2003*
- The Federal Deposit Insurance Reform Act of 2005*
- Financial Services Regulatory Relief Act of 2006*
- The Housing and Economic Recovery Act of 2008*
- Emergency Economic Stabilization Act of 2008*
- Helping Families Save Their Homes Act of 2009*
- Dodd-Frank Wall Street Reform and Consumer Protection Act*

Code of Business Conduct and Ethics

Code of Business Conduct and Ethics

Board Committee Charters

The following Board of Directors' Committee Charters establish the purpose, membership, duties, and responsibilities for each of the Board committees.

- Audit Committee Charter
- Community Development Committee Charter
- Compensation Committee Charter
- Executive Committee Charter
- Nominating and Corporate Governance Committee Charter
- Risk Oversight Committee Charter
- Technology Committee Charter

Corporate Governance Guidelines

Corporate Governance Guidelines

Financial Code of Ethics for Chief Executive Officer and Senior Financial Officers

In addition to the Code of Business Conduct and Ethics, the Chief Executive Officer, Chief Financial Officer, Corporate Controller, and Principal Accounting Officer are bound by the additional provisions set forth in our Financial Code of Ethics relating to ethical conduct, conflicts of interest, and compliance with law. The provisions of the Financial Code of Ethics provide for the full, fair, accurate, timely, and understandable disclosure of financial performance and other material information.

Financial Code of Ethics

Independent Auditor

2020 Proxy Statement

Huntington engaged PricewaterhouseCoopers LLC as an independent registered public accounting firm

Non-Audit Fee Ratio	2019
Non-audit fees	14.53%
Audit fees	$6,298,448
Audit-related fees	$1,458,555
Total auditor fees	$9,076,083

Investor Relations Policy

Huntington is committed to providing timely, accurate, and complete information consistent with legal and regulatory requirements, to enable orderly and fair trading of its securities in the marketplace. The IR Disclosure Policy and Analyst Access Policy sets forth the guiding principles and requirements applicable to Huntington's public disclosures.

The policy outlines analyst/investor access standards to Company representatives to assure equitable access, as much as is practically possible given Company resource constraints, and so that analysts/investors can have realistic expectations regarding the nature, frequency, and breadth of such Company representative access.

Recoupment/Clawback Policy

The Recoupment/Clawback Policy sets forth the guidelines for possible recoupment or clawback of incentive compensation in appropriate situations to the extent permitted (or required) by law and by the Company's plans, policies, and agreements. This policy dictates the situations that shall trigger a review, which generally involves behaviors or actions outside the bounds of the Company's overall risk appetite and governance structure.

Adherence to Federal Laws

Huntington supports and complies fully with the U.S. Bank Secrecy Act of 1970 and its anti-money laundering provisions. Employees receive anti-money laundering training annually. All employees also are required to undergo training on avoiding facilitation of tax evasion and terrorist financing. The most at-risk employees are required to undergo enhanced training.

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Huntington also complies with the requirements of the U.S. Patriot Act of 2001, which requires financial institutions to develop a customer identification program that implements procedures to:

- Collect identifying information about customers opening an account;
- Verify that the customers are who they say they are;
- Maintain record of the information used to verify their identity; and
- Determine whether the customer appears on any list of suspected terrorists or terrorist organizations.

Huntington guards faithfully against customers who might use its services to conduct criminal acts and works diligently to identify clients or beneficial owners who make unusual transactions. The Huntington Bank Secrecy Act and Anti-Money Laundering Group monitors customer transactions to identify suspicious activity and reports any such activity to law enforcement.

Huntington's Customer Due Diligence Program identifies, measures, monitors, controls, and manages customer risk in alignment with the U.S. Bank Secrecy Act and the USA Patriot Act. Huntington won't do business with anyone whose funds it believes have been acquired unlawfully or illegitimately or who it believes has been convicted of a crime involving misappropriation of funds, terrorist activity, drug or human trafficking, or money laundering.

Cybersecurity and Customer Privacy

Commitment to Customer Security and Privacy

Huntington's commitment to customer security and privacy is reflected in its Online Privacy Policy, which is publicly available and complies with the Cybersecurity Information Sharing Act. Huntington also complies with Title V of the Gramm-Leach-Bliley Act, which requires financial institutions to notify customers of privacy policies and practices, and inform them of the conditions under which their personal information may be disclosed to nonaffiliated third parties.

Privacy & Security
Telemarketing Policy
Privacy Notice
Online Privacy Policy
Security Commitment

Customer Protection Education & Tips

Understanding Phishing
Improving Password Habits
Online Banking Security
Debit & Credit Card Security
Online Safety Tips
Online Safety Tips for Business
Common Types of Frauds & Scams
Sign up for Fraud Alerts
How to Monitor Your Accounts & Information
How to Report Fraud or Suspicious Activity
What to do if Your Identity is Compromised
Smartphone Security Tips
Wire Fraud Scams
Safe Shopping Tips

Government Relations

Company Contributions

Huntington does not use corporate funds, either directly or indirectly, for election-related contributions to political candidates, political parties, or candidate committees, including super PACs or independent expenditure committees. Huntington contributes on occasion to local/state issue and levy campaigns that support the interests of our communities and the company. These contributions are made infrequently, and when made, are publicly reported in alignment with company policy and applicable law, and approved by senior management independent of individual political beliefs. The company's contributions for 2019 totaled $58,000.

Designation	Political Committee	Cause	Amount
Columbus, OH	Citizens for Columbus State	Columbus State Bond Issue	$40,000
Columbus, OH	Opportunity City PAC	2019 Columbus Bond Package	$10,000
Toledo, OH	Toledo 2020	Income Tax Levy	$5,000
Columbus, OH	Keep Columbus Strong	Ticket Tax Issue	$2,500
Elyria, OH	Citizens Committee for Lorain County	Metro Parks Levy	$500
TOTAL			**$58,000**

Oversight and Management

All political activities conducted by or on behalf of the company are managed by Huntington's Government Relations department. The group is led by the Chief Public Affairs Officer, who is responsible for the department's policies, activities, and legal compliance; and the group reports to Huntington's Senior

Executive Vice President and General Counsel. Moreover, the group is subject to the oversight of the Community Development Committee of the Board of Directors. Huntington maintains policies and processes intended to ensure that all public affairs activities are conducted in accordance with those policies and applicable legal limits. Huntington colleagues are also bound by the bank's code of conduct and ethics, which aligns with the Bank Bribery Amendments Act of 1985 and the U.S. Foreign Corrupt Practices Act. Huntington's Employee Handbook instructs colleagues about the policy, which prohibits employees from giving anything of value to foreign officials or political candidates in order to obtain or keep business. Colleagues are asked to acknowledge their understanding of this policy annually, and the General Counsel reports violations of the policy to the Board annually.

Huntington's practice also aligns with Congressional rules that ban the purchase of all meals, gifts, entertainment, or travel for members of Congress, the Executive Branch, and their staffs. Every January and July, Huntington requires its colleagues to acknowledge the bank's practice for complying with the Honest Leadership and Open Government Act and to make all reports required under the law.

Political Action Committee Contributions

HBI-PAC, Huntington's political action committee, makes bipartisan campaign contributions in compliance with local, state, and federal election laws. All HBI-PAC funds are voluntary donations from eligible colleagues. No corporate funds are contributed to HBI-PAC. The company's political action committees are overseen by a PAC board of directors, administered by Government Relations department staff, and managed in compliance with applicable local, state, and federal laws, as well as Huntington's mission, vision, and values. HBI-PAC contributions are publicly available on the U.S. Federal Election Commission website* (Committee ID: C00165589) and on the websites of respective state election authorities. Visit Huntington's Government Relations webpage.

Corporate Income Taxes

In 2019, Huntington incurred $248 million of federal, state, and local income taxes, all of which was incurred in the United States.

Supplier Management

Supplier Management Policy
Service Provider Code of Conduct
Purchase Order Terms and Conditions

Legal Standards for Huntington Suppliers

Huntington endeavors to have suppliers:

- Include in their Huntington contracts to abide by the Office of Foreign Asset Control regulations governing terrorist financing and to follow all other federal laws and regulations that prohibit doing business with entities listed by the U.S. Department of the Treasury as Specially Designated Nationals and Blocked Persons.
- Comply with U.S. Immigration laws and rules, regulations, and guidelines in allowing non-U.S. citizen employees to perform work on behalf of the bank. Suppliers must follow all applicable laws governing background and professional reference checks and drug testing, including the Immigration Reform and Control Act of 1986 and the Fair Credit Reporting Act, and rules and regulations under the Office of Foreign Asset Control, the Terrorist Watchlist and the Excluded Parties List System.
- Verify that representatives who work at Huntington facilities or have access to confidential business or customer information have not been convicted of a crime.
- Have a formal training program for those engaged in marketing, sales, delivery, servicing, and providing goods and services, including training in anti-money laundering regulations, the Bank Secrecy Act, the Consumer Financial Protection Act, and other relevant laws and regulations.
- Agree to be subject to federal regulatory oversight specific to the banking industry and to internal operating controls and security processes at any Huntington location where they perform services. They agree to encrypt all sensitive and confidential information that is sent over a public network or transported on an external storage device.
- Have in place a written risk management program associated with outsourcing or subcontracting their work to third parties, including technology service providers and vendors. Huntington does annual risk assessments for high-risk suppliers and every three years for moderate-risk suppliers. Huntington provides an annual third-party risk management report to the board's Operation Risk Committee, the Risk Management Committee, and the Technology Committee.

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Social

Colleague Experience

Careers at Huntington

Diversity and Inclusion Policy

Environmental

Environmental Reporting

Environmental Policy

Huntington recognizes that a healthy, sustainable future requires environmental stewardship, and commits to increasing our environmental performance and reducing our carbon footprint. Led by the CEO and executive management, we make this commitment as a natural extension of the corporate values our colleagues embody in their everyday actions.

CDP Public Participation

Huntington is a committed participant in CDP (formerly the Carbon Disclosure Project), a global initiative that allows us to track and submit data toward managing our environmental impact.

Greenhouse Gas Reporting Assurance

Energent Solutions has performed a verification of Huntington National Bank's (HNB) greenhouse gas (GHG) assertion, performed by Heapy Engineering, in accordance with ISO 14064-3 and GHG Protocol Scope 2 Guidance, 2015 amendment to the GHG Protocol Corporate Standard for their participation in the 2019 Carbon Disclosure Project (CDP). The assurance report states:

"Huntington National Bank has developed an excellent system for obtaining and tracking all utility and greenhouse gas data. Based on the above review of the 2018 GHG assertion:

1. Is materially correct and is a fair representation of the GHG data and information,
2. Complies with the International Standard ISO 14064-3: Greenhouse gases – Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions.
3. Complies with the GHG Protocol Scope 2 Guidance, 2015 amendment to the GHG Protocol Corporate Standard.

Other activities not covered in this emissions report but may be worth further investigation are the following:

- Emissions associated with leased buildings. HNB may never see these bills, nor do they have control over the building efficiency. However, they should be considered as part of the portfolio for emissions.
- Emissions associated with backup generators. It is unlikely backup generators would make a difference in the total emissions as they are used during power loss, but it could alter the scope the emissions fall under."

Scope 3 Emissions (in MT CO_2e)

Scope 3 Emissions	2017	2018
Business Air Travel	1,151	--
Hotel	939	533
Rental Vehicles	317	132
Company Vehicles	215	276
Herman Miller Furniture Products	385	5,607
Electronic Devices	269	2,204
Carpet	244	--
LVT	8	--
Courier Services (Brinks)	660	744
Courier Services (Internal)	968	218
Courier Services (FedEx)	193	258
Landfill Waste	--	1,253
TOTAL	**5,350**	**11,224**

2019 Scope 3 Emissions will be available in our CDP Climate Change 2020 Report, which will be published in the third quarter of this year.

Additional Disclosures

The Huntington National Bank is an Equal Housing Lender and Member FDIC.

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VA loans require a VA certificate of eligibility. Huntington is not acting on behalf of, or at the direction of, the VA, FHA, the USDA, or the Federal Government.

Caution Regarding Forward-Looking Statements

This communication contains certain forward-looking statements, including, but not limited to, certain plans, expectations, goals, projections, and statements, which are not historical facts and are subject to numerous assumptions, risks, and uncertainties. Statements that do not describe historical or current facts, including statements about beliefs and expectations, are forward-looking statements. Forward-looking statements may be identified by words such as expect, anticipate, believe, intend, estimate, plan, target, goal, or similar expressions, or future or conditional verbs such as will, may, might, should, would, could, or similar variations. The forward-looking statements are intended to be subject to the safe harbor provided by Section 27A of the Securities Act of 1933, Section 21E of the Securities Exchange Act of 1934, and the Private Securities Litigation Reform Act of 1995.

While there is no assurance that any list of risks and uncertainties or risk factors is complete, below are certain factors which could cause actual results to differ materially from those contained or implied in the forward-looking statements: changes in general economic, political, or industry conditions; the magnitude and duration of the COVID-19 pandemic and its impact on the global economy and financial market conditions and our business, results of operations, and financial condition; uncertainty in U.S. fiscal and monetary policy, including the interest rate policies of the Federal Reserve Board; volatility and disruptions in global capital and credit markets; movements in interest rates; reform of LIBOR; competitive pressures on product pricing and services; success, impact, and timing of our business strategies, including market acceptance of any new products or services implementing our "Fair Play" banking philosophy; the nature, extent, timing, and results of governmental actions, examinations, reviews, reforms, regulations, and interpretations, including those related to the Dodd-Frank Wall Street Reform and Consumer Protection Act and the Basel III regulatory capital reforms, as well as those involving the OCC, Federal Reserve, FDIC, and CFPB; and other factors that may affect our future results. Additional factors that could cause results to differ materially from those described above can be found in our 2019 Annual Report on Form 10-K, as well as our subsequent Securities and Exchange Commission ("SEC") filings, which are on file with the SEC and available in the "Investor Relations" section of our website, http://www.huntington.com, under the heading "Publications and Filings."

All forward-looking statements speak only as of the date they are made and are based on information available at that time. We do not assume any obligation to update forward-looking statements to reflect circumstances or events that occur after the date the forward-looking statements were made or to reflect the occurrence of unanticipated events except as required by federal securities laws. As forward-looking statements involve significant risks and uncertainties, caution should be exercised against placing undue reliance on such statements.

Contact Huntington

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