CLIMATE RISK POLICY STATEMENT

INTRODUCTION

Huntington acknowledges that climate change is a real issue, and, with a forward-looking, forward-thinking mindset, we champion efforts for change today, tomorrow, and for years to come. We believe climate change provides risks and opportunities for our business, and we are acting strategically to integrate climate-related insights into our decision-making and striving to help our stakeholders do the same.

Huntington supports the recommendations of the Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD) and employs the TCFD framework to enhance its understanding and disclosure of the evolving impact of risks associated with climate change, together with possible mitigation strategies. Huntington continues to build its internal capacity to conduct climate change scenario analysis, in line with the TCFD recommendations, and is expanding this program to evaluate both physical and transition risks across a selection of climate-sensitive portfolios. These efforts will help the bank identify potential material financial risks and will inform its business strategy in relation to climate change going forward. Based on the guidance provided by the TCFD platform, Huntington is taking steps to formalize our climate risk management practices and ensure that they are integrated into our existing, robust risk management program.

CLIMATE RISK

Huntington defines climate risk as the actual or potential threat of adverse effects on its financial ecosystem including customers, colleagues, stakeholders, and communities. These climate impacts (greenhouse gas emissions, waste, resource depletion) may pose a material risk to the sustainability of Huntington's operational, business activities, and geographic marketplace resiliency.

We believe the current and future impacts of adverse environmental events on our stakeholders require full institutional engagement in the timely identification, assessment, and management of climate-related risks. In recent years, we have witnessed the devastating toll that climate-related disasters can have on our stakeholders.

APPROACH TO RISK MANAGEMENT

We understand our risks, manage, and communicate them effectively.

1. Our Board-level committee framework includes separate and distinct audit and risk committees. Appointees to these committees have specific financial industry, legal, or other relevant risk management experience, and have oversight responsibilities for the company's current and prospective risk-taking activities.
2. We utilize three lines of defense to identify, measure, monitor, control and report the risks we have or will assume.
3. All colleagues are responsible for the identification and ownership of risk as we embrace the philosophy that "Everyone Owns Risk".

4. Compensation practices are aligned to our strategic objectives with appropriate risk balancing mechanisms.
5. We strive to be fully compliant with laws and regulations and build processes and controls to promptly identify and correct potential issues.
6. We continue to invest in the control environments, risk data aggregation, and risk reporting
7. We diligently review third party vendors and associated risks.
8. We maintain a well-developed business continuity plan to operate in a business as usual manner during unexpected natural disasters.

Huntington's Enterprise Risk Management ("ERM") program provides the framework to ensure risk awareness and adherence to the Board's stated risk appetite. Maintaining this program helps ensure strong and proactive risk governance that supports the achievement of a robust, holistic view of key risks, and drives management of risk. Huntington's focus on risk management and commitment to an effective risk management culture will ensure that we conduct business within defined risk tolerances of aggregate moderate-to-low risk, fulfilling Huntington's mission to deliver consistent earnings with top quartile financial performance over time, and to sustain a well-capitalized position. Huntington's philosophy is that risk management is a process of continuous improvement and we will always do our due diligence to consider environmental impacts.

CLIMATE RISK MANAGEMENT FRAMEWORK & REVIEW PROCESS

The Climate Risk Management Framework that we are developing is intended to align seamlessly with our existing Enterprise Risk Management structure. This structure will include the ongoing assessment of the potential impact of climate risk across multiple risk pillars. Although climate-related emerging risk issues have been identified and addressed on an ad hoc basis within the current emerging risk identification framework, upon completion, the Climate Risk Management Framework will provide a structured approach to consistently identify, assess, manage, and report climate-related risks and their impact across the enterprise.

Huntington's climate risk assessment measures will facilitate a uniform risk assessment score that will be determined primarily by the impact of multiple environmental-related dimensions. The resulting climate risk factor (CRF) can then be applied in a uniform and consistent manner across numerous stratifications of the data. Once established at the individual entity level, the CRF can then be combined into a composite CRF, facilitating broader and comparative views of climate risk across the Company.

The climate risk process development group is comprised of stakeholders across the company, with periodic input and guidance provided by Huntington's executive leadership team and the Board's Risk Oversight Committee. An overarching objective is to maintain alignment with the TCFD climate risk precepts and to monitor and incorporate initial and subsequent prudential regulatory direction.