



2016

Environmental, Social, and Governance Report



Our commitment to corporate
social responsibility.

Huntington Corporate Social Responsibility 2016 Highlights

Huntington is committed to delivering sustainable, long-term value to our investors, colleagues, customers and communities through our commitment to financial, environmental, social and governance stewardship and best practices. We appreciate our partners who join us in shared responsibility to ensure positive impacts in the world we serve.

Empowering Economic Mobility, Building Strong Neighborhoods



\$16 Billion

five-year community development plan.

#2

SBA national lender in number of loans.

✓ **\$6 million in closing costs waived** for low-income borrowers in Midwest.

\$126 Million invested in affordable housing in low-income neighborhoods.

\$25 Million invested in comprehensive economic development program in Flint, MI.

✓ Huntington Home Savers helped **2,192 customers in distress with their mortgages.**

Operating with Integrity



✓ Risk Management is deeply engrained in our culture, and strong corporate governance is foundational to our commitment.

31% ↑

Diversity on our Board of Directors.

✓ Created board level ESG accountability and aspirations.

16.1%

Diversity among our suppliers.

#5

The board, management and Huntington colleagues are the **fifth largest shareholder of the company.**

Investing in Our Workforce



68% Diversity by ethnicity or gender.

43 Average individual training hours per colleague.

Sustainable Success for Generations



66% of Huntington customers use e-statements.

↓ **15%** Reduction in greenhouse gas emissions.

Advocating for Our Customers

#1

J.D. Power & Associates for Retail Banking Satisfaction among traditional banks in the U.S. Central Region for fourth consecutive year.

Welcome.

Our commitment to corporate social responsibility.

To our shareholders, customers, colleagues and communities:

Welcome to Huntington's first ESG Annual Report. It signals our commitment to provide transparency and accountability in alignment with global standards for environmental, social and governance considerations.

While it marks a new way of reporting about our commitments and how we intend to incorporate them into our business strategies, it does not represent a shift in our core business values. Rather, it is a reaffirmation of our long-held practice of doing the right thing for our shareholders, customers, colleagues and communities.

This philosophy began more than 150 years ago with the founding of our bank by P.W. Huntington, who spoke about the balance between commerce and civic stewardship, community leadership and involvement. In an age of global connectivity, we know that working for the common good can have a lasting impact that provides value for our shareholders and the communities we serve.

This is only the beginning of our efforts to strengthen and communicate our commitment to our corporate social responsibility. In coming years, we will provide increasingly detailed reports that allow you to see our progress toward environmental, social and governance goals.

We invite your partnership in creating economic opportunity and promoting business practices that sustain healthy communities and empower future generations.



Stephen D. Steinour
Chairman, President
and Chief Executive Officer



David L. Porteous
Lead Director,
Board of Directors

In this report:**OVERVIEW**

Financial Highlights	4
Market Presence	5

SOCIAL

Workplace	7
Employment	8
Customers	12
Community	13

ENVIRONMENT

24

GOVERNANCE

31

OUR COMMITMENT TO ESG

37



In 2016, Huntington experienced a historic year as we celebrated the 150th anniversary of our founding and completed the transformational acquisition of FirstMerit.

We also eclipsed two meaningful financial milestones for the first time as total assets exceeded \$100 billion, and quarterly revenue exceeded \$1 billion. We continued organic growth in our legacy businesses, while adding new products and new markets, investing in our businesses with a keen eye on both risks and the opportunities, and delivering positive operating leverage for the fourth consecutive year.

FINANCIAL OVERVIEW

Total Assets

\$99.7 Billion

Total Equity

\$10.3 Billion

Total Deposits

\$75.6 Billion

Total Loans

\$67.0 Billion

CAPITAL RATIOS

9.56% Common Equity Tier 1 (CET1) Risk-based Capital Ratio

10.92% Tier 1 Risk-based Capital Ratio

13.05% Total Risk-based Capital Ratio

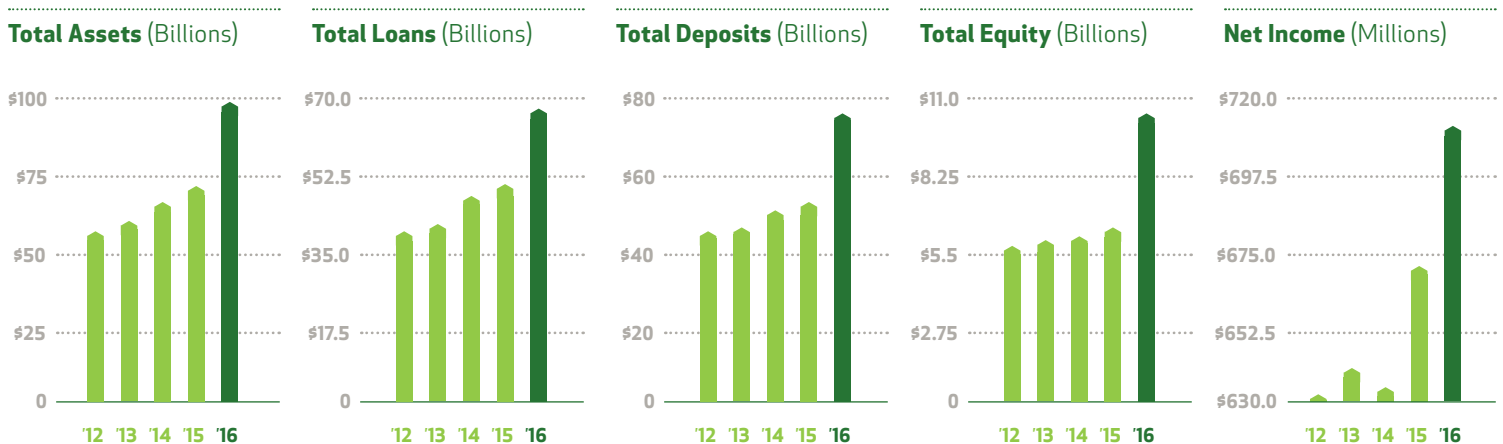
INCOME STATEMENT HIGHLIGHTS

\$3.6 Billion Total Revenue (FTE)

\$712 Million Net Income

\$0.70 EPS

FIVE-YEAR TRENDS

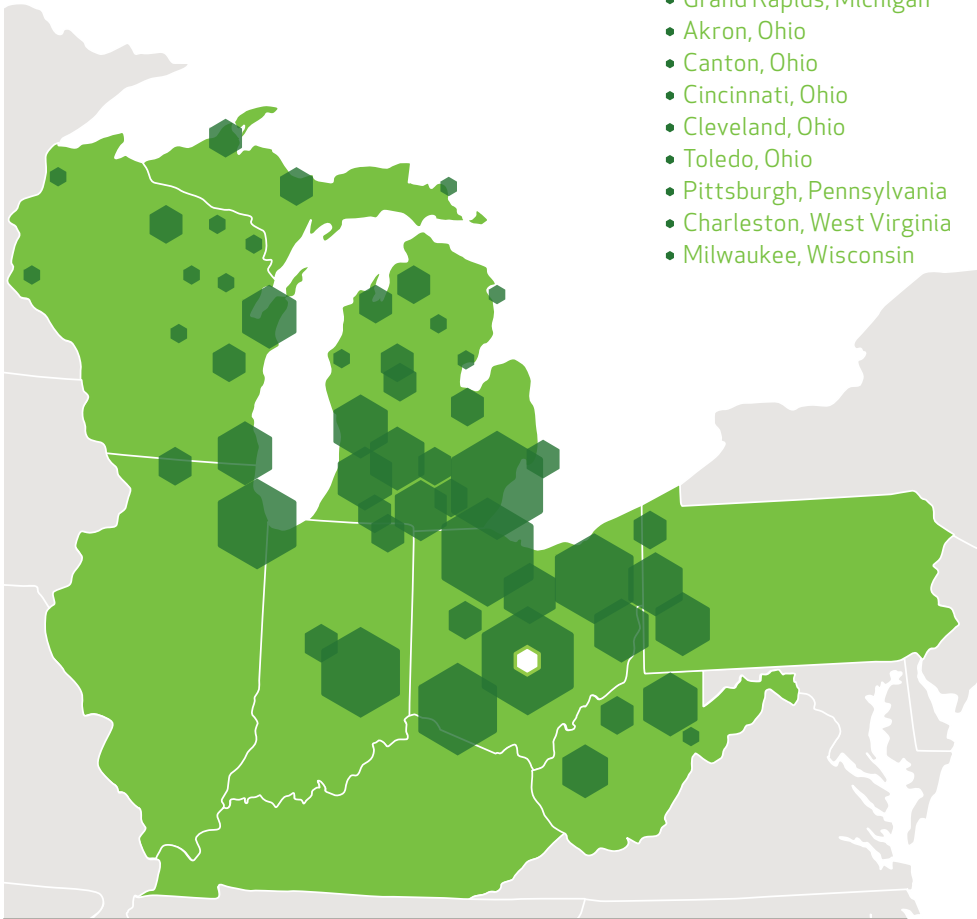


FRANCHISE OVERVIEW

Huntington is a multistate, diversified regional bank with nearly 16,000 full-time equivalent employees. At the end of 2016, we served customers through 1,091 branches and 24 private client group offices.

Regional Headquarters

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



Our products and services focus on eight states located in the American Midwest: Ohio, Illinois, Indiana, Kentucky, Michigan, Pennsylvania, West Virginia, and Wisconsin. We also provide select financial services and other activities in various other states, and international banking services through our Columbus, Ohio, headquarters.

Indiana Branches: 46 ATMs: 77 Deposits: \$3,395,101 ¹	Pennsylvania Branches: 53 ATMs: 106 Deposits: \$3,372,008 ¹
Illinois Branches: 39 ATMs: 38 Deposits: \$2,581,013 ¹	West Virginia Branches: 30 ATMs: 147 Deposits: \$1,735,415 ¹
Kentucky Branches: 10 ATMs: 20 Deposits: \$515,309 ¹	Wisconsin Branches: 37 ATMs: 37 Deposits: \$1,031,257 ¹
Michigan Branches: 353 ATMs: 431 Deposits: \$15,211,932 ¹	
Ohio Branches: 523 ATMs: 1,035 Deposits: \$48,865,400 ¹	

EXTENDED FOOTPRINT PRODUCTS

- Asset Finance
- Auto
- Boat & RV
- Food & Agribusiness
- Franchise
- Healthcare
- Large Corporate
- National Settlements
- Sponsor Finance
- Technology Financing

COLLEAGUES

15,993



1 figure = 1,000

BRANCHES AND ATMS

1,115



1,891



¹ As of June 30, 2016. Source: FDIC

Investing in the Common Good



Huntington's social responsibility commitment includes providing colleagues with a living wage, opportunities for growth and a welcoming workplace. It means empowering small businesses to create new jobs, and families to fulfill their dreams. It means investing in neighborhoods to transform the quality of life in our communities.

Building a Positive Workplace

For Huntington, social responsibility starts with its employees. Huntington recruits, develops and retains talented colleagues through a positive and welcoming work environment that encourages interaction, engagement and high performance.

Open communication among executive leadership and all other colleagues is key to building a positive work environment at Huntington.



63%

of those surveyed on Glassdoor™ would recommend a job at Huntington to a friend.

83%

registered approval of the CEO on Glassdoor™.

Performance and results are driven by acquiring the right people with the right skills at the right time, enabling them to execute their strategies and fostering a supportive results-based culture. With a stated aspirational goal of inclusion in the Forbes 100 Best Companies to Work For consideration list, Huntington prioritizes relationships between executive management and employees.

More than 700 employees who rated their experiences on Glassdoor, the jobs and recruiting site, reported high satisfaction with Huntington. As of month-end February, 63 percent of those surveyed would recommend a job at Huntington to a friend, and 83 percent registered approval of the CEO.

Huntington keeps all colleagues apprised of operational changes through the employee handbook, which is given to each new employee. Huntington's handbook team reviews and revises the handbook throughout the year. Changes are electronically communicated to all colleagues, who are required to pass a test on handbook content annually.

Huntington Supports Its Colleagues

Raising our minimum salary commitment:

\$12.50 for new hires.

\$14.00 for high-performing colleagues.

Huntington's Total Health benefits package includes medical, dental and vision coverage as well as a 401k plan with employer match and profit sharing, and personalized support and guidance to help colleagues navigate health care and benefits.

Huntington is proud to be a top job creator in the Midwest, with a 6.2 percent vacancy rate in 2016. Huntington raised its minimum salary commitment to \$12.50 per hour for new hires and to \$14 for high-performing incumbent colleagues. Huntington also launched an effort to improve its new-hire experience, including enhanced training and onboarding of new colleagues, weekly webinars on employee benefits, and surveys to assess the onboarding and recruitment processes. Huntington's Total Health benefits package includes medical, dental and vision coverage as well as a 401k plan with employer match and profit sharing, and personalized support and guidance to help colleagues navigate health care and benefits.

Understanding the importance of a balanced life, Huntington offers a year of paid medical leave – six months beyond that which is required by law – as well as paid time off and family time off, which includes five additional days off in connection with the birth or adoption of a child. Colleagues also receive family support services, adoption assistance, eligibility for scholarships for dependent children, commuter benefits and cancer support resources. For active military personnel on military leave, **Huntington will provide 10 days' predeployment pay for those preparing for a deployment of six months or more** and also offer up to \$2,500 a year in travel allowance for the employee or immediate family members.

Fostering a Healthy Workforce

Huntington received the Silver-level 2016 Healthy Ohio Worksite award for large companies with 1,000 or more employees.



Huntington is among 38 Ohio employers recognized for demonstrating a commitment to employee wellness through comprehensive worksite health promotion and wellness programs. **Huntington received the Silver-level 2016 Healthy Ohio Worksite award** for large companies with 1,000 or more employees.

Prospective employees are screened for drug and nicotine use, and vigorous nicotine cessation programs are in place for incumbent employees. When a colleague has been diagnosed with an infectious disease, procedures are in place to inform and protect all employees. Colleagues and family members are invited to participate in a variety of healthy activities, including biometric screenings, health assessment, health challenges, health coaching and other activities. Huntington rewards all such activities with a contribution to employees' health savings accounts as part of their medical benefits plan.

Employees receive violence in the workplace prevention training in addition to safety protocol in anticipation of bank robberies or other incidents of violence to ensure a safe workplace. Post-traumatic counseling is available after any such event.

Supporting Professional Growth

“Our human capital strategy focuses on our colleagues, brand and customers to drive business results through effective talent management and workforce effectiveness. We will continue to drive our culture to be an employer of choice by effectively retaining, developing, engaging and attracting talent.”



Raj Syal
Chief Human Resources Officer

Our Integrated Talent Management Value Proposition

Each Huntington colleague receives an average of 43 training hours per year. Professional development programs are offered in communications, professional effectiveness, management, leadership and business development. Online training programs include When Coaching Is Not Working, Reporting Wrongful Conduct, Is Management Right for Me? and Helping Your Newly Promoted Peer Succeed.

All colleagues meet with their managers twice per year for **goal planning and performance and development reviews that are aligned with their career development plans.** Huntington reports on human capital development through annual employee engagement surveys in which all colleagues participate.

Huntington creates a comfortable family atmosphere that encourages professional development and growth among its colleagues.



43

Average individual training hours received by colleagues in 2016.

654,772

Total training hours given to Huntington colleagues in 2016.

A Diverse and Inclusive Workplace

The philosophy Huntington has put into practice is that equal opportunity extends beyond having a variety of demographic groups represented in the organization. It is just as important to create a culture of inclusiveness in which all colleagues feel welcome and comfortable. Extending well beyond legal compliance, Huntington's diversity and inclusion efforts are focused on a diverse workforce, an inclusive workplace, diversity among suppliers, and active support of inclusion in the community. **Huntington strives for a workforce that not only represents diversity but also celebrates it.**

Targeted Diverse Recruitment

- Partnering with colleges and universities to increase diverse participation in intern programs with the goal of converting them into employees.
- Recruiting at historically black colleges and universities.
- Partnering with talent acquisition and all Human Resources areas and business segments to identify and source ethnic minorities and women, particularly in underserved roles.
- Updating the diversity and inclusion content on the Huntington career site.
- Posting job positions with diverse job organizations, such as National Black MBA Association and Prospanica.



68%

of Huntington's workforce is diverse by ethnicity or gender.

16.1%

spend with diverse business enterprises.



LOOKING AHEAD:

Our goals for the coming year.

40.8%

Combined diversity at job grades 73+.



43%

Diversity for our upper management workforce.

Ensuring Equal Opportunity

“With the changing demographics in society and evolving customer needs, we must remain intentional in how we attract, retain, and develop talent; Appreciating these rich differences is how we cultivate the best ideas and develop the best innovations for making Huntington the best performing regional bank in the nation.”



Stephen D. Steinour
Chairman, President and
Chief Executive Officer

Huntington’s public commitment to equal opportunity can be found in the corporate policy statement signed by its CEO, which states, in part, “With the changing demographics in society and evolving customer needs, we must remain intentional in how we attract, retain and develop talent, creating a more inclusive environment that leverages diversity effectively... Appreciating these rich differences is how we cultivate the best ideas and develop the best innovations.”

At the core of Huntington’s corporate culture is a resolve to eliminate discrimination based upon race, gender, sexual orientation, gender identity, disability, military status and religion. This commitment is reflected in the public support Huntington’s CEO and colleagues demonstrate when they represent Huntington at LGBT Pride, UNCF and Autism walks. It’s reflected in the diversity of the Board of Directors and Huntington’s workforce – 68 percent of which is diverse by ethnicity or gender. It’s reflected in the company’s pilot meditation rooms, mothers’ rooms and gender inclusive facilities. It’s reflected in the **100 percent Human Rights Campaign Foundation Corporate Equality Index score** Huntington has earned four years in a row and the **2016 Champion of Opportunity Award** earned from Opportunities for Ohioans with Disabilities.

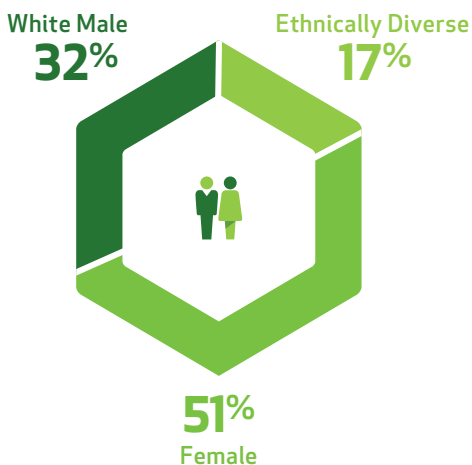
Huntington offers unconscious bias training for all employees, **requires managing inclusion training for all new hires**, and each of its 13 Executive Leadership Team members execute annual diversity and inclusion planning.

Diversity is a focus of succession planning and the promotions process. Huntington encourages participation in our employee affinity groups – AdaptAbility, African-American Business Resource Group (BRG), Asian BRG, Huntington LGBT Network, Huntington Women’s Network, Huntington Young Professionals, Military BRG and

Today’s Families BRG – and inclusion councils at several of our management centers. Huntington has created a corporate Diversity and Inclusion Strategic Council, developed a mentorship program through its BRGs and Inclusion Councils, and began publishing a quarterly inclusion newsletter. **In 2016, Huntington added military veteran- and Latino-relations experts to focus on the unique customer experiences of service members and Latinos.**

Huntington realizes its efforts are insufficient if it does not hold itself accountable. This is why **the Board of Directors Community Development Committee requests quarterly reports on diversity and inclusion efforts.** Huntington has set ambitious but achievable targets, including a base of **43 percent diversity for our upper management workforce** and 15 percent in the ownership of our suppliers – and asks our suppliers and professional service firms to track and report the diversity of their subcontractors and workforces to account for women, LGBT, racial minorities and military inclusion. For verification and input, Huntington submits our numbers to organizations such as Diversity Inc., National Minority Supplier Development Council, and Human Rights Campaign.

Total Workforce Diversity



2016 Awards and Recognition

- **Champion of Opportunity Award: Opportunities for Ohioans with Disabilities**
- **2016 Most Influential Black Corporate Directors: Savoy Magazine**
- **Perfect Score: Best Places to work for LGBT Equality – Human Rights Campaign Foundation**

Helping Customers Achieve Their Dreams

RickiLea Murphy and Ryan Winfield,
with their dog Gunner

“We really appreciate all your help and making everything so easy! Thank you so much!”

A young couple, their first home—and a picture that says it all. Sometimes a photo is worth a thousand words, just like the one below. With a 5-percent down payment, these Cleveland newlyweds were approved for a conventional loan within a week and cleared to close on their first home in fewer than 30 days.



One of the nation's top two lenders for customer satisfaction with mortgage servicing, according to a J.D. Power & Associates survey, Huntington creates locally driven programs that meet the specific needs of each community while offering loans tailored to meet the needs of each individual borrower. In 2016, **Huntington made 3,389 community development home ownership loans, a 9 percent increase over the previous year** and a 36 percent increase compared to 2014 in targeted neighborhoods.

One of Huntington's community-tailored initiatives is **The Detroit Flexline Product, which offers home equity financing using modified credit and collateral parameters to qualifying customers** in the City of Detroit, where the cost of renovating a home can exceed its appraised value. Other localized partnerships, all of which have grown steadily over the past two years, include:

- **Indianapolis Indiana Neighborhood Housing Program**, which enabled 234 people to buy homes in Indianapolis and surrounding markets with a focus on first-time homeowners.
- **East Akron Ohio Neighborhood Development Corp.**, which enabled 112 people to buy homes focused in low-to-moderate income tracts.
- **Canton Ohio Building Partnership**, which enabled 111 people to buy or rehab homes in identified Canton neighborhoods with the focus on low-to-moderate income areas.

3,389

community development home ownership loans in 2016, exceeding our goal of 3,236 for targeted neighborhoods.

+9% increase in home ownership loans over 2015, and a...

+36% increase compared to 2014.

Revitalizing Neighborhoods

In the wake of Flint's city water crisis, Huntington partnered with FlintNOW Foundation investing \$25 million in a comprehensive economic development program – including a \$1 million grant to support small business – aimed at stabilizing the Flint economy. FlintNOW provides relief to its businesses and residents, including mortgage assistance, hardship relief, small business loans and youth education.

Since 2015, Huntington has waived more than \$6 million in closing costs, helping to bring new homeowners to low-to-moderate income neighborhoods. In 2016, Huntington made 141 community development loans totaling \$698 million and 97 community development investments for \$131 million.

Huntington also offers closing cost discounts and home-buying workshops to employees of its strategic mortgage partnerships. Building upon these partnerships by investing in the communities where colleagues work and live, Huntington in 2016 established its new Community Mortgage Loan Officer Team, a group of 22 officers working in 18 different markets with local community groups to find new ways to organically generate loan activity.

Huntington's lending professionals are well-trained and effective. All Huntington loan officers and operations colleagues are required to attend training courses that educate them on home lending programs. Since mandatory training began in 2013, **Huntington has increased its state housing agency product volume by nearly 900 percent**.

Huntington Home Savers addresses the needs of customers having difficulty meeting their mortgage obligations. **In 2016, Home Savers helped 1,976 customers stay in their homes.**

\$25 Million invested in a comprehensive economic development program in Flint, MI.

\$6 Million in closing fees paid to low-income borrowers since 2015.

+900% increase in state housing agency and board lending product volume since mandatory training began in 2015.

2,192 customers helped by the Home Savers program in 2016.

1,976 of whom were able to stay in their homes.

Supporting a City in Need

With the City of Detroit emerging from a crisis, Huntington CEO Steve Steinour joined Detroit Mayor Mike Duggan and a variety of government, banking and nonprofit leaders Feb. 18, 2016, to announce the Detroit Home Mortgage program.

The program is an innovative public-private partnership that will increase home ownership and improve neighborhoods in the city that perhaps was hardest hit by the recession. The City of Detroit, the Obama Administration, the Clinton Global Initiative and several banks led by Huntington collaborated on what Mayor Duggan called “a game-changer for Detroit.”

The federal government adjusted lending guidelines so that banks can lend qualified homebuyers the full amount needed to purchase a renovated home or to buy and rehabilitate homes anywhere in Detroit. Borrowers will get a first mortgage for the appraised value of the house and a second mortgage for as much as \$75,000 to fill the gap between the appraised value and the sale price and the cost of renovations. Detroit Home Mortgage will provide as many as 1,100 mortgages over the next five years.

Huntington, which took a lead role in establishing the program, is both a program lender and the lead investor in a capital pool that will purchase the second mortgages originated by the program lenders. **Huntington has committed approximately \$19 million of the \$42 million pool.**

“With an opportunity to get a home mortgage,” Mayor Duggan said, “qualifying homeowners and homebuyers have a real opportunity to buy and renovate a house in the city and make it a home.”



Family, Not a File.

Every day, Huntington makes the dream of homeownership a reality for customers.

Family, Not a File is an internal campaign that showcases borrower testimonials about how the bank’s lending efforts have made their lives better.

- After moving from Chattanooga, **Drew and Ryan** transformed a fixer-upper in a low-to-moderate income Indianapolis neighborhood into their ideal home thanks to a loan from Huntington.



- **Marcie Kansou** was the first homebuyer to use the Detroit Home Mortgage program and renovated a home in Detroit’s Rosedale Park neighborhood, not far from where she grew up: “Now I have a place that I can truly call and make my own, where I can bring family together and continue traditions that actually began in this neighborhood.”



- 83-year-old Navy veteran **Marvin Meadows** hadn’t owned a home in 15 years before qualifying for a Huntington VA loan. Now he and his wife have a new house down the street from their son and grandson: “I couldn’t have asked for better service.”



A Culture of Customer Advocacy

Banking is about people, and it's our job to make peoples' lives better by:

Doing the Right Thing + Moments That Matter = Exceptional Huntington Experiences

At Huntington, customer advocacy is about listening carefully and avoiding assumptions. It is about empathy and the ability to appreciate another's experience. It's about taking the time to walk in the shoes of others in order to become their champion. This attention to customers has made a difference for Huntington in the eyes of its customers and the general public. **Huntington takes a robust and systematic approach to customers' opinions and concerns, using their feedback to continuously improve customer experience. This commitment is reflected in the many industry accolades that consistently recognize Huntington's best-in-class brand favorability, satisfaction and loyalty.**

Each colleague, regardless of job title, has a role to play as a customer advocate and in doing so, is critical in impacting the lives and businesses of customers. Huntington's senior executive leadership team includes the Chief Customer Officer and Director of Customer Advocacy, who is tasked with maintaining a persistent focus on the needs and the feedback of customers. Customer insights are registered and shared across the company to support business strategies or prompt policy changes.

In 2016, **Huntington's customer advocacy team successfully partnered with colleagues across the organization on over 150 efforts to improve the customer experience while continuously working to identify new ones.**

The team also kicked off new initiatives to address Huntington's top five customer service complaints.

Huntington offers a wide variety of consumer loan products including residential mortgages, home equity lines of credit, indirect auto loans, credit cards, and secured and unsecured consumer loans. Huntington has established specific customer assistance groups within the bank to communicate directly with those requiring additional help in the event of a job loss, or other sources of financial difficulties. Huntington has also established a complaint management governance process that includes working groups focused on understanding complaint trends from consumers, small business, wealth management, commercial and auto business customers. Through this process, cross-functional teams identify customer pain points, actions to improve the customer experience and monitor the progress of actions taken.



"It's about investing yourself in someone else's story, looking out for them and being a champion for their exceptional Huntington experience."

Carrie Birch
Customer Advocacy Director

Customer Service Awards

- J.D. Power & Associates, Highest in Customer Satisfaction with Small Business Banking in the Midwest Region (2014, 2016)
- Money Magazine, Best Bank Great Lakes Region (2016)
- TNS, Consumer Choice Award for retail banking in the U.S. Central Region (2012, 2013, 2015, 2016)
- Greenwich Associates, Wealth Excellence and Excellence in Middle-Market and Small Business Banking Awards
- Bain & Company in their published report, "Customer Behavior and Loyalty in Retail Banking," named Huntington the NPS® leader among traditional banks in the US Midwest (2012-2016)

Distinguished Customer-Centric Products and Services



Huntington's **24-Hour Grace** overdraft fee relief feature comes free with all consumer Checking, Savings and Money Market deposit accounts.



With **Asterisk-Free Checking** there are no fees to open the account, no costs to maintain it and no minimum balance requirement.



All Day Deposit convenience is available until midnight through ATMs or the Huntington Mobile App.

Honoring Military Customers



The Veteran's Day flag raising at Huntington's Crosswoods location in Columbus, Ohio.

Recognizing the sacrifices made and difficulties experienced by those who serve or have served their country in the United States military, Huntington is stepping up its efforts to meet the financial needs of servicemembers and veterans. In 2016, Huntington hired a customer advocacy specialist focusing specifically on the needs of military customers. Since then, Huntington has created a **Military Customer Experience Road Map, which includes the centralization and streamlining of all Servicemembers Civil Relief Act (SCRA) cases** – including the removal process for those who no longer are servicemembers – in order to drastically reduce the risk of error and ensure that Huntington is delivering the protections and assistance active-duty servicemembers need. **Huntington is primed to go above and beyond SCRA requirements by proactively seeking out servicemembers among its existing customers** and informing them of the protections and assistance to which they are entitled. Huntington's centralized system has established **weekly SCRA reporting from all business segments**, which meet monthly in the form of Huntington's SCRA Working Group. Huntington also has implemented a formal process to facilitate servicemembers' requests to have their vehicles shipped to them overseas.

Huntington is committed to further improving its service to military customers in 2017, including ensuring that full-time active-duty servicemembers have the same access to SCRA protection opportunities as National Guard and Reserve servicemembers. Huntington also is developing internal training to ensure all colleagues are educated about the specialized programs and the unique needs and experiences of military customers.

Protecting Customer Privacy



Huntington's commitment to customer privacy and security is spelled out in its Information Security Program overview: "Protecting the confidentiality and integrity of our customers' information is a key commitment of Huntington." Huntington has safeguards in place to provide security and confidentiality for customer and bank information, minimize anticipated threats or hazards to the security or integrity of such information, and comply with all applicable federal and state laws.

The direct engagement of the CEO and Board of Directors reflects the importance of privacy and security. **Huntington's Chief Information Security Officer reports to executive management and meets frequently with the CEO and board members.** The Information Security Program includes layered controls around Huntington networks, systems and data, such as network firewalls, intrusion detection and prevention, enterprise anti-virus solutions, advanced persistent threat monitoring and data encryption and protection. In addition, Huntington makes a point of locating its system in facilities that are physically secure. In the event of a breach, Huntington has a procedure in place to notify those affected in a timely manner.

Regular third-party reviews and audits have found Huntington's security system to be strong. Huntington also hires an external security consulting firm to perform annual penetration testing to measure the security of its network and systems. PricewaterhouseCoopers validates those tests as well as other examinations to include federal audits as Huntington's auditor.

Huntington complies with all privacy laws and trains all colleagues in security and awareness training, which includes a requirement for a passing grade on an annual online exam and additional exercises that prepare them to identify and respond to the illegal practice of phishing. Training instructs employees how to protect information, whether on paper or electronic, and how to protect equipment and access to data. Huntington classifies all data as public, internal use only, confidential or restricted, and educates colleagues on the proper protocols for each category.

Engaging Communities and Improving Lives

Enhancing the communities in which Huntington is operating is in the bank's DNA, permeating throughout the organization. Huntington has earned a reputation for strong community relationships and investing in local nonprofit and charitable organizations in order to build healthy and vibrant communities. Huntington views community engagement through a holistic lens that includes financial gifts, loans, volunteerism, board placement, connectivity, economic development and affordable housing.

Giving back to the communities Huntington serves means sharing both resources and time. In 2016, **Huntington donated \$7.5 million to community organizations and Huntington colleagues logged more than 24,528 volunteer hours in 2016.** Highlighted activities included the Martin Luther King Day of Service, the Pelotonia bicycle ride to end cancer, work on Habitat for Humanity homes and financial education for Junior Achievement. Huntington also has more than 240 colleagues serving on more than 371 boards throughout our bank footprint.

Riding for One Goal: End Cancer



“Every pedal that spins, every helmet that you see, every marker that you pass, the meaning is different. It’s more than just that ride or the eight months that led up to the ride. It was about every story, every memory that I was able to hear or share.”



Richard Remiker
Commercial Banking Director and
Team Huntington Pelotonia Chair

24,500+

volunteer hours.

Barbara Close
Branch Manager,
Marietta, Ohio

“We believe the best way to honor the spirit of Dr. Martin Luther King Jr. is to make a special difference.”



William C. Shivers
Canton/Mahoning Valley Regional President
Canton, Ohio

“Huntington and Junior Achievement share the belief that the long-term success of our community depends on preparing young people to join the workforce.”



“What started as an effort to help people with their taxes turned into the creation of a financial empowerment program.”

Brent Frymier
Regional Marketing Manager
Indianapolis, Indiana



“Every person needs housing, but it takes good furniture to transform a house into a home.”

John R. Malone Jr.
Huntington Wealth and Investment Relationship Manager,
Board Member, Furniture Bank of Central Ohio, Columbus, Ohio

Building Homes and Strengthening Families



“Huntington’s support and generosity will greatly improve housing conditions.”

Sue Henderson
 Vice President, U.S. Operations
 Habitat for Humanity International

\$250,000

Donated to Habitat for Humanity International.

\$150,000

Donated to Habitat for Humanity Mid-Ohio.

In celebration of its 150th anniversary, Huntington announced the **donation of \$250,000 to Habitat for Humanity International and an additional \$150,000 to Habitat for Humanity-MidOhio** to support neighborhood revitalization efforts. The donation, along with employee volunteer support, helped to improve homes with 150 Habitat families in Huntington’s Midwest geography, while championing Habitat for Humanity-MidOhio’s goal of increasing impact within shared local communities. Huntington also pledged \$1 million to fight domestic violence through Choices in Columbus and through a \$250,000 donation to the Battered Women’s Shelter of Akron.

A Transformative Commitment

\$16.1 Billion Five-year Community Development Plan:



\$6.6 Billion + \$5.7 Billion + \$3.7 Billion + \$30 Million + \$25 Million

in small business lending within low-to-moderate income areas.

in single family mortgage lending in low-to-moderate income areas.

in community growth lending and investment targeting affordable housing and community-based loan funds.

in economic impact, including 10 new branches and dedicated mortgage officers in low-to-moderate income and majority minority areas.

in additional grants and philanthropy primarily targeting housing and small business credit service access.

Huntington's most significant 2016 community development initiative came in May with the announcement of a visionary project that leverages a tremendous amount of resources and services to increase affordable housing rentals, home ownership and neighborhood transformation. Huntington's \$16.1 billion five-year Community Development Plan in partnership with the National Community Reinvestment Coalition targets underserved borrowers, communities and small businesses. The plan, set to begin in 2017, includes mortgage and small business lending in low-and-moderate income communities, community development lending and investments, a philanthropy program, and other services to increase access to financial services in low-to-moderate income communities.



"It's a natural fit for Huntington to invest in the neighborhoods that have been home to generations of our customers and colleagues."



Sandra Pierce

Chairman Huntington Michigan
Private Client Group and Regional Banking Director

Boosting Economic Development and Creating Jobs

Huntington also contributed to economic development through its industry-leading support of small businesses. Huntington has been ranked Highest in Customer Satisfaction with Small Business Banking in the Midwest Region since October of 2008. Presently, **Huntington is the No. 3 SBA national lender in dollars (\$221.4 million in the first half of SBA FY 2017) and No. 2 national lender in units** (1,120 units in the first six months of SBA FY 2017). In SBA FY 2016, Huntington ranked No. 2 in units (3,905) and No. 5 in dollars (\$633.5M).

Huntington's SBA lending for business acquisitions increased to \$249 million – an increase of 83 percent over the previous fiscal year – in 2016, and lending to startup businesses rose by 69 percent to \$214 million. **Huntington made 4,927 new money loans for \$266 million in 2016**, \$125 million of which were SBA guaranteed.

Huntington was recognized by Greenwich Associates in 2016 for excellence in middle-market and small business banking and was **ranked No. 1* by J.D. Power in customer satisfaction** in small business banking in the Midwest. In May of 2016, Huntington pledged to increase its goal of small business lending in low-to-moderate income tracts by 18 percent over the next five years, to \$6.6 billion.

Helping small businesses succeed:

#1

in Small Business Administration (SBA) lending in its eight-state regional footprint since October 2008.

#2

in units (3,905) nationally in SBA FY 2016.

#5

in dollars (\$633.5M) nationally in SBA FY 2016.

\$249 Million in SBA lending for business acquisitions in 2016.

• Unlimited Concrete Solutions

had been operating in Columbus since 1975, but was hit hard by the recession. Thanks to support and guidance from Huntington, it was able to rebuild its finances and maintain its 90 employees.



• Huntington supplied Jessica and Thad Kittrell with an SBA loan that enabled them to fulfill their dream of opening a restaurant.

101 Beer Kitchen now operates three central Ohio locations with 180 employees.



• Bowl for Fun bowling alley manager Bill Faulk and four fellow employees capitalized on the opportunity to purchase the business from their retiring owner thanks to an SBA loan from Huntington.



“We’re proud of our bank’s ongoing commitment to improve the quality of life in the communities we serve.”



Dino Orsati

Branch Manager
Steubenville, Ohio

*Huntington National bank received the highest numerical score among eight banks in the Midwest region in the J.D. Power 2016 U.S. Small Business Banking Satisfaction Study, based on 8,159 total responses, measuring the opinions of small business customers with annual revenues of \$100,000-\$10 million, surveyed June-August 2016. Your experiences may vary. Visit jdpower.com.

Creating Affordable Housing Opportunities

Guided by the philosophy that a roof over one's head is the most basic of human rights, Huntington invested \$126 million in affordable housing in 2016, working both with for-profit and nonprofit developers as well as partner banks to enhance the communities it serves and the low- and moderate-income residents who live there.

Huntington invested \$6 million and granted a \$10 million loan in the heavily blighted and crime-ridden Colony and Fisher Arms Apartments in Detroit in 2016. Following a major public-private rehabilitation, which required a multi-tiered source of financing, the complex reopened as the safe, comfortable and affordable River Crest Apartments, helping to transform the neighborhood around it. Huntington also made a below-market \$11 million community development loan to finance construction of Marlowe Court, an affordable senior housing development in Cincinnati's College Hill neighborhood, and invested \$70,000 in the J.O.S.H.U.A. (Journeys Of Service Helping Upper Appalachia) partnership with Urban Mission to provide free home repairs and teach home-improvement skills to seniors and low-income families in Steubenville.



Huntington provided a construction loan for East Liberty, an 85-unit affordable housing development in Pittsburgh's East Larimer neighborhood. Huntington is East Liberty's sole equity investor.



An affordable family housing facility originally built in 1979, Ashland Village in Ashland, Ohio, was rehabilitated in 2016 thanks to a construction loan from the bank and support from Ohio Equity Fund for Housing XXV—of which Huntington is a \$47 million investor.

584

affordable housing units addressed with awards from Federal Home Loan Bank (FHLB) of Cincinnati. Huntington's 2016 FHLB awards are more than those of the top five other member banks combined.

\$126 Million

invested in affordable housing in 2016.



LOOKING AHEAD:

Our goals for the coming year.

\$175 Million

in tax credits for low-income housing.

Revitalizing a Neighborhood



With 210,000 square feet, the Huntington Gateway Center opens in 2017 with space for 1,600 colleagues.

\$18 Million

400
new jobs.

\$25 Million
in new payroll.

In November, Huntington announced a public-private partnership that will generate new jobs and vitality in low-to-moderate income neighborhoods in Columbus. **Huntington is investing more than \$18 million** in a vacant department store building to build the 210,000 square-foot office campus that will serve as an anchor of the Northland neighborhood. The project will yield almost 400 new jobs and \$25 million in new payroll.

Huntington also announced a commitment of \$300 million in investments and loans in Columbus neighborhoods through 2020. In addition, Huntington has committed to add 1,000 new jobs in the City of Columbus by 2024.

Expanding Financial Wellness

A proud hallmark of Huntington's community engagement has been a multitude of efforts aimed at increasing financial wellness in its communities.

Financial Literacy Programs include:

- **Huntington Kids Club:** promoting elementary school student involvement in all phases of the banking process, teaching kids about money;
- **Teach a Child to Save Days:** teaching elementary school kids the importance of saving money;
- **Teach a Child about Credit Days:** teaching students the basics and importance of credit;
- **Young Adult MoneySmart:** a partnership with FDIC arming high school and college students with the information they need to know about money and budgeting;
- **Adult MoneySmart:** a partnership with FDIC offering free classes that cover a basic financial education, including banking, credit, checking accounts, consumer rights, loans, homeownership, and financial recovery;
- **Small Business MoneySmart:** a partnership with the FDIC and SBA offering free classes for small businesses, including time management, financial management, record keeping, banking services, tax planning, and insurance options;
- Participation in **National Financial Literacy Month** activities across the country.

6,868+ hours of Financial Wellness Training in 2016.

“At Huntington, we believe in better financial health. We consider it our privilege to make a difference in the communities in which we live and work.”



John Corbin
Indiana Regional President
Indianapolis, Indiana

Commitment to the Environment



Just as Huntington cares about making a positive impact on the neighborhoods and communities where it operates, the bank is committed to continually improving its environmental sustainability practices. How it operates its buildings, how it educates its colleagues and how it works with suppliers all speak to a commitment to doing the right thing for the environment.

Taking Care of the Earth

Huntington cares deeply about the environment. That's why Huntington participates enthusiastically in international, national and company-based initiatives to reduce its carbon footprint.

This commitment starts with executive responsibility. Huntington's ESG Committee, which oversees alignment with ESG environmental standards, reports to the Huntington Board of Directors. Huntington's Senior Vice President and Director of Corporate Real Estate, Facilities and Space Management has **executive responsibility for greenhouse gas reductions** and has created a new energy and sustainability director position to be responsible for environmental programs and policy.

Huntington is a proud **participant in CDP** (formerly the Carbon Disclosure Project), a global initiative that enables companies, cities, states and regions to measure, manage and report environmental impacts. As part of the program, Huntington tracks and submits annual data on its sustainability activities and results. In 2016, Huntington tracked 502 energy related projects for inclusion in its CDP disclosure. The bank's CDP score rose to a C in 2016 and diligent efforts are underway to raise those scores into the A-B range.

502

Energy-related projects tracked in 2016.

121

Energy-related work orders to reduce GHG.

661

Active Energy Star sites in 2016.

Reducing Huntington's Carbon Footprint

Just as Huntington creates shareholder value through operational efficiencies, the bank creates value for the environment through energy efficiencies. Each Huntington-owned location participates in the U.S. Environmental Protection Agency's voluntary **ENERGY STAR program**, which helps businesses implement superior energy efficiency practices in electricity, natural gas and water use. The program encourages businesses such as Huntington to report on efforts to reduce greenhouse gas emissions.

In 2016, Huntington tracked 661 active sites as part of its ENERGY STAR activities and wrote 121 energy-related **work orders intended to reduce greenhouse gas emissions**. Our goal is a 4 percent annual increase in our ENERGY STAR score over five years. In fact, Huntington has made enormous progress in raising its scores, recording a 16-point increase since it began participating in 2011.

That progress is due, in large part, to the hard work of more than 50 facility managers and a motivated, six-member Energy & Sustainability Team. This team partners with Ecova and ENERGY STAR to identify and implement steps to use energy and natural resources more efficiently. In addition to a corporate-wide continuous improvement project, Huntington has researched and implemented a variety of energy-related reduction projects, including:

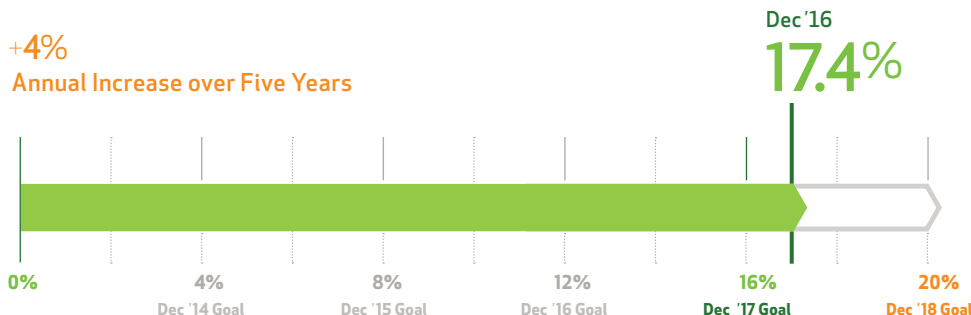
- Window film
- ASHREA-level energy audits
- Efficient lighting technology replacements (including a ban on incandescent lighting)
- Remote thermostat program
- Upgrades to realize HVAC and other mechanical equipment efficiencies
- General employee education and awareness, including promotion of transportation alternatives

In 2012, Huntington launched **Project Papercut**, an initiative to significantly reduce paper consumption by encouraging colleagues to print less and by offering paperless alternatives to customers. Reduced paper consumption in Huntington's print center and a reduction in consumption of copier paper are examples of how these efforts have improved Huntington's sustainability. In addition, the bank partners with suppliers who incorporate initiatives such as recycling and sourcing paper from certified forests.

Image enabled work-flow automation also supported paperless processes and reduced courier miles by 2.4 million since 2015.

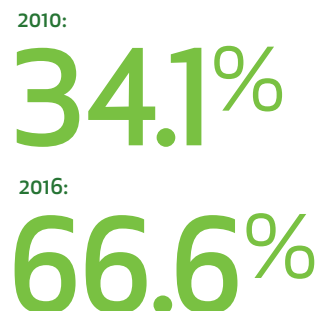
Huntington also engages our customers to reduce paper consumption with digital investments to encourage use of **online statements** over printed and mailed documents. In 2016, we achieved top quartile ranking with 66.6 percent of our business and consumer clients utilizing online statements.

Energy Star Goals



Industry-Leading Paperless Approaches

Consumer and business customers using online statements:



Following Environmental Best Practices

Huntington's commitment to doing the right thing includes making sure the company complies with all local, state and federal laws and regulations – and that its executive team and Huntington colleagues have the information they need to do the right things.



Every Huntington facility manager has access to Certified Building Operator Training offered through the Midwest Energy Efficiency Alliance.



Huntington is committed to using new energy technologies, such as solar and wind energy and innovative new efficiency measures, to reduce our carbon footprint and return value to our investors.



Huntington is developing a **formal environmental policy with sustainability standards** that will be implemented in 2017, along with a formal greenhouse gas-reduction policy. In the meantime, the bank continues to:



Comply with all U.S. and Ohio Environmental Protection Agency regulations.

The bank requires its 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 – 2007 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.



Monitor environmental performance.

Huntington continually monitors its environmental performance and reports results as part of its participation in the CDP and as part of its ENERGY STAR participation. As part of the ENERGY STAR program, the bank also monitors performance by building, region and facility manager, reporting scores internally as a continuous improvement tool. Among the statistics reported are year-over-year comparisons of energy reductions by accountable manager. These numbers also are monitored and documented by region.



Provide funding for environmental training.

Training is available to every Huntington facility manager. This includes Certified Building Operator Training offered through the Midwest Energy Efficiency Alliance, Trane Building Automation Controls, Siemens Building Automation Controls and other approved job-related training. Compensation, bonuses and incentives are tied to Huntington's goal of reducing energy in each of our buildings by at least 2 percent annually.



Educate Huntington colleagues about sustainability.

Environmental education for all Huntington colleagues is part of an energy sustainability initiative across Huntington's footprint. The program includes continual communication to all colleagues about measures they can take to reduce the company's carbon footprint.

Piloting Future Solutions

Huntington generates a portion of its **energy from renewable sources**, using solar panels and a wind turbine. In 2016, Huntington generated 61,100 kWh of solar and wind generated electricity. The bank expects that total to reach 414,160 kWh in 2017, and 765,679 kWh in 2018.

While a number of energy efficiency programs are in place throughout Huntington's footprint, the bank's Gateway Center in Columbus, Ohio, is being built as a pilot for a number of additional sustainability initiatives. These include:

- A single-stream recycling program;
- A 700,000 kWh solar bifacial panel with reflective roofing;
- A lighting system with LED fixtures, daylight harvesting and occupancy control;
- High-efficiency HVAC equipment;
- Additionally, Huntington's senior management has created a new Huntington Energy & Sustainability Director position.

In the construction of the new facility, Huntington requested the contractor investigate buying locally to reduce transportation energy costs and follow energy efficient construction methods. Huntington also has instituted a number of resource conservation steps, including a mix of technology to reduce water used in restrooms. And the bank is looking at sustainable ways to better use green spaces.

Huntington knows that taking care of our environment is the right thing to do, for the company, its communities and the world. It's committed to taking increasingly effective steps to do just that.



LOOKING AHEAD:

Our environmental goals:

- 1 Reduce energy in each of our buildings by at least 2 percent annually.
- 2 Eliminate incandescent lighting from our entire footprint by the end of 2017.
- 3 Define minimum efficiency standards for HVAC equipment by the end of 2017.
- 4 Define waterflow standards for restroom equipment by the end of 2017.
- 5 Define minimum efficiency standards for lighting equipment by the end of 2017.

61,100 kWh

of wind and solar electricity generated in 2016.

414,160 kWh

estimated from solar and wind in 2017.

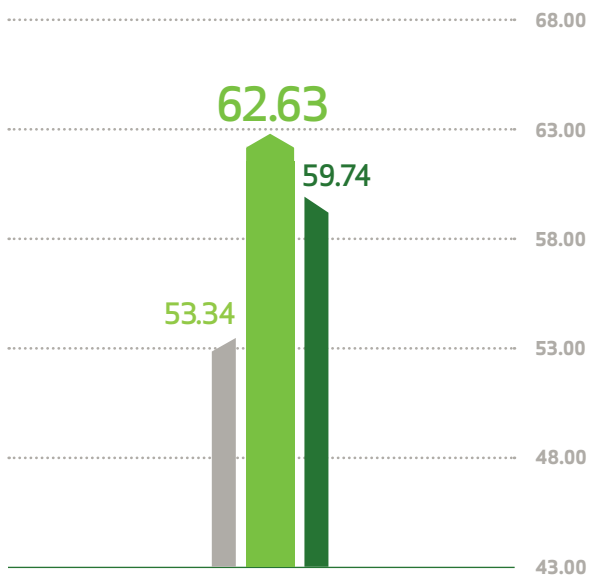
765,679 kWh

estimated electricity from solar and wind in 2018.

Huntington's Greenhouse Gas Reductions

Energy Star Progress - December 2016

- Avg. Baseline Energy Star Score
- Avg. Current Energy Star Score
- Avg. Actual Target

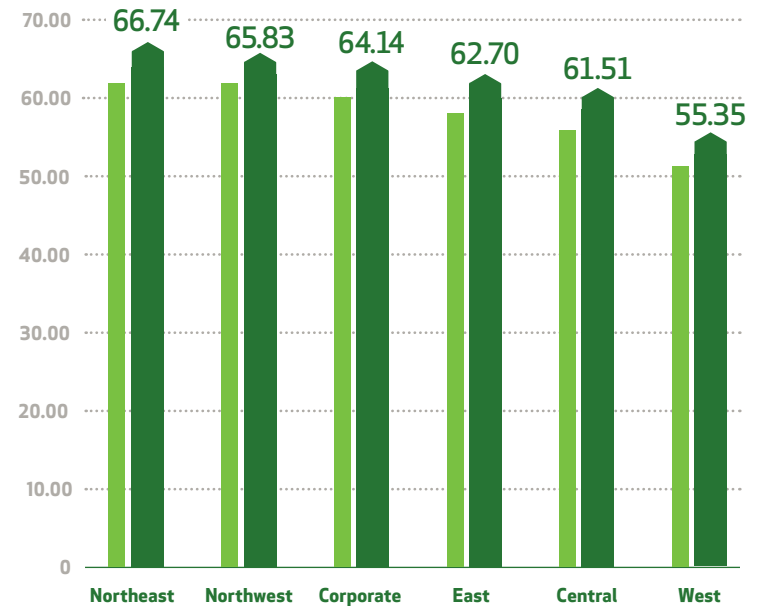


Average Energy Star Score by Region

- Dec 2015
- Dec 2016

+6%

Average rating increase per region.



Total GHG Emissions - 2013 to 2015

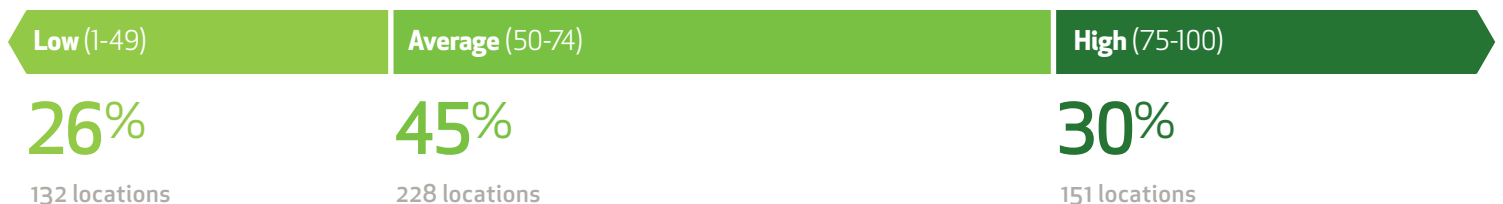
-15%

Decrease in absolute emissions in 2015 compared to 2013.

METRIC TONNES OF CARBON DIOXIDE EQUIVALENT (MT CO₂E)

88,692 - 2013
 85,915 - 2014
 74,960 - 2015

Huntington Bank Energy Star Scoring Makeup - December 2016



Easton Business Service Center Weather-normalized EUI

◆ 2015
◆ 2016

↓ **19%**

Decrease in year-over-year EUI at our largest facility.

KBTU/FT²;



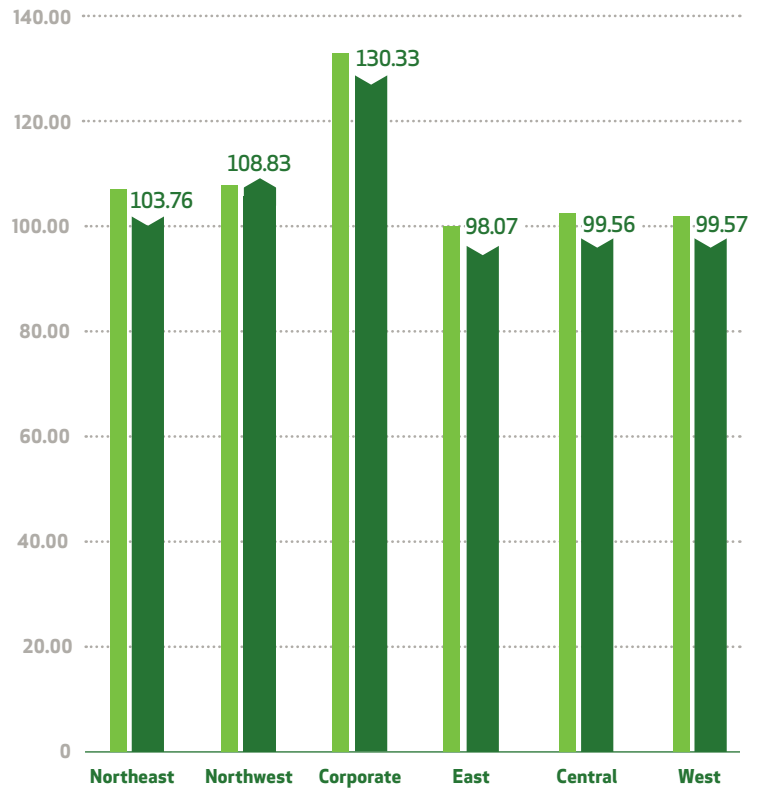
Average Weather-normalized EUI by Region

◆ Dec 2015
◆ Dec 2016

5/6

Regions showed a decrease in EUI.

KBTU/FT²; >100 FT²

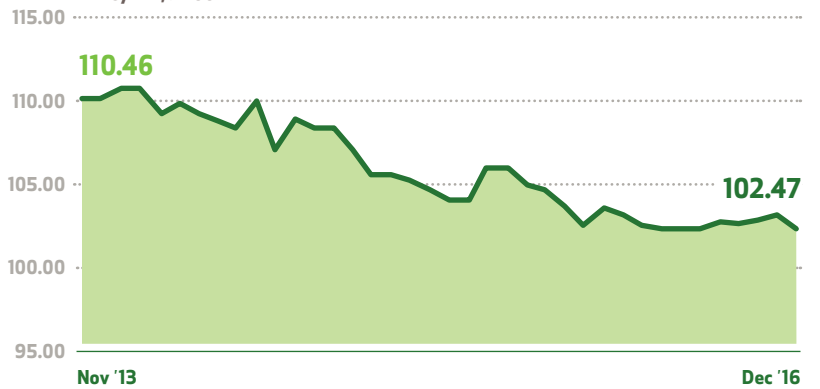


Huntington Bank Weather-normalized EUI

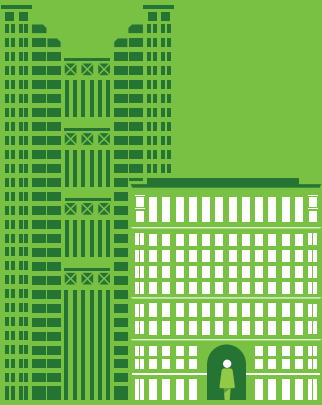
— **7%**

Decrease in EUI over the last three years.

KBTU/FT²; >100 FT²



Operating with Integrity



Huntington could not exist without the public's trust. Investors, customers, colleagues and communities count on Huntington to do the right thing always by operating the company with integrity and by acting legally, ethically and morally in all situations.

Accountability at the Top

Doing the right thing requires both ethical and operational frameworks that Huntington's leadership team and all colleagues understand and follow.



Huntington's governance guidelines are available on the company's governance website.

Huntington's **governance guidelines**, which are available on the bank's corporate governance website, detail board responsibility for setting the tone for, and monitoring compliance with, ethical standards and for monitoring company performance related to its vision, mission, strategies and objectives. They also set expectations for the performance and effectiveness of the Chief Executive Officer and management, and direct the company's financial reporting processes and internal controls. Individual charters detail the responsibilities of the board committees, on whose recommendations the board acts.

As illustrated in the biographical sketches in the 2017 Proxy Statement, Huntington's board consists of 15 seasoned leaders from diverse walks of life, bringing to the company a variety of skills, knowledge, experiences and perspectives. All of them are committed to maintaining a well-rounded and effective board aligned with Huntington's business strategies. **At least annually, the Nominating and Corporate Governance Committee reviews the composition of the board** to assure that members represent the appropriate knowledge, skills and experience needed for the success of the organization.

Huntington's board and the Nominating and Governance Committee have determined that a majority of **the board's members are independent** as defined in the NASDAQ Stock Market Marketplace Rules, as is the actively engaged Lead Director. Members of the Compensation Committee are independent under NASDAQ Stock Market Marketplace Rules, while all Audit Committee members are independent under stricter NASDAQ requirements for board audit committees.

*Huntington Bancshares Incorporated
Board of Directors*



Financial Integrity

Compensation

Remuneration of Huntington's leaders are transparent to its stakeholders. The 2017 Proxy Statement lists board members who received remuneration during 2016, along with the amounts earned in fees and stock awards. The proxy statement also discloses compensation of executive officers.

To promote strong management and shareholder alignment, Huntington requires executive officers to meet and maintain a dollar value of ownership based on a multiple of their salaries, and ownership levels are evaluated annually based on current stock prices. In addition, executive officers are subject to a holding requirement equal to 50 percent of net shares received when they exercise stock options or upon the release of full value share compensation awards. Executive officers must hold these shares until they retire or otherwise leave the company.

Huntington's Recoupment/Clawback Policy provides guidelines for possible recoupment or clawback of incentive compensation due to misconduct, performance or adverse risk outcome. It can be found on the corporate governance website and in the 2017 Proxy Statement.



Collectively, the Board, Management, and Huntington Colleagues are the 5th largest shareholder of the company.



Board Committee Charters

Committee charters, which can be found on Huntington's corporate governance website, include those for the Audit, Community Development, Compensation, Executive, Nominating and Governance, Risk Oversight, HIC Oversight and Technology committees.



Investor Relations Disclosure Policy

Huntington is committed to providing timely, accurate and complete information consistent with legal and regulatory requirements, including Regulation Fair Disclosure, which enables orderly and fair trading of our securities. Huntington's Investor Relations Disclosure Policy and Investor Relations Analyst Access Policy require that disclosure to be made in ways that provide analysts and investors with equal access to company information.



Audit Fees

Audit fees, audit-related fees, tax fees and all other fees are reported on page 63 of the 2017 Proxy Statement.



Reporting

Huntington's Code of Business Ethics insists on completeness and accuracy when preparing reports for our shareholders and prohibits unauthorized disclosure of financial, operational or business information through digital and mobile channels. Our Financial Code of Ethics for Chief Executive Officer and Senior Financial Officers guide those covered in making financial reports. Our Investor Relations Analyst Access Policy and Investor Relations Disclosure Policy further support these goals and procedures.



ESG Accountability

Huntington is committed to delivering sustainable, long-term value in financial, environmental, social and governance activities and has undertaken an initiative to formalize a structure by which it can publicly document activities using ESG reporting guidelines and metrics.

Acting Ethically, Always



Helga Houston
Chief Risk Officer

“At Huntington, we are committed to ‘Doing The Right Thing,’ and we know that our shareholders expect us to take well-managed risks. In doing so, we expect that each of our colleagues own the risk they take, Raise Their Hand about risks they see, and actively communicate across the organization. Strong risk management and a deeply-engrained risk culture are not just good corporate governance, but also the ‘Right Thing’ for all our stakeholders.”

All Huntington colleagues are required to undergo annual training in the Code of Business Conduct and Ethics and to pass an exam to demonstrate a thorough knowledge of the code. **Huntington also requires all suppliers to abide by our Code of Business Conduct and Ethics**, acting with the same high standards of honesty, fairness and integrity that is required of Huntington colleagues.

Huntington’s Financial Code of Ethics for Chief Executive Officer and Senior Financial Officers guide our chief executive officer, chief financial officer, corporate controller and principal accounting officer in making financial disclosures. It also holds the CEO and senior financial officers responsible for reporting material information that may affect disclosures, deficiencies in the design or operation of internal controls regarding financial data, conflicts of interest and violations of the code.





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. Employees are asked to acknowledge their understanding of this policy annually, and the General Counsel reports violations of the policy to the board annually.

Doing the right thing always also requires Huntington to deal with local, state and national governments with honesty and integrity. That is why Huntington employs registered lobbyists to advocate on behalf of the company, the business and various associated stakeholders; employees not authorized to lobby for Huntington are prohibited from doing so. Huntington reports on its federal lobbying as required by federal, state and local laws.

Huntington’s political action committees make political contributions exclusively with employee donations and **independently of corporate contributions**. The committees are overseen by a PAC steering committee and are administered by Government Relations department staff and managed in compliance with local, state and federal laws as well as Huntington’s mission, vision and values.

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.

-  [Ethical risk assessments.](#)
-  [Anti-Money Laundering Training](#)
-  [Workplace Safety Training](#)
-  [Compliance with tax laws and regulations](#)

Financial Transparency

Adherence to Federal Laws

Huntington supports and complies fully with the 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.

Huntington also complies with the requirements of the USA 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 records of the information used to verify their identity.
- ✓ Determine whether the customer appears on any list of suspected terrorists or terrorist organizations including promotion of transportation alternatives.

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.

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. Customers have the option to prevent certain disclosures to nonaffiliated third parties.

Empowering Colleagues

It's important that all Huntington colleagues follow all laws, codes and policies, and that they are able to ask questions and report violations freely. Huntington's open-door practice encourages employees to approach any member of management with ethical questions or concerns, without fear of retaliation. Employees may also call Huntington's 24-hour internal Ethics Line if they believe a Huntington colleague has engaged in unethical behavior. Huntington also gives colleagues various ways through the company intranet to make their concerns known to appropriate Risk Management personnel.

Huntington investigates all allegations of potential wrongdoing and, as appropriate, reports them to the board or relevant board committee, as well as to relevant authorities. Huntington makes every effort to protect the confidentiality of a person who provides information on the Ethics Line, although an information source may be disclosed to people with a business need to know. The board receives a report every quarter summarizing the activity on the Ethics hotline and the disposition of all reports.



Huntington's open-door practice encourages employees to approach any member of management with ethical questions or concerns, without fear of retaliation. Employees may call Huntington's 24-hour internal Ethics Line if they believe a Huntington employee has engaged in unethical behavior.

Ensuring Supplier Accountability

Suppliers must meet Huntington's high ethical standards, as well as follow all applicable state and federal laws, in order to continue doing business with the bank.

Suppliers are required 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.

Huntington's Chief Sourcing Officer leads the effort to ensure that all material and equipment suppliers adhere to the law and to Huntington's high ethical standards.



Additionally, suppliers:

- ✓ **Must 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.
- ✓ Must verify that representatives who work at Huntington facilities or have access to confidential business or customer information **have not been convicted of a crime.**
- ✓ **Must 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.
- ✓ **Are 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.
- ✓ **Must 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 risk assessments every year for high-risk suppliers and assessments every three years for moderate-risk suppliers. Huntington's Chief Sourcing Officer provides an annual third-party risk management report to the board's Operational Risk Committee, the Risk Management Committee and the Technology Committee.

ESG: Our Responsibility



Huntington is committed to delivering sustainable, long-term value in financial, environmental, social and governance activities. We have undertaken an initiative to formalize a structure by which we can publicly document our activities using ESG reporting guidelines and metrics. Huntington's ESG Strategic Plan is designed to advance our program substantially within three years.

Our Commitment to ESG

“Closely aligned to moral soundness in banking is commercial integrity in the community. The two walk together, and the highest plane of excellence can be attained in neither without the cooperation and support of the other.”



Pelatih Webster Huntington

Founder of Huntington Bank

P.W. Huntington, who in 1866 founded the bank that bears his name, espoused a philosophy that is carried on by his successors still today. “Closely aligned to moral soundness in banking is commercial integrity in the community,” Huntington said. “The two walk together, and the highest plane of excellence can be attained in neither without the cooperation and support of the other.”

This represents a responsibility by Huntington to the colleagues it employs, the customers it serves and the communities in which it operates. It means a living wage, opportunities for growth and a welcoming workplace for all. It means services that empower small businesses to create new jobs and families to fulfill their dreams. It means community investments that revitalize neighborhoods and transform the quality of life of its residents.

This is what P.W. Huntington believed 151 years ago, and it's what Huntington Bank strives toward today.



LOOKING AHEAD:

The future of ESG at Huntington:

While our dedication to global stewardship and a responsible growth strategy has always been central to delivering long-term value to the shareholders, colleagues, customers and communities we serve, the formalized reporting of our 150 year commitment to doing the right thing is newly focused by an effort to benchmark those values, setting bold goals to achieve the highest standards in global ESG performance.

We have **established an enterprise ESG strategy** integrated with our core performance objectives, **led by executive management, and a newly formed Corporate ESG Committee with accountability to the Board of Directors Nominating and Governance Committee.**

In 2017 we will advance **a three-year plan to mature our ESG core business model** setting progressive goals and developing policies toward our aspiration of becoming an industry leader and market shaping champion in utilizing ESG approaches and taking ESG factors into account as we manage risk and drive our business.

Progress toward our ESG goals and impacts will be published annually. We invite active engagement with all our partners toward achieving our shared vision of a sustainable planet and vibrant communities for generations.



Contact Huntington

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Environmental, Social and Governance Office

Corporate.Responsibility@huntington.com

Customer Service

1.800.480.BANK (2265)



Additional Information

About Us

Huntington.com/About-Us

[Annual Reports](#)
[Board of Directors](#)
[Code of Business Conduct/Ethics](#)
[Community Development Investment](#)
[Community Reinvestment Act](#)
[Corporate Governance Guidelines](#)
[Diversity & Inclusion](#)
[Executive Management](#)
[Financial Code of Ethics](#)
[Financial Education](#)
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[Presentations/Conference Calls](#)
[Proxy Statement](#)
[Recoupment/Clawback Policy](#)
[Regulatory Disclosures](#)

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HuntingtonBank



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Huntington National Bank



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