



Purpose-Driven. Always and All Ways.

2022 TCFD REPORT





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Message from Our Chairman, President & CEO and Lead Director

To make people's lives better, help businesses thrive, and strengthen the communities we serve: This is Huntington's Purpose, and it is embedded into all facets of our business strategy. We have many opportunities to positively impact the customers, communities, colleagues, and shareholders we are fortunate to serve.

Being responsible environmental stewards is one way we live out our Purpose. Huntington has consistently made investments to increase our sustainable operations, including cutting operational emissions, increasing renewable energy use, and reducing landfill waste. In 2022 alone, we undertook over 400 sustainability projects across our footprint, representing over \$14 million in investments. Work remains to improve our operational efficiency, and we are working to renew our commitments in these areas.

We proactively engage with our customers, while taking a balanced view, to understand how we can assist them in meeting their transition plans and goals. We have heard from our customers that, like us, they want to take actions to conserve energy, preserve natural resources, and strengthen communities. Such steps must balance the impacts rapid change can have on people and industries that depend on affordable, reliable energy and the attendant jobs provided.

Simultaneously, the Midwest is home to customers and companies investing in new and innovative technologies designed to lessen our collective impact on the environment, which will ultimately create jobs and new sources of affordable energy. We believe new industry growth represents a tremendous opportunity that will accelerate our ability to develop sustainable revenue streams, further enabling us to invest long term in our communities.

These realities explain why we are investing heavily in our Renewable Energy Finance (REF) group. REF is designed to assist customers at all points in their sustainability journey. Whether financing solar grids or battery storage opportunities or assisting customers with navigating the regulatory and tax environment to identify viable projects, Huntington's product and service offerings are designed to meet the modern needs of our customers. This intersection of sustainability and banking is one where we can amplify impact for the benefit of all stakeholders.

Likewise, we remain focused on ensuring appropriate governance in all facets of our business, including with respect to environmental matters. Our Nominating and ESG (NESG) Committee meets quarterly to guide and inform management strategy. Our Climate Risk



L-R: David L. Porteous, Stephen D. Steinour

Director and Chief ESG Officer, supported by a robust committee and working group structure, help leadership across Huntington identify and manage climate risk, understand sustainability opportunities, and hone strategies. Through strong governance and risk management practices, we can optimize outcomes for all stakeholders.

We invite you to learn more about Huntington's approach to these and many other topics in our 2022 Task Force on Climate-related Financial Disclosures (TCFD) Report. This report illustrates how we align to the TCFD framework, including our commitment to accountability and transparency. We believe progress occurs by setting ambitious goals and describing how we approach the risks and opportunities we face.

By supporting actions and initiatives outlined in this report, we intend to create long-term shareholder value and a sustainable future for all.

Stephen D. Steinour
Chairman, President,
and Chief Executive Officer

David L. Porteous
Lead Director,
Board of Directors

About This Report

This is Huntington's third year aligning with the TCFD recommendations, and this report should be reviewed as a companion piece to our [2022 Environmental, Social, and Governance \(ESG\) Report](#). Consistent with TCFD's recommendations, this report outlines our approach to managing climate-related risks and opportunities in the areas of Governance, Strategy, Risk Management, and Metrics and Targets. This report covers the period from January 1, 2022, to December 31, 2022, except where noted.

Our goal in preparing this report is to provide our stakeholders with greater transparency as well as our progress to date. We welcome your feedback at corporate.responsibility@huntington.com.

ALIGNMENT WITH UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS

As discussed in more detail in our ESG Report, we believe aspirationally aligning with the United Nations (UN) Sustainable Development Goals (SDGs) reflects our intention to demonstrate a conscious approach to impacting our stakeholders and the communities we serve.

With respect to environmental sustainability and climate change, we are focused on aligning with four SDGs: #3 Good Health and Well-Being, #10 Reduced Inequalities, #11 Sustainable Cities and Communities, and #13 Climate Action. From the environmental sustainability targets we have set to our efforts to promote environmental equity, we are committed to taking meaningful actions in support of these goals.

Huntington's climate change strategy is aligned with the following goals:



In addition, Huntington's overall ESG strategy is aligned with the following goals:



OUR LEGACY OF ENVIRONMENTAL SUSTAINABILITY AND CLIMATE ACTION

2010

Began reporting to CDP.

2017

Set first-ever environmental goals covering greenhouse gas (GHG) emissions, water consumption, landfill waste, and office paper printing.

Published our first ESG report.

2019

Developed mid-term (by 2027) and long-term (by 2037) GHG Scope 1 and Scope 2 emissions targets.

2021

Announced our Climate Risk Director and Environmental Strategy and Sustainability Director appointments.

Expanded Huntington's environmental strategy to analyze and understand the magnitude of value chain emissions (Scope 3).

Developed an exploratory net-zero roadmap.

2014

Financed our first renewable energy finance deal.

2018

Published our Environmental Policy Statement.

2020

Established a renewable energy use goal.

Published our Climate Risk Policy Statement.

2022

Achieved legacy Huntington 2017 environmental goals.

Began work to set new and revised 2022 environmental goals.

Completed initial calculation of Scope 3 financed emissions using the Partnership for Carbon Accounting Financials' (PCAF) standard methodology.



TCFD IMPLEMENTATION PLAN AND PROGRESS

Our focus on TCFD alignment enables us to manage climate-related risks more effectively while positioning us to meet customers where they are along their carbon transition journeys.

GOVERNANCE	STRATEGY	RISK MANAGEMENT	METRICS AND TARGETS
Accomplishments			
<ul style="list-style-type: none"> Published our Environmental Policy Statement (2018), Climate Risk Policy Statement (2020), and internal Climate Risk Policy (2022), establishing Board oversight of climate-related risks and opportunities. Initiated quarterly environmental and climate risk updates to the NESG Committee of the Board, Risk Oversight Committee of the Board, and/or the full Board (2020). Began providing quarterly climate risk updates to the Risk Management Committee (2020). 	<ul style="list-style-type: none"> Began financing renewable energy projects (2014). Established environmental sustainability goals (2017). Instituted a Climate Risk Working Group to develop a Climate Risk Framework (2020). Joined PCAF (2022). Completed initial calculation of Scope 3 financed emissions using PCAF's standard methodology (2022). Developed green lending definitional criteria (2022). 	<ul style="list-style-type: none"> Announced the Company's first Climate Risk Director (2021). Acquired comprehensive third-party climate analytics to address physical risk entity-level emissions and transition risk (2021). Conducted comparative physical risk vulnerability analysis for all Huntington and peer facilities (2022). Established dedicated Climate Risk team oversight program to build out our climate risk capabilities (2022). Established interim climate-related credit risk underwriting and analysis guidance (2022). 	<ul style="list-style-type: none"> Announced 2022 environmental sustainability goals (2017). Developed mid-term (by 2027) and long-term (by 2037) GHG Scope 1 and Scope 2 emissions targets (2019). Established a renewable energy goal to source 50% of our electricity from renewables by 2035 (2020). Implemented a detailed process to inventory, disclose, and verify Scope 1, Scope 2, and some relevant Scope 3 emissions categories (2017). Developed an exploratory net-zero roadmap (2021).
Current Focus			
<ul style="list-style-type: none"> Training the Board and management on environmental- and climate risk-related matters. Engaging with shareholders throughout the year. Participating in various environmental- and climate risk-related external working groups to learn and share best practices. Maintaining a leadership grade within CDP's scoring methodology. 	<ul style="list-style-type: none"> Enhancing supplier engagement on Scope 3 carbon emissions disclosure. Continuing to refine our financed emissions methodology. Continuing education for our Board and colleagues on climate-related risks and opportunities. Developing REF products to assist our customers' transition to a low-carbon economy. Operationalizing green lending definitional criteria. 	<ul style="list-style-type: none"> Running initial climate scenario analysis pilot for select portfolios under three Network for Greening the Financial System-equivalent scenarios. Operationalizing climate-related credit guidance in underwriting processes. Refining our Climate Risk Policy Statement. Continuing to refine our financed emissions methodology. 	<ul style="list-style-type: none"> Striving to achieve all environmental sustainability goals, including GHG emissions. Enhancing Scope 3 inventory process to ensure inclusion of all relevant value chain emission sources. Establishing historical Scope 3 financed emissions trends and targets based on 2021 and 2022 data. Establishing interim (2030) Scope 1 and Scope 2 emissions reduction targets and approach. Progressing against 2035 renewable energy goal.
Aspirational Objectives			
<ul style="list-style-type: none"> Further integrate environmental and climate risk data into Board oversight, and management and business unit decision-making. Engage shareholders to better understand, among other things, their environmental and climate expectations. 	<ul style="list-style-type: none"> Further integrate environmental- and climate-related opportunities into the Company's strategic plan. Develop climate-related finance product offerings. Optimize outcomes for communities through the Company's role in a just decarbonization transition. 	<ul style="list-style-type: none"> Establish historical emissions trends to inform future decisions. Develop end-to-end scenario analysis process incorporating internal credit models. Roll out climate risk training across the organization. Fully integrate climate risk assessment across underwriting and portfolio management processes. 	<ul style="list-style-type: none"> Calculate our carbon offset allowance and determine how to source high-quality credits. Integrate industry best practices into net-zero roadmap. Develop and refine long-term (2050) targets.

Governance

We believe strong corporate governance and transparent business practices are critical to Huntington's long-term success. Every day, we strive to operate as a disciplined, trustworthy, and ethically sound organization, and we are committed to continually enhancing our practices to ensure we create value for those we serve.

ENVIRONMENTAL POLICIES

We have clearly defined policies that drive our environmental stewardship initiatives:

- **Environmental Policy Statement:** Details our holistic commitment to protecting the environment, addressing climate change and climate risk, increasing sustainable procurement, and promoting transparency and accountability.
- **Climate Risk Statement:** Establishes our guiding principles and responsibilities for mitigating climate-related impacts.

In 2023, we made further refinements to our Climate Risk Statement to detail our approach to climate risk management, enhance our climate risk management framework, and reflect our balanced approach to engaging with and managing exposure to certain carbon-intensive industries.

In addition, our internal **Climate Risk Policy** establishes the guiding principles for climate risk management at Huntington, including roles and responsibilities across the three lines of defense (lines of business, centralized and independent credit risk and compliance

functions, and independent internal audit and credit review), governance structure, and cadence for reporting by the Climate Risk team to the Board.

Our environmental stewardship policies align with and support aspects of well-recognized and respected frameworks, such as the UN SDGs and the principles of the Paris Agreement. Additionally, we demonstrate our commitment to transparency through our disclosures to CDP and our reporting to the TCFD framework.

ENVIRONMENTAL GOVERNANCE

Our ESG program is overseen by the Board's NESG Committee, which works to ensure our ESG efforts are integrated into the strategic priorities of the Company. The Committee oversees Huntington's efforts and communicates our progress with stakeholders throughout the year, including through our annual ESG report. In addition, the NESG Committee and Risk Oversight Committee jointly review Huntington's Environmental Policy and Climate Risk Statements to help provide a fulsome perspective on how we manage climate- and sustainability-related risks and opportunities.

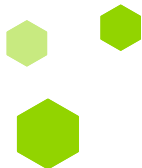
Our ESG framework ensures that the ESG considerations most important to our stakeholders are integrated into relevant Board committee agendas for discussion, awareness, and governance. This framework reflects our belief that environmental sustainability and climate change are serious issues that deserve a

proactive response and oversight from the highest level of our Company. Bank leadership regularly informs the Board of climate transition strategies and environmental sustainability initiatives through quarterly NESG Committee and Risk Oversight Committee updates.

Our Executive Leadership Team (ELT) is accountable for executing the ESG ambition approved by the Board, including establishing and delivering on short- and long-term performance goals made public in our annual ESG report.

The ELT is also responsible for executing our environmental performance management framework, which incorporates environmental governance, strategy, and operations grounded in the considerations most important to our stakeholders. The CEO and other members of the ELT provide strategic direction for our carbon footprint reduction and environmental programs, driving accountability throughout the organization.

Our General Counsel, Chief Technology & Operations Officer, and Chief Risk Officer, who all report directly to the CEO, are responsible for overseeing activities to reduce our climate-related impacts. Each leader provides guidance and oversight to their respective teams, who are directly responsible for measuring progress against our GHG emissions reduction targets, implementing initiatives to reduce our carbon footprint, evaluating climate-related risks and



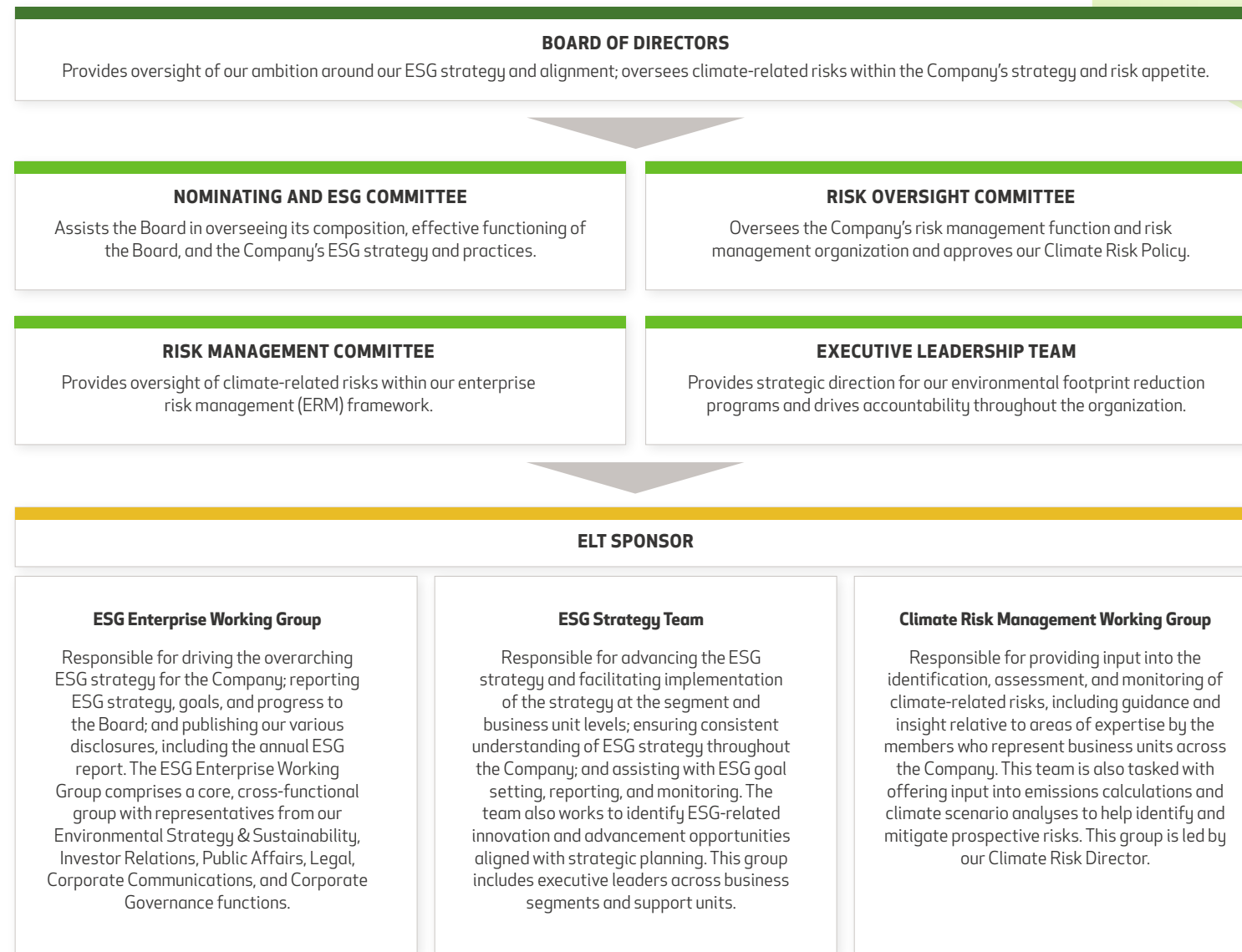
opportunities, and executing against our overall environmental strategy. In addition, the President of the Commercial Bank is integrally involved in helping to identify opportunities to expand our reach into new businesses and with new customers impacted by climate risk and sustainability trends.

Our Chief Risk Officer is responsible for providing regular updates on risk management issues, including climate-related risk, to the Board’s Risk Oversight Committee. In addition, our Chief Risk Officer leads our Global Risk Assessment Group, which is responsible for assessing the potential impacts of climate change, emerging threats, and broader trends related to climate risk and subsequent environmental issues.

Our Chief ESG Officer, who reports to our General Counsel, is responsible for the following aspects of environmental sustainability: general oversight, integration into corporate strategy, partnership with the Bank’s climate risk function, communication to internal and external stakeholders, integration into the Bank’s risk management structure, and providing quarterly updates to Huntington’s NESG committee.

Our Chief Procurement Officer is responsible for overseeing the acquisition of goods and services, with a focus on building relationships with providers who share our same commitment to the environment. The Chief Procurement Officer is also responsible for our supplier engagement program, which includes our Supplier Emissions Engagement Questionnaire, to help us better analyze and understand our Scope 3 supply chain emissions.

HUNTINGTON’S ENVIRONMENTAL GOVERNANCE STRUCTURE



Other key leaders and departments include the following:

- The **Corporate Real Estate and Facilities Director** is directly responsible for our operational GHG emissions reduction targets, reducing our carbon footprint, and energy reduction targets across Huntington's facilities.
- The **Environmental Strategy and Sustainability Director** is responsible for day-to-day execution of Huntington's environmental sustainability commitments and strategy. This includes work pertaining to decarbonization commitments, external disclosure preparation, partnering with business lines navigating climate-related challenges and opportunities, and serving as an industry thought leader on environmental sustainability topics.
- The **Director of Energy Management** is responsible for leading our operational carbon emissions reduction projects and meeting our energy efficiency goals.
- The **Climate Risk Director** is responsible for leading the Climate Risk Management Working Group, which is engaged in multiple workstreams to develop and implement capabilities to manage climate-related risks across business segments and risk pillars in alignment with Huntington's ERM framework.

- The **Director of Investment Management** oversees investment management, including integration of ESG strategies into portfolio management activities for interested customers.
- **Regional Facility Managers**, in conjunction with local facility managers, are responsible for the execution of energy reduction projects in their regions. 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.

Annual bonuses and merit increases are directly tied to the achievement and success of specific initiatives for the following roles:

- Chief ESG Officer
- Corporate Real Estate and Facilities Director
- Environmental Strategy and Sustainability Director
- Director of Energy Management
- Regional Facility Managers

In addition, colleagues across the Company are offered opportunities to be involved in Huntington's environmental efforts. For example, colleagues from multiple business units participate in climate risk management workstreams that are building out the Company's climate risk capabilities.

Our Green Team Business Resource Group (BRG) is comprised of a cross-functional group of colleagues tasked with generating, exchanging, and evaluating ideas to improve the Company's environmental performance. This team regularly collaborates with other Huntington BRGs and colleague groups to organize cleanup and volunteer events, with an emphasis on helping underserved communities. The team also promotes environmentally friendly practices through monthly sustainability education posts and assists colleagues in finding ways to reduce environmental impacts at work, at home, and throughout their communities.



Strategy

Huntington's focus on environmental stewardship reflects our commitment to protecting the planet, mitigating the effects of climate change, promoting biodiversity, reducing our reliance on natural resources, and addressing the environmental challenges faced by under-resourced communities. We know significant change and a comprehensive approach are required to meet these challenges on behalf of our stakeholders.

ENVIRONMENTAL AND CLIMATE STRATEGIES

Our path to a more sustainable future is guided by our environmental and climate strategies, which include embracing environmental stewardship, advancing our net-zero roadmap, transitioning to renewable sources of energy, improving our energy efficiency, and helping our customers achieve their environmental sustainability goals.

We believe climate change provides risks and opportunities for our business. We are acting strategically to integrate climate-related insights into our decision-making and to leverage these insights for our customers' benefit. We are actively developing our climate risk framework, capabilities, forecasts and scenario analyses, and expertise. Formalizing management practices, defining time frames, enhancing our data measurement capabilities, and strengthening our communications and training prepare us for anticipated shifts in the business environment.

The goal of our REF group is to be an industry leader in offering solutions that promote sustainable business and unlock opportunities for renewable energy alternatives. Among our commitments, we continue to focus on expanding our existing REF group and pursuing new opportunities for our financing products through our distributed energy resources and novel product research initiatives.

Through our REF offerings, we are leveraging our knowledge and financial expertise to actively explore the potential expansion of climate-related financing products to assist our customers in their decarbonization efforts, including by providing financing for renewable energy, electrical vehicle (EV) charging stations, micro-grid, and battery storage projects.

NET-ZERO ROADMAP

In past ESG reports, we have discussed our philosophy of "doing the right things in the right order," which is why we initially developed an exploratory net-zero roadmap outlining a potential approach and activities to achieve a net-zero carbon future. As we continue this journey, we are focused on advancing our long-term net-zero roadmap to drive meaningful impact by incorporating industry best practices, full Scope 3 emissions, and targets based on climate science. This fulsome view of our total emissions, inclusive of our TCF acquisition, supports robust discussion with the Board of Directors, executive management, and other senior leadership on our climate strategy.

In support of our strategy, we joined PCAF in 2022, a global collaboration of financial institutions focused on enabling a standard approach to assessments and disclosures of financed GHG emissions. Participation in this partnership enables a consistent framework to set targets, track progress, and disclose our financed emissions under a GHG accounting standard widely adopted by banks and other financial institutions.

Also in 2022, we completed an initial calculation of our 2021 financed emissions using PCAF's standard methodology—an important milestone as we advance our climate strategy and net-zero roadmap. Building on this initial calculation, we are refining our process to improve our data quality, with 2022 financed emissions anticipated to serve as the baseline for goal setting moving forward.

Net-Zero Roadmap

ESTABLISH BASELINE AND TARGETS	Consistent with attempts to limit global warming to 1.5° Celsius of preindustrial levels, set science-informed decarbonization targets for Scope 1, 2, and 3 emissions (including financed emissions).
ENERGY EFFICIENCY	Reduce energy consumption to lowest feasible level through energy efficiency, conservation, and innovation.
ELECTRIFICATION AND RENEWABLE ENERGY	Electrify buildings and fleet. Power all operations with 100% renewable energy.
PORTFOLIO MANAGEMENT DECISIONS	Reduce financed emissions by partnering with customers to provide innovative products and advice so they can proactively respond to climate risks and the transition to a low-carbon economy. Expand green industry portfolio.
ENERGY TRANSITION SERVICES	Support customers as they execute against their decarbonization strategies.
CARBON OFFSETS	Identify strategies to source high-quality, third-party-verified carbon offsets that comply with well-recognized best practices for residual emissions we are unable to abate.

Net-Zero Roadmap Deliverables

1

BOARD AND EXECUTIVE LEADERSHIP COMMITMENT AND SUPPORT

We have engaged our Board and executive management in the development of our net-zero roadmap, and we are committed to ensuring any future plans and deliverables have their full transparency and support. In addition, our governance will be informed by frameworks and protocols that we believe advance decarbonization goals pragmatically, enabling us to support our customers' energy and transition needs.

2

STRATEGIC INTEGRATION ACROSS ALL BUSINESS LINES

Successful decarbonization requires strategic thinking and buy-in. In working with our senior leadership, we are identifying potential challenges associated with decarbonization scenarios, learning about investments needed to support future business opportunities, and developing action plans designed to advance our efforts.

3

CLIMATE RISK INTEGRATION INTO UNDERWRITING AND CREDIT PRACTICES

While climate risks are well understood conceptually, we continue to invest in pinpointing portfolio- and industry-related risks, improving scenario analysis, capturing historical data, and integrating findings from these exercises into how we operate. How we bring climate risk into credit decisions represents the ongoing evolution of our approach.

4

METRICS AND TARGETS BASED ON CLIMATE SCIENCE

Targets based on climate science are cornerstones of our roadmap. Our full TCFD report contains our newly established climate targets that align with well-respected frameworks. These will serve as the foundation for future decarbonization efforts, and all future plans will be supported by targets informed by climate science.

Membership with PCAF Drives Reporting Accountability

In 2022, Huntington became a member of PCAF. Our alignment with PCAF provides a consistent framework through which to set emissions targets, track progress, and disclose our financed emissions through a common GHG accounting standard.

Developing a financed emissions calculation process is time intensive. The PCAF methodology encompasses six major asset classes—one of which is motor vehicle finance. The consumer auto portfolio, which represented approximately 10.8% of the Company's total outstanding loans and leases at the end of 2022, was the first bank product segment we assessed because it is well defined and relatively homogenous and is backed by high-quality internal data that are relevant to accurately tracking emissions. We are proud to reach this milestone and continue to work on the remaining portfolios covered by the PCAF methodology as we further our efforts to operate transparently.

MANAGING CLIMATE RISKS

Our approach to identifying, assessing, and responding to climate-related risks is integrated into our multidisciplinary, companywide risk management process (read more in [Risk Management](#)). On a periodic basis, we assess our operations to evaluate our risk exposure and ensure that we continue to conduct business within our defined risk tolerances and an aggregate moderate-to-low, through-the-cycle risk appetite. We believe risk management is a process of continuous improvement, and we are committed to doing our due diligence to consider environmental impacts.

For climate risk management purposes, Huntington defines short-, medium-, and long-term risks as follows:

	FROM (YEARS)	TO (YEARS)	PLANNING HORIZON
Short-term	1	2	Operating
Medium-term	2	5	Strategic
Long-term	5	10	Scenario



Types of risk considered in our climate risk assessments include:

RISK TYPE	DESCRIPTION	RISK MANAGEMENT
Current regulation	Risk of current laws or regulations that increase the cost of doing business or affect an entire sector, industry, or market.	We are subject to extensive regulation, supervision, and examination. Knowledge of current regulations, including climate-related regulations, helps us remain compliant and competitive. We have a regulatory change management team that orchestrates new regulation review, and any material changes are considered for potential inclusion in our quarterly risk assessments as top or emerging risks.
Emerging regulation	Risk of potential laws or regulations that could increase the cost of doing business or affect an entire sector, industry, or market.	We are subject to extensive regulation, supervision, and examination. Knowledge of emerging regulations, including climate-related regulations, helps us remain compliant and competitive. For example, we are monitoring the proposed SEC climate-related disclosure rule. This proposed move to a mandated disclosure scheme presents a risk to Huntington as it may require conformity to new standards and methodologies that are not currently in place at Huntington.
Technology	Risk of falling behind in adopting emerging technologies to reduce climate risk and support environmental sustainability.	As energy costs continue to rise across the country, Huntington is continually evaluating emerging technologies that could reduce utility spend and hedge against rising costs. As part of our environmental and climate strategies, Huntington must stay abreast of emerging technologies to effectively plan for and execute electrification in our facilities and fleet vehicles as we execute our net-zero roadmap.
Legal	Risk associated with the possibility of reputational or financial loss as a result of legal issues.	Huntington's risk management program includes consideration of legal contracts that govern third parties, including technology service providers and vendors. Huntington performs annual risk assessments for high-risk suppliers and assessments every three years for moderate-risk suppliers. This risk management program helps mitigate losses and minimize the risks associated with regulatory or governmental scrutiny, civil money penalties, and reputational damage.
Market	Risk of financial losses caused by movement in market prices.	We perform regular portfolio analysis for certain environmental risks that may occur across multiple risk types, products, and business units. We have established credit risk concentration metrics and limits for a variety of exposures, including the energy portfolio, to minimize risk-taking and to help ensure appropriate portfolio diversification. We use quantitative methods, such as economic capital measurement and other models, to capture and analyze credit concentration risks and understand the potential impacts of varied economic environments by sector and the portfolio.
Reputation	Risk of potential negative stakeholder opinion or negative publicity impacting the Company's performance and success.	Reputational risks are evaluated as a part of our broader ERM program. We believe a strong risk culture can be a competitive advantage in ensuring our colleagues "do the right thing" for our stakeholders and the environment. Environmental and climate stewardship have become increasingly important to our stakeholders, including investors, customers, colleagues, and recruits.
Acute physical	Risk that is event-driven, including increased severity of extreme weather events, such as cyclones, hurricanes, heat or cold waves, or floods.	Acute physical risks are among the considerations associated with assessing risk in our lending portfolios and are considered a relevant operational risk. They are also included in our Business Continuity Plan, Corporate Crisis Management Program, and Regional Response Plans. Our risk and control self-assessment process can be used, as applicable, to call out or otherwise escalate extreme weather-related events, such as floods, blizzards, and droughts.
Chronic physical	Risk associated with long-term events, including increased severity of extreme weather events over time.	Chronic physical risks are among the considerations associated with assessing risk in our lending portfolios and are considered a relevant operational risk. They are also included in our Business Continuity Plan, Corporate Crisis Management Program, and Regional Response Plans.

CLIMATE-RELATED RISK EXAMPLES

RISK TYPE	DESCRIPTION
Short-Term: Monitoring Emerging Costs (Transition Risk)	Numerous factors are likely to influence near-term energy costs, including potential changes to taxes, legislation and regulation, and rate structures. We aim to mitigate unexpected increases by monitoring the energy procurement market to ensure we are doing our due diligence with energy contracts. We also actively explore ways to mitigate peak electricity demand at our facilities by studying the feasibility of on-site generation and other peak shaving methods for energy consumption, such as battery energy storage systems. These installations would help mitigate the risk associated with high and potentially rising utility demand charges by utilizing the on-site photovoltaic system to reduce peak demand at these buildings.
Short-Term: Evaluating Our Energy Efficiency Strategy (Transition Risk)	Huntington continually assesses options to install LED lighting and high-efficiency HVAC systems in our office and branch locations to manage energy costs and improve our environmental performance. We recognize that the incentives associated with these options help make the business case for these investments. Depreciation of existing equipment also plays a significant role in deciding what projects Huntington pursues. In 2022, we completed 103 interior and exterior LED lighting projects while also incorporating daylight harvesting controls.
Short-Term: Emerging Regulation (Transition Risk)	The proposed move to a mandated disclosure scheme presents a risk to Huntington as it may require conformity to new SEC standards and methodologies that are not currently in place at Huntington. Huntington will continually monitor this rule proposal to prepare for compliance with a future mandated disclosure. We have a regulatory change management team that orchestrates new regulation review. Huntington has already begun to assess the cost of compliance via third-party auditors by reviewing potential required methodologies and frameworks internally.

LEVERAGING CLIMATE-RELATED OPPORTUNITIES

Since our founding, Huntington has been committed to providing banking solutions that empower our customers. Huntington has helped finance energy efficiency and renewable energy projects across the U.S. for more than a decade. In recent years, we have expanded these services to a broader array of REF solutions to help meet the evolving needs of those we serve.

As awareness of climate change and the need to decarbonize grows, we continue to build our REF offerings as we work to expand our customer base to include stakeholders pursuing an increasingly wider array of environmental sustainability projects.

This includes helping fund and support sustainable projects for both independent power producers and corporate entities.

In 2022, we took the next step in maturing our REF offerings by formalizing a new strategy to guide our practice. We also unified our REF capabilities and personnel across our organization under one team. This integration helps to provide a competitive advantage by allowing closer collaboration, better synchronization of services, and organizational alignment—all of which enable us to provide more comprehensive and customer-centric services.

Physical Risk and Our Response

Rising global temperatures mean an increasing intensity of precipitation events, especially in tropical and high-latitude areas. These events are linked with extreme storms such as hurricanes and blizzards, which can shut down cities and cause states of emergency. In conjunction, changes in precipitation patterns that result in extreme rain or drought, especially in the Southwest and mid-continental areas in the U.S., can result in flooding that threatens our facilities in urban areas.

Severe weather events and the disruptions associated with them present the potential risk of physical damage to Huntington's facilities and impact our colleagues' work schedules and health. The damage to locations and/or the inability to staff locations may result in increased operational costs. If locations cannot be opened, this may pose a potential impact to Huntington's customers. Huntington manages this risk through our Business Continuity Plan, Corporate Crisis Management Program, and Regional Response Plans. Our Business Continuity Program is aligned with our risk management process and is designed to support ongoing contingency planning to evaluate the impact of events that may adversely affect customers, assets, or colleagues. The Regional Response Plans were developed for each of the 16 regions used for Business Continuity Planning and provide specific steps to mitigate impacts resulting from extreme weather events such as flooding, tornadoes, and blizzards.

Renewable Energy Finance

Our REF group provides customized solutions for businesses innovating in the green technology market. This arm positions Huntington to grow assets, diversify investments, and monetize tax benefits through our specialized offerings:

- **Energy Efficiency Contracting:** Energy efficiency performance contracts that provide customers with the ability to finance and implement energy efficiency measures in their homes and businesses; and
- **Renewable Energy Project Financing:** Construction loans, tax equity bridge loans, term loans, and sale and leasebacks to finance renewable energy projects owned by a third party, such as a commercial entity, utility, or government entity.

The REF group targets long-term relationships with strong renewable energy sponsors. These entities develop, construct, operate, and maintain renewable energy facilities and sell the output to investment-grade off-takers under long-term, fixed-rate power purchase agreements.

In 2022, we made notable strides in strengthening our REF group with the hiring of a dedicated senior credit officer. This position will deliver credit discipline alongside our renewable energy expertise, strengthening our ability to help customers design, implement, and successfully fund impactful projects. This expertise helps achieve a smoother application and approval process, better project performance, and overall increased customer satisfaction.

Distributed Energy Resources

Huntington is committed to expanding our distributed energy resources financing and services, including for EV charging port, micro-grid, hydrogen power, and battery storage projects. We realize the viability of such projects is often influenced by state-specific regulations and tax incentives, as well as macroeconomic conditions such as supply chain availability. We continue to assess the market with consideration of these issues to identify where we can support customers with risk-appropriate energy transition banking solutions in the most impactful ways.

\$843 million

in green financing in 2022

A Spotlight on Our Relationships

Huntington's commitment to improving the environment is reflected in the long-term relationships we have formed with businesses and sponsors that develop, operate, and maintain renewable energy facilities.

In 2022, our REF team provided financing for 14 renewable energy projects with a total capacity of 1,685 MW.

A few highlights include:

- A \$215 million sale and leaseback financing commitment for a 105 MW solar facility;
- A \$150 million sale and leaseback financing commitment for fuel cells for an international financial services group;
- A \$120 million sale and leaseback financing commitment for solar projects for a utility company;
- A \$71 million term loan financing commitment for a solar portfolio; and
- A \$40 million corporate revolving financing commitment for a renewable energy sponsor.

Risk Management

We believe climate change provides risks and opportunities for our business. We are acting strategically to integrate climate-related insights into our decision-making and striving to help our customers do the same. Based on guidance provided by the TCFD framework, Huntington has taken steps to formalize our climate risk management practices and integrate them into our robust ERM program.

Key components of our ERM program include:

- Our Board-level committee framework includes separate and distinct Audit and Risk Oversight Committees. Members of 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.
- We utilize three lines of defense to identify, measure, monitor, control, and report the risks we have or will assume.
- All colleagues are responsible for the identification and ownership of risk as we embrace the philosophy that "everyone owns risk."
- Compensation practices are aligned to our strategic objectives with appropriate risk balancing mechanisms.
- We strive to be fully compliant with all laws and regulations and build processes and controls to promptly identify and correct potential issues.

- We continue to invest in control environments, risk data aggregation, and risk reporting.
- We diligently review third-party vendors and associated risks.
- We maintain a well-developed Business Continuity Plan to support operation in a business-as-usual manner during unexpected natural disasters.

CLIMATE RISK MANAGEMENT FRAMEWORK

Our Climate Risk Management Framework is embedded within our ERM structure. Our formal Climate Risk Program includes ongoing assessment of our seven risk pillars detailed in our 2022 ESG Report. While climate-related risk issues have been an ongoing consideration for Huntington, our formal Climate Risk Program provides a structured approach to consistently identify, assess, manage, and report climate-related risks and their impact across the enterprise.

Building on our progress, in 2022, we continued to focus on data, putting dedicated resources in place, and business unit engagement.

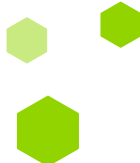
Our seven workstreams are focused on addressing our most critical climate risk-related priorities and supporting the buildout of Huntington's climate risk capabilities. The workstreams are led by colleagues from business segments across the organization with support from the Climate Risk team. These include:

Data and Measurement: The Data and Measurement workstream is establishing data sets and estimation methodologies relating to both transition risk and physical risk categories, which will be used for multiple purposes. These include portfolio measurement of financed emissions, inputs for scenario analysis, development of risk tolerances and metrics, data gap identification and prioritization, PCAF alignment exercises, and other risk measurement and monitoring processes.

Scenario Analysis: This workstream is developing a methodology for scenario analysis using the Network for Greening the Financial System (NGFS) scenarios as a starting point. We will use this output to gain a greater understanding of our credit risk financial impacts. In conjunction with scenario analyses, the Company generated initial carbon-earnings-at-risk information for select public companies within Huntington's credit portfolio.



Learn more about Huntington's ERM program in our [2022 ESG Report](#).



Credit Policy and Procedure Development: The Credit Policy and Procedure Development workstream is developing climate-related credit risk policies, procedures, and guidance to assist in consideration of climate-related risks across the credit life cycle. Initial efforts include consideration of climate-related credit decisioning tools and scorecards to identify credits that merit additional climate due diligence.

Governance: This workstream is engaged in review of regulatory guidance, development of policy controls, and other activities relating to the integration of climate considerations into the Company's risk frameworks and governance structures.

Risk Processes and Metrics: The Risk Processes and Metrics workstream has developed a climate risk taxonomy. Work is ongoing to embed climate considerations into existing risk assessments and risk processes across every risk pillar and business unit.

Disclosure and Reporting: This workstream is establishing processes for integrating climate risk disclosures into existing financial reporting processes to prepare for the SEC's proposed climate risk disclosure requirements.

Communications and Training: This workstream is developing enterprise-level climate risk training modules and more specialized training programs for bankers and other colleagues. This workstream will also leverage internal and external communication strategies with regard to climate risk.

CLIMATE-RELATED SCENARIO ANALYSIS

Huntington uses climate-related scenario analysis to assess the potential impact of climate-related risk drivers on our risk profile. To date, we have conducted a qualitative scenario analysis, with plans to add quantitative analysis within the next two years.

While we are still in the process of refining our approach to scenario analysis, initial focal questions included:

- What geographical areas are more susceptible to climate-related physical risks over the short-, medium-, and long-term?
- What industry sectors are more susceptible to climate-related transition risks over the short, medium, and long term?
- What is the degree of data variation across model providers?
- Is there a view alignment on selected samples of portfolio items between model providers and Huntington?

Climate-Related Credit Decisioning Guidance

To reduce Huntington's climate-related risks and help our customers do the same, we are developing tools to identify potential physical risks and transition risks in the credit decisioning process. Huntington is continuously working to understand and project trends relating to carbon-intensive sector exposures. We are disclosing the total emissions from our vehicle finance portfolio, which represented approximately 10.8% of the Company's total outstanding loans and leases at the end of 2022. In addition, preliminary calculations of financed emissions for all PCAF asset classes have been completed.

We are currently developing and operationalizing our climate-related credit risk underwriting policy, as well as expanding and enhancing our review procedures to facilitate a more comprehensive assessment of climate-related credit risk across all our portfolios.

CLIMATE-RELATED SCENARIO ANALYSIS CONSIDERED

CLIMATE-RELATED SCENARIO	SCENARIO ANALYSIS COVERAGE	TEMPERATURE ALIGNMENT OF SCENARIO	PARAMETERS, ASSUMPTIONS, ANALYTICAL CHOICES
Physical climate scenarios	Companywide	4.1°C and above	High Climate Change Scenario: Continuation of business as usual with emissions at current rates. This scenario is expected to result in warming in excess of 4°C by 2100.
Physical climate scenarios Customized publicly available physical scenario	Companywide	2.1°C – 3°C	Moderate Climate Change Scenario: Strong mitigation actions to reduce emissions to half of current levels by 2080. This scenario is more likely than not to result in warming in excess of 2°C by 2100.
Physical climate scenarios Customized publicly available physical scenario	Companywide	1.6°C – 2°C	Low Climate Change Scenario: Aggressive mitigation actions to halve emissions by 2050. This scenario is likely to result in warming of less than 2°C by 2100.
Transition scenarios NGFS scenarios framework	Portfolio		<p>High Carbon Price Scenario: This scenario represents the implementation of policies that are considered sufficient to reduce GHG emissions in line with the goal of limiting climate change to 2°C above preindustrial levels by 2100. This scenario is based on research by the Organisation for Economic Co-operation and Development (OECD) and the International Energy Agency (IEA).</p> <p>Medium Carbon Price Scenario: This scenario assumes that policies will be implemented to reduce GHG emissions and limit climate change to 2°C in the long term, but with action delayed in the short term. This scenario draws on research by OECD and IEA along with assessments of the sufficiency of country Nationally Determined Contributions by Climate Action Tracker by Ecofys, Climate Analytics and New Climate Team (2017). Countries with Nationally Determined Contributions that are not aligned to the 2°C goal in the short term are assumed to increase their climate mitigation efforts in the medium and long term.</p> <p>Low Carbon Price Scenario: This scenario represents the full implementation of country Nationally Determined Contributions under the Paris Agreement, based on research by OECD and IEA.</p>

Based on this initial assessment, we found that the majority of Huntington’s Midwestern footprint locations are less vulnerable to physical climate risk than other locations within the U.S. Furthermore, none of our critical infrastructure is in high-risk areas.

Limitations identified in the existing scenario-analysis input data informed our strategy and decision to acquire next-generation data. We have successfully onboarded next-generation physical risk data and are actively engaged with multiple vendors in the transition risk space.

Relative to other banks, we have fewer branches in high-risk locations—**1% compared with 10% for other banks.**

Metrics and Targets

ENVIRONMENTAL SUSTAINABILITY GOALS AND PERFORMANCE

Since 2017, Huntington has been steadfast in charting our environmental performance to measure our progress. We have made a determined effort to develop our environmental and climate action roadmap, and we have accelerated our efforts to improve our energy efficiency, transition to renewable energy, expand our EV charging infrastructure, and reduce our emissions.

Completing Our 2022 Environmental Sustainability Goals

In 2022, we achieved our first-ever environmental goals set in 2017—a significant milestone in our environmental responsibility journey. As discussed in our 2021 ESG Report, we began integrating environmental data from our TCF acquisition in mid-June 2021, which impacted our ability to meet our previously defined 2022 goals. However, our 2022 legacy Huntington performance demonstrates our achievement of all three 2022 goals against our 2017 legacy Huntington baseline.

Below we have included data corresponding with both performance of the total Company and performance of legacy Huntington to help our stakeholders understand our environmental journey and to demonstrate our transparency in reporting.

INDICATOR	TARGET	TARGET YEAR	2022 TOTAL COMPANY	2022 LEGACY HUNTINGTON
Water Consumption ¹	15% reduction	2022	18% increase	30% reduction
Landfill Waste ¹	25% reduction	2022	10% reduction	53% reduction
Office Paper Printing ^{1,2}	25% reduction	2022	43% reduction	43% reduction

¹ Compared with a 2017 baseline based on legacy Huntington.

² Paper printing data does not include TCF data as Project Papercut is not yet offered at these locations.

Greenhouse Gas Emissions Reduction Goals

The below table outlines our progress against our mid- and long-term GHG emissions reduction goals. Having made substantial progress on these goals for legacy Huntington, we are modifying our goals in 2023 to a single goal of realizing 35% GHG emissions (Scope 1 and Scope 2 location-based) reduction by 2030 across the entire Company, including updating our target years to reflect our progress to date.

INDICATOR	TARGET	TARGET YEAR	2022 TOTAL COMPANY	2022 LEGACY HUNTINGTON
GHG Emissions (Scope 1 & Scope 2 location-based) ¹	31% reduction	2027	22% reduction	43% reduction
	41% reduction	2037	22% reduction	43% reduction

Our Environmental Sustainability Goals

In 2023, with input from the Board of Directors, executive leadership, and other engaged stakeholders, we built on the progress of our inaugural goals by defining a new set of goals focused on reducing our emissions, mitigating our energy use, adopting renewable energy alternatives, and lowering our water consumption. We built our goals with an understanding of the most up-to-date climate science to make a meaningful impact.

INDICATOR	TARGET	TARGET YEAR	2022 TOTAL COMPANY PERFORMANCE
GHG Emissions (Scope 1 & Scope 2 location-based)	35% reduction	2030	n/a - 2022 baseline year
GHG Emissions (Scope 2 market-based)	50% reduction	2035	n/a - 2022 baseline year
Water Consumption	15% reduction	2030	n/a - 2022 baseline year
Landfill Waste	25% reduction	2030	n/a - 2022 baseline year
Renewable Energy	50% of electricity usage	2035	1% of electricity usage

ENVIRONMENTAL PERFORMANCE SUMMARY

The following table shows Huntington's historical progress against our environmental goals through specific emissions, usage, and consumption measurements.

	2017 (baseline)	2018	2019	2020	2021	2022 TOTAL COMPANY	2022 LEGACY HUNTINGTON
Scope 1 - Direct Emissions (MT CO ₂ e) ^{1,2}	14,341	13,828	13,686	11,964	12,328	17,895	12,033
Scope 2 - Indirect Emissions (MT CO ₂ e) ^{1,2}	77,722	73,172	60,727	48,237	47,838	54,345	40,133
Building Energy Consumption (MWh) ¹	219,601	255,869	192,127	162,339	168,417	202,709	142,510
Renewable Energy (MWh) ³	n/a	n/a	n/a	1,331	1,197	1,220	1,220
Water Consumption (gallons) ¹	109,429,769	105,326,152	99,539,001	94,100,000	122,195,984	129,462,000	76,323,000
Office Paper Printing (total pages printed) ⁴	129,886,686	124,601,643	107,848,939	66,720,241	66,909,004	74,669,245	74,669,245

¹ At least four to five months of 2021 TCF data (depending on utility vendor for each location) and 12 months of 2022 TCF data are included in Scope 1 and Scope 2 GHG emissions, energy, water, and landfill waste data.

² From 2020 to 2021, the eGrid emissions factors (which were used for Huntington's 2022 GHG inventory) increased. The U.S. overall saw an increase of 4.2% in emissions intensity between the two years. This is primarily due to an increase of 2.6% for coal as a percent of the resource mix for the grid. Wind and solar had an increase as well, but each less than 1%. Natural gas had a 2.1% decrease. For Huntington, this impact led to an increase of 2,865 MT CO₂e (approximately 5%) for 2022 Scope 2 location-based emissions.

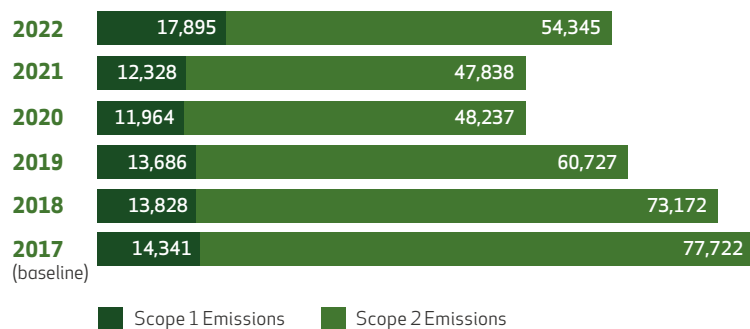
³ Solar array data collection began in 2020.

⁴ Paper printing data does not include TCF data as Project Papercut is not yet offered at these locations.

GREENHOUSE GAS EMISSIONS PERFORMANCE

Understanding our GHG emissions profile allows us to track and project progress against our long-term GHG emissions reduction goals. We report on our Scope 1, Scope 2, and some relevant supply chain Scope 3 emissions. We also receive third-party assurance of our GHG emissions data to ensure it is materially correct.

Scope 1 and Scope 2 Emissions (MT CO₂e)¹



¹At least four to five months of TCF data (depending on utility vendor for each location) are included in 2021 Scope 1 and Scope 2 GHG emissions, and 12 months of TCF data are included in 2022 Scope 1 and Scope 2 GHG emissions.

²We continue to make far-reaching progress to enhance and refine our understanding of our Scope 3 emissions data, which is why our reported Scope 3 emissions increased significantly over the last three years. Read more about our efforts under Engagement Drives Robust Disclosures.

³2021 data did not receive third-party assurance and was not included in the 2021 ESG Report.

Defining Our GHG Emissions

Scope 1 Emissions: Includes direct emissions from heating, cooling, owned aircraft, and owned corporate fleet. Huntington's reported Scope 1 categories include building natural gas and fuel from owned aircraft and corporate fleet.

Scope 2 Emissions: Includes indirect emissions from electricity, heating, and cooling. Huntington's reported Scope 2 categories include purchased electricity, chilled water, and steam.

Scope 3 Emissions: Includes other indirect emissions. Huntington's reported Scope 3 categories include purchased goods and services, capital goods (e.g., office furniture & carpet), fuel- and energy-related activities (e.g., transmission losses), upstream transportation (e.g., armored transportation mileage), waste generation, business travel (e.g., hotel, air travel, and rental cars), and upstream leased assets (e.g., leased office spaces). Financed emissions are also considered Scope 3 emissions; Huntington has calculated the financed emissions related to its auto book. Calculation methodologies for additional sources of financed emissions are in development.

Scope 3 Emissions (MT CO₂e)²

SCOPE 3 EMISSIONS	2017	2018	2019	2020	2021	2022
Category 1: Purchased goods and services	269	2,204	3,210	68,195	75,171	213,169
Category 2: Capital goods	637	4,846	279	246	4,678	3,186
Category 3: Fuel- and energy-related activities	n/a	n/a	n/a	n/a	n/a	15,343
Category 4: Upstream transportation and distribution	1,821	1,220	1,451	1,824	6,459	6,700
Category 5: Waste generated in operations	n/a	1,253	1,111	835	1,187	1,602
Category 6: Business travel	2,622	941	4,698	1,065	2,289	8,192
Category 7: Employee commuting	n/a	n/a	19	n/a	n/a	20,400
Category 8: Upstream leased assets	n/a	n/a	n/a	10,907	22,954	22,007
Category 15: Financed emissions – Auto Book ³	n/a	n/a	n/a	n/a	1,879,572	1,566,563
Total	5,349	10,464	10,768	83,072	1,992,310	1,857,162

Engagement Drives Robust Disclosures

We are committed to providing our stakeholders with robust, transparent disclosures and take a continuous improvement approach to our ESG reporting. Each year, we enhance and refine our understanding of our Scope 3 emissions data, including increased engagement with suppliers to obtain more complete data. We also used an estimation tool to gain a better understanding of employee commuting emissions. We continue to make

far-reaching progress on this effort, which is why our reported Scope 3 emissions increased significantly over the last three years.

In addition, for the 2022 reporting period, our Scope 1, 2, and 3 emissions, including our auto book financed emissions, received third-party assurance using the ISO14064-3 standard. For more information, view our [2022 GHG Verification Report](#).

Next Steps

As we continue our journey to manage our climate-related risks and opportunities, we are focused on the following objectives:

GOVERNANCE

We aim to further create awareness and educate our colleagues and stakeholders on our ongoing environmental sustainability and climate risk efforts. This includes integrating environmental and climate risk data into Board oversight and management and business unit decision-making. In alignment with our Purpose, we will also engage our shareholders to better understand, among other things, their environmental and climate expectations.

STRATEGY

We intend to further integrate environmental- and climate-related opportunities into the Company's strategic plan. This includes developing climate-related finance product and service offerings. To deliver on our commitment to environmental equity and justice, we plan to develop and enhance processes to consider the community impact of climate and sustainability decisions.

RISK MANAGEMENT

To further understand our climate-related risks, we plan to establish historical emissions trends to inform future decisions and develop an end-to-end scenario analysis process incorporating internal credit models. We intend to engage our colleagues by rolling out climate risk training across the organization and fully integrating climate risk assessment across underwriting and portfolio management processes.

METRICS AND TARGETS

Building on our first-ever environmental sustainability goals and current targets, we have established new interim targets to continue our progress and will identify metrics that correspond to key deliverables in our net-zero roadmap.



ADDITIONAL INFORMATION

[2022 ESG Report](#)

[Environmental Policy Statement](#)

[2022 Annual Report](#)

[Climate Risk Statement](#)

[2023 Proxy Statement](#)



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This TCFD Report should be read in conjunction with our current ESG Report, Annual Report, and Proxy Statement, all of which contain additional information about our Company. This TCFD Report uses certain terms, including those that the TCFD refer to as "material," to reflect the issues or priorities of us and our stakeholders. Used in this context, however, these terms are distinct from, and should not be confused with, the terms "material" and "materiality," as defined by or construed in accordance with securities or other laws or as used in the context of financial statements and reporting. Furthermore, any forward-looking statements contained in this TCFD Report should not be unduly relied upon, as actual results could differ materially from expectations. For more information about such statements, please refer to the "Forward-Looking Statements" and "Risk Factors" sections of our latest Form 10-K, as updated or supplemented by our subsequent filings with the Securities and Exchange Commission ("SEC"), which are on file with the SEC and available in the "Investor Relations" section of our website, <http://www.huntington.com>, under the heading "Regulatory and SEC Filings."



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