

**California’s Voluntary Carbon Market Disclosures
Business Regulation Act (AB 1305) (“VCMDBA”) Disclosure**

A business entity that operates within California and makes claims as described in Section 44475.2 of the VCMDBA is required to disclose on its website information regarding those claims.¹ Because it is possible that the VCMDBA may be construed to apply to Huntington Bancshares Incorporated (“Huntington”), Huntington is making the disclosure required by Section 44475.2 of the VCMDBA.

Since 2017, Huntington has published goals related to the reduction of its Scope 1 and Scope 2 carbon emissions. The table below identifies the requirements of California’s laws and details regarding Huntington’s carbon dioxide and greenhouse gas emissions reductions practices. The disclosures below apply to Huntington and its subsidiaries.

AB 1305 Disclosure Requirements	Huntington Disclosure
<p>44475.2(a): All information documenting how, if at all, a “carbon neutral,” “net zero emission,” or other similar claim was determined to be accurate or actually accomplished, and how interim progress toward that goal is being measured. This information may include, but not be limited to, disclosure of independent third-party verification of all of the entity’s greenhouse gas emissions, identification of the entity’s science-based targets for its emissions reduction pathway, and disclosure of the relevant sector methodology and third-party verification used for the entity’s science-based targets and emissions reduction pathway.</p>	<p>Huntington engages Energent Solutions (“Energent”), an independent third-party engineering firm, to perform verification on its emissions data. Energent is a Professional Engineer registered in the state of Ohio and a Certified Energy Manager licensed through the Association of Energy Engineers. Energent verifies that Huntington’s emissions reporting complies with <i>ISO 14064-3: Greenhouse gases—Part 3</i> standards. Energent also verifies that Huntington’s emissions reporting complies with <i>the GHG Protocol Scope 2 Guidance, 2015</i>.</p> <p>Energent verifies the following information regarding carbon emissions on which Huntington makes a reduction claim:</p> <ul style="list-style-type: none"> • Energy use information for all fuel sources that comprise the Scope 1 and Scope 2 emission categories. Scope 1 emissions include the use of natural gas and fuel oil as well as fuel for our owned corporate fleet and owned corporate jet. Scope 2 emissions include indirect emissions associated with the purchase of

¹ It should be noted that the VCMDBA does define the concepts of “operating within” or “making claims within”.

electricity, steam, and chilled water for our facilities.

- The conversion of energy use information from relevant usage measurements, as applicable, into metric tons of carbon dioxide equivalent (commonly expressed using the abbreviation MT CO₂e).

Verified energy use information comes directly from Huntington facilities, owned fleet vehicles, and the owned corporate jet. For facility energy use, Energent relies on actual utility bills provided by Huntington's utility bill pay third provider to sample consumption thresholds in accordance with the verification standards. Fuel data from Huntington's owned fleet vehicles and owned corporate jet is provided by the associated vendors. Huntington may publish market- or location-based emissions calculations, and Energent verifies both approaches. Huntington can then measure year-over-year reductions in Scope 1 and Scope 2 emissions from published baselines, which form the basis of its public performance goals.

Huntington publishes actual emissions in MT CO₂e as well as performance goals compared to published baselines. Huntington compares current year performance against the established emissions baseline to evaluate interim performance. Current year and baseline emissions data would be validated by Energent.

Performance goals are calculated directly from Energent-verified emissions data. As a result, Huntington calculates its Scope 1 and Scope 2 performance goals, usually expressed as a percentage increase or decrease in emissions from an established baseline, without reliance on Energent. Performance goals may be interim, long-term, or ad hoc.

	<p>Huntington may publish ad-hoc performance goals to account for significant events, such as a merger or acquisition.</p> <p>Huntington’s Scope 1 and Scope 2 emissions are not validated as being “science-based” by a third party.</p> <p>Huntington’s current carbon reduction goals, its progress against current goals, its most recent ESG and TCFD Reports, and its most recent third-party verification report can be found here.</p>
<p>44475.2(b): Whether there is independent third-party verification of the company data and claims listed.</p>	<p>Huntington engages Energent, an independent third-party engineering firm, to perform verification on its emissions data. Energent is a Professional Engineer registered in the state of Ohio and a Certified Energy Manager licensed through the Association of Energy Engineers. Energent verifies that Huntington’s emissions reporting complies with <i>ISO 14064-3: Greenhouse gases—Part 3</i> standards. Energent also verifies that Huntington’s emissions reporting complies with <i>the GHG Protocol Scope 2 Guidance, 2015</i>.</p>