

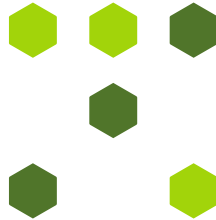


Task Force on Climate-related Financial Disclosures **REPORT**

OCTOBER 2020

INTRODUCTION:

Our Commitment to Addressing Climate Change



About This Report

This is Huntington's first report to specifically address the Task Force on Climate-related Financial Disclosures' (TCFD) recommendations and should be reviewed as a companion piece to our [2019 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, 2019, to December 31, 2019, except where noted.

Our goal in preparing this report is to provide our stakeholders with greater transparency about our climate-related risks and opportunities, as well as our program progress to date. This builds on our commitment to do the right thing for our shareholders, customers, colleagues, and communities – what we call “Looking Out for People.”

We welcome your feedback at corporate.responsibility@huntington.com.

About Huntington*

Huntington Bancshares Incorporated is a regional bank holding company headquartered in Columbus, Ohio, with \$120 billion of assets and a network of 839 full-service branches, including 11 Private Client Group offices, and 1,330 ATMs across seven Midwestern states. Founded in 1866, The Huntington National Bank and its affiliates provide consumer, small business, commercial, treasury management, wealth management, brokerage, trust, and insurance services. Huntington also provides vehicle finance, equipment finance, national settlement, and capital market services that extend beyond its core states. Visit huntington.com for more information.

*as of 9/30/2020

Governance: Our Approach to Managing Environmental Sustainability

Huntington is committed to ongoing consideration of and participation in established, best-practice, voluntary initiatives that reduce our carbon footprint. Our approach to environmental sustainability is guided by our [Environmental Policy Statement](#), which outlines our pledge to protect the environment, address climate change, and manage our environmental risks. It serves as a guide for the Board of Directors, Executive Leadership Team, key functional leaders, and the organization overall.

Board Oversight

Our Board of Directors monitors stakeholder demands related to climate change and provides oversight of our ambition around ESG program strategy and alignment. At the end of 2019, our Board consisted of 15 directors, comprised of our Chairman/CEO and 14 independent directors, who include our Lead Director. Importantly, our risk and governance committees require at least three independent directors and are chaired by an independent director with the knowledge and expertise to lead the committee.

The Nominating and Corporate Governance Committee oversees the Company's commitment to ESG issues, practices, and activities. The Committee also oversees Huntington's efforts to effectively communicate with shareholders throughout the year, including through our annual [ESG report](#). The Committee receives regular energy conservation and environmental sustainability updates from management.

The Board's Risk Oversight Committee is responsible for overseeing the Company's enterprise-wide risk management function, consistent with our strategy and risk appetite. This includes oversight of policies, and risk control infrastructure for compliance risk, credit risk, operational risk, interest rate risk, liquidity risk, market risk, reputation risk, and strategic risk.

All Board Committee meeting agendas are reviewed for ESG-related topics and flagged for both awareness and discussion among the broader Board.

Executive Leadership-Driven Strategy

The Executive Leadership Team (ELT) is responsible for executing a performance management framework that incorporates governance, strategy, and operations grounded in the considerations most material to our stakeholders. This framework ensures we formalize and standardize our approach to integrating ESG considerations into our Board and ELT decision-making, business strategy, and business platforms. The implications for our climate change efforts include regular evaluation of business opportunities to lessen our carbon footprint. The CEO and other members of the ELT provide strategic direction for our environmental footprint reduction programs and drive accountability throughout the organization.

Our Chief Technology & Operations Officer, who reports directly to the CEO of Huntington, is responsible for oversight and guidance of all direct climate-related impacts. This position oversees the team that is directly responsible for greenhouse gas emissions reduction targets, reducing our carbon footprint, and energy reduction targets across Huntington's facilities.

The CEO, Chief Technology & Operations Officer, General Counsel, or their designees are responsible for providing the Nominating and Corporate Governance Committee with quarterly environmental sustainability and ESG performance updates. In 2020, management began providing the Committee with a quarterly ESG dashboard that includes carbon emissions and other environmental metrics.

Our Chief Risk Officer is responsible for providing regular updates on risk management issues to the Board's Risk Oversight Committee. In 2019, we elevated our strategic approach by establishing our Global Risk Assessment Group, which is led by the Chief Risk Officer. The group was formed as an in-house "think tank" responsible for assessing the potential impacts of the ever-changing economic and political landscapes, as well as emerging threats and broader disruption trends. Climate risk and other environmental issues are important topics under the purview of the group.

The Private Client Group & Regional Banking Director oversees investment management, including the development of ESG-focused portfolio offerings. The Commercial Banking Director oversees the Renewable Energy Finance Group, which is responsible for developing customized solutions for businesses innovating in the green technology market.

Activating Leaders and Colleagues

Huntington operates with clear lines of accountability for implementing and tracking improvements in our operations that will improve our environmental performance, address climate change, and reduce our environmental risks. Functional roles include the following:

Our approach to Risk Management is based on the concept of "Everyone Owns Risk." Each business segment has its own Segment Risk Officer, who helps identify, measure, monitor, control, and report risks. Throughout the organization, we encourage

an atmosphere of "Raise Your Hand" and active communication around risks observed by colleagues.

Risk Management Lines of Defense

- 1 Our individual business segments are accountable for understanding and appropriately managing all the risks associated with their activities.
- 2 Our Chief Risk Officer, corporate risk management, and credit administration oversee the Company's risk-taking activities and assess risk independently of the business units.
- 3 Our internal audit and credit review process ensures that our risk governance framework is appropriate for the complexities of the bank.

The Senior Vice President of Corporate Real Estate is directly responsible for greenhouse gas emissions reduction targets, reducing our carbon footprint, and energy reduction targets across Huntington's facilities. The achievement and success of these initiatives are directly tied into annual bonuses and merit increases.

The Director of Energy and Sustainability has the responsibility to reduce Huntington's carbon footprint and monitor activities related to greenhouse gas emissions. This is done through improving building efficiency and sustainability efforts, such as incorporating environmental goals into the methods we use to build and renovate our buildings, standardizing equipment efficiency standards across our footprint, overseeing utility management, increasing our portfolio's ENERGY STAR® scores for Huntington

GOVERNANCE

facilities, ensuring we are able to measure and monitor environmental performance, and engaging and educating Huntington colleagues on sustainability on a continuing basis. As above, the achievement and success of these initiatives are directly tied into annual bonuses and merit increases.

Huntington's Regional Facilities 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. Compensation, bonuses, and incentives are tied to Huntington's goal of reducing energy use in each of our buildings by at least 2% annually.

Environmental education for all Huntington colleagues is part of our energy sustainability initiative across Huntington's footprint. The program includes communication to all colleagues about measures they can take to reduce the Company's carbon footprint. We provide opportunities for colleagues to be involved in environmental efforts in various ways – for example, by joining the "Green Team," reducing cafeteria waste and plastic bottle use, and participating in battery disposal and electronics recycling programs.

Our Strategic Approach to Environmental Sustainability

We are committed to creating an environmentally sustainable future through focused environmental management efforts. We embrace responsible practices regardless of directives from legislation or the marketplace. We acknowledge that climate change is a real issue, and, with a forward-looking, forward-thinking mindset, we champion efforts for change today, tomorrow, and for years to come. We believe climate change provides risks and opportunities for our business, and we are acting strategically to integrate climate-related insights into our decision-making and striving to help our stakeholders do the same.

Managing Risks and Opportunities

Huntington defines short-, medium-, and long-term risks as follows:

	From (years)	To (years)	Comment
Short term	1	2	Operating Planning Horizon
Medium term	2	5	Strategic Planning Horizon
Long term	5	10	Scenario Planning Horizon

We consider risks and opportunities with potential financial implications for our business of over \$10 million per year to be substantive.

Types of risk considered in our climate risk assessments include:

- Current regulation
- Emerging regulation
- Technology
- Legal
- Market
- Reputation
- Acute physical
- Chronic physical

Short-Term Risks Examples

Monitoring Emerging Costs

New fuel and/or energy taxes and regulations are likely to be implemented in areas where Huntington operates. Regulations and legislation that put a price on carbon pose a risk of increased utility costs, which could impact our overall operational expense. Ongoing regulatory uncertainty at the state level and Huntington's exposure to multiple utility partners play a role in cost disparity. While it's difficult to control these costs, we aim to mitigate unexpected increases by monitoring the energy procurement market to ensure we are doing our due diligence with energy contracts. We are also actively exploring ways to mitigate peak electric demand at numerous facilities by studying the feasibility of various on-site generation and other peak shaving methods through building controls and energy monitoring. For example, we examined the feasibility of installing a Battery Energy Storage System (BESS) at our Gateway Center in Columbus, Ohio. This installation would help mitigate the risk associated with high and potentially rising utility demand charges by utilizing the on-site photovoltaic (PV) cells to reduce the building's peak demand.

Evaluating Our Energy Efficiency Strategy

Huntington continually evaluates options to install LED lighting and high-efficiency HVAC in our workplaces 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 to pursue.

Long-Term Risk Example

Managing Severe Weather Impacts

Severe weather events, and the disruptions associated with them, could cause physical damage to Huntington’s facilities and impact employee work schedules. The damage to locations and/or inability to staff locations may result in increased operational costs, and consequently, may pose a potential impact to Huntington’s clients.

Striving for Best-in-Class Performance

Climate change is a real issue for the stakeholders we serve, and we have a responsibility to mitigate our impact by reducing our carbon footprint. As such, we have set environmental goals to drive accountability and progress. In 2019, we made the strategic decision to update our 2022 environmental goals after exceeding our goals just two years after establishing the baselines in 2017.

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

*Compared with a 2017 baseline

In addition, in 2019, we established new, longer-term goals for greenhouse gas emissions reduction. Instead of our previous goal of a 10% reduction by 2022, which we had already achieved, we set more aggressive targets to achieve the following:

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

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

We are focused on aligning our new goals with efforts that tie directly to how we operate our business. This starts with our own behaviors and practices and the improvements we can make within our own footprint, including:

Strengthening our building and renovation strategy:

Throughout our building and renovation process, we continually evaluate opportunities to drive greater energy efficiency. For example, in 2017, Huntington’s newly constructed Gateway Center opened featuring a 526,169 kWh bi-facial solar panel with reflective roofing, a lighting system with LED fixtures, daylight harvesting and occupancy control, and high-efficiency HVAC equipment. The construction of this facility served as a pilot for several additional sustainability initiatives. To reduce energy consumption, we also examine low-cost/no-cost measures, such as modifying HVAC set-points and schedules as well as LED lighting thresholds.

Examples of 2019 energy efficient projects across our footprint, include:

- Interior/exterior LED lighting projects with daylight harvesting controls (94 projects completed)
- High-efficiency HVAC projects (70 projects completed)
- Window replacement projects in various locations (7 projects completed)
- Roof projects in various locations (29 projects completed)

Of note, in 2019, we invested in a new solar array, which produces 602,326 kWh annually, at our Easton facility, our largest site. We also installed 1,152 new LG bi-facial solar panels and reinstalled 206 of the existing Sharp panels.

Standardizing equipment efficiency specifications: We have implemented equipment efficiency standards and a rebate process to ensure that all installed equipment exceed state baseline efficiencies. All energy-related projects must also apply for a utility rebate, if available.

Concentrating on ENERGY STAR® scores: The U.S. Environmental Protection Agency's (EPA) ENERGY STAR® program drives implementation of energy-efficient practices among organizations nationwide. We began our voluntary participation six years ago, and in 2019, Huntington achieved 60 new ENERGY STAR certifications, including 56 bank branches. Overall, we have 698 active sites in the ENERGY STAR program, and we have 54% of all ENERGY STAR certified bank branches across the country. This certification means these sites perform in the top 25% of similar facilities nationwide for energy efficiency and meet energy efficiency performance levels set by EPA.

Benchmarking our performance: Through our “lowest five” regional benchmarking initiative, we conduct an analysis to identify low-performing (high energy usage) sites. Results from this initiative help us understand where to focus our energy efficiency efforts. Huntington also compares its portfolio's performance against peer institutions using frameworks such as System Advisor Model (SAM), CDP, and ENERGY STAR.

Being a good steward and leader in the marketplace: Huntington's commitment to managing climate change was solidified with the hiring of our Energy and Sustainability Director over three years ago. This role was established to expand our strategy around environmental sustainability and climate change. Huntington's Energy and Sustainability Director serves as a leader both within the Company and across our region.

Business Strategy and Financial Planning Impact

Climate-related risk has impacted our business strategy in the following ways:

Products and services: Clients and investors are continuing to seek products and services that have a positive impact on the climate. As such, Huntington has created loan and banking products, such as our Renewable Energy Financing (REF) program. The REF group provides comprehensive, customized solutions for businesses innovating in the green technology market. REF uniquely positions Huntington to grow assets,

diversify investments, and monetize tax benefits – all while enhancing Huntington's commitment to the environment – through four specialized offerings:

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

The program has gone through a new product assessment and is included in a comprehensive business unit and product forecast. In 2019, the REF group closed 12 energy-related transactions totaling \$127.4 million.

Supply chain: Many of our customers, suppliers, and other constituents in the value chain care deeply about the environment and want to know what Huntington is doing to combat climate change and climate risk. To address these concerns, we have detailed our sustainability and environmental efforts in our annual [ESG report](#), which has resulted in increased awareness and transparency of our sustainability efforts.

Investment in R&D: We monitor climate-related technology developments, including how they might affect our development of new products and services. In 2019, we invested in electric vehicle (EV) charging stations and rideshare programs for colleagues as part of our growing partnership with SMART Columbus. This has resulted in a deeper understanding of how emerging technologies can affect our business operations.

In addition, climate-related risk has impacted our financial planning through capital expenditures and direct costs. Climate-related issues are factored into the planning for capital expenditures (such as for energy

efficiency upgrades) and utility costs for Huntington buildings. Each year, we budget for anticipated costs related to Huntington's carbon footprint.

Launching New Products for ESG Investing

Throughout our history, Huntington has been providing socially responsible investing (SRI) options to clients such as faith-based organizations and other SRI-focused investors. This has enabled investors to screen out specific sectors or practices and ensure that they are investing in companies that meet their SRI criteria.

In response to customer demand and as a growth platform for the Company, we are expanding our offerings to create a suite of ESG-driven investment solutions that include mutual funds and exchange-traded funds whose strategies feature companies engaged in sustainably impactful activities. The basic value proposition is that an ESG focus should help drive companies' financial performance through added efficiency, enhanced competitive positioning, and/or

risk reduction. To build and manage the portfolios, we are using a variety of qualitative and quantitative ESG indicators, including our own research, third-party ESG rankings, and collaborative ESG strategy reviews. We have also developed a continuum of portfolios, ranging from aggressive growth to maximum income, and have the ability to create custom ESG portfolios for clients.

Every new investment offering introduced goes through extensive risk management review before it is approved for client use. In addition, the Director of Investment Management and a team of portfolio managers and analysts meet monthly to discuss asset allocation recommendations related to the ESG portfolios.

We recognize and respect the fact that ESG investing may not be appropriate for every investor, but for those who are interested, we are committed to offering a full suite of products and services.

Our Enterprise Climate Risk Management Framework

Based on the guidance provided by the TCFD platform, Huntington is taking steps to formalize our climate risk management practices and ensure that they are integrated into our existing, robust risk management program. Our Climate Risk Management Framework is intended to align closely with TCFD's Implementation Path, as well as with the Bank Policy Institute's Climate Risk Group's best practices.

Overview of Huntington's Climate Risk Framework

We believe the current and future impacts of adverse environmental events on our stakeholders require full institutional engagement in the timely identification, assessment, and management of climate-related risks. In recent years, we have witnessed the devastating toll that climate-related disasters can have on our stakeholders. These disasters include algal blooms in our Great Lakes, inland flooding as U.S. Midwest dams and riverbanks were overwhelmed, and contamination of local water sources in Michigan, West Virginia, and elsewhere.

Integration into Existing Enterprise Risk Management Process

The Climate Risk Management Framework that we are developing is intended to align seamlessly with our existing Enterprise Risk Management structure. This structure includes ongoing assessment of our seven Enterprise Risk Pillars: Operational Risk, Credit Risk, Compliance Risk, Market Risk, Strategic Risk, Liquidity Risk, and Reputation Risk. Climate-related risk issues have been a recurring, but ad hoc consideration in our

evaluation of these risks. The new integrated Climate Risk Management Framework will provide a structured approach to consistently identify, assess, manage, and report climate-related risks and their impact across the enterprise.

In addition to adhering to the TCFD Implementation Guidance, Huntington has incorporated an initial foundational structure that is generally non-technical, more qualitative, and macro-oriented. We believe this initial framework will provide useful baselines, the ability to back test against historical data, a clear view of directional trends, and a platform for organizational learning. Over time, the framework will migrate to a process that is increasingly technical, more quantitative, granular, and model-driven.

Climate Risk Scoring

Huntington's climate risk assessment measures will facilitate a uniform risk assessment score that will be determined primarily by the impact of multiple environmental-related dimensions. The resulting climate risk score (CRS) can then be applied in a uniform and consistent manner across numerous possible segmentations of the data, including: entire enterprise, business units, vendors, customers, geographies and markets, strategic initiatives, new products and services, collateral types, and M&A, joint venture, or similar considerations.

Once established at the individual item level, the CRS scores can then be combined into a composite CRS, facilitating broader and comparative views of climate risk across the Company.

Framework Dimensions of Climate Risk Impacts

At its inception, the framework will utilize several dimensions of climate-related risk to generate a CRS. The primary dimensions will likely include:

Physical Climate Impacts Dimension (PCID): The PCID will initially be determined based on projected climate-related costs by geography. This risk dimension may be applied at the regional, state, or county level, and over varying time series, as applicable.

Emissions Factor Dimension (EFD): EFDs will be applied on a North American Industry Classification System (NAICS) or sector level. Depending on the sector, greater weight may be applied to either Scope 1, 2, or 3 emissions. Over time, we may also decide to introduce adjustment factors for carbon-intensive, higher-risk sector participants, as well as for green goods and services. We will also look to identify and provide adjustment factors for carbon-intensive firms that have implemented decarbonization transition strategies.

Transition Risk Factor Dimension and Climate

Scenarios: Climate scenario outcomes will be heavily influenced by numerous transition risk factors. The potential for near-term transformational change is significant, but it is complicated by the many possible climate change catalysts, including additional U.S. and international regulatory considerations. Therefore, we must have a process that is agile and qualitative in the near term and allows for forward-thinking that may result in more definitive scenario modeling over the longer term.

Environmental Performance Metrics and Targets

Goals and Progress

2018 was a strategically important year for measuring and elevating our environmental performance. During the year, we established 2017 as our baseline, fine-tuned our processes for collecting and analyzing our data, and identified key metrics. In 2019, we continued our five-year journey to implement a best-in-class energy and environmental sustainability strategy and made significant progress against our goals. Recognizing this progress and our desire to do the right thing, we updated our 2022 goals for reducing water usage, landfill waste, and paper printing, compared with 2017 baselines.

Indicator	Previous 2022 Goal*	2019 Progress*	Updated 2022 Goal*
Greenhouse Gas Emissions	↓ 10%	↓ 16%	see longer-term goals below
Water	↓ 10%	↓ 9%	↓ 15%
Landfill Waste	↓ 10%	↓ 22%	↓ 25%
Paper Printing	↓ 10%	↓ 17%	↓ 25%

*Compared with a 2017 baseline

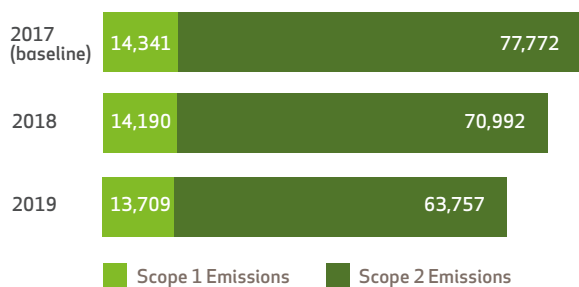
In addition, we established new, longer-term absolute goals for greenhouse gas emissions reduction:

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

Long-Term Goal:
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Key Metrics and Data

SCOPE 1 AND SCOPE 2 EMISSIONS (MT CO₂e)

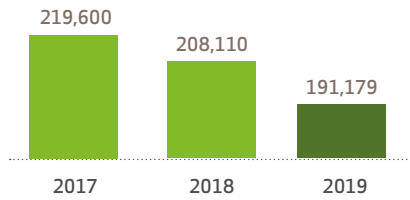


SCOPE 3 EMISSIONS (MT CO₂e)

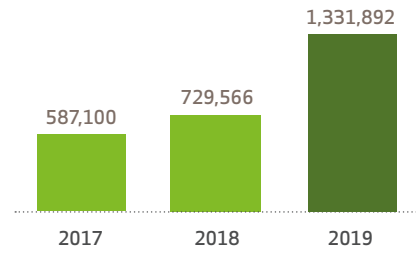
	2017	2018	2019
Purchased goods and services	654	2,204	3,210
Capital goods	252	4,846	279
Fuel- and energy-related activities	1,183	218	162
Upstream transportation and distribution	853	1,002	1,289
Waste generated in operations	-	1,253	1,111
Business travel	2,408	941	4,698
Employee commuting	-	-	19
TOTAL	5,350	10,464	10,768

METRICS AND TARGETS

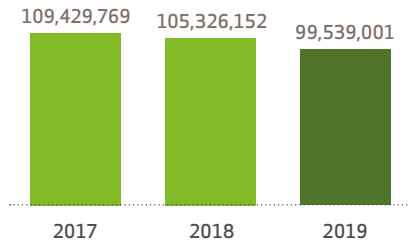
BUILDING ENERGY CONSUMPTION (MWh)



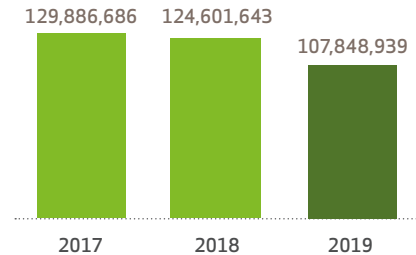
ON-SITE SOLAR GENERATION (kWh)



WATER CONSUMPTION (Gallons Consumed)



PAPER USAGE (Total Pages Printed)



Greenhouse Gas Reporting Methodology and Assurance

To calculate and verify our carbon footprint, Huntington contracted Heapy Engineering, a third-party engineering firm, to calculate our greenhouse gas (GHG) emissions and Energent Solutions, a third-party consulting firm, to validate the findings. Energent Solutions did a thorough review of the final spreadsheet calculations to ensure the spreadsheet was functional. No issues were found that would compromise the integrity of the data.

The following standards were used to calculate Huntington's GHG emissions:

- Defra Voluntary 2017 Reporting Guidelines
- Energy Information Administration 1605B
- IPCC Guidelines for National Greenhouse Gas Inventories, 2006
- The Climate Registry: General Reporting Protocol
- The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
- USEPA Center for Corporate Climate Leadership: Direct Emissions from Stationary Combustion Sources

Scope 1 and 2 Emissions:

To prove the accuracy of the material and data provided by Huntington, a plan was put in place to sample a statistically significant number of utility bills. The percentage of each utility type sampled is as follows:

- Electricity – Confirm 70% of the energy usage
- Natural Gas – Confirm 70% of the energy usage
- Chilled Water – Confirm 100% of the energy usage
- Fuel Oil – Confirm 100% of the energy usage
- Steam – Confirm 100% of the energy usage

Usage data was pulled from ENERGY STAR Portfolio Manager by Heapy Engineering to compile the GHG emissions. Trane, who manages Huntington's utility bill pay, provided a spreadsheet with usage data and bill images. Actual utility bills were then compared to the data to ensure accuracy. First, the aggregate energy use assertion was compared to the total of the actual bills, then individual site usage was compared. Usage was organized from largest to smallest to capture 70% of the total usage with the fewest number of verified bills.

Trane runs each entry through a bill exception reporting system to identify potential errors. A well-developed set of algorithms and tolerances serve to flag potential errors for review, after which a bill validation team approves or corrects the entries in question. With this level of scrutiny, it is unlikely there will be statistically significant errors in the dataset.

Scope 3 Emissions:

With scope 3 emissions coming from products, delivery services, travel, and waste, we must rely heavily on the internal tracking of Huntington. The detailed internal tracking done by Huntington and external data provided by FedEx, SHARE, Brinks, and Herman Miller office products are verified for errors and inconsistencies. Backup data has been provided for 100% of the overall scope 3 emissions for the completed reporting year of 2019.

Conclusion

Climate change is a serious issue, and we are committed to the journey to manage and mitigate our impact. We will continue to explore climate-related risks and opportunities and hold ourselves accountable through enhanced disclosures. We believe we have a role in protecting the environment, addressing climate change, and managing our environmental risks for the benefit of our shareholders, colleagues, customers, and communities. In doing so, we are enabling long-term value creation and delivering on our purpose of looking out for people.

CONTACT HUNTINGTON

INVESTOR RELATIONS

Huntington.Investor.Relations@huntington.com
614.480.5676

ENVIRONMENTAL, SOCIAL, AND GOVERNANCE OFFICE

Corporate.Responsibility@huntington.com

MEDIA RELATIONS

Huntington.Communications@huntington.com

Huntington.com

