

## Strength in













2023 ESG REPORT



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To Our Fellow Shareholders, Customers, Colleagues, and Community Members—Welcome.

Huntington emerged from 2023 in a position of strength, despite a challenging operating environment within the industry.

Huntington remained consistent—a hallmark of our strategy focusing on creating more inclusive and economically vibrant communities, becoming the best place our colleagues will ever work, and capitalizing on opportunities to operate more sustainably.

Customers and communities remain at the center of our sustainable efforts, and we made significant progress in serving these stakeholders in 2023:

- In the first 31 months of our five-year, \$40 billion community plan, we have already made \$27.3 billion in loans and investments.
- Our Lift Local Business® program has made over \$100 million in financing available to historically underserved small business owners, reaching our lending goal two years ahead of schedule.
- 2023 marked our 6<sup>th</sup> consecutive year as the nation's largest originator in number of SBA 7(a) loans and the 15th consecutive year leading all financial institutions in our region.

• We expanded access to Huntington Home for Good, an innovative affordable lending product designed to meet the needs of historically under-resourced communities. We also provided over \$9.5 million in down payment assistance, bringing our three-year total to over \$40 million.

Not only do these investments enhance communities, but they also create economic growth and opportunities for all consumers to achieve their financial goals.

We have also maintained focus on our voluntary environmental commitments. Last year, we published new environmental goals, and we are pleased to provide an update on our progress, which includes a 7% decrease in Scopes 1 and 2 greenhouse gas (GHG) location-based emissions. This will be our fourth year publishing our Climate Report, previously known as the TCFD Report, as we seek to consistently and transparently disclose how we manage climate risks and opportunities.



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

Our environmental and sustainability programs have been recognized as peer-leading by external third parties, and we remain focused on meeting and exceeding forthcoming regulatory standards. This means:

- Making investments in reporting and emissions calculations' technology to improve the accuracy, automation, and quality of external disclosures;
- Strengthening our internal control environment in advance of regulatory compliance dates; and
- Building on our customer-focused engagement strategy to assist them in navigating regulatory and market challenges.



Often an overlooked prong of effective sustainability programs, effective governance plays a critical role in helping us achieve long-term success. Board committees, including the Nominating and ESG and Risk Oversight Committees, provide oversight over management's environmental, social, and governance strategies. Our Legal and Public Affairs teams navigate the rapidly changing external environment, identifying new requirements and creating investor-grade disclosures. Finally, our internal committee and working group structure help disseminate critical messages to key business leaders and receive actionable feedback to integrate into our strategy.

We believe our governance processes, including effective challenge, help us create more robust sustainability goals and external disclosures.

Our efforts share an important foundation—our colleagues' commitment. Whether it's loan officers and underwriters working to help borrowers, facilities managers installing energy efficiency upgrades at branches, or lawyers helping navigate new regulatory requirements, colleagues drive all facets of Huntington's sustainability strategy.

In addition, we are grateful that our colleagues have helped Huntington create a unique, vibrant culture. Colleagues are actively engaged in our Business Resource Groups, Communities of Practice, and Inclusion Councils across our footprint. Collectively, colleagues volunteered over 35,990 hours in their communities in 2023. And recognizing "everyone owns risk," colleagues completed more than 577,810 hours of training to help keep the Bank, and our customers, safe.

In closing, 2023 presented challenges to the financial industry, but Huntington is capitalizing on opportunities. Our sustainability strategy remains core to our Purpose, and we look forward to continuing to partner with our stakeholders to make people's lives better.

Stephen D. Steinour

Chairman, President, and Chief Executive Officer

Steve Steinour

**David L. Porteous** 

David h Patr

Lead Director,
Board of Directors

Our approach to ESG is rooted in our Purpose, Vision, and Values.

DUR

### **PURPOSE**

We make people's lives better, help businesses thrive, and strengthen the communities we serve.

OUR

### **VISION**

To become the country's leading people-first, digitally powered bank.

OUR

### **VALUES**

- Can-do Attitude
- Service Heart
- Forward Thinking



2024 Proxy Statement

### **About Our ESG Report**

Thank you for your interest in Huntington's environmental, social, and governance (ESG) goals and progress. This 2023 ESG Report is Huntington's eighth report on our ESG strategy, and it covers the period from January 1, 2023, to December 31, 2023, except where otherwise noted.

This report is in alignment with the Sustainability Accounting Standards Board (SASB) standards for the Commercial Banks and Consumer Finance industries. Our report is also informed by the results of our latest stakeholder priorities review, and we reference other established reporting frameworks, ratings, and rankings, such as the Global Reporting Initiative (GRI) and United Nations Sustainable Development Goals (UN SDGs).

2023 marks our fourth year aligning with the Task Force on Climate-related Financial Disclosures' (TCFD) recommendations, and you can review our disclosures in our standalone 2023 Climate Report.

We also continue to monitor the Taskforce on Nature-related Financial Disclosures (TNFD) framework and the International Sustainability Standards Board (ISSB) standards and their application to our reporting strategy.

As part of our ESG reporting strategy and commitment to quality disclosures, we monitor new and emerging regulations to inform our approach toward regulatory compliance. We comply with California's Voluntary Market Disclosures Act (AB 1305) and are preparing our compliance with the California Senate Bill 253 and Senate Bill 261, which are currently scheduled to come into effect over the next two years. We have also taken steps to prepare for new climate-related disclosure regulations issued by the U.S. Securities and Exchange Commission (SEC). We will continue to monitor litigation that could impact federal and state rulemaking activity.

We suggest reviewing our ESG and Climate reports as companions to our annual report and proxy statement, each issued in March 2024. Together, these disclosures demonstrate our commitment to transparency, timeliness, and ongoing improvements in our disclosures.

We welcome your feedback at <a href="mailto:corporate.responsibility@huntington.com">corporate.responsibility@huntington.com</a>







#### **Alignment With United Nations Sustainable Development Goals**



Huntington is aligned with the following SDGs:

#### 1. No Poverty

Our commitments to financial education, serving the underbanked, and economic inclusion programs give us a platform to help reduce poverty and drive economic empowerment for all.



#### 3. Good Health and Well-Being

3 GOOD HEALTH AND WELL-BEING Our holistic support of our colleagues includes prioritizing their personal, emotional, physical, and financial well-being. Through our philanthropic commitments, we aim to address systemic health-related issues, such as food insecurity and environmental equity.



#### 5. Gender Equality

Throughout the talent life cycle, we focus on providing equitable opportunities and inclusion for women, from the hiring process and pay equity to talent development programs.



#### 8. Decent Work and Economic Growth

Every year, multiple leading organizations rank Huntington as a great place to work. For our customers and communities, we work hard every day to promote investments in economic growth and prosperity, most notably through our position as #1 in the number of SBA 7(a) loans in the nation.1



#### 10. Reduced Inequalities

We believe our commitments to economic inclusion, workplace DEI, and supplier diversity will help reduce inequalities and create economic opportunities for our colleagues, for our customers, and in our communities.



#### 11. Sustainable Cities and Communities

Fair and responsible banking is central to who we are, and we are tireless advocates for our customers and contribute to the vitality of our communities. Through our Renewable Energy Finance group, we offer solutions that promote sustainable business and unlock opportunities for renewable energy alternatives that transform cities.

#### 13. Climate Action

We believe the current and future impacts of climate risk events require full institutional engagement, and Huntington is focused on environmental policies and strategic efforts to mitigate and manage climate change and its related risks.



### Company Overview and Financial Impact

Huntington Bancshares Incorporated is a \$196 billion asset regional bank holding company headquartered in Columbus, Ohio<sup>1</sup>.

Founded in 1866, The Huntington National Bank and its affiliates provide consumers, small and middle-market businesses, corporations, municipalities, and other organizations with a comprehensive suite of banking, payments, wealth management, and risk management products and services. Huntington<sup>2</sup> operates approximately 970 branches in 11 states, with certain businesses operating in extended geographies<sup>1</sup>.

In 2023, we continued to execute on our long-term growth strategy with the expansion of our Commercial Bank into the Carolinas and Texas, focusing on middle-market, corporate, and specialty banking capabilities.

As part of our Vision, we are creating a sustainable, long-term competitive advantage with focused investment in customer experience, product differentiation, and key growth initiatives that enable us to deliver value to all stakeholders. Our goals include:

- Driving organic growth across all business segments;
- Delivering sustainable, top-quartile financial performance;
- Delivering on our aspiration to be a Category of One company; and
- Maintaining stability and resilience through risk management with an aggregate moderate-to-low, through-the-cycle risk appetite and a well-capitalized position.

#### Financial Highlights and Trends (in millions, except per share amounts)

		2021	2022	2023
	Total Assets	\$174,064	\$182,906	\$189,368
	Total Loans and Leases	\$111,267	\$119,523	\$121,982
Balance Sheet  Income Statement	Total Deposits	\$143,263	\$147,914	\$151,230
	Total Equity	\$19,318	\$17,769	\$19,398
	Total Revenue	\$6,016	\$7,285	\$7,402
	Net Income	\$1,295	\$2,238	\$1,951
	Earnings Per Share	\$0.90	\$1.45	\$1.24

<sup>&</sup>lt;sup>1</sup>Huntington's assets, branches, and footprint states are as of June 30, 2024.

<sup>&</sup>lt;sup>2</sup>When we refer to "Huntington," "we," "our," "us," and "the Company" in this report, we mean Huntington Bancshares Incorporated and our consolidated subsidiaries, unless the context indicates that we refer only to the parent company, Huntington Bancshares Incorporated. When we refer to the "Bank" in this report, we mean our only bank subsidiary, The Huntington National Bank, and its subsidiaries.



### Our ESG Strategy

At Huntington, we focus on the issues important to our business and our stakeholders, using ESG as a strategic driver for sustainable growth.

We address ESG with a Purpose-focused strategy that builds on our economic impact. This begins with our commitment to delivering sustainable, long-term shareholder value through top-tier performance, while maintaining an aggregate moderateto-low, through-the-cycle risk appetite and well-capitalized position. As a regional bank, our economic impact includes helping individuals and families reach their goals of financial stability and homeownership; providing businesses, especially small and midsized businesses, with the resources to grow; serving and uplifting unbanked and underbanked individuals; and working in partnership to create prosperous and resilient communities for all.

#### **ESG Oversight**

Our ESG program is overseen by the Board of Directors' Nominating and ESG Committee (NESG Committee), with roles and responsibilities assigned to key leaders and working groups throughout the Company. Huntington's most significant ESG considerations are integrated into quarterly NESG Committee agendas for discussion, awareness, and governance. The Executive Leadership Team (ELT) is accountable for executing the ESG strategy approved by the Board, including setting and delivering on short- and long-term performance goals disclosed in our annual ESG reports and other documents.

Reporting to the Company's General Counsel, the Chief ESG Officer is responsible for leading Huntington's ESG strategy in alignment with our stakeholders' interests, integrating it throughout the Company and proactively identifying emerging risks and opportunities to grow and maintain stakeholder value. In addition, the Chief ESG Officer remains at the forefront of new and emerging regulatory requirements and reporting frameworks, embedding relevant considerations into Huntington's ESG program framework and our disclosures, which will continue to evolve as we align with new and emerging expectations. Read more in About Our ESG Report.

The Chief ESG Officer provides quarterly updates to the NESG Committee and internal management committees and oversees ESG integration into various workstreams. committees, and councils. Our

Environmental Strategy and Sustainability Director and Senior ESG Program Manager report to the Chief ESG Officer.

### **GOVERNANCE ESG Program** Framework ESG **MATURITY STRATEGY OPERATIONS**

#### **ESG Governance Structure BOARD OF DIRECTORS** Community Development HR & Compensation Risk Oversight NESG Committee<sup>1</sup> Audit Committee<sup>1</sup> Technology Committee Committee Committee<sup>1</sup> Committee **EXECUTIVE LEADERSHIP TEAM** Risk Management Disclosure Review Credit Policy & Strategy Incentive Compensation Oversight Committee Committee Committee Committee **ESG WORKSTREAMS** Climate Risk Management Accounting & Reporting Diversity, Equity, and Fair & Responsible Technology & Operations ESG Strategy Team Risk Committee Working Group Inclusion Strategic Council Banking Working Group Working Group

<sup>&</sup>lt;sup>1</sup> Committees represent primary ownership of ESG matters.

#### **ESG Stakeholder Prioritization**

Huntington completed a review of stakeholder priorities in early 2023.

The "Most Important" topics are those where stakeholders believe ESG most directly contributes to the Company's long-term financial success. These topics include corporate governance, data security, financial performance, risk management practices, human capital management, and overall corporate strategy.



Stakeholder Feedback

To understand and address the needs of our stakeholders, we regularly engage with them in a variety of ways to discuss their primary topics of interest. Read more on our website.

**Stakeholder Priorities** (alphabetically ordered)

#### **IMPORTANT**

to Stakeholders and the Business

- Human rights
- Land use and biodiversity
- Management of legal and regulatory environment
- Operational sustainability
- Supply chain management
- Sustainability-related business risks and opportunities

#### **MORE IMPORTANT**

to Stakeholders and the Business

- Community development and impact
- Disaster response and business continuity
- Fair and responsible banking
- Financial inclusion and education
- Talent management and engagement
- Technology and innovation

#### **MOST IMPORTANT**

to Stakeholders and the Business

- Business ethics and transparency
- Corporate governance
- Customer service and satisfaction
- Data security and privacy
- Diversity, equity, and inclusion (DEI)
- Employee health, safety, and well-being
- Enterprise and systemic risk management
- Financial performance



### **ESG Data Summary**

	METRIC		2021 <sup>1</sup>		2022		2023	GOAL (IF APPLICABLE)
	Total assets (in millions)	\$	174,064	\$	182,906	\$	189,368	
	Total loans and leases (in millions)	\$	111,267	\$	119,523	\$	121,982	
Z	Total deposits (in millions)	\$	143,263	\$	147,914	\$	151,230	<u> </u>
PAI	Total equity (in millions)	\$	19,318	\$	17,769	\$	19,398	
Σ	Total revenue (in millions)	\$	6,016	\$	7,285	\$	7,402	
0	Net income (in millions)	\$	1,295	\$	2,238	\$	1,951	
~	EPS	\$	0.90	\$	1.45	\$	1.24	
0	Total FTE colleagues		18,442		19,920		19,955	
	Branches		1,092		1,032		999	
	ATMs		1,322		1,675		1,629	
	Value of microfinance originations and renewals	\$	1,584,541,043 <sup>2</sup>	\$	853,937,925	\$	754,492,031	
	Total community investment (in billions)	\$	7.6	\$	12	\$	7.7	Five-year, \$40 billion community investment (2021-2026)
<u>M</u>	Community development loans (in millions)	\$	1,900	\$	1,987	\$	796	
	Community development investments (in millions)	\$	924	\$	957	\$	730	
Z	Closing costs waived for buyers in low-to-moderate income regions	\$	19,045,510	\$	12,076,729	\$	9,673,644	
	Huntington colleague volunteer hours		28,520		36,044		35,992	
	Financial wellness training hours provided to the community		2,441		4,839		6,276	
	Community Reinvestment Act-qualified financial contributions	\$	10,222,953	\$	15,294,350	\$	18,602,903	
	Scope 1 emissions location-based (MTCO <sub>2</sub> e)		12,328		17,895		16,331	
	Scope 2 emissions location-based (MTCO <sub>2</sub> e)		47,838		54,345		50,793	
	Scope 3 emissions (MT CO <sub>2</sub> e)		1,992,310		1,857,162		1,798,928	
	Greenhouse gas emissions (Scope 1 & Scope 2 location-based) reduction		n/a		n/a		7%	35% reduction by 2030, compared with a 2022 baseline
	Greenhouse gas emissions (Scope 2 location-based) reduction		n/a		n/a		2%	50% reduction by 2035, compared with a 2022 baseline
A N	Building energy consumption (MWh)		168,417		202,709		186,560	
ш	On-site solar generation (MWh)		1,197		1,220		977	
Σ	Renewable energy	1% o	f electricity usage	1% of	electricity usage	1% of e	electricity usage	50% of electricity usage by 2035
80	Average ENERGY STAR score		69.09		65.81		67.89	
<b>X</b>	ENERGY STAR certified buildings		80		151	<u> </u>	251	
Z	Average site energy use intensity (kBtu/ft²)		82.62		92.47		80.50	
ш -	Average source energy use intensity (kBtu/ft²)		171.90		185.36		165.61	
	Water consumption (gallons)		122,195,984		129,462,000		127,687,000	
-	Water consumption reduction		n/a		n/a		1% reduction	15% reduction by 2030, compared with a 2022 baseline
	Landfill waste reduction		n/a		n/a		5% increase	25% reduction by 2030, compared with a 2022 baseline

 $<sup>^{\</sup>rm 1}\,\mathrm{Does}\,\mathrm{not}\,\mathrm{reflect}$  a typical reporting year due to TCF acquisition.

<sup>&</sup>lt;sup>2</sup> Includes Paycheck Protection Program loans.

METRIC	2021 <sup>1</sup>	2022	2023	GOAL (IF APPLICABLE)
		Workfo	rce Data	
Total workforce gender and/or racial/ethnic diversity	68%	68%	67%	
•Total workforce - racially/ethnically diverse <sup>2</sup>	23%	25%	25%	
•Total workforce - white female	45%	43%	42%	
•Total workforce - white male	32%	32%	33%	
Middle and executive management gender and/or racial/ethnic diversity	45%	47%	48%	50% by 2025
Average base pay for racially diverse colleagues with the same job titles as non-racially diverse colleagues	99%	101%	102%	
Average base pay for women colleagues with the same job titles as men	99%	99%	99%	
		Supplier	Diversity	·
Total spend with diverse suppliers (in millions)	\$ 272.8	\$ 239.1	\$ 182.3	
Diversity spend as percentage of total spend	21%	22%	19%	18% annually
Number of diverse suppliers	226	236	206	
		Engagement, Developmen	t, Retention, and Attraction	
Engagement survey - Engagement	slightly below 75 <sup>th</sup>	slightly below 75 <sup>th</sup>	slightly below 75 <sup>th</sup>	
	percentile	percentile	percentile	
Engagement survey - Culture	above 75 <sup>th</sup> percentile	above 75 <sup>th</sup> percentile	above 75 <sup>th</sup> percentile	
Engagement survey - Trust	above 75 <sup>th</sup> percentile	above 90 <sup>th</sup> percentile	above 75 <sup>th</sup> percentile	
Number of colleagues participating in enterprise-wide talent development programs	1,139	277	555	
Total learning hours	611,949	698,807	577,811	
Average learning hours per colleague	33	34	29	
Executive leaders with "ready now" successors	61%	64%	60%	
Leadership roles filled with internal candidates	100%	28%	49%	
Voluntary turnover rate	20%	17%	11%	
90-day external hire retention	90%	89%	89%	
Board gender diversity	33%	27%	31%³	
Board racial/ethnic diversity	27%	27%	25%³	
Board gender and/or racial/ethnic diversity	47%	47%	56% <sup>3</sup>	
Hours of ethics training completed by colleagues	14,047	16,090	16,241	

 $<sup>^{\</sup>rm 1}\,{\rm Does}\,{\rm not}\,{\rm reflect}$  a typical reporting year due to TCF acquisition.

<sup>&</sup>lt;sup>2</sup> Racially/ethnically diverse means Asian, Black, Hispanic or Latino, American Indian or Alaska Native, Native Hawaiian or Other Pacific Islander, or two or more races. This data is based upon Huntington's U.S. colleagues' voluntary self-identification of race/ethnicity based on EEO-1 definitions.

<sup>&</sup>lt;sup>3</sup> Data as of June 30, 2024.



**CUSTOMER FOCUS AND IMPACT** 

#### Customer Advocacy, Experience, and Satisfaction

At Huntington, we live our Purpose by fostering and maintaining relationships on a national scale, at the community level, and person to person. Through the connections we make, we help our customers manage and control their finances and their livelihoods—and better understand the needs of our customers and the communities we serve.

We are also delivering on our Purpose by continuing to leverage data, as well as customer and colleague feedback, to improve and enhance the overall Huntington experience. Without losing the human touch, we are focused on the implementation of digital solutions to facilitate easier, convenient transactional banking. By ensuring exceptional relationships between our colleagues and customers, we can offer personalized advice and information for our customers—and deepen our connections.

# ECONOMIC

**CUSTOMER FOCUS AND IMPACT** 

Customer Advocacy, Experience, and Satisfaction

**BUSINESS FOCUS AND IMPACT Business Banking** 

**COMMUNITY FOCUS AND IMPACT** 

Investing in Communities

Affordable Housing and Homeownership

#### A Focus on Fair and Responsible Banking

We are committed to providing fair access to banking so that everyone has opportunities to participate in the economy. We firmly stand against discrimination and harassment of any type, including on the basis of race, ethnicity, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or expression, political opinions, speech, or affiliations, or any other characteristic protected by federal, state, or local laws. Our policies relating to fair, responsible, and inclusive lending are overseen by our Board of Directors' Community Development and Risk Oversight Committees. These committees review the Company's compliance with standards, including Unfair, Deceptive, or Abusive Acts and Practices requirements.

Our commitment to fair, responsible, and inclusive banking is demonstrated through our focus on these areas:

- 1. Product Development & Marketing: We focus on identifying the needs of customers and developing products and tools to meet those needs. We are also committed to helping customers make informed decisions by communicating and marketing our products in a responsible manner.
- **2. Sales & Service**: We look out for our customers by building deep relationships with them and matching our solutions with their needs.
- 3. Customer Advocacy, Experience, and Satisfaction: We use data analytics to identify opportunities for understanding and improving the customer experience. Through a continuous loop of customer and colleague feedback, as well as information provided through customer complaints, we redesign and improve products and processes.
- **4. Compliance**: We follow a risk-based approach to meeting our regulatory and legal compliance obligations, always maintaining a customer-centric focus.

#### Fair Play Banking

For more than a decade, our Fair Play Banking philosophy has guided our relationships with our customers, enabling us to provide transparent, honest service without hidden fees or asterisks.

Fair Play Banking was established as a response to the insights we received from our customers. As their expectations have changed over the years, our philosophy has evolved to meet them, leading to a range of products, technology, and solutions that help make our customers' financial lives simpler and more prosperous.

Recent Fair Play Banking initiatives include:

- The elimination of extended overdraft fees;
- The reduction of overdraft fees to \$15;
- The elimination of non-sufficient funds and return deposit item fees;
- The Cashback Rewards Credit Card, featuring unlimited 1.5% cashback on all purchases, no annual fee, no foreign transaction fees, and Huntington Late Fee Grace; and
- Requiring colleagues in applicable roles to complete annual training on topics such as complaint management, managing customer relationships, and product development and marketing.

Learn more about <u>Huntington's Fair Play Products</u>.

#### **Huntington's New Secured Credit Card**

In January 2024, Huntington announced the Secured Credit Card, designed to help eligible customers improve their financial health by providing access to credit. The Secured Credit Card includes educational resources to help customers build their credit profile and develop healthy spending and saving habits.

The card offers a number of features that reflect Huntington's Fair Play Banking philosophy, including:

- 1% cashback on every purchase
- No annual fee
- Huntington Late Fee Grace, which provides cardholders with an extra day to pay if a payment is missed
- Free online FICO score access through Huntington's digital banking experience, The Hub

Ranked No. 1 in Customer
Satisfaction with Retail Banking
in Pennsylvania for the second
consecutive year in the
J.D. Power 2024 U.S. Retail
Banking Satisfaction Study.<sup>1</sup>



<sup>1</sup> For J.D. Power 2024 award information, visit jdpower.com/awards.

#### **Holistic Customer Experience**

We believe that the experience of our customers—and their satisfaction—is directly impacted by the experience of our colleagues.

By managing the customer experience, the colleague experience, and our culture together under one business function, we are able to improve everyone's experience and further elevate overall satisfaction. This integration benefits us and our stakeholders in many ways:

- **Insights**: We have increased our ability to understand the colleague experience, the customer experience, and the relationship between the two, enabling the delivery of actionable insights into business segments and support functions.
- **Accountability**: We have improved our ability to measure the impact of customer experience on colleagues, the impact of colleague experience on customers, and the impact of both on key indicators.
- **Alignment**: We champion cultural alignment throughout the Company, enabling us to design and deliver exceptional experiences with a more integrated view.

Led by our Experience Management Office (EMO), we work to achieve our Category of One ambitions through crossenterprise collaboration. We provide business segment and regional leaders with colleague and customer insights, achievable goals, and centralized support to champion our culture.



#### The Journey to a Category of

• Our Purpose Is Our Compass: We make people's lives better, help businesses thrive, and strengthen the communities we serve.

INTRODUCTION

- Our Actions Deliver Our Purpose: People-first business strategies and initiatives are developed and delivered in response to colleague and customer expectations.
- Our Colleagues Bring It All to Life: Each and every colleague brings life to our Purpose and Values by consistently creating unparalleled experiences for others that are unique and authentic to Huntington.

We hold ourselves accountable for improving the customer experience using several syndicated standard and proprietary surveys and experience metrics, including customer satisfaction scores and Net Promoter Score (NPS).

#### **Retail Consumer Customer Experience**

Customer Satisfaction:

2022|51% 2023|53%

Net Promoter Score:

2022|36 1 2023|37

**Retail Small Business Customer Experience** 

Customer Satisfaction:

2022|59% 12023|66%

Net Promoter Score:

2022|32 2023|44

#### **Putting Customers First in Product Innovation**

At every step in our product development life cycle, we maintain a consistent focus on our customers and their needs.

- **Product Clarity**: Our goal is to offer products and services that are useful and beneficial to our target markets, that are simple and clear to understand, and with terms that are clearly explained and disclosed. All new, revised, or expanded products or services receive thorough reviews. Our risk management governance structure—overseen at the board level by our Risk Oversight Committee—requires products and service evaluations that are commensurate with their inherent risk. complexity, and novelty, with senior leaders signing off on new products and services before launch.
- **Fair Pricing**: Offering products and services in a responsible manner requires an initial review of our pricing and fee structures to ensure they are competitive and fair. As our processes and the consumer marketplace change, we conduct continuous reevaluation to ensure that pricing remains consistently fair.
- Honest Marketing: Advertising content must support our brand promise while also including necessary disclosures. We review our materials to ensure they fairly and accurately convey how our products and services work.
- **Responsible Life Cycles**: As we have shown with 24-Hour Grace®, \$50 Safety Zone®, and other offerings, fairness sometimes means discontinuing fees, products, or services. We may also stop offering a product or service when customers are no longer able to reasonably access the benefits.

#### **Huntington's Product Governance Structure**

**Risk Oversight Committee** 

**BUSINESS SEGMENT-LEVEL** RISK COMMITTEES

MANAGEMENT-LEVEL PRODUCTS AND SERVICES SUBCOMMITTEE

**EXECUTIVE-LEVEL PRODUCT AND** SERVICE RISK COMMITTEE

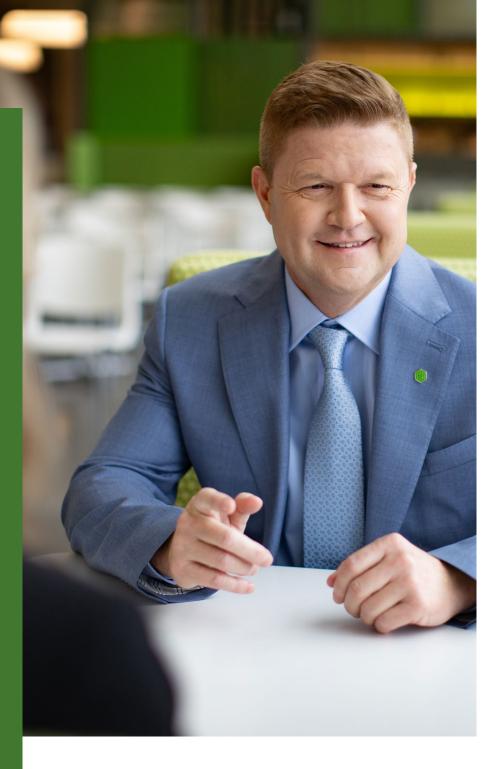
Governance structure determined based on product or service inherent risk, complexity, or novelty.

#### **Making Banking Inclusive for All**

Huntington strives to be the bank of choice for everyone, welcoming all customers with cultural competence and contributing to closing the wealth gap in multicultural communities. Two recent initiatives have helped us connect with a broader range of people.

To enhance the banking experience for people with autism or neurodiversity, Huntington provides step-by-step banking guides in partnership with Magnusmode. The digital MagnusCards visual quides offer visual, text, and audio instructions for everyday transactions—using an ATM, remotely depositing a check, opening a checking account online, or using a debit card.

In 2024, Huntington began piloting a multicultural banking program in the Chicago and Detroit markets. Through this program, we provide proactive and intentional community outreach aimed at strengthening relationships and deepening engagement with diverse populations who have traditionally been underserved and underbanked. We partner with customers, delivering the insights and guidance that contribute to financial empowerment. In addition, we are adapting the look and feel of branches in these markets, offering language support services and colleagues with specialized training.



#### **Customer Support and Advocacy**

Huntington approaches customer experience and service with the same forward-thinking mindset encompassed in our Values. Our goal is to provide customer experiences that set us apart and drive our Category of One performance.

Over the last several years, we transformed the way we envision solutions and develop new products by inviting customers to the table. Through focus groups, surveys, and one-on-one conversations, we take time to listen, observe the ways current solutions fall short of expectations, and review potential new solutions. These human-centered design principles have allowed us to gain deeper insights and find more innovative and relevant solutions.

In addition, the EMO ensures that customer complaints are reviewed, categorized into granular themes, and analyzed to develop actionable insights. During 2023, the team worked with business partners to implement over 80 actions to address complaints and reduce friction. Actions taken include those related to:

- Branch experience (service quality, ATM, consistency)
- Digital experience (money movement, technical/log in issues, mobile deposits, Cash App fraud)
- Deposits and fees (deposit holds, promotions, account closures, check orders, account opening verification process)
- Loan origination (follow-up, processing timeframe, refinance options)
- Loan servicing (auto title/lien release, auto payoff process, title transfers)



### **Business Banking**

From mom-and-pop shops to regional chain businesses, Huntington is committed to supporting the needs of small and medium-sized businesses. Our team's expertise, combined with our powerful digital solutions and the relationships we foster with business owners, differentiates us as the banking partner that provides end-to-end support for our business customers.

We recognize businesses in Chicago have different needs than those in Colorado, which is why we restructured our business banking division in 2023. To better serve our business customers, we unified our Business Banking and Middle-Market practice areas under our Regional Bank model, designed to service customers with up to \$50 million in annual revenues. We have aligned our teams under regional presidents, who empower our colleagues to provide customized products and solutions tailored to their local market.

We also acknowledge that our small and medium-sized business customers are consumers themselves and seek more convenient ways to manage their personal and business finances. In 2023, we created a tool that allows business banking customers to toggle between their business and personal banking accounts within

our retail online banking system. This allows small businesses to conduct business-to-business and business-to-consumer transactions in a seamless manner.

Huntington customers know that no one banks like we do, and in 2023, we announced an expansion in the Carolinas, building on our commercial lending and investment services that have been offered in this region for 10 years. Our dedicated Huntington colleagues in North and South Carolina will help us bring the full power of the Regional Bank model as we grow our middle market, corporate, and specialty banking capabilities.

> We are the nation's largest originator of SBA 7(a) loans by volume for six years running and the 15<sup>th</sup> straight year, leading all financial institutions in our footprint.1



<sup>&</sup>lt;sup>1</sup> SBA loans subject to SBA eliqibility. Huntington is the #1 SBA 7(a) lender in the number of loans in the region made up of Illinois, Indiana, Kentucky, Ohio, Michigan, West Virginia, Western Pennsylvania, Wisconsin, Minnesota, and Colorado. Source: U.S. Small Business Administration (SBA) from October 1, 2022, to September 30, 2023. Huntington is #1 in the nation in number of SBA 7(a) loans for fiscal year ending September 30, 2023.

#### **How We Help Businesses Thrive**

Huntington provides the right tools, talent, and information to assist businesses from their formation, to launch, and through various stages of growth. We go to great lengths to pair the right bankers with our small-business customers, and our interactions with these customers are driven by insight, not sales. We share data with customers and ask questions to understand what they truly need, then provide advice on various topics that will then help the customer select from our wide range of products and services that will best fit their business.

#### Lift Local Business® Expands Opportunity

Since launching in October 2020, Lift Local Business, a lending program for historically underserved small-business owners, has exceeded its five-year, \$100 million commitment to support minority-, women-, and veteran-owned small businesses. As of December 2023, we helped more than 1,400 small businesses with approximately \$101 million in lending, business planning support, free financial and entrepreneurial courses, and other services to help them achieve their goals—all in line with our \$40 billion Community Plan and exceeding our goal of \$100 million by 2025.

Huntington has funded more than \$33.5 million to Black-owned businesses through the Lift Local Business initiative. According to White House data, Black business ownership is growing at the fastest pace in 30 years, and the share of Black households owning a business has doubled between 2019 and 2022.

As we look ahead, we are focused on bringing Lift Local Business to new markets, hosting more programs for small business owners to learn about tools and resources to grow their businesses, and increasing access to capital to historically underserved small business owners.

#### Lift Local Business Highlights

#### Value of Booked Loans by Demographic<sup>1</sup>

BUSINESS TYPE	LOAN AMOUNT
Black-owned businesses	\$33.5 million
Women-owned businesses	\$32.1 million
Hispanic-owned businesses	\$6.8 million
Veteran-owned businesses	\$4.7 million
Low-to-moderate income area businesses	\$3.1 million
Other minority-owned businesses	\$21.0 million

INTRODUCTION

#### **Top Industry Categories**

71%

8%

6%

Transportation & Warehousing

Healthcare & Social Assistance

14%

Food Service & Accommodations

Administrative Support

12%

Retail Trade

\$101 million in total booked loans<sup>1</sup>

1,452 loans

inception through 2023



#### **Our Small-Business Support Ecosystem**

We care for our customers throughout the small-business growth life cycle. Our ecosystem of support starts with our community partners, who help us build trust and transparency with small-business owners. It continues with Lift Local Business Relationship Managers, who consistently engage with customers, branch managers, and small-business development partners to provide guidance and support the success of small-business owners. This personalized approach has resulted in increases in access to capital for our customers and expanded financial opportunity for all.

A key partner in our efforts to support small businesses is Operation HOPE, a nonprofit organization working to disrupt poverty and foster inclusion for low-to-moderate income (LMI) individuals. Operation HOPE provides educational resources and tools to promote financial literacy, including an Online Entrepreneurial Training Program. As of January 2, 2024, there were more than 1,300 active Operation HOPE Entrepreneurial Training Program course users.

#### **Huntington Spurs Small-Business Growth**

Our commitment to support small businesses across our footprint extends beyond funding. Small-business owners face unique challenges in realizing their vision, and we have developed specialized resources and education programs to help, including our Access to Capital and Small Business Seeds for Growth events.

In 2023, our teams worked closely with community partners and small-business support organizations to deliver nearly 75 Access to Capital presentations across our 11 regions, with more than 2.300 small-business owners in attendance.

Our Small Business Seeds for Growth initiative, designed to surround small-business owners with peer support, tools, and resources to grow their business, also continues to expand. Key events were held in Wisconsin, where Huntington partnered with the Wisconsin Women's Business Initiative Corporation to present a seminar on preparing for capital. Over 130 businesses attended the event, and local business experts provided 54 individualized coaching sessions on site.

We also hosted our first bilingual Seeds for Growth event in Denver in partnership with Mi Casa, an organization committed to advancing the economic prosperity of the Latino community. Access to Capital was presented in both Spanish and English, with 30 business owners attending the Spanish session, highlighting the opportunity to provide business-owner education in preferred languages.

#### **Bringing Vietnamese Coffee to the Masses**

Lan Ho, a first-generation Vietnamese American, made a bold career change from pharmacist to beverage entrepreneur after being furloughed during the pandemic. In response, she tapped into her heritage, hustle, and flair for unique branding to launch Fat Milk, Chicago's first Vietnamese mail-order coffee company. Her brand saw instant global recognition when Bon Appetit listed Fat Miilk on their "Highly Recommend" list. Shortly after, more accolades followed. As she looked to expand her business, Lan turned to Huntington. In February 2023, Fat Miilk received a loan through Huntington's Lift Local Business loan program, which helped Lan open a Fat Miilk coffee bar and expand her e-commerce presence.



#### Doing More to Look Out for Small and Medium-Sized Businesses

Businesses must adapt to changes in the marketplace and make shifts as the economic climate evolves. Our Business Solutions Service and Dedicated Business Relationship Manager teams provide an extra layer of support for new and existing businesses from guidance through the loan application process to bringing subject-matter and process-level expertise to new and existing customers. These teams complement our dedicated field bankers, SBA and practice-level experts, and other colleagues who create a total network of support for our business customers.

#### 2023 Small-Business Lending Highlights: New Originations

	LOAN VOLUME (TOTAL)		LOAN AMOU	NT (TOTAL)
Geography	Huntington <sup>1</sup>	% Market Share	Huntington	Top Competitor
Colorado	227	15.77%	\$54,302,600	\$93,750,500
Illinois	534	27.30%	\$96,116,500	\$138,557,000
Indiana	315	26.43%	\$58,025,500	\$31,031,000
Kentucky	63	14.25%	\$13,066,300	\$16,700,200
Michigan	1,399	56.00%	\$201,839,000	\$47,901,000
Minnesota	144	9.21%	\$28,125,000	\$41,358,200
Ohio	2,341	63.94%	\$327,153,600	\$49,709,900
West Virginia	79	50.64%	\$13,363,000	\$6,100,000
Western Pennsylvania	285	43.91%	\$53,604,400	\$21,681,300
Wisconsin	56	5.81%	\$13,553,000	\$31,966,300
National (ex-footprint)	1,882	n/a	\$512,626,300	n/a
Total	7,325	12.77%	\$1,371,775,200	\$1,848,315,000

#### **2023 Microfinance New Originations and Renewals**

LOAN SIZE	UNITS	TOTAL VALUE OF LOANS	AVERAGE LOAN SIZE
Less than \$10,000	355	\$2,945,158	\$8,296
\$10K-\$25K	1,926	\$41,290,010	\$21,438
\$25K-\$50K	2,896	\$123,277,675	\$42,568
\$50K-\$75K	920	\$59,680,379	\$64,870
\$75K-\$100K	1,224	\$115,276,022	\$94,180
\$100K-\$250K	2,336	\$412,022,788	\$176,380
Total	9,657	\$754,492,031	\$78,129

\$2.9 billion in lending to small and medium-sized business customers in 2023



<sup>&</sup>lt;sup>1</sup> SBA loans subject to SBA eligibility. Huntington is the #1 SBA 7(a) lender in the number of loans in the region made up of Illinois, Indiana, Kentucky, Ohio, Michigan, West Virginia, Western Pennsylvania, Wisconsin, Minnesota, and Colorado. Source: U.S. Small Business Administration (SBA) from October 1, 2022, to September 30, 2023. Huntington is #1 in the nation in number of SBA 7(a) loans for fiscal year ending September 30, 2023.



#### **Balancing Small-Business Risk and Opportunity**

Huntington's processes, policies, and procedures around smallbusiness lending bring risk considerations to the forefront of lending decisions. Our approach to lending harmonizes with our organizational risk appetite as well as its appropriateness for our small-business customers. From the start, we give every application full and fair consideration for all lending programs and products we offer. By providing products that are easy to navigate, supplemental to traditional credit vehicles, and aligned with our risk appetite, we are confident that we are creating relationships for the Company in a way that reduces our overall risk, while helping small businesses thrive.

#### **Our Small Business Investment Companies Investing Strategy**

Licensed by the SBA, Small Business Investment Companies (SBIC) provide businesses with unique opportunities for debt and equity financing and offer an alternative to private funding mechanisms, such as venture capital, when seeking startup funding.

Huntington Private Capital seeks limited partner investments with qualified SBIC-backed private credit and equity funds. Our target funds range in size from \$100 million to \$500 million in committed capital, including SBIC leverage. The Huntington Private Capital team maintains longstanding relationships with partner fund managers that extend beyond the current fund raise. We also have debt and equity co-investment capabilities that can help extend our fund managers' reach.

### **Investing in Communities**

At Huntington, we are committed to creating vibrant, economically inclusive communities. We intentionally seek out leaders and residents of the communities in our footprint to identify their financial needs. Together, we implement solutions that strive to make a positive impact.

From June 2021 through December 2023, we have lent or invested \$27.3 billion in our communities as part of Huntington's five-year, \$40 billion Community Plan. In 2023, we helped more than 1,400 small businesses through our Lift Local Business® program; we launched a new mortgage program to help meet the needs of historically under-resourced communities; and we expanded our financial literacy to multilingual communities, enabling them to learn in their preferred language. As of December 2023, our Community Plan investments have helped nearly 150,000 businesses and families.

#### Huntington's \$40 Billion Community Plan

Our Community Plan prioritizes programs that meets the needs of under-resourced and marginalized communities. By doing so, we help strengthen small businesses and foster economic equality,

Purpose-driven bank, we are passionate about making meaningful, systemic change and improving economic vitality for our customers and communities.

INTRODUCTION





**Embedding Equity Across Our Community Plan** 

Huntington has committed \$16 billion in loans and investments to establish programs and services that foster social equity in areas such as affordable housing, small-business financing, community services, and environmental equity. Through 2023, we have invested **\$11.2 billion** toward this goal.

#### **Community Plan Investment Progress** (June 2021 to December 2023 – 31 months)

PILLAR	FIVE-YEAR COMMITMENT	PROGRESS THROUGH 2023
Small Business	Huntington committed <b>\$10 billion</b> to small business; <b>\$2 billion</b> is committed to lending to diverse-owned businesses and businesses located in diverse census tracts.	<b>\$6.6 billion</b> , including <b>\$1.9 billion</b> to diverse borrowers and borrowers in diverse census tracts
Home & Consumer Lending	Huntington committed <b>\$24 billion</b> in affordable mortgage lending; <b>\$12 billion</b> is committed to meeting the needs of diverse and under-resourced populations.	<b>\$14.6 billion</b> , including <b>\$8.1 billion</b> to diverse borrowers or for properties in diverse census tracts
Community Development Lending & Investing	Huntington committed <b>\$6.5 billion</b> in loans and investments to historically under-resourced people, businesses, and communities; <b>\$2 billion</b> is committed to projects in diverse census tracts.	<b>\$6.1 billion</b> , including <b>\$1.2 billion</b> in diverse census tracts
当然巨	Total: \$40.5 billion	Total: \$27.3 billion

#### Community Plan Impact at a Glance

**15,000+ small businesses** in diverse neighborhoods have received loans totaling more than \$1.9 billion

**54,600+ small businesses** with less than \$1 million in gross annual revenue and/or in LMI neighborhoods have been funded more than \$4.6 billion

**30,000+ home loans,** totaling more than \$8 billion, have been granted to diverse borrowers and/or in diverse neighborhoods

**49,500+ home loans,** totaling \$6.5 billion, have been originated in LMI neighborhoods and/or to LMI borrowers

#### **Small Business**

Lift Local Business, one of our many programs focused on uplifting small businesses, provides entrepreneurs with more opportunity for financial success, offering greater access to capital, business-planning services, and educational resources.

In 2023, Huntington colleagues organized more than 50 Access to Capital presentations across our 11 regions with more than 1,700 small business owners in attendance. We also sponsored Small Business Seeds for Growth events across our footprint to provide small-business owners with peer support and tools for growth. We hosted our first bilingual Small Business Seeds for Growth event in Denver to provide business owners education in their preferred language. Learn more about Lift Local Business in Business Banking.

#### Community Development Lending and Investing

Huntington's community development lending and investment (CDLI) programs provide more than capital solutions. They have spurred affordable housing developments, provided small businesses access to capital, created affordable healthcare plans, built community facilities, and empowered education in communities across our footprint.

In addition to our Alternative Community Capital (ACC) team, our responsive, customer-focused team of strong leaders and experienced associates are trained to help businesses navigate their financial options. We aim to strengthen small businesses and foster economic justice in under-resourced communities by providing non-tax credit, Community Reinvestment Act-qualified CDLIs.

#### 2023 Community Reinvestment Act-Qualified Philanthropic Commitments



94 donations totaling **\$1,884,400** supported Affordable Housing programs



695 donations totaling **\$12,748,670** supported Community Services programs



107 donations totaling **\$3,969,833** supported Economic and Revitalization Programs

#### **Huntington's National Community Advisory Council**

An important element of our community outreach is the active engagement of our National Community Advisory Council (the Council), which provides feedback related to our efforts in affordable housing, community development, nonprofit services, and small-business and economic development. The Council is the link that connects Huntington with key members of the communities we serve.

Comprising 18 community partners from across our footprint, the Council meets regularly and shares insights about community projects and investments with our executive leadership. In addition, the Council reviews progress on the Community Plan, provides insight and feedback on future strategies, services, products, and emerging issues, and advocates for Huntington's community stakeholders.

#### Community Development Loans & Investments

2021

329 loans totaling

\$1.9 billion

106 investments totaling

\$924 million

2022

436 loans totaling

\$2.0 billion

86 investments totaling

\$957 million

2023<sup>1</sup>

280 loans totaling

\$796 million

156 investments totaling

\$730 million

Huntington received an

"Outstanding" rating from the Office
of the Comptroller of the Currency
(OCC) on our most recent Community
Reinvestment Act performance
evaluation (May 2020).

35,990+
total volunteer hours
from Huntington colleagues
in 2023

<sup>&</sup>lt;sup>1</sup> 2023 loans and investments were lower than previous years due to interest rate increases, which negatively impacted the size of certain commercial development projects.

#### **COMMUNITY FOCUS AND IMPACT**

### Affordable Housing and Homeownership

Affordable and safe housing is vital to the well-being and health of the communities we serve. Homeownership gives families the opportunity to build wealth and long-term financial prosperity, as well as provide economic and social stability for generations to come. Huntington is committed to acting as a catalyst for change by investing in affordable housing solutions that help make the dream of homeownership a reality for people from all walks of life.

We work to create accessible mortgage options, with the support of trained Community Mortgage Loan Officers and financial educational programs provided by community partners. As part of our five-year, \$40 billion Community Plan, Huntington's Home Lending team is committed to providing \$24 billion in loans to LMI borrowers and borrowers in LMI neighborhoods, including \$12 billion in lending to diverse and under-resourced borrowers. From June 2021 through December 2023, we have provided \$14.6 billion in affordable mortgage lending, including \$8.1 billion to diverse borrowers or for properties in diverse census tracts.

We offer products for first-time homebuyers, home improvement loans, home equity loans, emergency relief for residents who could use a helping hand, and more. Our team helps address the challenges facing borrowers within our footprint by offering state, local, and proprietary programs, including those designed to address saving for down payments, homebuyer education, and alternative credit.

#### 2023 Impact At a Glance

**~\$1.5 billion** in Community Development Loans and Investments

**~\$9.7 million** in closing costs covered for buyers in LMI regions

~\$575,000 in closing costs for VA loans covered



#### **Removing Barriers to Homeownership**

#### **Closing Cost Assistance Program**

For many people—even those with the steady income to make monthly payments—down payments and closing costs can be among the biggest barriers to homeownership. For qualifying borrowers, Huntington's Closing Cost Assistance Program covers all but \$500 of Huntington closing costs, which saves the average borrower thousands of dollars. In 2023, nearly 2,900 loans qualified for this program, and we covered more than \$9.7 million in closing costs for buyers in LMI regions.

We believe in the power of partnerships to amplify our community impact, and we participate in local and state down payment assistance programs in our retail footprint states. In late 2023, Huntington joined civic leaders, corporate partners, nonprofits, and other lenders in the Minnesota GroundBreak Initiative, a grassroots effort to address racial disparities and other longstanding gaps in homeownership, business lending, and wealth creation. This program offers down payment assistance ranging from \$36,000 to \$45,000. In addition, in April 2023, Huntington was a lead participant in the **Detroit Down Payment Assistance** program, providing up to \$25,000 of assistance. In addition, our Federal Home Loan Bank (FHLB) Welcome Home Program provided 42 Huntington borrowers across our footprint each with \$10,000 to \$15,000 of assistance under the FHLB's first-time home buyer program.

#### **Review of Denied Loan Applications**

We review conditionally denied mortgage and home equity applications to evaluate whether alternative avenues to approval may exist, helping ensure fair and equitable treatment of all consumers. This process helps reduce barriers for LMI borrowers and borrowers located in LMI areas. In 2023, we helped more than 1,200 families achieve their homeownership goals through this additional review process.

#### **Preserving Homeownership**

The Huntington Home Savers program addresses the needs of customers who struggle to meet their mortgage obligations. We help them understand mortgage relief and protections and provide mortgage assistance options such as refinancing, repayment plans, and payment deferrals. In 2023, the program provided aid to 1,857 homeowners.

#### Home Savers Impact (2020 - 2023)

YEAR	CUSTOMERS ASSISTED
2020	3,596
2021	2,968
2022	3,118
2023	1,857

#### **Huntington Home for Good**

To help provide equitable access to credit for people who may have encountered barriers to their homeownership dreams, we offer Huntington Home for Good. This mortgage product helps expand access to home lending options by modifying eligible credit criteria, including expanded use of alternate credit, greater debt evaluation flexibility, and low down-payment requirements. Huntington offers its Closing Cost Assistance Program to all borrowers who qualify.

Home for Good mortgages offer down payment options as low as 3%. In addition, applications include a Huntington Down Payment Assistance Grant of 2% of the sales price up to \$5,000 with no repayment obligation. The program is currently offered in several areas, including Detroit, Warren, and Grand Rapids in Michigan; Columbus, Cincinnati, and Toledo in Ohio; Chicago and Lake County in Illinois; Kenosha, Wisconsin; and Minneapolis/St. Paul, Minnesota.

In addition, the Home for Good Home Equity Line of Credit was launched in April 2024. Huntington also expanded Home for Good Mortgage to additional regions in 2024 and will continue to evaluate the expansion of Home for Good products into other communities.

#### Improving Equitable Access to Affordable Housing

With strong support from our partners, Huntington is committed to improving equitable access to affordable housing across our footprint.

We are involved in **Project REACh (Roundtable for Economic Access and Change)**, which was created by the OCC to promote financial inclusion through greater access to credit and capital. Project REACh brings together leaders from the banking industry and national civil rights organizations, as well as business and technology experts, to reduce barriers that prevent full, equal, and fair participation in the nation's economy. In recent years, the collaborative has focused on expanding the impact of Special Purpose Credit Programs like Huntington Home for Good, addressing the issue of appraisal bias, identifying opportunities to support single-family housing production, and building a path for borrowers to homeownership through housing counseling.

In addition, Huntington has committed to Project REACh's Appraisal Diversity pledge, which includes taking specific actions to help address concerns in home valuations, which can limit the ability of consumers to fully benefit from enjoying the financial returns of homeownership. Specifically, we have committed to providing advisor services to program participants.

As a leading national home equity lender, Huntington is providing \$300,000 to the **John Glenn College of Public Affairs at The Ohio** State University (OSU) to better understand the challenges faced by older adults who often have difficulty accessing home equity. Through this study, we will provide OSU researchers with access to anonymized customer data to help them assess customer credit decisions, identify barriers that lead to home equity denials, and find potential solutions.

**Convergence Columbus** is an initiative led by the national Mortgage Bankers Association (MBA), Ohio Housing Finance Agency, and the John Glenn College of Public Affairs at OSU. Huntington is a strategic launch partner and founding investor, and we have committed to investing \$100,000 over a threeyear period to help support the initiative's success. Our support of Convergence Columbus has helped to launch a new website where individuals and families can find information about the home buying process along with connections to grants, events, and lenders.

Huntington serves as an Advisor to the **Appraiser Diversity** Initiative, a nationwide program led by the Appraisal Institute, Fannie Mae, Freddie Mac, and the National Urban League. It is designed to attract new entrants to the real estate appraisal field while fostering diversity in the profession.





### **Environmental Strategy**

Huntington's focus on environmental stewardship reflects our commitment to protecting the planet, mitigating the effects of climate change, promoting biodiversity, using natural capital sustainably, and addressing the environmental challenges faced by under-resourced communities. We know significant change and a comprehensive approach are required to support our stakeholders in this transition.

Our environmental and climate strategies quide us. These strategies include advancing our decarbonization approach, transitioning to renewable sources of energy, improving energy efficiency, and helping customers achieve their environmental sustainability goals. In addition to these core commitments, we have programs to reduce waste and water consumption in our operations, expand our emphasis on green building design and construction across our corporate real estate footprint, and drive sustainable procurement throughout our supply chain.

# ENVIRONMENTAL

Environmental Strategy

Environmental Performance

#### **Environmental Policies and Oversight**

As part of our environmental management system, we have clearly defined policies and programs that drive our environmental stewardship initiatives. They enable us and our third-party suppliers to comply with, and often exceed, applicable environmental regulations and laws where we operate.

- Our 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.
- Our <u>Climate Risk Statement</u> establishes our quiding principles and responsibilities for mitigating climate-related impacts, including our approach to climate risk management, our climate risk management framework, and our balanced approach to engaging with and managing climate-related financial exposures.

In 2023, we updated both statements to align with regulatory expectations and climate risk management best practices.

#### Notable milestones in

- Announced updated 2030 environmental goals.
- Invested in a platform to

integrate ESG, climate, and financial reporting, as well as help improve data quality.

• Prepared to strengthen our internal controls to help us meet anticipated regulatory requirements.

Our environmental stewardship policies align with and support aspects of well-recognized and respected frameworks, including the UN Sustainable Development Goals and the principles of the Paris Agreement. Additionally, we demonstrate our commitment to transparency through our disclosures to CDP and our reporting that aligns with the TCFD framework.

Climate change presents risks and opportunities for our business, and we are strategically integrating climate-related insights into our decision-making and how we serve our customers. Our climate risk framework, capabilities, and expertise continue to evolve in preparation for the future.

We also regularly monitor emerging regulations and frameworks, including the SEC climate-related disclosure rule, European Union regulations and frameworks, and state-level legislation, such as California Senate Bills 253 and 261. We benchmark against our current reporting status and proactively take preparedness steps.

#### **Supporting Our Customers' Environmental Goals**

The goal of our Renewable Energy Finance (REF) group is to be a leader in offering solutions that promote sustainable business and unlock opportunities for renewable energy alternatives. Through our REF offerings, we leverage 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 providing financing for renewable energy, electric vehicle (EV) charging stations, and microgrid and battery storage projects.



#### 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. Learn more about our climate-related governance, strategy, risk management, and targets in our standalone 2023 Climate Report.

COVERNANCE						
GOVERNANCE	STRATEGY	RISK MANAGEMENT	METRICS AND TARGETS			
	Accomp	Accomplishments				
Published our Environmental Policy Statement (2018), Climate Risk Policy Statement (2020), internal Climate Risk Policy (2022), and Climate Risk Statement (2023), establishing Board oversight of climate-related risks and opportunities.  Initiated quarterly environmental and climate risk updates to the NESG Committee, Risk Oversight Committee, and/or the full Board (2020).  Began providing climate risk updates to the executive-level Risk Management Committee (2020).  Began providing climate risk updates to the executive-level Risk Management Committee (2020).  Poined the Partnership for Carbon Accounting Financials (PCAF) (2022).  Completed initial calculation of Scope 3 financed emissions using PCAF's standard methodology (2022).  Appointed the Company's first Chief ESG Officer (2022).  Initiated operationalizing our green lending definitional criteria and process (2023).		<ul> <li>Announced the Company's first Climate Risk Director (2021).</li> <li>Acquired comprehensive third-party climate analytics to address physical risk entity-level emissions and transition risk (2021).</li> <li>Conducted comparative physical risk vulnerability analysis for all Huntington and peer facilities (2022).</li> <li>Established dedicated Climate Risk team oversight program to build out our climate risk capabilities (2022).</li> <li>Established interim climate-related credit risk underwriting and analysis guidance (2022).</li> <li>Delivered first-ever enterprise-wide climate risk training (2024).</li> </ul>	<ul> <li>Began reporting to CDP (2010).</li> <li>Announced 2022 environmental sustainability goals (2017).</li> <li>Established a renewable energy goal to source 50% of our electricity from renewables by 2035 (2020).</li> <li>Implemented a detailed process to inventory, disclose, and verify Scope 1, Scope 2, and some relevant Scope 3 emissions categories (2017).</li> <li>Developed an exploratory decarbonization roadmap (2021).</li> <li>Announced updated 2030 environmental sustainability goals (2023).</li> </ul>			
	Curren	nt Focus				
<ul> <li>Ensuring compliance capabilities and training the Board and senior management on new and emerging regulatory requirements.</li> <li>Engaging with shareholders on emerging environmental topics.</li> <li>Participating in various environmental- and climate risk-related external working groups to learn and share best practices.</li> </ul>	<ul> <li>Enhancing supplier engagement on Scope 3 carbon emissions disclosure.</li> <li>Implementing an integrated reporting solution, carbon accounting platform, and control environment to automate reporting and prepare for heightened regulatory expectations.</li> </ul>	<ul> <li>Running initial climate scenario analysis pilot for select portfolios under multiple standard scenarios.</li> <li>Operationalizing climate-related credit guidance in underwriting processes.</li> <li>Evaluating geographic concentration approaches to managing climate risk exposure.</li> </ul>	<ul> <li>Enhancing Scope 3 inventory process to include all relevant value chain emission sources.</li> <li>Progressing against 2035 renewable energy goal by exploring green procurement opportunities.</li> <li>Automating comprehensive financed emissions calculations.</li> </ul>			
	Aspiration	al Objectives				
<ul> <li>Further integration of environmental and climate risk data into management and business unit decision-making with board oversight.</li> <li>Establish centralized responsibility for creating, acquiring, harmonizing, and managing climate-related data for effective usage across all business units.</li> </ul>	<ul> <li>Ongoing identification of environmental- and climate-related opportunities as part of the Company's overall strategic planning process.</li> <li>Develop climate-related finance product offerings.</li> <li>Optimize outcomes for communities through the Company's role in a just decarbonization transition.</li> <li>Build sustainability talent across Huntington's footprint to magnify positive impacts.</li> </ul>	Embed climate risk considerations across Risk Management processes and functions.     Advocate for effective climate risk management policies and practices as a leading voice in the industry.	<ul> <li>Find opportunities to engage with carbon offset market as they mature.</li> <li>Identify additional granular opportunities to decarbonize operational emissions.</li> <li>Develop and refine long-term 2030-2050 targets.</li> </ul>			

### **Environmental Performance**

#### Our Environmental Sustainability Goals and Progress

In 2023, we began refining our data quality and collection processes while continuing to focus on our goals. We invested in an enterprisewide data collection platform for our ESG metrics to improve tracking and reporting on our progress. In the future, this will also assist in automating the collection and calculation of our metrics across the business while providing the ability to view updated measurements in real time.

We also introduced new environmental sustainability goals, as noted in our 2022 ESG Report. Building on the progress of our inaugural goals, our new goals were set with an understanding of the most up-to-date climate science to make a meaningful impact.

#### Our Environmental Sustainability Goals

INDICATOR	TARGET	TARGET YEAR	2023 PROGRESS <sup>1</sup>
GHG Emissions (Scope 1 & Scope 2 location-based)	35% reduction	2030	7% reduction
GHG Emissions (Scope 2 market-based)	50% reduction	2035	2% reduction
Water Consumption	15% reduction	2030	1% reduction
Landfill Waste <sup>2</sup>	25% reduction	2030	5% increase
Renewable Energy³	50% of electricity usage	2035	1% of electricity usage

#### **Environmental Performance Summary**

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

	2022 (BASELINE)	2023
Scope 1 – Direct Emissions (MT CO <sub>2</sub> e) <sup>4</sup>	17,895	16,331
Scope 2 – Indirect Emissions (MT CO <sub>2</sub> e) <sup>4</sup>	54,345	50,793
Building Energy Consumption (MWh)	202,709	186,560
Renewable Energy (MWh)	1,220	977
Water Consumption (gallons)	129,462,000	127,687,000



implemented at Huntington facilities, resulting in more than \$19 million in investments in 2023.



<sup>&</sup>lt;sup>1</sup> 2022 serves as the baseline year for all goals.

<sup>&</sup>lt;sup>2</sup>We are actively identifying opportunities to reduce waste disposal across our footprint.

<sup>&</sup>lt;sup>3</sup> Our PPA (signed in 2020) with AEP Energy to provide renewable energy for approximately 19% of our 2023 electric load profile experienced construction delays and will take effect in 2025, which has contributed to slower progress with respect to our renewable energy usage.

<sup>&</sup>lt;sup>4</sup>The verification report, performed by Energent, noted that the 2023 GHG emissions assertion is materially correct, a fair representation of the GHG emissions data and information, and complies with ISO 14064-3. Therefore, the original 2023 GHG emissions assertions have been reported.

#### Huntington's Renewable Energy Roadmap

To achieve our goal of shifting 50% of our electricity sourcing to renewables by 2035, we have established a two-pronged strategy:

- **Reducing Our Energy Consumption**: Through a combination of efficient buildings and improved operations, we strive to reduce our overall energy footprint. At select locations, we are also investigating on-site renewable energy systems including, but not limited to, solar photovoltaics, geothermal, and other advanced energy technologies.
- Reviewing Renewable Energy Procurement Opportunities: For our Scope 2 emissions that we are unable to reduce through efficiency improvements, we continue to review renewable energy procurement opportunities to help offset our impacts. Our power purchase agreement (PPA) with AEP Energy to provide renewable energy for approximately 19% of our 2023 electric load profile experienced construction delays and will take effect in 2025. We signed an agreement with DTE Energy's MIGreenPower Program in 2023 to source renewable energy for approximately 12% of our current electric load profile starting in 2026. We continue to evaluate PPAs and virtual PPAs to help mitigate our environmental footprint.

#### 2023 Energy Efficiency Projects Completed Across Our Footprint

TYPE OF PRODUCT	NUMBER OF PROJECTS COMPLETED
High-efficiency HVAC systems	181
Interior/exterior LED lighting with daylight harvesting controls	102
Window replacements	38
Roofing enhancements	35
Elevator modernization	18

Since 2013, Huntington has been a voluntary participant in the U.S. Environmental Protection Agency's (EPA) ENERGY STAR program. As of December 31, 2023, we achieved the following:

INTRODUCTION

- **243 ENERGY STAR-certified bank branches**, comprising 59% of all ENERGY STAR-certified bank branches across the country.
- 251 ENERGY STAR-certified sites registered.
- Recognition by the EPA with **Elite Member status**, making Huntington one of fifteen companies in the U.S. to earn this top distinction and the only financial institution to do so.



We have installed on-site solar arrays at corporate-owned office buildings, including our Ohio-based Easton, Gateway Center, and Akron Operations Center facilities. In 2023, these facilities produced

977 MWh of renewable energy.

#### **Advancing Our Electric Vehicle Charging Network**

Huntington's commitment to advance a low-carbon economy extends to our colleagues and customers. We believe low- or no-emissions vehicles are the future of transportation, and we have continued investing in EV charging infrastructure across our office and branch locations.

Currently, Huntington has 56 EV charging ports at various locations. These ports provide colleagues and customers with a convenient and affordable means to charge their vehicles while at our locations. In 2023, the use of these ports saved approximately 16,859 gallons of gasoline.

We plan to expand our EV charging footprint to additional regional locations as more of our colleagues and customers transition to EVs. Beyond the direct benefits of helping commuters lower carbon emissions, our investment in EV charging infrastructure reflects our mission to give back to the communities in which we live and work. Our EV ports are available to the public, providing an accessible and convenient charging option for local residents and contributing to improved air quality.

#### **ENERGY STAR Scoring Makeup**

LOW (1-49)	<b>MEDIUM</b> (50-74)	HIGH (75-100)
17%	42%	41%
145 locations	360 locations	351 locations

#### **Reducing Resource Waste and Consumption**

We continue to seek opportunities to reduce our resource consumption and lower the volume of waste we send to landfill. Our ongoing actions include the following:

- Reducing paper usage at our facilities and encouraging our customers to opt-in to paperless statement alternatives;
- Partnering with our suppliers to procure paper with recycled content and paper sourced from certified forests as defined by the Forest Stewardship Council and Sustainable Forestry Initiative;
- Replacing polystyrene foam and plastic serviceware products at our facilities with compostable, biodegradable, and reusable options. We have also worked to remove plastic bottled water from our cafeterias, markets, and vending machines, as well as from our online supply system, in favor of reusable alternatives: and
- Actively identifying areas of opportunity to reduce waste by auditing our facilities for recycling programs.

In addition, we contract with a third party to manage our electronic waste and provide us with an audit report of our efforts. This provider helps identify surplus or end-of-life technology at our sites and schedules recovery and pickup. These materials are then either refurbished and donated for a second life or, if no longer viable, designated for recycling.

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#### 2023 Electronic Recycling Delivers Impact



**17,091 reused** and **23,436 recycled** digital devices



17,119,091 kWh energy savings, equivalent to annual power usage for 1.340 homes



3,168,338 kg reduced CO, emissions, equivalent to removing 2,278 cars from the road per year



14,108 kg hazardous waste reduction, equivalent to the average weight of 115 refrigerators

#### **Water Stewardship and Quality**

Huntington actively manages the reduction of our water use with low-flow toilets, water-efficient faucet fixtures, and waterefficient landscaping. We keep our colleagues informed of water conservation and other environmental best practices through regular sustainability tips sent to their email inboxes. We have also taken steps to improve water quality in our buildings and encourage reusable alternatives by providing water bottle filling stations and filtered water faucet adapters.

#### **Building Construction and Design**

Huntington has policies that specify requirements for all the facilities we operate to maximize efficiency. Chief among these is our "AIA Document A201 – 2017 General Conditions of the Contract for Construction" policy. In addition to requiring all building stakeholders to comply with all local, state, and federal codes, this policy lays out additional expectations for safety, quality, reliability, and other best practices during the design and construction phases.

Beyond our policies, our Real Estate Management team proactively addresses environmental issues that could impact the health and safety of our colleagues. This includes overseeing the evaluation, reporting, and remediation for the following categories: indoor air quality, water quality testing, refrigerant reclamation and reuse, underground storage tank management, and environmental contractor management.



ENVIRONMENTAL

**ECONOMIC** 

#### **Green Building Design and Construction**

We prioritize the use of environmentally friendly products in our facilities to provide workplaces that are safe and healthy for our colleagues and customers and sustainable for the planet. We have implemented formal policies at all our facilities so that we utilize resources as efficiently as possible. Where feasible, we also integrate green products into our design, and we set minimum energy and water efficiency requirements for our building products that contractors and service providers must meet. These design standards include requirements to exceed Seasonal Energy Efficiency Ratio ratings, which are used to evaluate the performance of HVAC systems.

Other sustainability initiatives led by our Real Estate Management team include:

- Reusing existing structures and infrastructure, where appropriate, at our retail branches rather than demolition and rebuilding;
- Ensuring exterior materials, such as masonry and glass installed at our retail branches, are durable, nontoxic, and when possible, sourced in region;
- Using a highly regarded manufacturer of customized sustainable interiors for portions of interior buildouts; and
- Continuing to use LED lighting with our specified controls.

#### Sustainable Procurement

All vendors are expected to abide by our <u>Service Provider</u> <u>Code of Conduct</u>, which outlines expectations regarding ethical business practices, labor and human rights, health and safety, diversity, environmental responsibility, privacy, and confidentiality.

As highlighted in 2023 Climate Report, we engage with our suppliers on our collective decarbonization efforts. Additionally, we have also engaged with our suppliers to share best practices and implement green procurement strategies.

#### **Green Cleaning**

Our commitment to the environment is reflected in our choice of cleaning service providers. Our providers observe the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) green cleaning recommendations to protect the health and well-being of customers and colleagues in an environmentally conscious way. Additionally, our service providers have received Cleaning Industry Management Standard-Green Building Certification with Honors from the International Sanitary Supply Association, and they use products that meet Green Seal standards...



#### **Our Culture of Environmental Responsibility**

Our commitment to environmental responsibility is not just a business objective—it is embedded in our culture. Our Green Team Business Resource Group (BRG) collaborates with other Huntington BRGs and colleague groups to organize cleanup and volunteer events, with an emphasis on supporting historically under-resourced communities. Members of the Green Team often serve as champions of Huntington's environmental efforts and strive to engage others in making progress toward our environmental goals.

In 2023, we grew our Green Team BRG by 221 colleagues, a 63% increase compared with 2022. In recognition of Earth Day, Green Team members and other colleagues participated in various tree planting, gardening, litter pick-ups, and more to create positive impacts in our communities and beyond. In addition, several Huntington Board members and executive leaders joined our colleagues in Southeast Michigan to package 480 food boxes in support of senior citizens who experience food insecurity.



Diversity, Equity, Inclusion, and Culture

Colleague Engagement, Development, Retention, and Attraction

**ECONOMIC** 

In our journey toward a Category of One company, we aim to develop efforts and initiatives that elevate our culture and performance to a level that puts us in a class all our own. Each day we work to transform our Purpose into action and enact our Values of a Can-Do Attitude, Service Heart, and Forward Thinking to deliver for our stakeholders. Our colleagues are foundational to these efforts.

#### **Our Focus on Our People**

INTRODUCTION

We continuously seek ways to elevate the colleague experience as we strive to be a destination employer, and the best place our colleagues have ever worked. We remain focused on the following opportunities:

#### **ENHANCING OUR FOCUS ON OUR COLLEAGUES**

We aim to acquire strong talent to shape our future, enhance the talent experience throughout the colleague life cycle, and elevate leader capabilities to propel us forward for future growth and success.

#### **DEEPENING ENGAGEMENT ACROSS THE COMPANY**

Highly engaged colleagues feel a greater sense of connection to Huntington, and this is reflected in our continuous listening approach, which includes periodic pulse surveys and our annual Voice survey.

#### **HOLISTIC, ROBUST VIEW OF WELLNESS AND WELL-BEING**

Enhancements and additions to our comprehensive benefits and wellness offerings continue to be informed by colleague input through formal and informal feedback.



#### **Our Talent Strategy**

We have a comprehensive talent management program that emphasizes engaging, developing, retaining, and attracting the best talent to Huntington.

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We believe that exceptional Company performance is a balance between "what we do" and "how we do it." Our culture is reinforced in every stage of our talent strategy, beginning with acquiring talent that share our values and continuing throughout their career development with Huntington. Investment in our culture and our colleagues fuels our Purpose every day.

Our Chief Talent Officer provides oversight and support of our full talent strategy and life cycle.

Our respect for the protection and preservation of human rights is guided by the principles set forth in the United Nations Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Read more in our <u>Human</u> Rights Statement.



**ORGANIZATIONAL & COLLEAGUE PERFORMANCE** 

#### **Engaging Our Colleagues**

We leverage colleague feedback and insights to drive action within our regions, across our segments, and throughout our enterprise.

In 2023, we conducted our  $10^{th}$  consecutive companywide engagement survey, with a strategic focus on culture, trust, and engagement. Colleague engagement has remained consistent compared with 2022, and our colleagues report that feeling valued remains the top driver of engagement with Huntington. Colleagues also continue to report that the culture at Huntington is inclusive and welcoming, frequently describing it as flexible, people-oriented, and built on strong relationships within teams.

We also distribute **pulse surveys** to provide opportunities for colleagues to share real-time feedback. Pulse surveys are designed to solicit feedback on key topics that have emerged or remain critical to leadership, and the results help us gauge our progress.

**How Huntington Colleagues Describe Our Culture** 

**Companywide Engagement Survey Results** 

**84%** of colleagues are **"engaged** or highly engaged"

**SLIGHTLY BELOW THE** 

 $75 th_{\text{ percentile for } \textbf{Engagement}}$ 

**ABOVE THE** 

 $75 \text{th }_{\text{percentile for } \text{Trust}}$ 

**ABOVE THE** 

75th percentile for Culture





**ECONOMIC** 

#### **Developing Our Pipeline of Talent for Career Growth**

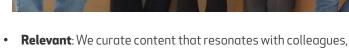
We believe our greatest asset in recruiting the talent we need is our existing workforce—everyone has an important role to play in career development. From investing in our interns to developing successors for key leadership positions, we intentionally prepare colleagues for their career journeys so they see a clear future at Huntington.

#### A Full View of Colleague Growth and Development

We enable and empower colleagues to navigate their career growth across the talent life cycle by designing experiences that are:

- **Colleague-centric**: Our programs are curated, created, and driven by the colleague, with an expansive library of courses to suit almost any career or developmental aspiration.
- Interactive and collaborative: We encourage colleagues to build connections through shared experiences. Our Career Hub enables colleagues to create connection points across the platform including skill-building education, mentoring opportunities, and qiq experiences to qain exposure and capabilities.





INTRODUCTION

- **Timely**: The content is available and accessible when colleagues need learning support or professional development.
- **Hybrid**: Learning opportunities meet colleagues where they are—in both location and modality—and are adaptable to individual needs.

#### **Developing Talent**

Our talent development programs are designed so that Huntington has a ready workforce to tackle the needs of the future. Whether through our award-winning internship program or one of our two-year development programs, high performers will be prepared for increased levels of impact and responsibility at Huntington.

555 colleagues participated in our enterprise-wide talent 74% development programs their career aspirations, and the world around them. of participants are gender and/or racially or ethnically diverse

> The following enterprise-wide programs support colleagues at key milestones along the talent pipeline:

- **Luminate**: High-performing early career talent
- **Emerge**: High-performing emerging talent
- Accelerate and Transformations: High-performing midto-executive level talent



Fostering New Talent Through Internships

Huntington invests in early talent by offering dynamic internships that address numerous areas of our business, including front line business segments, finance, audit, risk, IT, analytics, and operations. We also offer our interns professional development experience, with an innovative approach to collaboration and the involvement of executive leaders. Through our internship structure and strategy, we focus on transitioning college students and recent graduates into job opportunities. In 2023, we had 138 interns representing 66 colleges/universities and 66% gender and/or racial or ethnic diversity. Job offers were made to 67% of eligible interns, with 80% accepting their offer to start their career with Huntington.

#### Leveraging Technology for Professional Development

Our learning culture is reinforced by ongoing companywide and segment-specific training opportunities. In 2023, colleagues completed 21 enterprise training opportunities. We also offered an additional 45 business segment-specific modules of training that enabled colleagues to develop specific skills or knowledge. In total, our colleagues spent 577,811 hours—an average of 29 hours per colleague—participating in learning opportunities over the course of the year.

> 60% of all executive leaders have "ready now" successors

32%

of all open roles were filled by internal candidates, including 49% of leadership roles

### **Colleague Training Courses**

The following are some examples of annual training topics all colleagues are required to complete:

- Bank Secrecy Act/Anti-Money Laundering (BSA/AML)1
- Cybersecurity Essentials<sup>1</sup>
- Data Protection at Huntington<sup>1</sup>
- Maintaining a Safe, Professional, and Productive Work Environment
- My Role in Emergency Preparedness<sup>1</sup>
- Preventing Discrimination and Harassment
- Reporting Wrongful Conduct

# **Providing Tuition Support to Degree-Seeking Colleagues**

Huntington supports colleagues seeking degrees through a tuition reimbursement program, as well as preimbursement arrangements with two programs:

- Exact Track Business Program is an accelerated business degree program in partnership with Columbus State Community College (CSCC) and Franklin University. Colleagues earn two degrees upon completion: an Associate of Applied Science in Business Management from CSCC and a Bachelor of Science in Business Administration from Franklin.
- Western Governors University (WGU) offers an accelerated, online degree-completion program, with a self-paced format for colleagues who have already completed some college credits.

In 2023, 193 colleagues took advantage of preimbursement programs, equating to more than \$785,000 in tuition payments paid to universities on our colleagues' behalf.



by Training magazine



# **Retaining Our Colleagues**

Our holistic support for our colleagues empowers them to take care of themselves and our customers, demonstrating our commitment to one another. Huntington strives to provide some of the best benefits in the industry. We actively listen to our colleagues and tailor our benefits and perks to meet their evolving needs. We review and update our offerings annually.

In 2023, we eliminated the 12-month waiting period for family time off and caregiver leave making colleagues eligible for those programs the first of the month following 30 days of service.

### **Our Wellness Offerings**

#### **PERSONAL WELL-BEING**

- Family time off (up to four weeks of parental leave)
- Caregiver leave (one to two weeks off every two years based on length of employment)
- Workplace Flexibility Policy
- Expanded military benefits
- Scholarship program
- Huntington Cares Emergency Fund program

#### **EMOTIONAL WELL-BEING**

- "How are you doing, really?" program
- Employee assistance plan
- Resilience training for colleagues
- Comprehensive recognition program
- "Spotlight on Learning" program

#### **PHYSICAL WELL-BEING**

- Colleague wellness platform
- Wellness incentive opportunities for colleagues participating in healthy activities and preventive screenings
- Virtual/on-site fitness
- Fitness discounts

#### **FINANCIAL WELL-BEING**

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- 401(k) plan with a match of up to 4% (with 96% colleague participation)
- Minimum pay rate of \$20/hour (effective 1/1/2023)
- Medical plan premium tiering that scales with colleagues based on pay
- Tuition reimbursement and preimbursement





### Attracting The Best Talent<sup>1</sup>

Attracting and hiring the best talent are pivotal to our sustained success as we strive to be a destination employer. We embrace a talent attraction model that supports our mission to provide every candidate and every hiring manager with an exceptional experience that aligns with our cultural transformation and journey toward a Category of One company. In 2023, our Purpose Driven Hiring course was integrated into our leadership development program, which is designed for new leaders within their first 90 days of employment. This program is part of our continued investment to support new leaders by focusing on relevant and engaging training resources that allow them to dive deep into understanding the importance of their role. Purpose Driven Hiring supports our approach to hiring for alignment to Huntington's leadership behaviors, values, and skills, and creates a streamlined, repeatable process that promotes fair treatment and equity for all.

We will continue to be strategic and creative with telling our differentiated story, leveraging powerful messaging and surroundsound channels to get there. In 2023, we revamped our career site quarterly to highlight Huntington's dynamic energy, new perks, and recent awards, while aligning with our other online presences. We leveraged a candidate management platform to enhance communication and engagement with candidates. These efforts aim to transform our hiring process, elevating the experience of candidates, hiring managers, and recruiters alike, to attract and secure top talent that will shape the future of our bank.



<sup>&</sup>lt;sup>1</sup> Huntington is an equal opportunity and affirmative action employer and is committed to providing equal employment opportunities for all, regardless of race, ethnicity, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or expression, political opinions, speech, or affiliations, or any other characteristic protected by federal, state, or local laws.

Welcoming and celebrating diverse views, ideas, and opinions from all colleagues is at the core of how we fulfill our Purpose of making people's lives better, helping businesses thrive, and strengthening the communities we serve.

Employing a diverse and inclusive workforce is essential to our sustained success and growth. Our Company tagline—**Welcome**—is central to our identity and reflects how we foster an environment where our people can bring their authentic selves to work and feel empowered to grow their talents.

#### Advancing Our Commitment to Diversity, Equity, and Inclusion

Our <u>Diversity</u>, <u>Equity</u>, <u>and Inclusion Policy Statement</u> codifies our commitment to be intentional in how we engage, develop, retain, and attract talent to foster a more inclusive environment. Appreciating our individual differences is how we cultivate the best ideas and innovations for our customers.

We firmly stand against discrimination and harassment of any kind on the basis of race, ethnicity, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or expression, political opinions, speech, or affiliations, or any other characteristic protected by federal, state, or local laws.

#### **Our DEI Focus Areas**

Huntington's DEI strategy—which is led by our Chief DEI Officer, who reports to the CEO—focuses on the following:

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**ECONOMIC** 

#### **WORKPLACE INCLUSION**

Create an inclusive culture that fosters an authentic sense of belonging.

#### **WORKFORCE DIVERSITY**

Engage, develop, retain, and attract talent of all backgrounds that reflects the realities of our marketplace, our communities, and the relevant labor market.

#### **COMMUNITY ENGAGEMENT**

Fully leverage our diverse talent and inclusive culture toward positive outcomes that benefit our colleagues, customers, and communities.

#### SUPPLIER DIVERSITY

Drive economic inclusion within our supply chain to connect with diverse businesses and produce quality products and services in alignment with our Purpose.



#### **Aligning With the Needs of Our Regions**

Huntington's regional DEI strategy focuses on the following priorities:

- Support each business segment to monitor talent diversity and discuss momentum, opportunities, and strategy;
- Develop, execute, and communicate comprehensive DEI plans that support our regional community and colleague plans for each business segment;
- Partner with regional and business segment leaders to evaluate current business strategies and operational objectives;
- Support campus recruiting where we identify and connect with workforce development organizations. These organizations support training and placement of diverse professionals; and

• Collaborate on community and philanthropic initiatives supporting our Purpose of "Looking Out for People."

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Huntington's corporate Diversity, Equity, and Inclusion Strategic Council (DEISC) consists of representatives from business segments and internal strategic partners. It serves in an advisory role to guide alignment between DEI initiatives and our business goals and corporate values. The DEISC is responsible for driving progress toward our key performance indicators (KPIs) and aspirational goals, assessing our strategy's results, identifying best practices and opportunities for improvement, and providing executive support to our DEI Network.

#### Social Equity Colleague Plan: Bringing Our Strategy to Life

Our Social Equity Colleague Plan seeks to continually promote progress in the areas of culture and inclusion, career development and advancement, and the colleague experience. We are pursuing short- and long-term actions, and we review and refresh KPIs annually to continue to make progress toward our goals associated with culture, trust, and engagement.

#### **DEI Governance Structure**

#### **BOARD OF DIRECTORS**

Community Development Committee

#### **EXECUTIVE LEADERSHIP TEAM**

Chief DEI Officer

#### **ESG WORKSTREAMS**

Diversity, Equity, and Inclusion Strategic Council (co-chaired by Huntington's Chairman, President, and CEO and our Chief DEI Officer)



### **Workforce Diversity**

The following table represents our progress toward our workforce diversity goals. We are proud of our progress to date, and we anticipate continuing to monitor these key performance indicators into the future.

#### Middle and executive management/non-management diversity goals and progress

	2025 GOAL <sup>1</sup>	2023 PERFORMANCE			
Middle and Executive Management <sup>2</sup>					
Total Diversity	50%	48%			
Gender Diversity <sup>3</sup>	35%	31%			
Racial/Ethnic Diversity4	15%	18%			
Total Diverse Hiring <sup>5</sup>	50%	47%			
Total Diverse Promotions <sup>5</sup>	50%	58%			
Non-Management					
Internal Hiring	44%	32%			

We offer opportunities for colleagues to voluntarily self-identify their race, gender identity, disability, protected veteran status, and pronouns. Our Business Resource Groups (BRGs) and Inclusion Councils help promote our Self-ID campaign. Colleagues electing to share their identification preferences leads to more accurate data that will enhance awareness, encourage inclusion, and tailor our programs and benefits to best meet colleague needs.

In addition, we recognize our responsibility as an industry leader to identify and promote opportunities for diverse talent. We renewed our commitment to veterans and military families through a partnership with the USO and look forward to growth with our veteran talent. Our partnerships with historically Black colleges and universities and Hispanic-serving institutions help increase diverse participation in our award-winning intern programs and various career paths. We have established relationships with national organizations and institutions with local affiliates within our core markets. For example, we continued our partnerships with the National Black MBA Association and the National Association of Asian American Professionals by sending colleagues to their respective conferences, where they gained professional development experiences and connected with potential candidates.

Huntington scored 100% on Disability: IN's 2023 Disability Equality Index for the 7<sup>th</sup> consecutive year, and Huntington Chairman, President, and CEO Steve Steinour joined the list of 200 signatories on the nonprofit's CEO letter on disability.

Huntington scored 100% on the 2023-2024 Human Rights Campaign Foundation Corporate Equality Index for the 10<sup>th</sup> consecutive year.



<sup>&</sup>lt;sup>2</sup> Huntington defines middle and executive management at a defined salary grade and above, which encompasses approximately 5,800 U.S. colleagues. Colleagues outside the U.S. are not included.



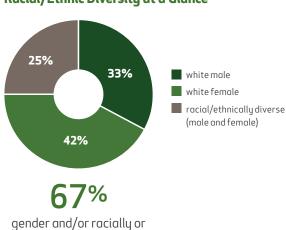
<sup>&</sup>lt;sup>3</sup> Reflects colleagues who self-identify as female.

<sup>4</sup> Reflects colleagues who self-identify as American Indian or Alaskan Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian or Pacific Islander, or Two or More Races.

<sup>5</sup> Reflects colleagues who self-identify as female (any race/ethnicity) and colleagues who self-identify as American Indian or Alaskan Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian or Pacific Islander, or Two or More Races.

#### **Huntington's Workforce Diversity Data**

#### Data: 2023 Total Company Gender and/or Racial/Ethnic Diversity at a Glance<sup>1</sup>

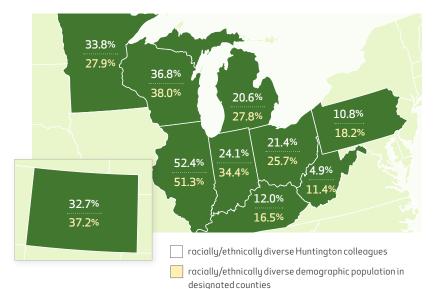


#### Total Workforce by Gender and Race<sup>1,3</sup>

ethnically diverse

	MALE	FEMALE
American Indian or Alaskan Native	0.2%	0.2%
Asian	2.8%	3.1%
Black or African American	3.2%	7.8%
Hispanic or Latino	2.0%	3.6%
Native Hawaiian or Pacific Islander	0.0%	0.1%
Two or More Races	0.9%	1.4%
White	32.9%	41.8%

#### Huntington Colleague Base Compared with Our Footprint Population<sup>1,2</sup>



#### Huntington Colleague Base Compared with Our Footprint Population (by race)1,2,3,4

	2023 PERCENT HUNTINGTON COLLEAGUE BASE	GENERAL RACIAL/ETHNIC REPRESENTATION ACROSS FOOTPRINT POPULATION
American Indian or Alaskan Native	0.3%	0.3%
Asian	5.9%	4.4%
Black or African American	11.0%	12.6%
Hispanic or Latino	5.6%	10.9%
Native Hawaiian or Pacific Islander	0.1%	0.0%
Two or More Races	2.3%	4.4%
White	74.7%	67.4%

# **Our Pay Equity Pledge**

We are committed to equity in every aspect of employment, including compensation. We continue to identify and implement proactive steps to ensure pay equity across our organization, including by conducting regular pay equity analyses, implementing effective hiring practices, and providing training for managers to identify and eliminate potential bias in compensation and other employment decisions. In furtherance of this commitment, we evaluate the ratio of our colleagues' pay, based on race and gender, for colleagues in the same position. We seek to maintain a pay ratio of approximately 100%.

102%

racially/ethnically diverse colleagues' pay as percentage of that paid to non-racially/ ethnically diverse colleagues

99%

women's pay as percentage of that paid to men

Huntington's latest EEO-1 report submitted to the U.S. Equal Opportunity Commission is available on our investor relations website. Data on Huntington's total workforce by race and gender are also available on our website.

<sup>&</sup>lt;sup>1</sup> Based on U.S. colleagues only as of December 31, 2023.

<sup>&</sup>lt;sup>2</sup> Percentages total more than 100% due to the Hispanic or Latino category also being included within other categories. Please see Census.gov for more details.

<sup>&</sup>lt;sup>3</sup> Huntington employs 21 international colleagues. Of these colleagues, eight are at the middle and executive management level. The gender/race/ethnicity of these colleagues are not reportable

Footprint states are Colorado, Illinois, Indiana, Kentucky, Michiqan, Minnesota, Ohio, Pennsylvania, South Dakota, West Virginia, and Wisconsin. Data based on 2021 estimated population as provided by Census.gov for designated counties.



#### **Workplace Inclusion**

Our inclusive, people-centered culture is nurtured by and for our colleagues. Our colleague-led BRGs, Inclusion Councils, and Communities of Practice (CoPs) continue to experience meaningful growth and serve as a hub of impactful, interactive educational opportunities that strengthen our culture, enhance the colleague experience, help us best meet our customers' specific needs, and support our communities.

INTRODUCTION

Each **BRG** is aligned by a shared background or interest and serves to elevate the diverse voices of our colleagues. The forum promotes professional and personal growth while helping to create a pipeline of talented, qualified, and diverse individuals for successive senior roles. Each BRG is sponsored by a Huntington senior executive.



















# **DEI NETWORK**

Business Resource Groups Business Resource Group Regional Chapters

9

Regional Inclusion Councils

Communities of Practice

At the end of 2023, we had more than 5,300 colleagues as active members in our DEI Network, representing 27% of our workforce.

# **Celebrating Our People During Week of Cultural Celebration**

We celebrated Huntington's third-annual Week of Cultural Celebration in September, a dedicated week to focus on promoting cultural diversity, celebrating one another while understanding and embracing everyone's personal story. Programming included more than 30 virtual events as well as regional and local activities to help celebrate our colleagues and our diverse backgrounds and cultures.

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Our region- and office-specific **Inclusion Councils** are voluntary, colleague-driven groups created to support the implementation of our inclusion strategy. Each Inclusion Council raises awareness about our DEI efforts within its region and regularly partners with BRG chapters to amplify support for various events and programs.

Our **CoPs** are colleague-led, volunteer affinity groups. By sharing information and experiences with fellow members, colleagues learn from each other and have personal and professional development opportunities. In late 2023, we launched our fifth CoP, Indigenous Professionals, which provides representation and inclusiveness for Native colleagues and their allies.



In 2023, the first cohort of Huntington colleagues participated in a DEI Executive Certification Program through The Ohio State University's Fisher College of Business. This immersive program helped colleagues expand their knowledge and understanding of inclusive leadership and specific strategies to strengthen their skills. Primary areas of emphasis included Team Dynamics, Overcoming Perceptual Biases, Emotional Intelligence, Leadership, Authenticity, Allyship & Advocacy, Developing Cultural Competence, Creating an Inclusive Culture for Courageous Conversations, and Shared Responsibility of Inclusive Excellence.

Each leader established personal DEI action plans and identified accountability partners to maintain shared responsibility. Based on positive colleague feedback, Huntington is exploring ways to enhance the colleague experience for a second cohort.



INTRODUCTION

#### **Supplier Diversity**

We are committed to working with diverse suppliers and helping them grow. In 2023, for the eighth consecutive year, we achieved our aspirational goal of devoting at least 18% of our total spend to diverse suppliers. Looking ahead, we are focused on increasing the number of diverse suppliers we work with and increasing our tier 2program outreach efforts.

Other 2023 supplier diversity outreach efforts included participation in the National Minority Supplier Development Council's annual conference and sponsorship and attendance at the National Black Suppliers Conference. We also continued our involvement in the Women's Business Enterprise National Council, the National Gay & Lesbian Chamber of Commerce, and Diversity:IN to form connections with new diverse suppliers.

For more information, please see Huntington's 2023 Supplier Diversity Economic Impact Report.

# **Supporting the Military Community**

We recognize the strengths, skills, and valuable experience current and former service members and their families bring to the workplace. Huntington recruits active, retiring, and separating military members for positions across our organization and helps to support them in their transition to the civilian sector through a dedicated military BRG. In addition, for those colleagues in the Guard or Reserve, Huntington has established a Military Leave Policy providing enhanced benefits for those that are called to duty. These benefits include differential pay for the service member and military time off to prepare for orders or to be with family upon returning home. In addition, these benefits extend beyond the service member and are applicable to the military family member for benefits such as a travel allowance and childcare and lawn care stipends. We also have a dedicated volunteer deployment support team.

We share the same commitment to looking out for our military customers. While we abide by the Uniformed Services Employment and Reemployment Rights Act, the Servicemember Civil Relief Act, and other applicable laws, which give military members a wide range of protections and benefits while on active duty, we also strive to go above and beyond to support our active service members and their families. We are also committed to meeting the unique needs of active-duty military personnel and veterans through a range of tools and solutions, offering products and services to support their financial well-being such as a VA mortgage program, Huntington Honors<sup>SM</sup> checking account, and small-business lending.



# **Corporate Governance** and Ethics



Strong corporate governance and ethical business practices are critical to Huntington's long-term success and help us create value for those we serve.

#### **Corporate Governance Structure**

Our Board of Directors and ELT are committed to executing on the Company's long-term Vision and aligning our strategic objectives with the interests of our stakeholders. Our Board sets the strategy, risk appetite, and ethical standards for the entire organization, and is responsible for conducting succession planning for the CEO and other members of the ELT. Our independent Lead Director, who has robust responsibilities, and independent committee chairs drive a unity of vision and strategy while maintaining distinct roles of daily operations and oversight.

Our Directors are active and engaged in their respective roles. During 2023, our Board held a total of 67 meetings (including full Board and committee meetings), with 95.9% average Director participation in full Board meetings and committee meetings on which they served.

# GOVERNANCE

Corporate Governance and Ethics Enterprise Risk Management Security and Privacy

### **Huntington's Board of Directors**

As of our 2024 Annual Meeting of Shareholders, our Board consists of 16 Directors, 14 of whom are independent. Over the past 18 months, we bolstered expertise on our Board, welcoming new Directors Rafael Diaz-Granados and Teresa Shea and returning Director Chris Inglis. Rafael brings extensive experience in strategic planning, investment, and executive leadership. Teresa is a seasoned executive and recognized leader in intelligence and national security. Chris rejoins the Board following his service as U.S. National Cyber Director for the U.S. government.

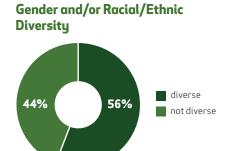
Each Board committee is chaired by an independent Director who is equipped with the knowledge and expertise to effectively carry out the committee's responsibilities. All Directors are elected annually with a majority vote standard (in uncontested elections).

FRONT ROW, L-R: Roger J. Sit, Alanna Y. Cotton, Richard W. Neu, Ann B. (Tanny) Crane, J. Michael Hochschwender, Gina D. France BACK ROW, L-R: Stephen D. Steinour, Richard H. King, Katherine M. A. (Allie) Kline, Rafael A. Diaz-Granados, John C. (Chris) Inglis, Jeffrey L. Tate, Teresa H. Shea, David L. Porteous, Kenneth J. Phelan, Gary Torgow

#### **Board Diversity**

INTRODUCTION

Our Board is committed to maintaining Directors who bring unique, diverse experiences, talents, and perspectives to the boardroom. As part of the Board refreshment process, the NESG Committee actively seeks candidates who possess diverse attributes with respect to gender, race, ethnicity, age, and experience. As of our 2024 Annual Meeting of Shareholders, 56% of our Board members are diverse in terms of gender and/or racial or ethnic diversity.



#### **2024 Proxy Statement**

Reference our 2024 Proxy Statement for additional information on the following:

- Board committees, responsibilities, and membership;
- Board diversity and skills;
- Board member bios
- Director and executive compensation;
- Board assessment process and takeaways; and
- Shareholder outreach, feedback, and actions.

# **Board Assessment, Refreshment,** and Succession Planning

The NESG Committee conducts a comprehensive annual Board assessment to evaluate Board composition and assure that the necessary knowledge, skills, and experience are represented. Guided by our independent Lead Director, the assessment helps validate that the Board and its committees are productively and efficiently fulfilling their duties and are best positioned to oversee Huntington's continued success. For example, our recent Board additions bring expertise that supports Huntington's approach to the evolving cybersecurity and threat landscape.

#### **Board and Executive Leadership Oversight** of ESG Activities

Huntington's ESG program is overseen by the Board's NESG Committee, which meets quarterly to oversee how our efforts are integrated into the strategic priorities of the Company. Our approach to governance aligns the ESG considerations most important to our stakeholders with Board committee agendas,

including bringing ESG topics to the full Board for awareness, discussion, and governance actions, as required.

The 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 ESG, Climate, and other reports. Our Chief ESG Officer oversees ESG integration into various workstreams and committees responsible for addressing specific topics. In addition, the Chief ESG Officer remains at the forefront of new and emerging regulatory requirements, ensuring relevant considerations are factored into Huntington's ESG program framework and our disclosures evolve and align with these requirements as appropriate. Read more about ESG oversight in Our ESG Strategy.

### **Executive Compensation Program Drive Ownership and Accountability**

Collectively, Huntington Directors and colleagues represent one of the Company's 10 largest shareholders, driving an ownership mentality throughout all levels of the organization. Huntington's

compensation philosophy is to pay for performance that creates long-term value through safe and sound banking practices. Our executive compensation program utilizes performance-based compensation practices designed to drive profitable growth and returns that are risk-appropriate, while doing the right thing for our stakeholders.

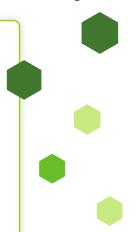
#### **Huntington's Stock Ownership Requirements**

POSITION	STOCK OWNERSHIP REQUIREMENT	
CEO	10x annual base salary	
ELT member (Senior Executive Vice President level)	3x annual base salary	
ELT member (Executive Vice President level)	2x annual base salary	

We use a broad group of incentive metrics—based on performance compared to financial targets and overseen by the HR and Compensation Committee—across our annual and long-term incentive programs. For executives and all managers, this includes using the People Leader Quotient (PLQ),1 which is a quantitative and qualitative performance metric designed to align managers with our talent attraction, development, and DEI objectives. Our Recoupment Policy is applicable to all incentive compensation for our colleagues. The HR and Compensation Committee also retains the ability to apply discretion to incentive payments, which drives proper alignment between pay and performance.

### **Shareholder Outreach and Engagement**

We value our investors' views and welcome their feedback. The NESG Committee oversees our outreach and engagement practices, and our Lead Director is also a frequent speaker on governance matters at director forums and with investors. Throughout the year, members of management actively engaged Huntington's shareholders around ESG and executive compensation. These conversations, which are summarized for the NESG Committee, included supporting Huntington's continued transparent reporting on climate risk, encouraging preparation for new and emerging regulations and frameworks, remaining engaged on colleague engagement, turnover, and talent development, and building on the Company's governance approach for artificial intelligence.



<sup>&</sup>lt;sup>1</sup> Our PLQ leverages a combination of quantitative and qualitative measures and is intended to emphasize the actions and behaviors expected of leadership while making Huntington stronger through the development of our most important asset: our people. Following the 2020 introduction of PLQ into performance expectations of direct reports to the CEO and the next level of leaders (approximately 200 leaders), we rolled it out more broadly. Since 2021, PLQ has been embedded in all people leader performance reviews (approximately 3,200 leaders). This strongly reinforces our commitment to leadership capabilities in engaging, developing, retaining, and attracting colleagues who contribute to Huntington's success.

**ENVIRONMENTAL** 

ECONOMIC

#### Our Deep Commitment to Ethics and Integrity

We set the highest standards of honesty, fairness, and accountability throughout our organization. Our Code of Conduct and Ethics, updated annually, provides guidance and resources on the ethical behavior expected of all Huntington colleagues. Upon hire and on an annual basis, all Huntington colleagues are required to complete online training and certification of the Code of Conduct and Ethics. Anyone who violates the Code or otherwise fails to follow our ethical and professional standards may be subject to disciplinary action, up to and including termination of employment. Except for the provisions of the Code that are specifically applicable only to colleagues, contractors, members of the Boards of Directors of Huntington, and its affiliates are also bound by the Code.

Our Corporate Risk Management function includes a Conduct Risk Officer and supporting team that oversee and assess conduct risk and report semiannually to the Board's Audit Committee and Risk Oversight Committee. Additionally, our management-level Conduct Risk Committee oversees the Conduct Risk program, which is designed to identify, measure, monitor, control, and report conduct-related risks. This committee is chaired by the Conduct Risk Officer and includes the Chief Risk Officer, General Counsel, and Chief Human Resources Officer.

#### **Reporting and Addressing Critical Concerns**

Our colleagues are empowered to ask questions or report suspected violations of the Code of Conduct and Ethics freely and without concern of retaliation. Our "raise your hand" practice

encourages colleagues to bring ethical questions or concerns to any member of management or Human Resources. Colleagues may also report suspected misconduct or concerns through various internal resources or utilize Huntington's 24/7 Ethics Hotline (800-620-8601) and web portal. To provide anonymity, the Ethics Hotline is managed exclusively by a third-party vendor. As outlined in our Service Provider Code of Conduct, this hotline and web portal can also be used by our service providers to report concerns or suspected unethical behavior. Our robust anti-retaliation policies protect colleagues who report concerns or suspected unethical behavior in good faith, regardless of an investigation's outcome.

Upon receipt of an Ethics Hotline complaint, a report is generated and distributed to a pre-defined list of senior executives, including the General Counsel, Chief Risk Officer, Chief Auditor, Chief Human Resources Officer, and Conduct Risk Officer. Procedures are in place to notify the Chair of the Board's Audit Committee if there is an allegation that relates to reliability of our financial statements. In 2023, we investigated 269 cases due to issues reported via our Ethics Hotline.

For cases that allege wrongful conduct, Human Resources initiates an investigation, which results in a formal document summarizing the issue, outcome, and any disciplinary action taken. On a quarterly basis, a summary of Ethics Hotline wrongful conduct allegations, including any whistleblower concerns, are shared with the Board's Audit Committee and Risk Oversight Committee.

# **Protecting Against Money** Laundering, Bribery, and Corruption

To protect Huntington and our stakeholders, we actively manage compliance with the U.S. Bank Secrecy Act (BSA) and Anti-Money Laundering (AML) laws, regulations, and quidance. Our three-pronged approach includes the following:

- 1. Approved by the Risk Oversight Committee, our BSA/ AML and Office of Foreign Assets Control (OFAC) policies, along with the Code of Conduct and Ethics, outline our expectations.
- 2. As noted in our Code of Conduct and Ethics, colleagues are required to understand and follow all Huntington BSA/AML policies and procedures. Colleagues receive mandatory annual training, both broad-based and rolespecific, that addresses permissible business and vendor activities to avoid bribery and corruption.
- 3. Huntington's committee structure, which includes Boardand management-level oversight and our Chief BSA/AML Officer, reinforces compliance through ongoing oversight and monitoring, including of Ethics Hotline and customer complaints, and emerging industry trends.

We also include anti-corruption language in our Code of Conduct, Service Provider Code of Conduct, and in our vendor contracts.

# Enterprise Risk Management

Our ability to protect the organization is foundational to achieving our Purpose, and as such, our approach to risk management is ongoing, owned by everyone, and integral to our culture.

In 2023, we advanced how we operate within our framework to better align with our Board's objectives, strategies, and risk tolerance. Most importantly, we funded and allocated new resources to support the risk management program. Under this enhanced approach, we implemented a new, more efficient process to identify, analyze, report, and resolve matters within our issues risk management program. We also conducted enterprise-wide training with thousands of colleagues to help our team better understand this transition and how we will execute this approach together. Finally, we added experienced, top-tier banking talent to our risk management team to support this comprehensive change.

While core aspects of our program have evolved to align with our strategy, certain foundational elements remain:

Our Risk Governance Framework and Risk Appetite Statement
serve as the basis for consistent and effective risk management.
The Framework outlines our seven enterprise risk pillars,
into which risks are embedded, and our requirements for the
Company's risk management program. The Risk Appetite
Statement defines our risk tolerances for each of the seven pillars



INTRODUCTION

**ECONOMIC** 

and escalation protocols for instances where we may be operating beyond our appetite. The Board-level Risk Oversight Committee approved our Risk Governance Framework, and the full Board approves our Risk Appetite Statement.

- Our **risk appetite is aggregate moderate-to-low on a through-the-cycle basis**, which helped us demonstrate strength and resiliency in 2023.
- Our **risk management program is structured across three lines of defense**, in which the first-line businesses own their risks and controls; second-line Corporate Risk Management independently oversees risk-taking activity; and third-line Internal Audit and Credit Review functions provide enterprise-wide assurance.

  Each line operates independently and, together, they provide a comprehensive model for mitigating risk across our pillars.

Huntington's Seven Risk Pillars

**COMPLIANCE RISK** 

**CREDIT RISK** 

LIQUIDITY RISK

**MARKET RISK** 

OPERATIONAL RISK

**REPUTATION RISK** 

**STRATEGIC RISK** 

# **Risk Management Lines of Defense**

### 1<sup>st</sup> Line

Our individual business segments, which include revenue-generating businesses and operational support groups, are accountable for understanding and appropriately managing all the risks associated with their activities. Business units are staffed with risk functions that report directly to business segment leadership.

#### 2<sup>nd</sup> Line

Our Chief Risk Officer, Corporate Risk Management, and Credit Administration oversee the Company's risk-taking activities independently of the first-line business units. All colleagues within Huntington's Corporate Risk Management group report to the Chief Risk Officer, who reports directly to both the CEO and to the Board's Risk Oversight Committee.

#### 3<sup>rd</sup> Line

Our Internal Audit and Credit Review groups provide independent and objective assurance and report directly to the Board.

#### A Global View of Risk

Our Emerging Risk Group serves as our in-house "think tank" and is responsible for assessing the potential impacts of the ever-evolving global, national, and regional economic and political landscapes, as well as emerging threats and broader disruption trends.

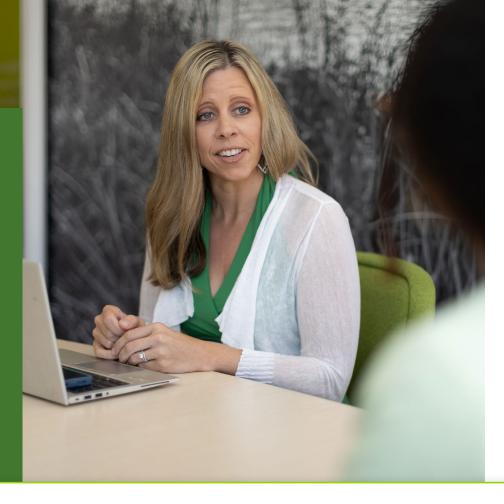
INTRODUCTION

Through its comprehensive analysis, collaboration with the broader risk management team, and coordination of Management expertise, this group brings focus to the exogenous risk management picture. We use numerous internal and external sources of economic, demographic, and industry data in combination with in-depth, proprietary analysis to identify change catalysts and develop actionable insights for leadership.

Topics addressed include, but are not limited to:

- Broader macroeconomic trends;
- Climate risk trends as applicable to banking;
- Credit and banking market developments impacting potential banking results;
- Credit cycle impact upon banking business segment risk;
- Forward-looking interpretation of financial market dynamics relative to market, liquidity, and other risks:
- Geopolitical risk factors with business and credit implications;
- Monetary conditions and trends with capital market, business, and economic risk implications; and
- Trends in public sector actions relative to the economy, banking, and financial markets.





#### **Managing Third-Party Risks**

Our Third-Party Risk Management Committee provides centralized oversight and governance associated with thirdparty relationships to evaluate risks. Guided by our Third-Party Risk Management Framework, the Committee relies on our relationship managers in each business segment to measure, monitor, and report the key risk and performance indicators for our third parties. The Committee also administers our Third-Party Relationships Risk Management Policy, which sets the quiding principles and requirements applicable to our thirdparty risk management process.

Essential to the success of our third-party risk management efforts is the administration of our dedicated Service Provider Code of Conduct, which clearly defines our thirdparty standards that are reflective of our culture of reliability and accountability. Service providers must abide by all applicable federal, state, and local laws, rules, and regulations while delivering products and services with a high degree of professionalism and in accordance with the terms and conditions of the relationship. Colleagues and service providers may also utilize Huntington's 24-hour Ethics Hotline if they believe an affiliate has breached the Service Provider Code of Conduct.

# Managing Risk Throughout the Life Cycle of Our Service Providers

**PLANNING** 

**DUE DILIGENCE** 

**CONTRACT NEGOTIATION**  **ONGOING MONITORING** 

**TERMINATION** 

# Security and Privacy

Huntington is focused on the safety, security, and privacy of our customers and colleagues. As the physical and digital banking spaces continue to evolve and converge, we seek to adapt to and accelerate forward-thinking innovation by following industry best practices, incorporating new data privacy standards, and evaluating and integrating emerging technologies.

#### **Evolving Our Approach and Oversight**

Huntington's security practices support our "We're for People" philosophy. Beyond while protecting our colleagues' and customers' overall safety, we secure the confidentiality, integrity, and availability of their information.

Huntington leverages a blended approach and comprehensive toolset to proactively evaluate the impact of external cyber, fraud, and physical threats to Huntington's customers, colleagues, business processes, or buildings.

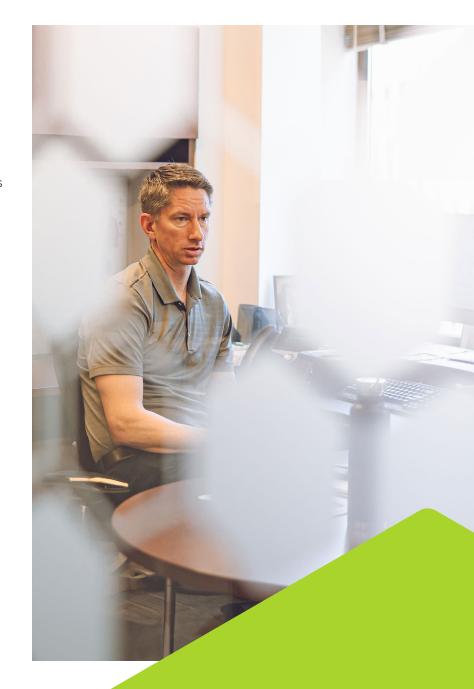
Risks are ranked on separate scales for cybersecurity, fraud, and physical security threats. For each level of increased threat, actions are prescribed in several predetermined categories, including:

- Additional levels and coordination of situational monitoring;
- More frequent and data-intensive reporting;
- Increased outreach and coordination with data providers; and
- Potential response actions.

We continuously adjust our cybersecurity activities based on the evolution of the threat environment, and we consider several factors in addressing threats that include the likelihood a given risk will come to fruition, applicability to our technology environment, the mitigation value of various control options, and the most effective application of our human and technology resources.

#### **Managing Cybersecurity Risk**

We consider cuber threats and data breaches to be top risks for our organization. We recognize the importance of maintaining strong foundational capabilities, which we balance with the need to continue investing in innovative technologies and resources to ensure we are best positioned in an ever-evolving cuber threat landscape. We have not experienced any material losses or other material consequences relating to technology failure, cyberattacks, or other information or security breaches.



We employ a set of in-depth defense strategies, which include efforts to make us less attractive as a potential target. We also invest in threat analytics to bolster our rapid detection and response capabilities and conduct regular system testing, vulnerability scans, data collection, and colleague training. Huntington's Information Security Program is designed to establish a management framework to define, develop, implement, document, and maintain the information security processes and controls for Huntington. It

supports corporate compliance with applicable federal and state regulations, FFIEC Examination Guidance, and industry-accepted security standards such as the National Institute of Standards and Technology (NIST) Cybersecurity Framework.

INTRODUCTION

In 2023, we formalized our cybersecurity governance process, allowing us to incorporate standardized procedures to manage risks, implement safeguards, and report on any potential breaches. The Technology Committee of the Board is regularly updated on evolving standards, vulnerability assessments, third-party and independent reviews, the current threat environment and trends, and information security.

#### **Our Zero Trust Framework**

Our Zero Trust framework helps prevent and limit potential impacts of unauthorized access across our networks. It consists of various security measures so customer and colleague data remain top of mind and actively managed. This technology driven architecture has been developed in various stages in recent years, with some key accomplishments occurring in 2023. These include:

- Updating our VPN services to protect both customers' and colleagues' data while allowing us to remain flexible with the evolving nature of remote work and computer access;
- Using behavioral biometrics to increase our security by monitoring activities that can be considered suspicious or malicious;
- Adapting our network engineering to better protect against, respond to, and identify threats in our environment; and
- Expanding our security services on our cloud-based platforms, allowing for a broader view of our operating environment and implementing increased control points.

#### Training, Audits, and Testing

We conduct information security risk audits and penetration testing of Huntington networks on an ongoing basis and through more agile, iterative means, testing specific elements of our evolving threat detection and protection capabilities. We use several internal teams, as well as third parties, to conduct these operations. All employees receive regular training and testing throughout the year, including annual mandatory components, on cybersecurity issues. In 2023, colleagues continued to receive targeted training on email phishing, vishing, and smishing given their prevalence in impacting customers and businesses.

# **Ensuring Crisis Preparedness**

Huntington's Enterprise Incident Management Team is a crossfunctional group of subject matter experts that monitors geopolitical events and critical infrastructure incidents to update and coordinate our security posture and conduct appropriate contingency planning for potential impacts to Huntington.

Our cyber crisis incident response playbooks and communication plans are regularly evaluated for alignment across our teams and colleagues. In addition, our business continuity plans are designed to support the resilience of our business in the face of disruption. Our Enterprise Incident Management Team also regularly revisits our overall technology and policy approach to identify opportunities to further enhance our security environment. We engage with peers, industry groups, and key vendors around the cyber threat landscape to ensure our activities reflect recognized best practices.

26,000+ hours

of cubersecurity training and **168 different courses** were completed by colleagues



**ENVIRONMENTAL** 



**ECONOMIC** 



#### Closing the Cybersecurity Talent Gap

We believe it is crucial we continue to encourage the development of cyber skills and establish opportunities for growth and advancement to ensure an adequate pipeline of key talent. Our efforts include:

- **EmpoWE-R Scholarship**: Huntington continued its support through a \$10,000 grant to the EmpoWE-R Women of Information Security scholarship fund. EmpoWE-R was formed to celebrate and promote women in the information security industry.
- Central Ohio Information Systems Security Association **Scholarship**: We donated \$10,000 toward the Central Ohio Information Systems Security Association (ISSA) Justin Kerby Scholarship for the second consecutive year. The scholarship is available to Ohio residents actively pursuing a degree in information security or cybersecurity or a similar degree.
- Support for The Ohio State University's Institute for **Cybersecurity and Digital Trust**: Over three years, Huntington provided \$50,000 to OSU's Institute for Cybersecurity and Digital Trust to help build and develop interest and focused learning opportunities for cybersecurity throughout Central Ohio.
- **Industry-Focused Engagements**: We sponsor targeted associations and industry events that focus on diverse talent development, including Women in Cybersecurity, the Central Ohio ISSA Summit, and the Financial Services Information Sharing and Analysis Center.

- **Support for Professional Affiliations**: We are proud of our partnerships with the Information Systems Audit and Control Association, ISSA, and the Association of Certified Fraud Examiners, which help our colleagues elevate their skill sets.
- **Security Mentor Connect**: Security Mentor Connect provides internal developmental and exposure opportunities for Huntington colleagues with the goal of enhancing colleague skill development, engagement, collaboration, and satisfaction across the security organization.

#### **Protecting Customer Privacy**

Huntington uses customer data to provide relevant, valuable products and services that benefit the lives of our customers. We are committed to respecting individuals' rights to the personal information that we hold and maintaining policies that promote trust among our stakeholders. We strive to provide our customers and colleagues with requisite transparency into, and, in certain cases, access to and control over the personal information we hold.

Huntington's Privacy Compliance team assesses and enhances Huntington's privacy program, works with business partners to evolve and implement proper controls, and integrates our privacy goals with other strategic functions.

In 2024, we will introduce a new data subject rights tool. The tool will enable Huntington to more effectively and efficiently manage data subject requests now and as our obligations continue to grow. In addition, it will help Huntington maintain compliance with applicable data protection laws and regulations and build trust with stakeholders. As part of this integration, Huntington will also implement enhanced data discovery functionality, which will enable us to better locate and manage personal data across our data environments.

#### Our commitment to privacy is grounded in six key pillars:

#### **GOVERNANCE OVERSIGHT**

- The board-level Risk Oversight Committee governs our data privacy program.
- The Privacy Compliance Office provides regular updates to the Risk Management Committee on privacy matters.
- At the management level, the Risk Management Committee provides oversight of the Legal, Risk, and Compliance Committee, which is tasked with managing our privacy compliance profile.
- Conduct regular assessments and audits of the privacy compliance program.
- Provide privacy training to colleagues and contractors who handle or access personal information
- Conduct both routine and ad hoc assessments of privacy risks while promoting data minimization, purpose limitation, and other key privacy practices.

#### **TRANSPARENCY**

- Provide notice to consumers of personal information processing through disclosures such as our U.S. Consumer Privacy Notice, Online Privacy Policy, and State Data Privacy Rights Notice.
- Inform customers of material changes to our information processing practices and revised notices.
- Notify impacted individuals in a timely manner in the event of a data breach, in compliance with federal and state law.

#### THIRD PARTIES **ACCESS** CONTROL

- Receive and respond to customer inquiries related to personal information processing.
- Provide customers with meaningful access and insight into their account and transaction information.
- Enable eligible individuals to obtain a portable copy of the personal information we hold.
- Collect customer preferences and adhere to elected preferences on information sharing, use, and marketing.
- Provide eligible individuals the ability to correct or delete personal information.
- Never sell personal information.

- Evaluate and assess the privacy practices of potential information processing vendors.
- Include privacy provisions in applicable vendor agreements, requiring vendors to adhere to Huntington's privacy expectations.
- Periodically assess existing vendors' privacy practices, including policy, procedure, and control performance reviews.

#### **Artificial Intelligence and Machine Learning**

Huntington approaches the use of advanced artificial intelligence (AI) and machine learning (ML) in a manner consistent with our core values and strategic priorities. The development, acquisition, implementation, and use of any model or tool is guided by internal policies to identify, measure, monitor, control, and report on a variety of risks, which include updates on Huntington's AI/ML program to the Board-level Technology Committee.

Our oversight is focused around six key areas:

- Ethical use:
- Responsible design and monitoring;
- Fairness and human interaction:
- Explainable and integrable models;
- Privacy, transparency, and control; and
- Data and technology management.

AI/ML is used as an added layer of support to better serve our stakeholders, such as in the case of fraud prevention, but it does not replace the foundational strategies, tools, and oversight in place to run our business. Further, we do not use AI to make lending decisions. Policies relating to customer-impacting AI/ML use cases is reviewed by our fair and responsible banking teams.

We provide regular training to relevant stakeholders and model owners that aligns with their roles, skill sets, and responsibilities. As the technology and our use of AI/ML techniques continue to evolve, we will explore expanded training opportunities to a larger set of Huntington colleagues, helping us maintain principled execution throughout the enterprise.

**ENVIRONMENTAL** 

#### **Preventing Fraud**

With banking's digital footprint ever-increasing, our cybersecurity and fraud prevention teams work hand-in-hand to actively monitor and prevent fraud. We employ various technologies to secure our customers' and colleagues' data and financial information. The risks and situations we face are constantly evolving, and we work diligently to remain ahead of the regulations and threat actors impacting the banking industry, reducing overall loss due to fraud as a quiding principle.

Our fraud prevention measures rely on a variety of preventative and detective processes, including:

- Regularly onboarding new technology to monitor and prevent fraud;
- Developing our fraud prevention talent and technology through continued investments;
- Educating our colleagues and customers to understand their role in defending against fraud through webinars, in-person and virtual outreach engagements, and digital content on a variety of internal and external platforms;
- Engaging with governmental agencies to help us align with the most up-to-date directives regarding fraudulent behavior;
- Monitoring the evolving regulatory landscape and updating our policies and procedures as necessary; and
- Working with law enforcement to identify and prosecute perpetrators of fraud.

### **Workplace Safety & Security**

Providing a safe and secure environment for colleagues and customers is one of our highest priorities. Measures we take to comply with the Bank Protection Act of 1968 and rules promulgated thereunder include:

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- Designation of a Chief Physical Security Officer;
- Procedures and training for all colleagues; and
- Investment in security devices and equipment.

Reporting to the Technology & Operational Risk, Fraud, and Security Officer, our Chief Physical Security Officer is responsible for overseeing physical security, crime prevention, crisis management, threat management, protective and flight operations, environmental health and safety measures, executive protection, and our Security Operations Center. Additionally, the Chief Physical Security Officer provides regulatory compliance oversight of opening and closing procedures, asset protection plans, and emergency response plans.

In recent years, we implemented several tools and resources to bolster our workplace safety and security capabilities, including:

- The **Virtual Command Center** provides enhanced visibility of personnel and physical assets across our footprint to facilitate real-time situational awareness and responsiveness during events such as weather disruptions, natural disasters, and other unforeseen events.
- Our **Threat Management Team** shares intelligence across fraud, physical security, and cyber functions. The team frequently coordinates with internal and external stakeholders to educate, disseminate intelligence, and serve as a liaison to law enforcement.

- We have developed a centralized **Threat Library** for security bulletins pertaining to threats that may impact Huntington colleagues and customers. This library enables easy access and improves awareness across cyber, fraud, and physical security domains, providing a better understanding of the current threat landscape.
- The **FUSION Center** is a shared service for cybersecurity, fraud, and physical security that uses data analysis to identify common threats and patterns in the security threat landscape.
- In 2023, we made significant enhancements to our **Branch Risk Model** and tools that utilize ML to help monitor the threat environment and provide updated risk ranking for branches across the footprint to better mitigate risk.
- We **engage with local law enforcement** to foster a safer environment for customers and colleagues as threats evolve.
- We adopted a **Data Miner Tool** that informs us of real-time threats in our communities, allowing colleagues and our Command Center to prepare for increased risks.
- We deployed **Automated Control Vestibules** at various locations to increase safety by verifying secure entry into sensitive areas.



#### Safety Procedures and Training for All Colleagues

Safety and security are key components of colleague training. Multi-modal training is provided to full-time, part-time, and contract colleagues throughout the year, including mandatory annual training on robberies, workplace violence prevention, active shooter situations, emergency preparedness and response, and workplace safety.

All branches conduct emergency response plan training, and we offer American Red Cross first aid, CPR, and AED certification. Our processes and procedures include regular tabletop exercises with our crisis and emergency response teams and various public safety agencies, and our facilities hold evacuation and shelter-in-place mandatory drills.

Several training resources and updated modules have been introduced recently, including:

- Active Shooter Drills: Huntington collaborated with local law enforcement and emergency medical services to complete an active shooter drill at our Gateway Center facility. We developed several new strategies and action plans from this exercise and are planning similar exercises in the future to increase preparedness.
- **De-escalation Training**: This course is designed to help train colleagues on minimizing instances of conflict and guickly resolving situations that have escalated. Topics include de-escalation techniques and scenarios as well as how to better understand and react to customer issues.

- **Enhanced Branch Incident Response Plan**: The enhanced Branch Incident Response Plan, our "all-hazards" plan aligned with national standards and best practices, includes flowcharts and event aids for all incidents and provides the Incident Commander with information emergency response, stabilization, and resolution.
- Enhanced Risk Modeling and Training: Using new data and risk profiles, we can better assess risks unique to each of our branch locations and provide enhanced and refreshed training to branch colleagues to keep them more secure.



# Sustainability Accounting Standards Board (SASB) Index

The index below includes SASB standards for the Financial Sector that we have determined to be most relevant for our business: Commercial Banks and Consumer Finance. All disclosures are based on Version 2023-12 of the SASB standards. Unless otherwise noted, all data and descriptions apply to our entire enterprise and are as of or for the year ended December 31, 2023. Certain information is not disclosed within the index below because that information (i) is not considered material or is privileged or confidential; (ii) could cause a competitive disadvantage to our business if publicly disseminated; or (iii) is not currently collected in a manner wholly correlative with the related SASB metric.

# **Reporting Status** Fully reporting Partially reporting Not reported

#### **Commercial Banks**

SASB CODE	ACCOUNTING METRIC	REPORTING STATUS	RESPONSE
Data Security			
	(1) Number of data breaches (2) Percentage that are personal data breaches		(1) We have not experienced any material losses or other material consequences relating to technology failure, cyberattacks, or other information or security breaches.
	(3) Number of account holders affected		(2) Not currently disclosed
	(5) Number of account notices affected		(3) Not currently disclosed
FN-CB-230a.2 Description of app	Description of approach to identifying and addressing data	•	2023 ESG Report, pp. 54-59: "Security & Privacy"
	security risks.		2023 Annual Report, pp. 31-34: "Operational Risk;" pp. 41-42: "Reputational Risk, Item 1C"
Financial Inclusion &	Capacity Building	'	
	(1) Number and (2) amount of loans outstanding that qualify for programs designed to promote small business and community		2023 ESG Report, p. 19: "2023 Small-Business Lending Highlights" and "2023 Active Microfinance Loans;" pp. 22-23: "Community Plan Investment Progress" and "Community Development Loans & Investments"
	development.		2023 Annual Report, p. 20: Overall CRA discussion
			Huntington Community Plan
FN-CB-240a.2	(1) Number and (2) amount of past due and nonaccrual loans or		(1) Not disclosed
	loans subject to forbearance that qualify for programs designed to promote small business and community development.		(2) Not disclosed
FN-CB-240a.3	Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers.	$\Diamond$	Not disclosed
FN-CB-240.4	Number of participants in financial literacy initiatives for unbanked, underbanked, and underserved customers.	•	In 2023, 868 Huntington colleagues partnered with over 406 organizations, providing nearly 6,300 hours of financial education to LMI adults and children.

SASB CODE	ACCOUNTING METRIC	REPORTING STATUS	RESPONSE
Incorporation of Envi	ronmental, Social, and Governance Factors in Credit Analysis		
FN-CB-410a.2	Description of approach to incorporation of environmental, social,		2023 ESG Report, p. 29: "Risk Management;" p. 52: "A Global View of Risk"
	and governance (ESG) factors into credit analysis.		2023 Climate Report, p. 19: "Climate-Related Credit Decisioning Guidance"
			2024 Proxy Report, pp. 72-82: Overview of ESG
			<u>Climate Risk Statement</u>
FN-CB-410b.1	Absolute gross financed emissions, disaggregated by (1) Scope 1, (2) Scope 2, and (3) Scope 3.	•	2023 Climate Report, pp. 21-22: "Metrics and Targets"
FN-CB-410b.2	Gross exposure for each industry by asset class.	•	Basel III Regulatory Capital Disclosures, p. 10: "Total Credit Risk Exposure"
FN-CB-410b.3	Percentage of gross exposure included in the financed emissions category.	•	2023 Climate Report, p 19: "Climate-related Credit Decisioning Guidance;" p 22: "Scope 3 Emissions"
FN-CB-410b.4	Description of the methodology use to calculate financed emissions.	•	2023 Climate Report, pp. 12-13: "Huntington's Decarbonization Framework"
Business Ethics			
FN-CB-510a.1	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, antitrust, anticompetitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations.	•	2023 Annual Report, pp. 155-156: Footnote 22 "Commitments and Contingent Liabilities"
FN-CB-510a.2	Description of whistleblower policies and procedures.	•	2023 ESG Report, p. 50: "Reporting and Addressing Critical Concerns"
Systemic Risk Manag	ement		
FN-CB-550a.1	Global Systemically Important Bank (G-SIB) score, by category.	•	Not relevant, Federal Reserve has deemed Huntington a Category IV bank (various Fed CCAR disclosures)
FN-CB-550a.2	Description of approach to integrate results of mandatory and		2023 Annual Report, p. 12: "Enhanced Prudential Standards;" pp. 14-15: "Capital and Stress Testing"
	voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities.	•	Basel III Regulatory Capital Disclosures, p. 6: "Capital Adequacy"
SASB CODE	ACTIVITY METRIC	REPORTING STATUS	RESPONSE
FN-CB-000.A	(1) Number and (2) value of checking and savings accounts by segment: (a) personal and (b) small business.		(1a) 4,302,997 Consumer checking accounts; 1,846,603 Consumer savings accounts
			(1b) 442,756 Business Banking checking accounts; 28,831 Business Banking savings accounts
			(2a) \$23,818,611,985 Consumer checking account average balance; \$15,165,865,074 Consumer savings account average balance
			(2b) \$13,100,601,184 Business Banking checking account average balance; \$425,737,973 Business Banking savings account average balance
FN-CB-000.B	(1) Number and (2) value of loans by segment: (a) personal, (b) small		(1a) 1,456,659 personal loans <sup>1</sup>
	business, and (c) corporate.		(2a) \$52,343,276,016 in personal loans <sup>1</sup>
			(1b) 78,113 business loans
		-	(2b) \$7,664,506,307 in business loans
			(1c) 146,216 corporate loans
			(2c) \$64,448,678,273 in corporate loans
	·	•	HUNTINGTON 2023 ESG REPORT   Strength in Pu

SASB CODE	ACCOUNTING METRIC	REPORTING STATUS	RESPONSE
Customer Privacy			
FN-CF-220a.1	Number of account holders whose information is used for secondary purposes.	•	2023 ESG Report, pp. 54-55: "Managing Cybersecurity Risk"
FN-CF-220a.2	Total amount of monetary losses as a result of legal proceedings associated with customer privacy.	•	2023 Annual Report, pp. 155-156: Footnote 22 "Commitments and Contingent Liabilities"
Data Security			
FN-CF-230a.1	(1) Number of data breaches, (2) percentage that are personal data breaches, (3) number of account holders affected.		(1) We have not experienced any material losses or other material consequences relating to technology failure, cyberattacks, or other information or security breaches.
			(2) Not currently disclosed
			(3) Not currently disclosed
	Card-related fraud losses from (1) card-not-present fraud and (2)	•	(1) 2023 ESG Report, pp. 54-59: "Security & Privacy"
	card-present and other fraud		(2) Not separately reported
FN-CF-230a.3 Description of approach to identifying and addressing data security risks.	Description of approach to identifying and addressing data		2023 ESG Report, pp. 54-59: "Security & Privacy"
		2023 Annual Report, pp. 31-34: "Operational Risk;" pp. 41-42: "Reputational Risk, Item 1C"	
Selling Practices			
	Percentage of total remuneration for covered employees that is variable and linked to the amount of products and services sold.	•	<u>2024 Proxy Report</u> , pp. 85, 87-88, 92-93, 111-113
			Huntington does not report on this type of compensation for business line colleagues and managers.
			Code of Business Conduct and Ethics and Recoupment Policy: <a href="https://www.huntington.com/About-Us/corporate-governance">https://www.huntington.com/About-Us/corporate-governance</a>
FN-CF-270a.2	Approval rate for (1) credit and (2) pre-paid products for applicants.	$\cap$	(1) Not disclosed
			(2) N/A
FN-CF-270a.3	(1) Average fees from add-on products, (2) average APR of credit products, (3) average age of credit products, (4) average number of credit accounts, and (5) average annual fees for pre-paid products.	$\Diamond$	Not disclosed
FN-CF-270a.4	(1) Number of customer complaints filed, (2) percentage with monetary or non-monetary relief.	$\Diamond$	Not disclosed
FN-CF-270a.5	Total amount of monetary losses as a result of legal proceedings associated with selling and servicing of products.	•	2023 Annual Report, pp. 155-156: Footnote 22 "Commitments and Contingent Liabilities"
SASB CODE	ACTIVITY METRIC	REPORTING STATUS	RESPONSE
FN-CF-000.A	Number of unique customers with an active (1) credit card account and (2) pre-paid debit card account.		(1) 502,274
		•	(2) N/A
FN-CF-000.B	Number of (1) credit card accounts and (2) pre-paid debit card		(1) 516,398
	accounts		(2) N/A

**SASBINDEX** 



# **Contact Huntington**

#### **Investor Relations**

Huntington. In vestor. Relations@huntington.com

#### **Environmental, Social, and Governance Office**

Corporate.Responsibility@huntington.com

#### **Media Relations**

Huntington.Communications@huntington.com

#### **Customer Service**

1.800.480.BANK (2265)

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This ESG Report should be read in conjunction with our current Annual Report and Proxy Statement, both of which contain additional information about our Company. This ESG Report uses certain terms, including those that the GRI or SASB 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 ESG 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, <a href="https://www.huntington.com">https://www.huntington.com</a>, under the heading "Regulatory and SEC Filings."

