

CONFIDENTIAL
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Huntington Bank Community Plan

Huntington has a long history of serving our communities and remaining true to our commitments. During the financial crisis, Huntington worked with our community partners to determine the programs and products needed to bring stability back to our communities. Through these efforts, we developed a strategy to increase lending to small businesses, to bring jobs back to neighborhoods, to build affordable housing through investments and lending to provide a safe foundation for families, and to honor all our community commitments so that our partners could continue to serve their constituents.

As Huntington merges with FirstMerit, we will move to a new phase in our work to revitalize our communities. Working with community partners and members of the National Community Reinvestment Coalition (NCRC), we have developed a Community Plan (Plan) to continue investment in our communities. The Plan demonstrates a strong prioritization of community investment in Huntington's expanded footprint and is designed to create significant public benefits.

Community needs, addressed in the plan, were identified through a series of meetings and communications that took place with more than 100 locally-based organizations, including NCRC and its member organizations (collectively, "CBOs"), and Huntington. The CBOs represented cities in our expanded footprint, including but not limited to: Akron, Charleston, Chicago, Cincinnati, Cleveland, Columbus, Detroit, Flint, Indianapolis, Pittsburgh, and Toledo.

The Plan continues our work to bring jobs back to our communities by providing funding and support to small businesses through training and development, along with micro and traditional lending. While we continue to work with community partners on foreclosure prevention, our focus will be on revitalizing our cities, working to repurpose vacant and abandoned properties into affordable housing, and providing affordable options to rehabilitate properties available for sale. We intend to accomplish by using our affordable loan programs, investing in affordable multi-family properties, and providing financial education including post purchase counseling. Additionally, we will continue to serve our communities' financial service needs through our affordable banking products, specifically Asterisk-Free Checking®, which includes 24-Hour Grace® and All-Day DepositSM. We will consider other innovations that provide greater access to traditional banking services to un-banked and under-banked.

This document highlights how Huntington expects to invest in, serve and partner with local communities. The Plan does not detail all CRA activities that Huntington currently undertakes or intends to undertake in the future. Although we expect continued economic stability, success in achieving many of the goals of the Plan are subject to a stable market environment, competitive factors, and other risks, assumptions and uncertainties which

are out of our control. Moreover, the goals set forth herein are subject to our obligation to ensure the safety and soundness of Huntington as a strong financial institution is maintained.

The Plan outlines the goals Huntington has developed to address the identified needs of the expanded footprint we will serve. Total investments and loans of \$16.1 billion with approximately \$3.7 billion of new funding will be provided to meet the needs of low- and moderate-income borrowers (LMIB), low and moderate-income (LMIT) communities, people or communities of color, women, persons in vulnerable classes (collectively, the “Underserved”), and small businesses. This Plan will remain in place for five years, beginning January 1, 2017, or upon consummation of the merger, whichever is later.

Single Family Mortgage Lending to LMIT & LMIB

Baseline: \$4.8B

Increase: \$0.9B

New Goal: \$5.7B

Huntington will adopt a single family lending goal for the LMIB and LMIT of \$5.7 billion over the next five years, which represents an 18% increase. Originations may occur through third parties and/or affiliates of Huntington.

Huntington intends to use its current affordable mortgage products, such as Community Access Mortgage (CAM), or other future appropriate products to drive loan production. Efforts will be focused in Akron, Charleston, Chicago, Cincinnati, Cleveland, Columbus, Detroit, Flint, Indianapolis, Pittsburgh, and Toledo, at minimum. The CAM product makes credit available to persons with below average credit scores, accepts non-traditional credit references and offers a low down payment feature with no minimum loan amount. CAM addresses many identified community needs in Huntington’s existing markets. In addition, Huntington is establishing the following goals:

- Achieve parity or better performance when compared to deposit accepting peers for lending to the Underserved in 75 percent of markets within a three-year period. Huntington plans to partner with CBOs to meet plan goals.
- Expand small dollar home improvement and mortgage lending, including through partnership with CBO’s. This includes programs such as our unsecured Home Improvement Loan and our secured rehabilitation programs as well as local programs such as Cleveland CASH, Cuyahoga HELP, Ohio Eco-Link Secured and Unsecured and others as they become available. Programs are made available to customers based on their situation and the terms of the various programs.
- Explore the development of rehabilitation loan and secured credit card programs within the confines of regulatory requirements and safe and sound business practices.

- Continue to participate in Ohio, Kentucky, Michigan, Indiana and West Virginia state loan programs, as well as expand into new states as the merger progresses.

Small Business Lending to SBB & in SBT

Baseline: \$5.6B

Increase: \$1.1B

New goal: \$6.6B

Huntington's lending goal, for small businesses (SBB) and small businesses in LMI tracts (SBT), is \$6.6 billion over a five-year period, representing an 18% increase. Loans may be originated through Huntington and/or its affiliates.

Huntington is a leader in small business lending, and intends to bring that leadership to its new markets as well as continue to expand in existing markets. Efforts will be focused in Akron, Charleston, Chicago, Cincinnati, Cleveland, Columbus, Detroit, Flint, Indianapolis, Pittsburgh, and Toledo, at minimum. Huntington will continue to be a strong small business lender, and continue to seek and develop options for microlending through community partnerships.

To effectively help small businesses, Huntington intends to:

- Continue to leverage a full range of SBA programs
- Partner with and financially support community organizations focused on building small business capacity by providing small business products, technical support programs, and financing to small businesses in LMI areas.
- Support CBOs that serve small businesses through counseling and technical assistance, on capacity building, financing strategies, and business operations.

Community Development Lending & Investment

Baseline: \$2.0B

Increase: \$1.7B

New goal: \$3.7B

Huntington's goal for community development lending and investing is \$3.7 billion over five years. Investments and loans will be made by Huntington and/or its affiliates. Efforts will be focused in Akron, Charleston, Chicago, Cincinnati, Cleveland, Columbus, Detroit, Flint, Indianapolis, Pittsburgh, and Toledo, at minimum. Huntington's ability to achieve this goal is subject to the availability of CRA qualified loans and investments, regulatory caps and may be inhibited by intense competition from other institutions which have recently committed to community plans developed in conjunction with NCRC.

Huntington plans to:

- Support smaller multi-family projects of less than 20 units, by offering a continuum of products and services that support projects throughout all stages of development.
- Pursue financing community-based developers and commercial developers who support the development of affordable housing, including multifamily housing, as well as enterprises that promote economic development, job creation, and neighborhood stabilization.
- Invest in or lend to CDFIs, SBICs, and other community-based loan funds and other organizations that demonstrate capacity to manage a loan fund, such as in Akron, Canton and Flint. This includes supporting CBOs that wish to create or become a CDFI or SBIC.
- Expand investments in local and regional Community Development Financial Institutions (CDFIs) and Small Business Investment Company (SBICs) that provide: micro-lending, products and services in LMIT, support for loan pools and EQ2 investing, and grants for technical assistance. Continue to support a range of financing options including, but not limited to state, local, federal, and tribal government programs; Historic, New Markets and Low Income Housing Tax Credits (LIHTCs); the USDA Rural Business Investment Program; Community Development Block Grants (CDBG); and Fannie Mae, Freddie Mac, and HUD financing.

Grants/Philanthropy

Baseline: \$10MM

Increase: \$15MM

New goal: \$25MM

Under this Plan, Huntington and/or its affiliates will create a philanthropy program, to be named at a future date, and will commit \$25MM of additional grants and philanthropy. Additionally, Huntington has agreed with FirstMerit to provide \$25 million of philanthropic funding to Akron, Canton, and Flint over 10 years. Huntington is committing a total of \$50 million to our expanded footprint as a result of the merger. Efforts will be focused in Akron, Charleston, Chicago, Cincinnati, Cleveland, Columbus, Detroit, Flint, Indianapolis, Pittsburgh, and Toledo, at minimum. Huntington's corporate philanthropic goals focus funding on economic development, community service, small businesses, education, affordable housing, and diversity and inclusion initiatives. Huntington intends such corporate philanthropy to include, but not be limited to, the following:

- Partnerships with and investment in Housing and Urban Development (HUD) certified counseling agencies to encourage home ownership. Huntington intends this activity to involve support for a range of activities that include pre- and post-purchase homebuyer counseling, credit counseling and repair, and general

financial education for potential borrowers. This will include support of certifications for housing counselors in Huntington's footprint.

- Increased contributions to local organizations, serving small businesses, such as SCORE, SBDCs, Women's Business Centers, and Veteran's Business Outreach Centers which provide technical assistance, training, and support.
- Continued support of community organizations, currently funded by FirstMerit, which provide services to the Underserved and small businesses. Funding will be maintained at the current level for the next two years.
- A comprehensive strategy for revitalization that centers on using all of Huntington's tools: lending, investments, grants, volunteer hours, etc. Under this strategy, Huntington will consider the level of public investments in various markets and work to leverage those investments to enhance a strategy that stabilizes and revitalizes LMIT.
- Support of NCRC's work with neighborhood organizations on capacity building.

Other Areas of Focus

Over the next five years, Huntington intends to provide \$30MM in economic impact or other programing support, including, but not limited to, the following:

New Branch Locations

Huntington will open 10 new branches in LMIT and/or Majority Minority Tracts (MMT). Specifically, Huntington will open three locations in each of the cities of Detroit, and Cleveland; two locations in Chicago; and one location in Toledo and in a city to be determined. Huntington will consider new branch locations serving LMIT and LMIB where a Huntington or First Merit branch has closed. The bank will evaluate the feasibility of providing excess vacant space in existing facilities to non-profit partners.

Huntington Colleagues in the Community

Huntington plans to introduce the position of Community Mortgage Loan Officer (CMLO) and intends to hire 18 CMLOs. The CMLO job family will be compensated based on unit production and community outreach. At minimum, one CMLO position will be created in the following cities, Akron, Chicago, Cincinnati, Cleveland, Columbus, Detroit, Indianapolis, Pittsburgh, and Toledo, unless the role already exists. Also, to the extent consistent with laws and Huntington's policies, Mortgage Loan Officers (MLOs) will be able to sell all products, including affordable mortgage products, to consumers. Huntington also intends to have dedicated processing and support staff to enhance underwriting performance and customer experience.

As new colleagues are hired for the CMLO or other positions, Huntington is committed to inclusive hiring of candidates and/or developing existing diverse colleagues and ensuring they are aware of the cultural diversity of the markets where Huntington operates.

Bilingual & Multilingual Services

Huntington will expand its outreach and customer service efforts for non-native English speakers, as permitted by regulation. In relevant locations, branches will strive to employ bilingual staff, and as permitted by regulation, translate marketing materials, and provide other services that are deemed important.

Banking Services

Huntington intends to continue to offer its consumer friendly Asterisk-Free Checking ® product that addresses the needs of LMIB, with All-Day DepositSM, 24-Hour Grace®. We will consider other innovations that provide greater access to traditional banking services to un-banked and under-banked, working to pair knowledge of this product with financial education and credit building/repair offered by CBOs.

Alternative Underwriting and Credit Scores

Huntington plans to evaluate alternative underwriting and credit scoring approaches, such as VantageScore, over the next six months for “unscorable” or “thin file” customers. If determined to be practical and consistent with safe and sound operations, Huntington will implement within 12 months after review and testing. Huntington will maintain the current alternative credit parameters under our CAM program. Alternative sources of credit are used for those applicants who do not have established credit or have a “thin file.”

Second Review

Huntington will continue to conduct a second review of denied applications. The newly formed consumer processing team will provide 1st line analysis of alternatives to denial, while the senior managers in the underwriting unit will provide the second review post denial. Finally, Huntington has an internal fair lending monitoring process that follows the CFPB’s protocol for pricing and underwriting monitoring which is executed no less than annually.

Huntington will explore developing a process to refer denied small business and consumer lending applicants to local community organizations for assistance.

Payday Lending

Huntington does not currently finance payday or title lending activity and does not intend to do so.

Marketing and Communications

Huntington plans to develop general and affirmative marketing campaigns for new and existing products to reach goals outlined in the Plan. Huntington intends to market and promote its mortgage and product offerings through various advertising mediums. Advertising mediums may include, but not be limited to, print collateral, advertising, social media, messaging in branches, product forums, conference/workshop/seminar support, sponsorships, media outreach around news items, public relations initiatives, client events, and communication pieces to clients and the community.

Additionally, Huntington plans to market products by conducting forums to explain the availability, benefits and terms of our products and programs to CBOs and their clients. CBO participation is important to the success of the Plan, in that through their participation they will have an understanding of Huntington products and programs so they can effectively refer their clients to Huntington.

Plan Governance

Huntington, with the assistance of NCRC, will charter a National Community Advisory Council (Council) and select a slate of members. Fifty percent of the Council will be comprised of organizations that are members of NCRC. NCRC members must be in good standing. The Council will meet four times per year with two meetings occurring in person. Members will be reimbursed for their travel. The Chair of the Community Development Committee of the Board and the CEO will meet with the Council at least annually.

The Council's objective will be to: (1) review progress against the Plan, (2) provide insight and counsel on current or future strategies, products, services, emerging issues and other topics of mutual interest, (3) remain knowledgeable about Huntington products and services, and (4) actively advocate and refer people and opportunities to Huntington, ensuring the success of the Plan.

Huntington will continue to engage its markets on issues important to CBOs. From time to time, but at least annually, Huntington will hold regional meetings, which will include local organizations from cities such as Akron, Charleston, Chicago, Cincinnati, Cleveland, Columbus, Detroit, Flint, Indianapolis, Pittsburgh, and Toledo, fifty percent of which will be members of and selected with the assistance of NCRC. NCRC members must be in good standing. The purpose of the meetings will be to discuss with the community progress against the plan, and to gain insight on current or future strategies.

Conclusion

Huntington intends to continue a partnership with NCRC and CBOs to support the economic and community development needs of the Underserved and small businesses. This collaboration will ensure continued focus on innovative solutions to address the financial barriers faced in its footprint.

Huntington values the expertise and commitment of its partners in this goal and recognizes that the combined impact of the partnership will provide a greater benefit than the contribution of any individual partner acting alone.

This plan is signed and agreed to by Huntington, the National Community Reinvestment Coalition, and the following organizations: