

Huntington Bancshares Incorporated

Basel III Regulatory Capital Disclosures

December 31, 2016

Glossary of Acronyms

Acronym	Description
AFS	Available For Sale
ALLL	Allowance for Loan and Lease Losses
C&I	Commercial and Industrial
CAP	Capital Adequacy Process
CRE	Commercial Real Estate
EAD	Exposure At Default
GAAP	Generally Accepted Accounting Principles in the United States
HTM	Held to Maturity
HVCRE	High Volatility Commercial Real Estate
ISDA	International Swaps and Derivatives Association
MD&A	Management Discussion and Analysis
MDB	Multilateral Development Bank
OTC	Over-The-Counter
PFE	Potential Future Exposure
PSE	Public Sector Entity
RWA	Risk Weighted Assets
SSFA	Simplified Supervisory Formula Approach
T-Bill	Treasury Bill
T-Bond	Treasury Bond
T-Note	Treasury Note
VIE	Variable Interest Entity

Introduction

Company Overview

Huntington Bancshares Incorporated (Huntington or HBI) is a multi-state diversified regional bank holding company organized under Maryland law in 1966 and headquartered in Columbus, Ohio. Through its subsidiaries, including its bank subsidiary, The Huntington National Bank (the Bank), Huntington is engaged in providing full-service commercial and consumer banking services, mortgage banking services, automobile financing, recreational vehicle and marine financing, equipment leasing, investment management, trust services, brokerage services, insurance service programs, and other financial products and services. Huntington's banking offices are located in Ohio, Illinois, Wisconsin, Michigan, Pennsylvania, Indiana, West Virginia, and Kentucky. Select financial services and other activities are also conducted in various other states. International banking services are available through the headquarters office in Columbus, Ohio. When we refer to "we", "our", and "us" in this report, we mean Huntington Bancshares Incorporated and our consolidated subsidiaries. When we refer to the "Bank" in this report, we mean our only bank subsidiary, The Huntington National Bank, and its subsidiaries.

The Board of Governors of the Federal Reserve System (Federal Reserve Board) is the primary regulator of HBI, a bank holding company under the Bank Holding Company Act of 1956 (BHC Act). As a bank holding company, HBI is subject to consolidated risk-based regulatory capital requirements which are computed in accordance with the applicable risk-based capital regulations of the Federal Reserve Board. These capital requirements are expressed as capital ratios that compare measures of regulatory capital to risk-weighted assets (RWAs). Capital levels are subject to qualitative judgments by the regulators on capital components, risk weightings and other factors. In addition, we are subject to requirements with respect to leverage.

On August 16, 2016, Huntington completed its acquisition of FirstMerit Corporation in a stock and cash transaction valued at approximately \$3.7 billion. FirstMerit Corporation was a diversified financial services company headquartered in Akron, Ohio, with operations in Ohio, Michigan, Wisconsin, Illinois and Pennsylvania. Post-merger, Huntington now operates across an eight-state Midwestern footprint. The merger resulted in a combined company with a larger market presence and more diversified loan portfolio, as well as a larger core deposit funding base and economies of scale associated with a larger financial institution.

Under the terms of the agreement, shareholders of FirstMerit Corporation received 1.72 shares of Huntington common stock, and \$5.00 in cash, for each share of FirstMerit Corporation common stock. The aggregate purchase price was \$3.7 billion, including \$0.8 billion of cash, \$2.8 billion of common stock, and \$0.1 billion of preferred stock. Huntington issued 285 million shares of common stock that had a total fair value of \$2.8 billion based on the closing market price of \$9.68 per share on August 15, 2016.

The acquisition of FirstMerit constituted a business combination. The FirstMerit merger has been accounted for using the acquisition method of accounting and, accordingly, assets acquired, liabilities assumed, and consideration exchanged were recorded at estimated fair value on the acquisition date. The determination of estimated fair values required management to make certain estimates about discount rates, future expected cash flows, market conditions, and other future events that are highly subjective in nature and may require adjustments, which can be updated for up to a year following the acquisition.

Regulatory Capital and Capital Ratios

In 2013, the Federal Reserve voted to adopt final capital rules implementing Basel III requirements for U.S. Banking organizations. The final rules establish an integrated regulatory capital framework and implement in the United States the Basel III regulatory capital reforms from the Basel Committee on Banking Supervision and certain changes required by the Dodd-Frank Act. Under the final rule, minimum requirements increase for both the quantity and quality of capital held by banking organizations. Consistent with the international Basel framework, the final rule includes a new minimum ratio of common equity tier 1 capital to risk-weighted assets and a common equity tier 1 capital conservation buffer of 2.5% of risk-weighted assets. The rule also raises the minimum ratio of tier 1 capital to risk-weighted assets and includes a minimum leverage ratio of 4%. These new minimum capital ratios were effective for us on January 1, 2015, and will be fully phased-in on January 1, 2019. We are subject to the standardized approach for calculating risk-weighted assets in accordance with subpart D of the final rule.

Huntington Bancshares Incorporated
Basel III Regulatory Capital Disclosures

The following are the minimum Basel III regulatory capital levels, including a capital conservation buffer beginning in 2016, which we must satisfy to avoid limitations on capital distributions and discretionary bonus payments during the applicable transition period, from January 1, 2015, until January 1, 2019:

	Basel III Regulatory Capital Levels				
	January 1, 2015	January 1, 2016	January 1, 2017	January 1, 2018	January 1, 2019
Common equity tier 1 risk-based capital ratio	4.5 %	5.125 %	5.75 %	6.375 %	7.0 %
Tier 1 risk-based capital ratio	6.0 %	6.625 %	7.25 %	7.875 %	8.5 %
Total risk-based capital ratio	8.0 %	8.625 %	9.25 %	9.875 %	10.5 %

The final rule emphasizes common equity tier 1 capital, the most loss-absorbing form of capital, and implements strict eligibility criteria for regulatory capital instruments. The final rule also modifies the methodology for calculating risk-weighted assets to enhance risk sensitivity. Banks and regulators use risk weighting to assign different levels of risk to different classes of assets.

Table 1 – Scope of Application

The Basel III Regulatory Capital Disclosures and HBI’s regulatory capital ratio calculations are prepared on a fully consolidated basis. The consolidated financial statements are prepared in accordance with U.S. GAAP and include the accounts of HBI and its majority-owned subsidiaries. All intercompany transactions and balances have been eliminated in consolidation. HBI is subject to the standardized approach for calculating risk-weighted assets.

Restrictions on the Transfer of Funds or Regulatory Capital within HBI

Dividends from the Bank to HBI are the primary source of funds for payment of dividends to our shareholders. However, there are statutory limits on the amount of dividends that the Bank can pay to HBI. Regulatory approval is required prior to the declaration of any dividends in an amount greater than its undivided profits or if the total of all dividends declared in a calendar year would exceed the total of its net income for the year combined with its retained net income for the two preceding years, less any required transfers to surplus or common stock. The Bank is currently able to pay dividends to HBI subject to these limitations.

Compliance with Capital Requirements

As of December 31, 2016, HBI had capital levels above the minimum regulatory capital requirements, as well as the well-capitalized standards established for prompt corrective action. For further detail on capital ratios, see Table 34 – Regulatory Capital Data in the 2016 Annual Report on Form 10-K. Also, the aggregate amount of surplus capital in our insurance subsidiaries included in HBI consolidated Total Capital as of December 31, 2016 was \$12 million. No subsidiary had a capital shortfall relative to its minimum regulatory capital requirements as of this reporting date.

Table 2: Capital Structure

Common equity (i.e., common stock, capital surplus, and retained earnings) is the primary component of our capital structure. Common equity allows for the absorption of losses on an ongoing basis and is permanently available for this purpose. Further, common equity allows for the conservation of resources during stress, as it provides HBI with full discretion on the amount and timing of dividends and other distributions.

However, regulators and rating agencies include other non-common forms of capital (e.g., subordinated debt and preferred stock) in their calculations of capital adequacy. Accordingly, Huntington allows for the inclusion of these alternative forms of capital in its metrics for the tier 1 risk based capital and total risk based capital ratios.

The terms and conditions of HBI's capital instruments are described in the 2016 Report on Form 10-K as follows:

- Common stock terms and conditions are described on the Balance Sheet in HBI's Consolidated Financial Statements
- Preferred stock terms and conditions are described in Note 13 - Shareholders' Equity in the 2016 Annual Report on Form 10-K
- Trust preferred securities terms and conditions are described in Note 20 - VIEs in the 2016 Annual Report on Form 10-K
- Subordinated debt terms and conditions are described in Note 11 - Long-Term Debt in the 2016 Annual Report on Form 10-K

The components of HBI's capital structure are disclosed in MD&A Table 32 - Capital Under Current Regulatory Standards (transitional Basel III basis) in the 2016 Annual Report on Form 10-K..

Table 3: Capital Adequacy

We utilize a capital adequacy process (CAP) which, at a minimum, addresses requirements set forth in the Federal Reserve's *Seven Principles of an Effective Capital Adequacy Process*:

1. Sound foundational risk management
2. Effective loss estimation methodologies
3. Solid resource estimation methodologies
4. Sufficient capital adequacy impact assessment
5. Comprehensive capital policy and planning
6. Robust internal controls
7. Effective governance

Huntington's CAP objectives are to assure that capital levels are considered strong, to support underlying risk positions, and allow it to continue its operations as a credit intermediary. To do so, the CAP assesses both point-in-time and forecasted capital ratios. Huntington understands that the appropriate level of capital cannot be determined solely through the application of quantitative criteria for "adequately" and "well-capitalized" levels. Huntington is independently responsible for assessing its own capital adequacy based on its risk profile and business model.

In building its CAP, Risk Management and Finance may establish working groups to facilitate day-to-day work and resolve and/or recommend solutions to challenges that arise as a result of CAP enhancements. Recommendations and updates from working groups are reported to the Capital Management Committee and, as applicable, to the Risk Oversight Committee of the Board of Directors.

Risk-weighted assets represent an institution's on-balance sheet assets and off-balance sheet exposures, weighted according to the risk associated with each exposure category. The risk-weighted asset calculation is used in determining the institution's capital requirement.

Huntington Bancshares Incorporated
Basel III Regulatory Capital Disclosures

The following table shows risk-weighted assets by exposure types:

Risk Weighted Assets	December 31, 2016
<i>(dollar amounts in thousands)</i>	
On-balance sheet assets:	
Exposure to sovereign entities ⁽¹⁾	\$ 670,642
Exposures to certain supranational entities and MDBs	—
Exposure to depository institutions, foreign banks and credit unions	457,284
Exposures to public sector entities (PSE)	1,338,844
Corporate exposures	33,630,114
Residential mortgage exposures	13,044,281
Statutory multifamily mortgages and pre-sold construction loans	658,080
High volatility commercial real estate (HVCRE) loans	1,697,688
Past due exposures	452,475
Other loans	12,527,935
Default fund contributions	—
Securitization exposures	395,975
Equity exposures	758,512
Trading & Other Assets	4,434,961
Off-balance sheet:	
Commitments	6,973,917
OTC Derivatives	582,276
Cleared transactions	1,136
Securitization Exposures	—
Letters of credit	593,986
Unsettled transactions	—
Other Off Balance Sheet Items	45,018
Total Standardized Risk Weighted Assets	\$ 78,263,124
Common Equity Tier 1 Capital Ratio	
Huntington Bancshares Incorporated	9.5649 %
Huntington National Bank	10.4204 %
Tier 1 Risk-Based Capital Ratio	
Huntington Bancshares Incorporated	10.9210 %
Huntington National Bank	11.6126 %
Total Risk-Based Capital Ratio	
Huntington Bancshares Incorporated	13.0529 %
Huntington National Bank	13.8259 %
Tier 1 Leverage Ratio	
Huntington Bancshares Incorporated	8.7000 %
Huntington National Bank	9.2869 %

(1) HBI's sovereign exposure is predominantly to the U.S. government and its agencies.

Note: Huntington is not subject to the Market Risk requirements under subpart F of the final rule.

HBI's capital ratios are presented in MD&A Table 34 – Regulatory Capital Data, in our 2016 Annual Report on Form 10-K.

Huntington Bancshares Incorporated
Basel III Regulatory Capital Disclosures

Table 4: Capital Conservation Buffer

The capital conservation buffer is mandatory regulatory capital that financial institutions are required to hold in addition to the other minimum capital requirements. Basel III guidelines state a banking organization would need to hold a capital conservation buffer in an amount greater than 2.5% of total risk-weighted assets over the regulatory “well-capitalized” minimums to avoid limitations on capital distributions and discretionary bonus payments to executive officers. HBI is subject to the capital conservation buffer requirements, which is phased-in, as detailed below:

	2016	2017	2018	2019
Capital conservation buffer	0.625 %	1.25 %	1.875 %	2.5 %

The capital conservation buffer of a banking organization is the lowest of the following three ratios: The common equity tier 1 capital ratio minus its minimum common equity tier 1 capital ratio, the tier 1 capital ratio minus its minimum tier 1 capital ratio and the total capital ratio minus its minimum total capital ratio. The capital conservation buffer calculations for Huntington Bancshares Incorporated and Huntington National Bank are shown in the tables below. The capital conservation buffers were 4.9210% and 5.6126% respectively. As a result of the calculations for both organizations, there are no limitations on distributions and discretionary bonus payments under the capital conservation buffer framework. The disclosure requirements of the Capital Conservation Buffer are available in Huntington's FR Y-9C Schedule HC-R Part I. and Call Report Schedule RC-R Part I.

Huntington Bancshares Incorporated

December 31, 2016

	Capital Ratio	Minimum Capital Requirement	Capital Conservation Buffer	Minimum Capital Conservation Buffer Requirement
Common Equity Tier 1 Capital	9.5649 %	4.5000 %	5.0649 %	0.6250 %
Tier 1 Capital	10.9210	6.0000	4.9210	0.6250
Total Capital	13.0529	8.0000	5.0529	0.6250

Huntington National Bank

December 31, 2016

	Capital Ratio	Minimum Capital Requirement	Capital Conservation Buffer	Minimum Capital Conservation Buffer Requirement
Common Equity Tier 1 Capital	10.4204 %	4.5000 %	5.9204 %	0.6250 %
Tier 1 Capital	11.6126	6.0000	5.6126	0.6250
Total Capital	13.8259	8.0000	5.8259	0.6250

Huntington Bancshares Incorporated
Basel III Regulatory Capital Disclosures
Table 5: Credit Risk: General Disclosures

The following credit risk policies are described in Note 1 to the Consolidated Financial Statements included in our 2016 Annual Report on Form 10-K:

- a. Policy for determining past due or delinquency status
- b. Policy for placing loans on nonaccrual status
- c. Policy for returning loans to accrual status
- d. Definition of and policy for identifying impaired loans
- e. Description of the methodology that HBI uses to estimate its allowance for loan and lease losses
- f. Policy for charging-off uncollectible amounts

Discussion of HBI's credit risk management process is presented in the 2016 Annual Report on Form 10-K in the Credit Risk section of MD&A.

Table 5B: Total Credit Risk Exposures

<i>(dollar amounts in thousands)</i>	Credit Exposure December 31, 2016			Average Balance
	Loans	Unused Commitments (1)	Total	
C&I	\$ 28,108,070	\$ 15,370,681	\$ 43,478,751	\$ 43,208,823
CRE	7,331,031	2,158,838	9,489,869	9,563,506
Automobile loans	10,968,782	—	10,968,782	11,630,067
Home Equity	10,106,356	9,224,814	19,331,170	19,273,468
Residential Mortgage	8,143,223	171,569	8,314,792	8,262,145
RV and marine finance	1,846,447	—	1,846,447	1,843,077
Other Consumer Loans	956,418	2,839,560	3,795,978	3,728,678
Total Loans and Commitments Credit Exposures	\$ 67,460,327	\$ 29,765,462	\$ 97,225,789	\$ 97,509,764

(1) Unused commitments include unused loan commitments and letters of credit.

<i>(dollar amounts in thousands)</i>	Derivatives Credit Exposure	
	December 31, 2016	Average Balance
Interest Rate	\$ 414,737	\$ 517,195
Foreign Exchange	135,399	145,075
Commodities	195,029	168,904
Equities	16,249	12,028
Total Derivatives Credit Exposures	\$ 761,414	\$ 843,202

Disclosure of Debt Securities exposure is described in Note 5 - Available-for-Sale and Other Securities and Note 6 - Held-to-Maturity Securities in the 2016 Annual Report on Form 10-K.

Table 5C: Geographic Distribution of Credit Exposures

<i>(dollar amounts in thousands)</i>	Loans and Commitments Credit Exposure by State							
	December 31, 2016							
	Commercial and Industrial	Commercial Real Estate	Automobile	Home Equity	Residential Mortgage	RV and Marine	Other Consumer	Total
Ohio	\$15,906,699	\$ 3,961,616	\$ 3,610,400	\$11,162,770	\$ 3,626,999	\$ 285,089	\$ 2,188,265	\$40,741,838
Michigan	6,894,822	1,217,837	774,615	3,883,193	1,848,153	237,664	695,383	15,551,667
Illinois	2,607,055	499,317	487,249	607,300	194,281	219,461	49,212	4,663,875
Wisconsin	542,931	125,495	450,107	160,317	66,296	107,266	23,232	1,475,644
Pennsylvania	3,084,465	482,652	872,371	1,082,001	413,888	66,835	168,069	6,170,281
Indiana	2,265,837	446,750	1,090,132	1,137,321	462,164	117,269	146,954	5,666,427
Kentucky	818,437	149,362	1,066,779	373,406	97,457	71,073	35,047	2,611,561
West Virginia	707,597	72,272	358,266	589,031	224,389	13,945	75,637	2,041,137
Other	10,650,907	2,534,569	2,258,863	335,831	1,381,165	727,845	414,179	18,303,359
Total	\$43,478,751	\$ 9,489,869	\$10,968,782	\$19,331,170	\$ 8,314,792	\$ 1,846,447	\$ 3,795,978	\$97,225,789

<i>(dollar amounts in thousands)</i>	Derivative Credit Exposure by Country				
	December 31, 2016				
	Interest Rate Derivatives	Foreign Exchange	Commodities	Equities	Total Exposure
United States	\$ 387,940	\$ 73,885	\$ 175,936	\$ —	\$ 637,761
Non-United States	26,797	61,514	19,093	16,249	123,653
Total Derivatives Credit Exposure	\$ 414,737	\$ 135,399	\$ 195,029	\$ 16,249	\$ 761,414

Disclosure of Debt Securities exposure by type is presented in Note 5 - Available-for-Sale and Other Securities and Note 6 - Held-to-Maturity Securities in the 2016 Annual Report on Form 10-K.

Huntington Bancshares Incorporated
Basel III Regulatory Capital Disclosures

Table 5D: Distribution of Exposures by Industry Type, Categorized by Major Types of Credit Exposures

<i>(dollar amounts in thousands)</i>	December 31, 2016			
	Credit Exposure by Industry Category			
	Loans	Unused Commitments	Derivatives	Total
Real Estate and Rental and Leasing	\$ 7,544,522	\$ 2,069,187	\$ 213,783	\$ 9,827,492
Manufacturing	4,937,112	3,426,838	77,161	8,441,111
Retail Trade	4,757,769	2,050,848	—	6,808,617
Finance and Insurance	2,010,247	2,231,838	261,131	4,503,216
Health Care and Social Assistance	2,728,651	1,044,738	26,476	3,799,865
Wholesale Trade	2,070,532	1,530,923	—	3,601,455
Professional, Scientific, and Technical Services	1,263,546	930,753	—	2,194,299
Transportation and Warehousing	1,365,972	338,106	—	1,704,078
Accommodation and Food Services	1,677,794	322,161	—	1,999,955
Construction	874,690	883,326	—	1,758,016
Other Services	1,223,016	456,474	138,524	1,818,014
Utilities	470,127	565,579	—	1,035,706
Mining, Quarrying, and Oil and Gas Extraction	667,957	438,614	30,660	1,137,231
Educational Services	501,187	194,928	—	696,115
Arts, Entertainment, and Recreation	556,157	160,248	—	716,405
Information	473,474	189,255	—	662,729
Admin./Support/Waste Mgmt. and Remediation Services	428,934	233,916	—	662,850
Public Administration	272,325	27,755	7,755	307,835
Agriculture, Forestry, Fishing and Hunting	150,751	70,310	—	221,061
Management of Companies and Enterprises	95,833	24,428	—	120,261
Unclassified/Other	1,368,505	339,294	5,924	1,713,723
Total Commercial Credit Exposure by Industry Category	35,439,101	17,529,519	761,414	53,730,034
Purchased impaired loans	—	—	—	0
Automobile loans and leases	10,968,782	—	—	10,968,782
Home Equity	10,106,356	9,224,814	—	19,331,170
Residential mortgage	8,143,223	171,569	—	8,314,792
RV and marine finance	1,846,447	—	—	1,846,447
Other consumer loans	956,418	2,839,560	—	3,795,978
Total Loans, Commitments, and Derivatives Credit Exposures	\$ 67,460,327	\$ 29,765,462	\$ 761,414	\$ 97,987,203

Discussion of Debt Securities exposure is presented in Note 5 - Available-for-Sale and Other Securities and Note 6 - Held-to-Maturity Securities in the 2016 Annual Report on Form 10-K.

Table 5E: Impaired or Past Due Loans by Major Industry or Counterparty Type and Charge-off Information

Disclosures of amount of impaired loans for which there was a related allowance under GAAP, amount of impaired loans for which there was no related allowance under GAAP, and the balance of Allowance for Loan Losses disaggregated on the basis of the impairment method are presented in Note 4 – Loans / Leases and Allowance for Credit Losses in the 2016 Annual Report on Form 10-K.

Huntington Bancshares Incorporated
Basel III Regulatory Capital Disclosures

Discussion of HBI's charge-offs during the period is presented in MD&A Table 19 – Net Loan and Lease Charge-offs in the 2016 Annual Report on Form 10-K.

Disclosures on the amount of loans past due 90 days and on nonaccrual, and loans past due 90 days and still accruing are presented in Note 4 – Loans / Leases and Allowance for Credit Losses in the 2016 Annual Report on Form 10-K.

Table 5F: Impaired Loans by Geographic Distribution:

Impaired loans with no related allowance recorded								
December 31, 2016								
<i>(dollar amounts in thousands)</i>	Commercial and Industrial	Commercial Real Estate	Automobile	Home Equity	Residential Mortgage	RV and Marine	Other Consumer	Total
State:								
Illinois	\$ 20,578	\$ 8,792	\$ —	\$ —	\$ —	\$ —	\$ —	\$ 29,370
Indiana	9,727	27,295	—	—	—	—	—	\$ 37,022
Kentucky	6,261	—	—	—	—	—	—	6,261
Michigan	42,324	19,229	—	—	—	—	—	61,553
Ohio	99,457	22,385	—	—	—	—	—	121,842
Pennsylvania	35,197	—	—	—	—	—	—	35,197
West Virginia	9,376	6,975	—	—	—	—	—	16,351
Wisconsin	11,293	148	—	—	—	—	—	11,441
Other	65,393	3,993	—	—	—	—	—	69,386
Total	\$ 299,606	\$ 88,817	\$ —	\$ —	\$ —	\$ —	\$ —	\$ 388,423
Impaired loans with related allowance recorded								
December 31, 2016								
<i>(dollar amounts in thousands)</i>	Commercial and Industrial	Commercial Real Estate	Automobile	Home Equity	Residential Mortgage	RV and Marine	Other Consumer	Total
State:								
Illinois	\$ —	\$ —	\$ 262	\$ 1,394	\$ 4,123	\$ —	\$ —	\$ 5,779
Indiana	17,722	29,419	3,757	21,774	17,724	—	—	90,396
Kentucky	6,960	602	3,944	7,066	7,100	—	—	25,672
Michigan	55,146	13,590	2,012	76,542	64,891	—	—	212,181
Ohio	177,370	42,706	8,858	172,544	160,064	—	—	561,542
Pennsylvania	37,546	4,386	4,392	14,723	13,259	—	—	74,306
West Virginia	25,105	197	1,964	12,144	6,683	—	—	46,093
Wisconsin	—	—	612	129	2,084	—	—	2,825
Other	86,394	6,338	5,160	13,088	51,825	—	3,897	166,702
Total	\$ 406,243	\$ 97,238	\$ 30,961	\$ 319,404	\$ 327,753	\$ —	\$ 3,897	\$1,185,496

Table 5G: Reconciliation of Changes in ALLL:

Reconciliation of changes in the Allowance for Loan and Lease Losses is presented in Note 4 – Loans and Leases and Allowance for Credit Losses in the 2016 Annual Report on Form 10-K.

Table 5H: Remaining Contractual Portfolio Maturity, Categorized by Credit Exposure

<i>(dollar amounts in thousands)</i>	Credit Exposure by Maturity			
	December 31, 2016			
	1 Year or Less	Over 1 Year To 5 Years	Over 5 Years	Total
C&I	\$ 15,169,086	\$ 23,581,101	\$ 4,728,564	\$ 43,478,751
CRE	2,327,561	5,615,380	1,546,928	9,489,869
Automobile loans and leases	131,333	7,010,458	3,826,991	10,968,782
Home equity	273,403	768,981	18,288,786	19,331,170
Residential mortgage	480,670	71,556	7,762,566	8,314,792
RV and marine finance	1,149	62,947	1,782,351	1,846,447
Other consumer loans	409,509	2,770,154	616,315	3,795,978
Debt Securities	221,495	1,149,460	21,434,529	22,805,484
Derivatives	87,464	550,792	123,158	761,414
Total Credit Exposure by Maturity	\$ 19,101,670	\$ 41,580,829	\$ 60,110,188	\$ 120,792,687

For additional information on credit exposures, please see the 2016 Fourth Quarter FR Y-9C and Note 4 – Loans and Leases and Allowance for Credit Losses, Note 5 – Available-for-Sale and Other Securities, Note 6 – Held-to-Maturity Securities, and Note 19 – Derivative Financial Instruments in the 2016 Annual Report on Form 10-K.

Table 6: General Disclosure for Counterparty Credit Risk-Related Exposures

We offer risk management products that enable customers to hedge various forms of financial risks including interest rate risk, foreign currency translation risk and commodity price risk. We also act as an intermediary between customers and money-center banks (primarily North American and European) enabling customers to access financial products (and hedge risk). Huntington's product suite enables customers to better control business risk and deepens relationships.

Prior to executing an OTC transaction, the financial strength of a potential counterparty is established using a risk rating methodology approved by the Credit Policy and Strategy Committee (reporting to the Board of Directors). The methodology is the same as that used to make lending decisions for commercial customers and similar for financial institution counterparties. Credit ratings are developed and exposure limits are established no less than annually that reflects our assessment of the financial strength of the counterparty.

The Bank uses an internal model to determine the potential future exposure (PFE) of OTC derivatives which is used to calculate the total credit exposure. As Huntington is subject to the Standardized Approach, RWA for OTC derivatives is determined using the methodology prescribed in the Final Rule for calculating PFE, and not our internal model.

To mitigate our exposure, collateral agreements are required for financial institution counterparties. These agreements consist of industry standard contracts (ISDA and Credit Support Annex agreements) that detail (inter alia) collateral requirements, acceptable collateral types, an unambiguous method for valuing collateral, as well as 'haircuts'. Daily collateral management activities are performed by a specialized Corporate Treasury team according to the legally enforceable contracts. The primary types of collateral taken in these contracts include cash, U.S. T-Bill, U.S. T-Note, U.S. T-Bond and U.S. Government Agency Securities.

Collateral agreements are not dependent on the credit ratings of the Bank or its counterparties. Rather, existing collateral agreements require Huntington and counterparty institutions to maintain 'well-capitalized' status (by regulatory standards). Failure to maintain 'well-capitalized' status is considered an early termination event and will likely result in a termination of the relationship.

Consistent with GAAP, an allowance is established to reflect the potential for losses associated with customer's unrealized losses on OTC contracts. A two-year cumulative probability of default metric is multiplied by unrealized customer losses to reflect a loss emergence period of two years.

<i>(dollar amounts in thousands)</i>	December 31, 2016
OTC Derivatives	
Gross Positive Fair Value	\$ 348,825
Net Unsecured Credit Exposure (1)	761,414
Collateral Held:	
Cash	\$ 92,481
Securities	28,790
Credit Equivalent Amount	637,864
Repo Style Transactions	
Gross Positive Fair Value	\$ 697,582
Net Unsecured Credit Exposure (1)	36,665
Collateral Held:	
Cash	\$ 660,917
Credit Equivalent Amount	36,665
Notional Amount of Credit Derivatives - Loan Participations	
Notional of Credit Derivatives - Purchased Protection	\$ 991,465
Notional of Credit Derivatives - Sold Protection	582,446
Total Notional of Credit Derivatives	\$ 1,573,911

(1) Represents the amount of credit exposure that is reduced due to the netting of offsetting positive and negative exposures where a valid master netting agreement exists, and collateral held.

Table 7: Credit Risk Mitigation

Discussion of HBI's credit risk mitigation policies and processes is presented in the Credit Risk section in the 2016 Annual Report on Form 10-K.

Exposures covered by eligible financial collateral after application of haircuts:

<i>(dollar amounts in thousands)</i>	December 31, 2016
Exposure Type	
Loans/Leases	\$ 1,305,398
Securities	—
Derivatives ⁽¹⁾	121,271
Repo-style transactions	660,917
Total	\$ 2,087,586

(1) Includes Derivatives, Investing and Trading Activities

Exposures covered by guarantees and credit derivatives with associated risk weighted amount:

<i>(dollar amounts in thousands)</i>	December 31, 2016	
Exposure Type	Exposure Amount	Risk Weighted Asset Amount
AFS/HTM Securities	\$ 18,662,910	700,180
Loans	270,569	13,361
Letters of Credit	58,864	11,770
Other ⁽¹⁾	62,133	62,133
Total	\$ 19,054,476	\$ 787,444

(1) Includes Credit Participation Swaps

Table 8: Securitizations

Huntington utilizes automobile loan securitizations primarily to manage its aggregate concentration in originated indirect automobile loans as well as for diversifying its liquidity sources. Our risk management organization plays an active role in the review and oversight of this exposure which includes on-balance sheet portfolio loans, off-balance sheet auto loans due to sales or securitizations which we continue to service and on-balance sheet investments in automobile loan asset-backed securities. We do not engage in synthetic or re-securitization activities.

During the 2016 fourth quarter and 2015 second quarter, we transferred \$1.5 billion and \$750 million respectively of auto loans to trusts in securitization transactions. The securitizations and the resulting sale of all underlying securities, including the residual interest certificates, were accounted for as sales. Huntington has concluded that it is not the primary beneficiary of these trusts because it has neither the obligation to absorb losses of the entities that could potentially be significant to the Variable Interest Entities (VIEs) nor the right to receive benefits from the entities that could potentially be significant to the VIEs. Huntington is not required and does not currently intend to provide any additional financial support to the trusts. Investors and creditors only have recourse to the assets held by the trusts. Huntington is the servicer of all indirect automobile loans that have been securitized and, as a result, the only on-balance sheet interest Huntington holds in the VIEs relates to capitalized servicing rights with a total carrying value of \$18.2 million at December 31, 2016, which represented our maximum exposure to loss. For information on our 2016 activity and realized gains or loss on sales of

Huntington Bancshares Incorporated
Basel III Regulatory Capital Disclosures

financial assets in securitizations, see Note 7 – Loan Sales and Securitizations, and Note 20 – VIEs, in our 2016 Annual Report on Form 10-K.

Prior to securitization, the underlying loans are classified as loans held for sale and are accounted for at the lower of cost or fair value. Gain or loss is recorded at the time of closing of the securitization transaction and the sale of all securities, including the residual interest certificates. The outstanding principal balance of securitized automobile loans at December 31, 2016 was \$1.7 billion. This amount is not representative of our risk of loss but is presented for the purpose of providing information as to the extent of our securitization activities.

See Note 1 - Significant Accounting Policies to the Consolidated Financial Statements included in our 2016 Annual Report on Form 10-K for our accounting policy on transfers of financial assets and securitizations. See Note 7 - Loan Sales and Securitizations and Note 20 - VIEs in our 2016 Annual Report on Form 10-K for additional information on securitization activities.

The following table represents exposures receiving securitization capital treatment. The amounts below include traditional securitizations. Approximately \$2.7 million, or 3.9%, in Lease exposures were past due at December 31, 2016. Net charge-offs on Lease exposures were \$84 million for the 2016 fourth quarter. HBI does not have any synthetic securitization exposures.

Securitization Exposures and related Risk-Weighted Assets by Exposure Type:

As of December 31, 2016			
<i>(dollar amounts in thousands)</i>	Exposure Amount (EAD)		
	On-balance sheet	Off-balance sheet	Total EAD
Leases (1)	\$ 69,825	\$ —	\$ 69,825
Mortgage-backed securities (2)	17,871,686	—	17,871,686
Asset-backed and other (2)	793,492	—	793,492
Total	\$ 18,735,003	\$ —	\$ 18,735,003

(1) Purchased via acquisition of Macquarie Equipment Finance, Inc. (rebranded as Huntington Technology Finance, Inc.)

(2) Purchased investment securities.

As of December 31, 2016				
<i>(dollar amounts in thousands)</i>	SSFA Calculation		Standardized Approach	Total RWA
	Asset-backed and other	Leases	Mortgage-backed securities	
0% to 20%	\$ 137,735	\$ 7,677	\$ 3,574,337	\$ 3,719,749
>20% to 100%	25,575	5,330	—	30,905
>100% - 1250%	116,188	103,471	—	219,659
Total	\$ 279,498	\$ 116,478	\$ 3,574,337	\$ 3,970,313

Table 9: Equities not Subject to Market Risk Capital Rules

Equity investments held at HBI include AFS equity securities, private equity investments, and other equity investments classified within other assets.

Non marketable equity securities are recorded at historical cost, and marketable equity securities are recorded as available-for-sale and carried at fair value with unrealized net gains or losses reported within other comprehensive income / (loss) in shareholders' equity. Low Income Housing Tax Credit investments are included in accrued income and other assets and the majority of these investments are accounted for using the proportional amortization method. Investments that do not meet the requirements of the proportional amortization method and other miscellaneous equity investments are generally accounted for using the equity method.

Summary of Equity Investment Exposures

Huntington's equity exposures not subject to the Market Risk rule include the following investments:

- Low Income Housing Tax Credit Investments - see Note 20 - VIEs in our 2016 Report on Form 10-K for additional information on affordable housing tax credit investments.
- Other Miscellaneous Equity Investments - New Market Tax Credit Investments, Historic Tax Credit Investments, Small Business Investment Companies, Rural Business Investment Companies, certain equity method investments and other miscellaneous investments.
- Federal Reserve Bank and Federal Home Loan Bank stock, which are considered equity exposures under the regulatory capital framework.

Equity Securities Not Subject to Market Risk Rule:

	December 31, 2016		
<i>(dollar amounts in thousands)</i>	Nonpublic	Publicly Traded	Total
Amortized cost	\$ 1,255,639	\$ 829	\$ 1,256,468
Unrealized gains/losses	—	440	440
Latent revaluation gains/losses (a)	—	—	—
Fair value	\$ 1,255,639	\$ 1,269	\$ 1,256,908

(a) The unrealized gains/(losses) not recognized either in the balance sheet or through earnings.

There were no net realized gains or losses arising from sales and liquidations of equity investments for the quarter ended December 31, 2016. Total net unrealized gains on available-for-sale equity investments recognized in accumulated other comprehensive income were \$440 thousand as of December 31, 2016.

Capital Requirements for Equity Securities Not Subject to Market Risk Rule:

	December 31, 2016	
<i>(dollar amounts in thousands)</i>	Exposure	Risk Weighted Assets
0%	\$ 298,966	\$ —
20%	248,738	49,748
100%	708,764	708,764
Full look-through approach	—	—
Total	\$ 1,256,468	\$ 758,512

Table 10: Interest Rate Risk for Non-Trading Activities

Disclosure is presented in the 2016 Report on Form 10-K, in the Interest Rate Risk portion of the Market Risk section of MD&A.

Huntington Bancshares Incorporated
Basel III Regulatory Capital Disclosures

Appendix A

Huntington Bancshares Incorporated
Basel III Regulatory Capital Disclosures
December 31, 2016

Table	Disclosure Requirement	Disclosure Location
Table 1: Scope of Application		
Qualitative A	The name of the top corporate entity in the group to which the Risk Based Capital Standards apply:	Basel III Regulatory Capital Disclosures - Scope of Application
B	A brief description of the differences in the basis for consolidating entities for accounting and regulatory purposes, with a description of those entities: (1) That are fully consolidated; (2) That are deconsolidated and deducted from total capital; (3) For which the total capital requirement is deducted; and (4) That are neither consolidated nor deducted (for example, where the investment in the entity is assigned a risk weight in accordance with this subpart).	Not applicable. HBI does not have differences in the basis of consolidation for accounting and regulatory purposes.
C	Any restrictions, or other major impediments, on transfer of funds or total capital within the group.	Basel III Regulatory Capital Disclosures - Scope of Application
Quantitative D	The aggregate amount of surplus capital of insurance subsidiaries included in the total capital of the consolidated group.	Basel III Regulatory Capital Disclosures - Scope of Application
E	The aggregate amount by which actual total capital is less than the minimum total capital requirement in all subsidiaries, with total capital requirements and the name(s) of the subsidiaries with such deficiencies.	Basel III Regulatory Capital Disclosures - Scope of Application
Table 2: Capital Structure		
Qualitative A	Summary information on the terms and conditions of the main features of all regulatory capital instruments	Basel III Regulatory Capital Disclosures - Capital Structure 2016 Annual Report on Form 10-K in Table 32 Capital Under Current Regulatory Standards (Basel III) of Management's Discussion and Analysis (MD&A) 2016 Annual Report on Form 10-K in Consolidated Financial Statements 2016 Third Quarter Report on Form 10-Q - Note 20 - VIEs 2016 Annual Report on Form 10-K - Note 11 - Long Term Debt
Quantitative B	The amount of common equity tier 1 capital, with separate disclosure of: (1) Common stock and related surplus; (2) Retained earnings; (3) Common equity minority interest; (4) AOCI; and (5) Regulatory adjustments and deductions made to common equity tier 1 capital	2016 Annual Report on Form 10-K in Table 32 Capital Under Current Regulatory Standards (Basel III) of Management's Discussion and Analysis (MD&A)
C	The amount of tier 1 capital, with separate disclosure of: (1) Additional tier 1 capital elements, including additional tier 1 capital instruments and tier 1 minority interest not included in common equity tier 1 capital; and (2) Regulatory adjustments and deductions made to tier 1 capital.	2016 Annual Report on Form 10-K in Table 32 Capital Under Current Regulatory Standards (Basel III) of Management's Discussion and Analysis (MD&A)

Huntington Bancshares Incorporated
Basel III Regulatory Capital Disclosures

D	The amount of total capital, with separate disclosure of: (1) Tier 2 capital elements, including tier 2 capital instruments and total capital minority interest not included in tier 1 capital; and (2) Regulatory adjustments and deductions made to total capital.	2016 Annual Report on Form 10-K in Table 32 Capital Under Current Regulatory Standards (Basel III) of Management's Discussion and Analysis (MD&A)
Table 3: Capital Adequacy		
Qualitative A	A summary discussion of the bank holding company's approach to assessing the adequacy of its capital to support current and future activities.	Basel III Regulatory Capital Disclosures - Capital Adequacy
Quantitative B	Risk-weighted assets for: (1) Exposures to sovereign entities; (2) Exposures to certain supranational entities and MDBs; (3) Exposures to depository institutions, foreign banks, and credit unions; (4) Exposures to PSEs; (5) Corporate exposures; (6) Residential mortgage exposures; (7) Statutory multifamily mortgages and pre-sold construction loans; (8) HVCRE loans; (9) Past due loans; (10) Other assets; (11) Cleared transactions; (12) Default fund contributions; (13) Unsettled transactions; (14) Securitization exposures; and (15) Equity exposures	Basel III Regulatory Capital Disclosures - Capital Adequacy
C	Standardized market risk-weighted assets as calculated under subpart F of this part.	Not applicable. HBI is not subject to the Market Risk requirements
D	Common equity tier 1, tier 1 and total risk-based capital ratios: (1) For the top consolidated group; and (2) For each depository institution subsidiary.	Basel III Regulatory Capital Disclosures - Capital Adequacy 2016 Annual Report on Form 10-K in Table 34 - Regulatory Capital Data
E	Total standardized risk-weighted assets.	Basel III Regulatory Capital Disclosures - Capital Adequacy
Table 4: Capital Conservation Buffer		
Qualitative A	At least quarterly, the bank holding company must calculate and publicly disclose the capital conservation buffer as described under §1.11.	Basel III Regulatory Capital Disclosures - Capital Conservation Buffer
Quantitative B	At least quarterly, the bank holding company must calculate and publicly disclose the eligible retained income of the bank holding company, as described under §1.11.	
C	At least quarterly, the bank holding company must calculate and publicly disclose any limitations it has on distributions and discretionary bonus payments resulting from the capital conservation buffer framework described under §1.11, including the maximum payout amount for the quarter.	
Table 5: Credit Risk: General Disclosures		
Qualitative A	The general qualitative disclosure requirement with respect to credit risk (excluding counterparty credit risk disclosed in accordance with Table 6), including the: (1) Policy for determining past due or delinquency status;	Basel III Regulatory Capital Disclosures - Credit Risk - General Disclosures Note 1 to the Consolidated Financial Statements included in the 2016 Annual Report on Form 10-K

Huntington Bancshares Incorporated
Basel III Regulatory Capital Disclosures

	<p>(2) Policy for placing loans on nonaccrual;</p> <p>(3) Policy for returning loans to accrual status;</p> <p>(4) Definition of and policy for identifying impaired loans (for financial accounting purposes);</p> <p>(5) Description of the methodology that the bank holding company uses to estimate its allowance for loan and lease losses, including statistical methods used where applicable;</p> <p>(6) Policy for charging-off uncollectible amounts; and</p> <p>(7) Discussion of the bank holding company's credit risk management policy.</p>	<p>Note 1 to the Consolidated Financial Statements included in the 2016 Annual Report on Form 10-K</p> <p>Note 1 to the Consolidated Financial Statements included in the 2016 Annual Report on Form 10-K</p> <p>Note 1 to the Consolidated Financial Statements included in the 2016 Annual Report on Form 10-K</p> <p>Note 1 to the Consolidated Financial Statements included in the 2016 Annual Report on Form 10-K</p> <p>Note 1 to the Consolidated Financial Statements included in the 2016 Annual Report on Form 10-K</p> <p>2016 Annual Report on Form 10-K in the Risk Management and Capital section of MD&A</p>
Quantitative B	<p>Total credit risk exposures and average credit risk exposures, after accounting offsets in accordance with GAAP, without taking into account the effects of credit risk mitigation techniques (for example, collateral and netting not permitted under GAAP), over the period categorized by major types of credit exposure. For example, banks could use categories similar to that used for financial statement purposes. Such categories might include, for instance</p> <p>(1) Loans, off-balance sheet commitments, and other non-derivative off-balance sheet exposures;</p> <p>(2) Debt securities; and</p> <p>(3) OTC derivatives</p>	<p>Basel III Regulatory Capital Disclosures - Credit Risk - General Disclosures, Table 5B</p> <p>2016 Annual Report on Form 10-K, Note 5 - Available-for-Sale and Other Securities, and Note 6 - Held -to-Maturity Securities</p>
C	<p>Geographic distribution of exposures, categorized in significant areas by major types of credit exposure.</p>	<p>Basel III Regulatory Capital Disclosures - Credit Risk - General Disclosures, Table 5C</p> <p>2016 Annual Report on Form 10-K, Note 5 - Available-for-Sale and Other Securities, and Note 6 - Held -to-Maturity Securities</p>
D	<p>Industry or counterparty type distribution of exposures, categorized by major types of credit exposure.</p>	<p>Basel III Regulatory Capital Disclosures - Credit Risk - General Disclosures, Table 5D</p> <p>2016 Annual Report on Form 10-K, Note 5 - Available-for-Sale and Other Securities, and Note 6 - Held -to-Maturity Securities</p>
E	<p>By major industry or counterparty type:</p> <p>(1) Amount of impaired loans for which there was a related allowance under GAAP;</p> <p>(2) Amount of impaired loans for which there was no related allowance under GAAP;</p> <p>(3) Amount of loans past due 90 days and on nonaccrual;</p> <p>(4) Amount of loans past due 90 days and still accruing;</p> <p>(5) The balance in the allowance for loan and lease losses at the end of each period, disaggregated on the basis of the bank's impairment method. To disaggregate the information required on the basis of impairment methodology, an entity shall separately disclose the amounts based on the requirements in GAAP; and</p> <p>(6) Charge-offs during the period.</p>	<p>Basel III Regulatory Capital Disclosures - Credit Risk - General Disclosures, Table 5E</p> <p>2016 Annual Report on Form 10-K - Note 4 - Loans and Leases and Allowance for Credit Losses</p> <p>2016 Annual Report on Form 10-K - Table 19 - Net Loan and Lease Charge Offs</p>
F	<p>Amount of impaired loans and, if available, the amount of past due loans categorized by significant geographic areas including, if practical, the amounts of allowances related to each geographical area, further categorized as required by GAAP.</p>	<p>Basel III Regulatory Capital Disclosures - Credit Risk - General Disclosures, Table 5F</p>
G	<p>Reconciliation of changes in ALLL.</p>	<p>2016 Annual Report on Form 10-K - Note 4 - Loans and Leases and Allowance for Credit Losses</p>

Huntington Bancshares Incorporated
Basel III Regulatory Capital Disclosures

H	Remaining contractual maturity delineation (for example, one year or less) of the whole portfolio, categorized by credit exposure.	Basel III Regulatory Capital Disclosures - Credit Risk - General Disclosures, Table 5H
Table 6: General Disclosure for Counterparty Credit Risk-Related Exposures		
Qualitative A	The general qualitative disclosure requirement with respect to OTC derivatives, eligible margin loans, and repo-style transactions, including a discussion of: (1) The methodology used to assign credit limits for counterparty credit exposures; (2) Policies for securing collateral, valuing and managing collateral, and establishing credit reserves; (3) The primary types of collateral taken; and (4) The impact of the amount of collateral the bank's would have to provide given	Basel III Regulatory Capital Disclosures - General Disclosure for Counterparty Credit Risk-Related Exposures
Quantitative B	Gross positive fair value of contracts, collateral held (including type, for example, cash, government securities), and net unsecured credit exposure. A bank's also must disclose the notional value of credit derivative hedges purchased for counterparty credit risk protection and the distribution of current credit exposure by exposure type.	Basel III Regulatory Capital Disclosures - General Disclosure for Counterparty Credit Risk-Related Exposures
C	Notional amount of purchased and sold credit derivatives, segregated between use for the bank's own credit portfolio and in its intermediation activities, including the distribution of the credit derivative products used, categorized further by protection bought and sold within each product group.	Basel III Regulatory Capital Disclosures - General Disclosure for Counterparty Credit Risk-Related Exposures
Table 7: Credit Risk Mitigation		
Qualitative A	The general qualitative disclosure requirement with respect to credit risk mitigation, including: (1) Policies and processes for collateral valuation and management; (2) A description of the main types of collateral taken by the bank; (3) The main types of guarantors/credit derivative counterparties and their creditworthiness; and (4) Information about (market or credit) risk concentrations with respect to credit risk mitigation.	2016 Annual Report on Form 10-K - Risk Management and Capital section of MD&A
Quantitative B	For each separately disclosed credit risk portfolio, the total exposure that is covered by eligible financial collateral, and after the application of haircuts.	Basel III Regulatory Capital Disclosures - Credit Risk Mitigation
C	For each separately disclosed portfolio, the total exposure that is covered by guarantees/credit derivatives and the risk-weighted asset amount associated with that exposure.	Basel III Regulatory Capital Disclosures - Credit Risk Mitigation
Table 8: Securitizations		
Qualitative A	The general qualitative disclosure requirement with respect to a securitization (including synthetic securitizations), including a discussion of: (1) The bank's objectives for securitizing assets, including the extent to which these activities transfer credit risk of the underlying exposures away from the bank to other entities and including the type of risks assumed and retained with resecuritization activity; (2) The nature of the risks (e.g. liquidity risk) inherent in the securitized assets; (3) The roles played by the bank in the securitization process 2 and an indication of the extent of the bank's involvement in each of them;	Basel III Regulatory Capital Disclosures - Securitization 2016 Annual Report on Form 10-K Note 1 - Significant Accounting Policies to the Consolidated Financial Statements 2016 Annual Report on Form 10-K - Note 7 - Loans Sales and Securitizations 2016 Annual Report on Form 10-K - Note 20-VIEs

Huntington Bancshares Incorporated
Basel III Regulatory Capital Disclosures

	<p>(4) The processes in place to monitor changes in the credit and market risk of securitization exposures including how those processes differ for resecuritization exposures;</p> <p>(5) The bank's policy for mitigating the credit risk retained through securitization and resecuritization exposures; and</p> <p>(6) The risk-based capital approaches that the bank follows for its securitization exposures including the type of securitization exposure to which each approach applies.</p> <p>B A list of:</p> <p>(1) The type of securitization SPEs that the bank, as sponsor, uses to securitize third-party exposures. The bank must indicate whether it has exposure to these SPEs, either on- or off-balance sheet; and</p> <p>(2) Affiliated entities:</p> <p>(i) That the bank manages or advises; and</p> <p>(ii) That invest either in the securitization exposures that the bank has securitized or in securitization SPEs that the bank sponsors.</p> <p>C Summary of the bank's accounting policies for securitization activities, including:</p> <p>(1) Whether the transactions are treated as sales or financings;</p> <p>(2) Recognition of gain-on-sale;</p> <p>(3) Methods and key assumptions applied in valuing retained or purchased interests;</p> <p>(4) Changes in methods and key assumptions from the previous period for valuing retained interests and impact of the changes;</p> <p>(5) Treatment of synthetic securitizations;</p> <p>(6) How exposures intended to be securitized are valued and whether they are recorded under subpart D of this part; and</p> <p>(7) Policies for recognizing liabilities on the balance sheet for arrangements that could require the bank to provide financial support for securitized assets.</p> <p>D An explanation of significant changes to any quantitative information since the last reporting period.</p>	
<p>Quantitative</p> <p>E</p> <p>F</p> <p>G</p> <p>H</p> <p>I</p>	<p>The total outstanding exposures securitized by the bank in securitizations that meet the operational criteria provided in § .41 (categorized into traditional and synthetic securitizations), by exposure type, separately for securitizations of third-party exposures for which the bank acts only as sponsor.</p> <p>For exposures securitized by the bank in securitizations that meet the operational criteria in §1.41:</p> <p>(1) Amount of securitized assets that are impaired/past due categorized by exposure type; and</p> <p>(2) Losses recognized by the bank during the current period categorized by exposure type.</p> <p>The total amount of outstanding exposures intended to be securitized categorized by exposure type.</p> <p>Aggregate amount of:</p> <p>(1) On-balance sheet securitization exposures retained or purchased categorized by exposure type; and</p> <p>(2) Off-balance sheet securitization exposures categorized by exposure type.</p> <p>(1) Aggregate amount of securitization exposures retained or purchased and the associated capital requirements for these exposures, categorized between securitization and resecuritization exposures, further categorized into a meaningful number of risk weight bands and by risk-based capital approach (e.g., SSFA); and</p>	<p>Basel III Regulatory Capital Disclosures - Securitization</p> <p>2016 Annual Report on Form 10-K - Note 7 - Loans Sales and Securitizations</p> <p>2016 Annual Report on Form 10-K - Note 20 - VIEs</p>

Huntington Bancshares Incorporated
Basel III Regulatory Capital Disclosures

	(2) Exposures that have been deducted entirely from tier 1 capital, CEIOs deducted from total capital (as described in §1.42(a)(1), and other exposures deducted from total capital should be disclosed separately by exposure type.	
J	Summary of current year's securitization activity, including the amount of exposures securitized (by exposure type), and recognized gain or loss on sale by exposure type.	
K	Aggregate amount of resecuritization exposures retained or purchased categorized according to: (1) Exposures to which credit risk mitigation is applied and those not applied; and (2) Exposures to guarantors categorized according to guarantor creditworthiness categories or guarantor name.	

Table 9: Equities not Subject to the Market Risk Rules

Qualitative A	The general qualitative disclosure requirement with respect to equity risk for equities not subject to the market risk rules, including: (1) Differentiation between holdings on which capital gains are expected and those taken under other objectives including for relationship and strategic reasons; and (2) Discussion of important policies covering the valuation of and accounting for equity holdings not subject to subpart F of this part. This includes the accounting techniques and valuation methodologies used, including key assumptions and practices affecting valuation as well as significant changes in these practices.	Basel III Regulatory Capital Disclosures - Equities not Subject to Market Risk Capital Rules
Quantitative B	Value disclosed on the balance sheet of investments, as well as the fair value of those investments; for securities that are publicly traded, a comparison to publicly-quoted share values where the share price is materially different from fair value.	Basel III Regulatory Capital Disclosures - Equities not Subject to Market Risk Capital Rules
C	The types and nature of investments, including the amount that is: (1) Publicly traded. (2) Non-publicly traded.	
D	The cumulative realized gains (losses) arising from sales and liquidations in the reporting period.	
E	(1) Total unrealized gains (losses). (2) Total latent revaluation gains (losses). (3) Any amounts of the above included in tier 1 or tier 2 capital.	
F	Capital requirements categorized by appropriate equity groupings, consistent with the bank's methodology, as well as the aggregate amounts and the type of equity investments subject to any supervisory transition regarding regulatory capital requirements.	

Table 10: Interest Rate Risk for Non-Trading Activities

Qualitative A	The general qualitative disclosure requirement, including the nature of interest rate risk for non-trading activities and key assumptions, including assumptions regarding loan prepayments and behavior of non-maturity deposits, and frequency of measurement of interest rate risk for non-trading activities.	2016 Annual Report on Form 10-K, in the Interest Rate Risk portion of the Market Risk section of MD&A
Quantitative B	The increase (decline) in earnings or economic value (or relevant measure used by management) for upward and downward rate shocks according to management's method for measuring interest rate risk for non-trading activities, categorized by currency (as appropriate).	2016 Annual Report on Form 10-K, in the Interest Rate Risk portion of the Market Risk section of MD&A