



# **Huntington Bancshares Incorporated**

Basel III Regulatory Capital Disclosures

December 31, 2017

## Glossary of Acronyms

<b>Acronym</b>	<b>Description</b>
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
SPE	Special Purpose Entity
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. Huntington has 15,770 average full-time equivalent employees. Through its bank subsidiary, The Huntington National Bank (the Bank), HBI has over 150 years of serving the financial needs of our customers. Through its subsidiaries, including the Bank, Huntington provides full-service commercial, small business, consumer banking services, mortgage banking services, automobile financing, recreational vehicle and marine financing, equipment leasing, investment management, trust services, brokerage services, insurance programs, and other financial products and services. The Bank, organized in 1866, is our only banking subsidiary. Huntington's banking offices are located in Ohio, Illinois, Wisconsin, Michigan, Pennsylvania, Indiana, West Virginia, and Kentucky. At December 31, 2017, the Bank had 10 private client group offices and 956 branches as follows:

- 458 branches in Ohio
- 303 branches in Michigan
- 50 branches in Pennsylvania
- 42 branches in Indiana
- 37 branches in Illinois
- 31 branches in Wisconsin
- 25 branches in West Virginia
- 10 branches in 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. Our foreign banking activities, in total or with any individual country, are not significant.

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.

### **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:

	<b>Basel III Regulatory Capital Levels</b>				
	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.

***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, 2017, 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 24 – Capital Under Current Regulatory Standards in the 2017 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, 2017 was \$14 million. No subsidiary had a capital shortfall relative to its minimum regulatory capital requirements as of this reporting date.

***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 2017 Annual 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 2017 Annual Report on Form 10-K
- Trust preferred securities terms and conditions are described in Note 20 - VIEs in the 2017 Annual Report on Form 10-K
- Subordinated debt terms and conditions are described in Note 11 - Long-Term Debt in the 2017 Annual Report on Form 10-K

The components of HBI's capital structure are disclosed in the table below:

<b>Capital Components</b>	December 31, 2017
<i>(in thousands)</i>	
Common equity Tier 1 risk-based capital:	
Common stock plus related surplus	\$ 9,678,192
Retained Earnings	588,357
Goodwill and other intangibles, net of related taxes	(2,199,543)
Deferred tax assets that arise from tax loss and credit carryforwards	(25,899)
Common equity Tier 1 capital	8,041,107
Additional Tier 1 capital:	
Shareholders' preferred equity	1,075,606
Other	(6,475)
Tier 1 capital	9,110,238
Tier 2 capital instruments plus related surplus	617,855
Total capital minority interest that is not included in Tier 1 capital	250,740
Qualifying allowance for loan and lease losses	777,919
Other	330
Tier 2 capital	1,646,844
Total risk-based capital	\$ 10,757,082

### ***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 the 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:

<b>Risk Weighted Assets</b>	December 31, 2017
<i>(dollar amounts in thousands)</i>	
<b>On-balance sheet assets:</b>	
Exposure to sovereign entities <sup>(1)</sup>	\$ 887,835
Exposures to certain supranational entities and MDBs	—
Exposure to depository institutions, foreign banks and credit unions	319,859
Exposures to public sector entities (PSE)	1,462,725
Corporate exposures	31,983,800
Residential mortgage exposures	13,527,289
Statutory multifamily mortgages and pre-sold construction loans	706,112
High volatility commercial real estate (HVCRE) loans	988,035
Past due exposures	314,681
Other loans	16,521,345
Default fund contributions	—
Securitization exposures	99,270
Equity exposures	863,855
Trading & Other Assets	4,351,227
<b>Off-balance sheet:</b>	
Commitments	7,150,784
OTC Derivatives	616,265
Cleared transactions	4,065
Securitization Exposures	—
Letters of credit	485,809
Unsettled transactions	—
Other Off Balance Sheet Items	8,587
<b>Total Standardized Risk Weighted Assets</b>	<b>\$ 80,291,543</b>
<b>Common Equity Tier 1 Capital Ratio</b>	
Huntington Bancshares Incorporated	10.01%
Huntington National Bank	11.02%
<b>Tier 1 Risk-Based Capital Ratio</b>	
Huntington Bancshares Incorporated	11.34%
Huntington National Bank	12.10%
<b>Total Risk-Based Capital Ratio</b>	
Huntington Bancshares Incorporated	13.39%
Huntington National Bank	14.33%
<b>Tier 1 Leverage Ratio</b>	
Huntington Bancshares Incorporated	9.09%
Huntington National Bank	9.70%

(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.

***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	0.63%	1.25%	1.88%	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 less its minimum common equity Tier 1 capital ratio; the Tier 1 capital ratio less its minimum Tier 1 capital ratio or the total capital ratio less 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 5.34% and 6.10% 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, 2017

	Capital Ratio	Minimum Capital Requirement	Capital Conservation Buffer	Minimum Capital Conservation Buffer Requirement
Common Equity Tier 1 Capital	10.01%	4.50%	5.51%	1.25%
Tier 1 Capital	11.34%	6.00%	5.34%	1.25%
Total Capital	13.39%	8.00%	5.39%	1.25%

**Huntington National Bank**

December 31, 2017

	Capital Ratio	Minimum Capital Requirement	Capital Conservation Buffer	Minimum Capital Conservation Buffer Requirement
Common Equity Tier 1 Capital	11.02%	4.50%	6.52%	1.25%
Tier 1 Capital	12.10%	6.00%	6.10%	1.25%
Total Capital	14.33%	8.00%	6.33%	1.25%



**Credit Risk: General Disclosures**

The following credit risk policies are described in Note 1 to the Consolidated Financial Statements included in our 2017 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 2017 Annual Report on Form 10-K in the Credit Risk section of MD&A.

**Total Credit Risk Exposures**

<i>(in thousands)</i>	Credit Exposure			Average Balance
	December 31, 2017			
	Loans	Unused Commitments <sup>(1)</sup>	Total	
C&I	\$ 28,107,003	\$ 16,628,957	\$ 44,735,960	\$ 43,988,670
CRE	7,225,761	2,415,932	9,641,693	9,535,168
Automobile	12,100,527	—	12,100,527	11,983,887
Home equity	10,099,655	9,871,181	19,970,836	19,843,193
Residential mortgage	9,509,963	176,879	9,686,842	9,557,580
RV and marine finance	2,438,276	—	2,438,276	2,404,671
Other consumer	1,123,179	3,576,843	4,700,022	4,423,788
<b>Total loans and commitments credit exposures</b>	<b>\$ 70,604,364</b>	<b>\$ 32,669,792</b>	<b>\$ 103,274,156</b>	<b>\$ 101,736,957</b>

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

<i>(in thousands)</i>	Derivatives Credit Exposure	
	December 31, 2017	Average Balance
Interest rate	\$ 309,544	\$ 342,928
Foreign exchange	151,234	136,191
Commodities	173,185	172,138
Equities	16,249	16,249
<b>Total derivatives credit exposures</b>	<b>\$ 650,212</b>	<b>\$ 667,506</b>

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 2017 Annual Report on Form 10-K.

Huntington Bancshares Incorporated  
 Basel III Regulatory Capital Disclosures

Geographic Distribution of Credit Exposures

Loans and Commitments Credit Exposure by State

December 31, 2017

<i>(in thousands)</i>	C&I	CRE	Automobile	Home equity	Residential mortgage	RV and marine	Other consumer	Total
Ohio	\$ 15,233,568	\$ 3,603,080	\$ 3,680,674	\$ 11,372,061	\$ 3,602,421	\$ 278,401	\$ 2,643,885	\$ 40,414,090
Michigan	6,928,910	1,395,438	799,205	4,170,486	2,014,443	199,910	935,874	16,444,266
Illinois	2,807,479	526,532	560,796	717,863	370,867	217,432	69,321	5,270,290
Wisconsin	525,540	86,382	425,738	167,363	82,417	104,454	41,401	1,433,295
Pennsylvania	3,168,206	420,441	905,176	1,141,670	538,838	87,234	199,178	6,460,743
Indiana	2,128,395	261,237	1,155,522	1,166,892	587,565	123,514	182,517	5,605,642
Kentucky	624,091	116,161	1,145,719	374,903	120,623	84,910	43,631	2,510,038
West Virginia	712,377	72,513	436,234	590,549	239,176	15,997	88,367	2,155,213
Other	12,607,394	3,159,909	2,991,463	269,049	2,130,492	1,326,424	495,848	22,980,579
<b>Total</b>	<b>\$ 44,735,960</b>	<b>\$ 9,641,693</b>	<b>\$ 12,100,527</b>	<b>\$ 19,970,836</b>	<b>\$ 9,686,842</b>	<b>\$ 2,438,276</b>	<b>\$ 4,700,022</b>	<b>\$ 103,274,156</b>

Derivative Credit Exposure by Country

December 31, 2017

<i>(in thousands)</i>	Interest Rate Derivatives	Foreign Exchange	Commodities	Equities	Total Exposure
United States	\$ 299,843	\$ 83,144	\$ 158,218	\$ 8,442	\$ 549,647
Non-United States	9,701	68,090	14,967	7,807	100,565
<b>Total derivatives credit exposure</b>	<b>\$ 309,544</b>	<b>\$ 151,234</b>	<b>\$ 173,185</b>	<b>\$ 16,249</b>	<b>\$ 650,212</b>

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 2017 Annual Report on Form 10-K.

**Distribution of Exposures by Industry Type, Categorized by Major Types of Credit Exposures**

<i>(in thousands)</i>	Credit Exposure by Industry Category			
	December 31, 2017			
	Loans	Unused Commitments	Derivatives	Total
Real estate and rental and leasing	\$ 7,377,958	\$ 2,126,850	\$ 144,148	\$ 9,648,956
Manufacturing	4,790,603	3,289,279	91,946	8,171,828
Retail trade	4,886,237	2,244,586	—	7,130,823
Finance and insurance	3,043,789	2,536,933	257,926	5,838,648
Health care and social assistance	2,663,808	886,556	13,116	3,563,480
Wholesale trade	2,290,617	1,418,498	—	3,709,115
Professional, scientific and technical services	1,257,299	944,544	—	2,201,843
Transportation and warehousing	1,242,611	334,011	—	1,576,622
Accommodation and food services	1,616,996	293,644	—	1,910,640
Construction	976,275	902,790	—	1,879,065
Other services	1,296,081	564,314	61,942	1,922,337
Utilities	389,388	522,870	—	912,258
Mining, quarrying, and oil and gas extraction	694,354	701,129	74,217	1,469,700
Educational services	504,173	211,314	—	715,487
Arts, entertainment and recreation	592,802	123,160	—	715,962
Information	467,004	208,128	—	675,132
Admin., support, waste mgmt., and remediation services	560,714	280,603	—	841,317
Public administration	254,589	25,573	4,173	284,335
Agriculture, forestry, fishing and hunting	171,823	82,333	—	254,156
Management of companies and enterprises	91,362	9,965	—	101,327
Unclassified, other	164,281	1,337,809	2,744	1,504,834
<b>Total commercial credit exposure by industry category</b>	<b>35,332,764</b>	<b>19,044,889</b>	<b>650,212</b>	<b>55,027,865</b>
Automobile	12,100,527	—	—	12,100,527
Home Equity	10,099,655	9,871,181	—	19,970,836
Residential mortgage	9,509,963	176,879	—	9,686,842
RV and marine finance	2,438,276	—	—	2,438,276
Other consumer loans	1,123,179	3,576,843	—	4,700,022
<b>Total Loans, commitments, and derivatives credit exposures</b>	<b>\$ 70,604,364</b>	<b>\$ 32,669,792</b>	<b>\$ 650,212</b>	<b>\$103,924,368</b>

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 2017 Annual Report on Form 10-K.

**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 2017 Annual Report on Form 10-K.

Discussion of HBI's charge-offs during the period is presented in MD&A Table 15 – Net Loan and Lease Charge-offs in the 2017 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 2017 Annual Report on Form 10-K.

**Impaired Loans by Geographic Distribution**

Impaired loans with no related allowance recorded

December 31, 2017

<i>(in thousands)</i>	C&I	CRE	Automobile	Home Equity	Residential mortgage	RV and marine	Other consumer	Total
State:								
Illinois	\$ 11,571	\$ —	\$ —	\$ —	\$ —	\$ —	\$ —	\$ 11,571
Indiana	5,606	20,953	—	—	—	—	—	26,559
Kentucky	—	—	—	—	—	—	—	—
Michigan	27,825	7,686	—	—	—	—	—	35,511
Ohio	91,946	11,309	—	—	—	—	—	103,255
Pennsylvania	41,219	—	—	—	—	—	—	41,219
West Virginia	2,282	3,461	—	—	—	—	—	5,743
Wisconsin	—	—	—	—	—	—	—	—
Other <sup>(1)</sup>	103,655	12,407	—	—	—	—	—	116,062
<b>Total</b>	<b>\$ 284,104</b>	<b>\$ 55,816</b>	<b>\$ —</b>	<b>\$ —</b>	<b>\$ —</b>	<b>\$ —</b>	<b>\$ —</b>	<b>\$ 339,920</b>

Impaired loans with related allowance recorded

December 31, 2017

<i>(in thousands)</i>	C&I	CRE	Automobile	Home Equity	Residential mortgage	RV and marine	Other consumer	Total
State:								
Illinois	\$ 32,924	\$ 9,231	\$ 1,301	\$ 4,822	\$ 3,670	\$ 269	\$ 37	\$ 52,254
Indiana	13,538	1,762	4,037	22,074	16,239	60	223	57,933
Kentucky	5,448	513	3,740	7,071	7,481	84	49	24,386
Michigan	52,174	6,022	2,128	71,378	56,480	348	2,125	190,655
Ohio	95,510	27,216	11,389	183,836	155,570	420	4,242	478,183
Pennsylvania	36,477	5,019	4,414	17,460	13,143	26	370	76,909
West Virginia	13,604	457	2,130	12,288	7,918	28	225	36,650
Wisconsin	—	—	1,347	732	1,838	116	25	4,058
Other	7,547	1,129	5,675	13,899	46,075	798	328	75,451
<b>Total</b>	<b>\$ 257,222</b>	<b>\$ 51,349</b>	<b>\$ 36,161</b>	<b>\$ 333,560</b>	<b>\$ 308,414</b>	<b>\$ 2,149</b>	<b>\$ 7,624</b>	<b>\$ 996,479</b>

(1) Includes purchase credit impaired loans

**Reconciliation of Changes in ALLL**

Reconciliation of changes in the Allowance for Loan and Lease Losses is presented in Note 4 – Loans / Leases and Allowance for Credit Losses in the 2017 Annual Report on Form 10-K

**Remaining Contractual Portfolio Maturity, Categorized by Credit Exposure**

<i>(in thousands)</i>	Credit Exposure by Maturity			
	December 31, 2017			
	1 Year or Less	Over 1 Year To 5 Years	Over 5 Years	Total
Loans and commitments				
C&I	\$ 16,687,050	\$ 23,992,123	\$ 4,056,787	\$ 44,735,960
CRE	2,599,482	5,660,886	1,381,325	9,641,693
Automobile	149,990	7,659,617	4,290,920	12,100,527
Home equity	215,792	740,589	19,014,455	19,970,836
Residential mortgage	644,733	65,155	8,976,954	9,686,842
RV and marine finance	1,509	67,761	2,369,006	2,438,276
Other consumer	147,063	3,926,760	626,199	4,700,022
Total loans and commitments	20,445,619	42,112,891	40,715,646	103,274,156
Debt securities	111,752	1,327,264	22,520,390	23,959,406
Derivatives	69,109	486,351	94,752	650,212
Total credit exposure by maturity	\$ 20,626,480	\$ 43,926,506	\$ 63,330,788	\$ 127,883,774

For additional information on credit exposures, see the 2017 Fourth Quarter FR Y-9C and Note 4 – Loans / 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 2017 Annual Report on Form 10-K.

***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 such terms as 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.

**Huntington Bancshares Incorporated**  
**Basel III Regulatory Capital Disclosures**

<i>(in thousands)</i>	December 31, 2017
<b>OTC Derivatives</b>	
Gross Positive Fair Value	\$ 239,213
Net Unsecured Credit Exposure <sup>(1)</sup>	621,024
Collateral Held:	
Cash	\$ 131,415
Securities	11,261
Credit Equivalent Amount	691,686
<b>Repo Style Transactions</b>	
Gross Positive Fair Value	\$ 259,568
Net Unsecured Credit Exposure <sup>(1)</sup>	2,058
Collateral Held:	
Cash	\$ 257,510
Credit Equivalent Amount	2,058
<b>Notional Amount of Credit Derivatives <sup>(2)</sup></b>	
Purchased Protection	\$ 1,182,500
Sold Protection	600,275
<b>Total Notional of Credit Derivatives</b>	<b>\$ 1,782,775</b>

(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.

(2) Includes Credit Participation Swaps

The Bank periodically enters into credit participation swaps to transfer counterparty credit risk related to interest rate swaps to and from other financial institutions. Under the terms of these agreements, the “participating bank” receives a fee from the “lead bank” in exchange for the guarantee of reimbursements if the customer defaults on an interest rate swap. The interest rate swap is transacted such that any and all exchanges of interest payments (favorable and unfavorable) are made between the lead bank and the customer. In the event of an early termination of the swap and the customer is unable to make the required close out payment, the participating bank assumes that obligation and is required to make this payment.

**Credit Risk Mitigation**

Discussion of HBI's credit risk mitigation policies and processes is presented in the Credit Risk section in the 2017 Annual Report on Form 10-K.

Exposures covered by eligible financial collateral after application of haircuts:

<i>(in thousands)</i>	December 31, 2017	
Exposure Type		
Loans/Leases	\$	1,349,914
Derivatives <sup>(1)</sup>		142,676
Repo-style transactions		257,510
<b>Total</b>	<b>\$</b>	<b>1,750,100</b>

(1) Includes Derivatives, Investing, and Trading Activities

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

<i>(in thousands)</i>	December 31, 2017		
Exposure Type	Exposure Amount		Risk Weighted Asset Amount
AFS/HTM Securities <sup>(1)</sup>	\$ 19,723,026	\$	1,045,675
Loans	289,408		15,159
Letters of Credit	49,298		9,860
Other <sup>(2)</sup>	60,046		60,046
<b>Total</b>	<b>\$ 20,121,778</b>	<b>\$</b>	<b>1,130,740</b>

(1) Includes U.S. Government Agencies and Government Sponsored Entity Securities.

(2) Includes Credit Participation Swaps.

**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 \$8 million at December 31, 2017, which represented our maximum exposure to loss. For information

**Huntington Bancshares Incorporated**  
**Basel III Regulatory Capital Disclosures**

on our 2017 activity and realized gains or loss on sales of financial assets in securitizations, see Note 7 – Loan Sales and Securitizations, and Note 20 – VIEs, in our 2017 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, 2017 was \$1.0 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 2017 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 2017 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 as HBI does not have any synthetic securitization exposures.

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

<i>(in thousands)</i>	December 31, 2017		
	Exposure Amount (EAD)		
	On-balance sheet	Off-balance sheet	Total EAD
Asset-backed and other <sup>(1)</sup>	481,688	—	481,688
Total	\$ 481,688	\$ —	\$ 481,688

(1) Purchased investment securities.

<i>(in thousands)</i>	December 31, 2017		
	SSFA Calculation		
	Asset-backed and other	Leases	Total RWA
0% to 20%	\$ 90,523	\$ —	\$ 90,523
>20% to 100%	8,747	—	8,747
>100% - 1250%	—	—	—
Total	\$ 99,270	\$ —	\$ 99,270

***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 2017 Annual 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, 2017					
<i>(in thousands)</i>	Nonpublic		Publicly Traded		Total
Amortized cost	\$	1,386,245	\$	829	\$ 1,387,074
Unrealized gains/losses		—		733	733
Latent revaluation gains/losses <sup>(1)</sup>		—		—	—
Fair value	\$	1,386,245	\$	1,562	\$ 1,387,807

(1) 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, 2017. Total net unrealized gains on available-for-sale equity investments recognized in accumulated other comprehensive income were \$733 thousand as of December 31, 2017.

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

December 31, 2017				
<i>(in thousands)</i>	Exposure		Risk Weighted Assets	
0%	\$		293,351	\$ —
20%			287,335	57,467
100%			806,388	806,388
Full look-through approach			—	—
Total	\$		1,387,074	\$ 863,855

***Interest Rate Risk for Non-Trading Activities***

Disclosure is presented in the 2017 Annual Report on Form 10-K, in the Interest Rate Risk portion of the Market Risk section of MD&A.

*Appendix A*  
**Huntington Bancshares Incorporated**  
 Basel III regulatory Capital Disclosures  
 December 31, 2017

Table	Disclosure Requirement	Disclosure Location
<b>1. Scope of Application</b>		
<b>Qualitative</b>		
A	The name of the top corporate entity in the group to which the Risk Based Capital Standards apply.	Basel III Regulatory Capital Disclosures: Introduction and 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
<b>Quantitative</b>		
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
<b>2. Capital Structure</b>		
<b>Qualitative</b>		
A	Summary information on the terms and conditions of the main features of all regulatory capital instruments.	Basel III Regulatory Capital Disclosures: Capital Structure 2017 Annual Report on Form 10-K: (1) Note 13 - Shareholders' Equity (2) Note 11 - Long Term Debt
<b>Quantitative</b>		
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	Basel III Regulatory Capital Disclosures: Capital Structure

**Huntington Bancshares Incorporated**  
**Basel III Regulatory Capital Disclosures**

Table	Disclosure Requirement	Disclosure Location
<b>2. Capital Structure, continued</b>		
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.	Basel III Regulatory Capital Disclosures: Capital Structure
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.	Basel III Regulatory Capital Disclosures: Capital Structure
<b>3. Capital Adequacy</b>		
<b>Qualitative</b>		
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
<b>Quantitative</b>		
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	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
E	Total standardized risk-weighted assets.	Basel III Regulatory Capital Disclosures: Capital Adequacy

Table	Disclosure Requirement	Disclosure Location
<b>4. Capital Conservation Buffer</b>		
<b>Qualitative</b>		
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
<b>Quantitative</b>		
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.	Basel III Regulatory Capital Disclosures: Capital Conservation Buffer
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.	Basel III Regulatory Capital Disclosures: Capital Conservation Buffer
<b>5. Credit Risk: General Disclosures</b>		
<b>Qualitative</b>		
A	The general qualitative disclosure requirement with respect to credit risk (excluding counterparty credit risk disclosed in accordance with Table 6), including the: <ol style="list-style-type: none"> <li>(1) Policy for determining past due or delinquency status;</li> <li>(2) Policy for placing loans on nonaccrual;</li> <li>(3) Policy for returning loans to accrual status;</li> <li>(4) Definition of and policy for identifying impaired loans (for financial accounting purposes);</li> <li>(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;</li> <li>(6) Policy for charging-off uncollectible amounts; and</li> <li>(7) Discussion of the bank holding company's credit risk management policy.</li> </ol>	Basel III Regulatory Capital Disclosures: Credit Risk - General Discussions  2017 Annual Report on Form 10-K: (1) Note 1 - Significant Accounting Policies (2) Risk Management and Capital section of MD&A
<b>Quantitative</b>		
B	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: <ol style="list-style-type: none"> <li>(1) Loans, off-balance sheet commitments, and other non-derivative off-balance sheet exposures;</li> <li>(2) Debt securities; and</li> <li>(3) OTC derivatives</li> </ol>	Basel III Regulatory Capital Disclosures: Credit Risk - General Discussions  2017 Annual Report on Form 10-K: (1) Note 5 - Available for Sale and Other Securities (2) Note 6 - Held to Maturity Securities
C	Geographic distribution of exposures, categorized in significant areas by major types of credit exposure.	Basel III Regulatory Capital Disclosures: Credit Risk - General Discussions  2017 Annual Report on Form 10-K: (1) Note 5 - Available for Sale and Other Securities (2) Note 6 - Held to Maturity Securities

Table	Disclosure Requirement	Disclosure Location
<b>5. Credit Risk: General Disclosures, continued</b>		
D	Industry or counterparty type distribution of exposures, categorized by major types of credit exposure.	Basel III Regulatory Capital Disclosures: Credit Risk - General Discussions  2017 Annual Report on Form 10-K: (1) Note 5 - Available for Sale and Other Securities (2) Note 6 - Held to Maturity Securities
E	By major industry or counterparty type: (1) Amount of impaired loans for which there was a related allowance under GAAP; (2) Amount of impaired loans for which there was no related allowance under GAAP; (3) Amount of loans past due 90 days and on nonaccrual; (4) Amount of loans past due 90 days and still accruing; (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 (6) Charge-offs during the period.	Basel III Regulatory Capital Disclosures: Credit Risk - General Discussions  2017 Annual Report on Form 10-K: (1) Note 4 - Loans and Leases and Allowances for Credit Losses (2) Table 15 - Net Loan and Lease Charge-offs
F	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.	Basel III Regulatory Capital Disclosures: Credit Risk - General Discussions
G	Reconciliation of changes in ALLL.	2017 Annual Report on Form 10-K: Note 4 - Loans and Leases and Allowances for Credit Losses
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 Discussions
<b>6. General Disclosure for Counterparty Credit Risk-Related Exposures</b>		
<b>Qualitative</b>		
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 would have to provide given a deterioration in the bank holding company's own creditworthiness.	Basel III Regulatory Capital Disclosures: General Disclosure for Counterparty Credit Risk-Related Exposures
<b>Quantitative</b>		
B	Gross positive fair value of contracts, collateral held (including type, for example, cash, government securities), and net unsecured credit exposure. A bank 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

Table	Disclosure Requirement	Disclosure Location
<b>6. General Disclosure for Counterparty Credit Risk-Related Exposures, continued</b>		
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
<b>7. Credit Risk Mitigation</b>		
<b>Qualitative</b>		
A	The general qualitative disclosure requirement with respect to credit risk mitigation, including: <ol style="list-style-type: none"> <li>(1) Policies and processes for collateral valuation and management;</li> <li>(2) A description of the main types of collateral taken by the bank;</li> <li>(3) The main types of guarantors/credit derivative counterparties and their creditworthiness; and</li> <li>(4) Information about (market or credit) risk concentrations with respect to credit risk mitigation.</li> </ol>	2017 Annual Report on Form 10-K: (1) Note 1 - Significant Accounting Policies (2) Risk Management and Capital section of MD&A
<b>Quantitative</b>		
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
<b>8. Securitizations</b>		
<b>Qualitative</b>		
A	The general qualitative disclosure requirement with respect to a securitization (including synthetic securitizations), including a discussion of: <ol style="list-style-type: none"> <li>(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;</li> <li>(2) The nature of the risks (e.g. liquidity risk) inherent in the securitized assets;</li> <li>(3) The roles played by the bank in the securitization process and an indication of the extent of the bank's involvement in each of them;</li> <li>(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;</li> <li>(5) The bank's policy for mitigating the credit risk retained through securitization and resecuritization exposures; and</li> <li>(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.</li> </ol>	Basel III Regulatory Capital Disclosures: Securitization  2017 Annual Report on Form 10-K: (1) Note 1 - Significant Accounting Policies (2) Note 7 - Loan Sales and Securitizations (2) Note 20 - VIEs

Table	Disclosure Requirement	Disclosure Location
<b>8. Securitizations, continued</b>		
B	A list of: <ol style="list-style-type: none"> <li>(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</li> <li>(2) Affiliated entities: <ol style="list-style-type: none"> <li>(i) That the bank manages or advises; and</li> <li>(ii) That invest either in the securitization exposures that the bank has securitized or in securitization SPEs that the bank sponsors.</li> </ol> </li> </ol>	<p>Basel III Regulatory Capital Disclosures: Securitization</p> <p>2017 Annual Report on Form 10-K:  (1) Note 7 - Loan Sales and Securitizations  (2) Note 20 - VIEs</p>
C	<p>Summary of the bank's accounting policies for securitization activities, including:</p> <ol style="list-style-type: none"> <li>(1) Whether the transactions are treated as sales or financings;</li> <li>(2) Recognition of gain-on-sale;</li> <li>(3) Methods and key assumptions applied in valuing retained or purchased interests;</li> <li>(4) Changes in methods and key assumptions from the previous period for valuing retained interests and impact of the changes;</li> <li>(5) Treatment of synthetic securitizations;</li> <li>(6) How exposures intended to be securitized are valued and whether they are recorded under subpart D of this part; and</li> <li>(7) Policies for recognizing liabilities on the balance sheet for arrangements that could require the bank to provide financial support for securitized assets.</li> </ol>	<p>Basel III Regulatory Capital Disclosures: Securitization</p> <p>2017 Annual Report on Form 10-K:  (1) Note 1 - Significant Accounting Policies  (2) Note 7 - Loan Sales and Securitizations  (3) Note 20 - VIEs</p>
D	An explanation of significant changes to any quantitative information since the last reporting period.	Not applicable. No changes since last reporting period.
<b>Quantitative</b>		
E	The total outstanding exposures securitized by the bank in securitizations that meet the operational criteria provided in § .141 (categorized into traditional and synthetic securitizations), by exposure type, separately for securitizations of third-party exposures for which the bank acts only as sponsor.	Basel III Regulatory Capital Disclosures: Securitization
F	<p>For exposures securitized by the bank in securitizations that meet the operational criteria in §.141:</p> <ol style="list-style-type: none"> <li>(1) Amount of securitized assets that are impaired/past due categorized by exposure type; and</li> <li>(2) Losses recognized by the bank during the current period categorized by exposure type.</li> </ol>	<p>2017 Annual Report on Form 10-K:  (1) Note 7 - Loan Sales and Securitizations  (2) Note 20 - VIEs</p>
G	The total amount of outstanding exposures intended to be securitized categorized by exposure type.	Not applicable.
H	<p>Aggregate amount of:</p> <ol style="list-style-type: none"> <li>(1) On-balance sheet securitization exposures retained or purchased categorized by exposure type; and</li> <li>(2) Off-balance sheet securitization exposures categorized by exposure type.</li> </ol>	Basel III Regulatory Capital Disclosures: Securitization

Table	Disclosure Requirement	Disclosure Location
<b>8. Securitizations, continued</b>		
I	(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  (2) Exposures that have been deducted entirely from tier 1 capital, CEOs 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.	Basel III Regulatory Capital Disclosures: Securitization
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.	Not applicable during the current year.
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.	Not applicable. HBI does not have any resecuritization exposures.
<b>9. Equities no Subject to the Market Risk Rules</b>		
<b>Qualitative</b>		
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
<b>Quantitative</b>		
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.	Basel III Regulatory Capital Disclosures: Equities not Subject to Market Risk Capital Rules
D	The cumulative realized gains (losses) arising from sales and liquidations in the reporting period.	Basel III Regulatory Capital Disclosures: Equities not Subject to Market Risk Capital Rules
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.	Basel III Regulatory Capital Disclosures: Equities not Subject to Market Risk Capital Rules
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.	Basel III Regulatory Capital Disclosures: Equities no Subject to Market Risk Capital Rules



Table	Disclosure Requirement	Disclosure Location
<b>10. Interest Rate Risk for Non-Trading Activities</b>		
<b>Qualitative</b>		
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.	2017 Annual Report on Form 10-K: (1) Interest Rate Risk portion of the Market Risk section of MD&A
<b>Quantitative</b>		
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).	2017 Annual Report on Form 10-K: (1) Interest Rate Risk portion of the Market Risk section of MD&A