

PUBLIC EXHIBIT VOLUME

RESPONSES TO ADDITIONAL INFORMATION QUESTIONS DATED FEBRUARY 2, 2021

APPLICATION

to the

BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM

By

HUNTINGTON BANCSHARES INCORPORATED

for prior approval to acquire

TCF FINANCIAL CORPORATION

And

TCF NATIONAL BANK

pursuant to Sections 3(a)(3) and 3(a)(5)

of the Bank Holding Company Act

and

Section 225.15 of Regulation Y

February 12, 2021

PUBLIC EXHIBIT VOLUME

RESPONSES TO ADDITIONAL INFORMATION QUESTIONS DATED FEBRUARY 2, 2021

February 12, 2021

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Public Exhibit 1

Responses to Questions 10, 11, 13 and 18

Trading and AFS Securities

As of September 30, 2020

\$ in millions

Huntington Top 5 Largest Trading and AFS Security Types

Trading Security Type	Fair value	Source	AFS Security Type	Fair value	Source
Securities issued by states and political subdivisions in the US	\$54	FR Y-9C HC-D Item 3.	Residential pass-thru securities issued by FNMA & FHLMC	\$4,983	FR Y-9C HC-B Item 4.a.(2)
Other debt securities	\$1	FR Y-9C HC-D Item 5.b.	Other residential mortgage securities issued or guaranteed by US Gov't agencies or sponsored organizations	\$4,498	FR Y-9C HC-B Item 4.b.(1)
			Securities issued by states and political subdivisions in the US	\$3,145	FR Y-9C HC-B Item 3
			Residential pass-thru securities guaranteed by GNMA	\$778	FR Y-9C HC-B Item 4.a.(1)
			Other commercial MBS issued or guaranteed by US Gov't agencies or sponsored organizations	\$721	FR Y-9C HC-B Item 4.c.(2)(a)

TCF Top 5 Largest Trading and AFS Security Types

Trading Security Type	Fair value	Source	AFS Security Type	Fair value	Source
None			Residential pass-thru securities issued by FNMA & FHLMC	\$5,206	FR Y-9C HC-B Item 4.a.(2)
			Securities issued by states and political subdivisions in the US	\$877	FR Y-9C HC-B Item 3
			Other commercial MBS issued or guaranteed by US Gov't agencies or sponsored organizations	\$712	FR Y-9C HC-B Item 4.c.(2)(a)
			All other residential mortgage-backed securities	\$210	FR Y-9C HC-B Item 4.b.(1)
			US Government agency and sponsored agency obligations (exclude mortgage back securities)	\$205	FR Y-9C HC-B Item 2

HTM Securities

As of September 30, 2020

\$ in millions

Huntington Top 5 Largest HTM Security Types

HTM Security Type	Amortized Cost	Source
Other commercial MBS issued or guaranteed by US Gov't agencies or sponsored organizations	\$3,367	FR Y-9C HC-B Item 4.c.(2)(a)
Residential pass-thru securities issued by FNMA & FHLMC	\$2,563	FR Y-9C HC-B Item 4.a.(2)
Other residential mortgage securities issued or guaranteed by US Gov't agencies or sponsored organizations	\$1,959	FR Y-9C HC-B Item 4.b.(1)
Residential pass-thru securities guaranteed by GNMA	\$363	FR Y-9C HC-B Item 4.a.(1)
US Government agency and sponsored agency obligations (exclude mortgage back securities)	\$256	FR Y-9C HC-B Item 2

TCF Top 5 Largest HTM Security Types

HTM Security Type	Amortized Cost	Source
Residential pass-thru securities issued by FNMA & FHLMC	\$164	FR Y-9C HC-B Item 4.a.(2)
Residential pass-thru securities guaranteed by GNMA	\$2	FR Y-9C HC-B Item 4.a.(1)
Other domestic debt securities	\$4	FR Y-9C HC-B Item 6.a.

Level 3 Asset Categories

As of September 30, 2020

\$ in millions

Huntington

Municipal securities	\$3,089
Mortgage servicing rights	\$191
Derivative assets (Mortgage loan interest rate locks)	\$50
Private-label CMO	\$49
Loans held for investment under fair value option	\$24

TCF



Deposits

As of September 30, 2020

*\$ in millions***Huntington**

Total deposits	\$100,620	<i>RC-E 7-column A + C</i>
Core deposits	\$96,414	<i>Total deposits less brokered deposits</i>
Brokered Deposits	\$4,206	<i>RC-E M.1.b.</i>
Uninsured Deposits	\$81,029	<i>RC-O M.2.</i>

TCF

Total deposits	\$39,397	<i>RC-E 7-column A + C</i>
Core deposits	\$37,338	<i>Total deposits less brokered deposits</i>
Brokered Deposits	\$2,059	<i>RC-E M.1.b.</i>
Uninsured Deposits	\$10,981	<i>RC-O M.2.</i>

Public Exhibit 2

Response to Question 12 (redacted)

Commercial Lending

Year to date as of September 30, 2020

\$ in millions

Huntington Commercial Lending Activity

	YTD 2020	Share of US Market	Size of US Market	Note
Syndicated lending	\$1,369	0.1%	\$1,186,430	Reflects syndicated lending volume where Huntington acted as Agent on the transactions and includes commitments made by Huntington as well as participant lenders. Huntington and market size sourced from Refinitiv Loan Connector US league tables and is YTD 2020.
Syndicated pipeline commitments	■	n/a	n/a	As of 9/30/2020 and represents where Huntington has made a commitment to an underwritten transaction, regardless of closing date. Includes only Huntington's commitment and does not include commitments from other lenders participating in these transactions.
Lending to small and medium sized enterprises	\$6,814	1.0%	\$684,579	Represents loans of <\$1 MM per Call Report (RC-C Part II Items 3.a through 4.c). US Market is sourced from SNL Financial using aggregated Call Reports at 9/30/2020
Unfunded commitments	\$18,053	0.8%	\$2,192,505	Represents unfunded C&I commitments per Call Report (RC-L Item 1.e.1). Industry data sourced from SNL Financial using aggregated Call Reports

Underwriting Services

Year to date as of September 30, 2020

\$ in millions

Huntington Underwriting Services Activity

	FY 2020	Share of US Market	Size of US Market	Note
Issuance of new equities	■	0.08%	\$762,942	Amounts reported through 12/31/2020. Share of market based on 12/31/2020 DealLogic League table
Corporate bonds	■	0.02%	\$2,385,048	Amounts reported through 12/31/2020. Share of market based on 12/31/2020 DealLogic League table
Commercial paper	n/a	n/a	n/a	Huntington does not participate
Asset back securities	■	n/a	n/a	Not a meaningful share
Other debt securities	■	0.56%	\$451,312	Amounts reported through 12/31/2020. Share of market based on 12/31/2020 DealLogic League table

Provisions of Services

Year to date as of September 30, 2020

\$ in millions

Huntington Service Activity

	YTD 2020	Share of US Market	Size of US Market	Note
Prime brokerage	n/a	n/a	n/a	Huntington does not participate
Securities lending	n/a	n/a	n/a	Huntington does not participate
Corporate trust (non-managed accounts)	\$23,783	0.6%	\$3,733,015	Represents Corporate trust and agency accounts per Call Report RC-T, Item 6, column B. Managed accounts included in wealth management below. US Market is sourced from SNL Financial using aggregated Call Reports at 9/30/2020.
Correspondent banking (revenue)	■	n/a	n/a	■
Wealth management (total assest under management)	\$18,109	0.4%	\$4,781,580	Represents assets under management per Call Report RC-T, Item 10, column A. US Market is sourced from SNL Financial using aggregated Call Reports at 9/30/2020.
Insurance (by segment, including reinsurance)	■	0.0%	\$1,437,102	US Market sourced from SNL Financial and represents 2019 direct premiums written
Commercial Property & Casualty	■			
Commercial Employee Benefits	■			
Personal Lines	■			
Life	■			
Title	■			

Public Exhibit 3

Affidavits of Publication

Huntington National Bank

The Columbus Dispatch
PROOF OF PUBLICATION

STATE OF OHIO, FRANKLIN COUNTY. SS:

Steve Vacolas
Credit Manager

The Columbus Dispatch, a newspaper published at Columbus, Franklin County, Ohio, with a daily paid Circulation of over 130,000 copies, personally appeared and made oath that the notice of which a true copy is here unto attached was published in *The Columbus Dispatch* for 1 time(s) on Jan 14, 2021.

and that the rate charged therefore is the same as that charged for commercial advertising for like services.

Steve Vacolas
subscribed and Sworn on this 14th day of Jan 2021 as witness my hand and seal of office.

Veronica Hill
NOTARY PUBLIC - STATE OF OHIO

Notice of Application for Acquisition of a Bank Holding Company

Huntington Bancshares Incorporated, Columbus, Ohio ("Huntington"), has applied to the Federal Reserve Board for permission to acquire TCF Financial Corporation, Detroit, Michigan ("TCF") with Huntington as the surviving company, and thereby acquire control of TCF's subsidiary bank, TCF National Bank, Sioux Falls, South Dakota. The Federal Reserve considers a number of factors in deciding whether to approve the application, including the record of performance of banks owned by Huntington in helping to meet local credit needs.

You are invited to submit comments in writing on this application to the Federal Reserve Bank of Cleveland, 1455 East Sixth Street, Cleveland, Ohio 44114, or via email: comments.applications@elev.frb.org. The comment period will not end before February 13, 2021, and may be somewhat longer. The Federal Reserve's procedures for processing applications may be found at 12 C.F.R. Part 262. Procedures for processing protested applications may be found at 12 C.F.R. 262.25. To obtain a copy of the Federal Reserve's procedures, or if you need more information about how to submit your comments on the application, contact R. Ryan Schilling, Banking Supervisor, at (513) 455-4406. The Federal Reserve will consider your comments and any request for a public meeting or formal hearing on the application if they are received in writing by the Federal Reserve Bank on or before the last day of the comment period.
1/14



VERONICA HILL
Notary Public, State of Ohio
My Commission Expires 12-04-2023

627 0959

AFFIDAVIT OF PUBLICATION
IN
Michigan.com
Detroit Publication

State of Michigan
County of Macomb) ss

WACHTELL, LIPTON, ROSEN & KATZ
51 WEST 52nd ST.
NEW YORK, NY 10019

IN THE MATTER OF:

Being duly sworn, deposes and says that the attached advertisements(s)
appeared in:

Published in: DET-DFP-Detroit Free Press
Published on : Thursday, January 14, 2021

Published in: DET-DN-Detroit News
Published on : Thursday, January 14, 2021

Invoice 0004528640 and as an authorized employee of Michigan.com,
he/she knows well the facts stated herein.


Tyna Smith

On this 19th of January 2021
Sworn to and Subscribed to me,


GINA ANNE HUFF
Notary Public State of Michigan
County of Livingston
My commission expires March 9, 2023

A Notary Public:
Acting in the County of Macomb

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Argus Leader

P.O. Box 677349, Dallas, TX 75267-7349

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NEW YORK, NY 10019

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of Affidavits: 1

Account No.: 2124031330B

Ad No.: 0004528528

Argus Leader AFFIDAVIT OF PUBLICATION

STATE OF SOUTH DAKOTA

COUNTY OF MINNEHAHA

I being duly sworn, says: That The Argus Leader is, and during all the times hereinafter mentioned was, a daily legal newspaper as defined by SDCL 17-2-21, as amended published at Sioux Falls, Minnehaha County, South Dakota; that affiant is and during all of said times, was an employee of the publisher of such newspaper and has personal knowledge of the facts stated in this affidavit; that the notice, order or advertisement, a printed copy of which is hereto attached,

Thursday, January 14, 2021

Sworn to and subscribed before me this 14 day of January, 2021.

Legal Clerk

Notary Public, State of Wisconsin, County of Brown

My Commission expires

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#4528528 Jan. 14, 2021

VICKY FELTY
Notary Public
State of Wisconsin