

Here for Good

Corporate Responsibility Impact Report
2024



Here for Good 2024 Highlights

All figures as of 12/31/2024



Here *for* our
Clients

90%

client retention

416

banking centers

~15,000

hours of cyber and privacy-related training courses

\$82.2B

in assets



Here *for* our
Associates

\$20

minimum wage

100%

401(k) match up to 6%

9

year average tenure

11

associate resource groups



Here *for* our
Communities

\$20M

distributed through First Horizon foundations

\$1.6M

in Grants for Good

~26,000

service hours

\$246M

in community development investments



Here *for* our
Environment

40.5%

reduction in Scope 1 and 2 GHG emissions (from 2019 baseline)

\$50,000

donated to ocean alkalinity research

\$1.5B

in renewable energy project financing since 2017

\$10.3M

invested in facility and banking center efficiency enhancements



A Message from Our Chairman, President and CEO

Our 161-year old history is rooted in our people-focused culture, centered around teamwork and collaboration. We're driven by a passion to help the clients and communities we serve unlock their full potential with capital and counsel, holding ourselves to the highest standards of ethical conduct and operational excellence.

At First Horizon, we create value by focusing on three clear principles – safety and soundness, profitability and growth – in that order. We execute these priorities by operating in an attractive footprint with a distinctive business model that supports our diverse client base and performs across economic cycles. Responsible corporate citizenship is central to the way we deliver on our Purpose and Core Values and is embedded in who we are and how we do business.

Our corporate responsibility strategy - centered around five interrelated pillars: **Clients, Associates, Communities, Environment and Governance** - reflects our commitment to be Here for Good for our stakeholders.

While our commitment to operating responsibly remains steadfast, our strategy continues to evolve in response to a dynamic operating environment. We continue to engage with our advisors, peers and industry groups and track regulatory changes, client sentiment and industry expectations to keep us informed on topics that matter most to our stakeholders.

Every day, we strive to help our clients succeed, and that requires us to be prepared to meet their changing needs and expectations. From homeownership to business expansion, our talented team delivers our competitive products and services through best-in-class service to help individuals and businesses achieve their dreams and aspirations. Our dedicated and resilient team is essential to our success and serves as a key competitive advantage. We invest in our associates to empower them to grow personally and professionally by providing competitive compensation, benefits, development and well-being programs, and we actively seek feedback to cultivate a culture of mutual support and belonging that fosters a highly engaged, performance-driven workforce.

Our passion to serve and support our communities is embraced throughout our organization. Through collaborative partnerships, strategic investments and associate service and leadership, we help provide greater access to financial capital, education, housing, community redevelopment and revitalization and health and human services to the communities within our footprint. We engage in initiatives that support the underserved and create healthier and more sustainable communities.

Our environmental strategy is guided by our sustainability mission statement to preserve, restore and contribute to the prosperity of the communities we serve. Our partnerships with individuals and organizations are centered around research, science, restoration and preservation. We continue to make progress, identifying and managing potential environmental risks and opportunities as our sustainability journey evolves.

We continue to adapt to the changing landscape of climate action by integrating sustainable practices and conducting business on a strong foundation of robust corporate governance and uncompromised ethics.

Thank you for your interest in our progress and for being part of our ongoing journey as we build on our legacy of success. We remain committed to building a responsible and sustainable organization to support our associates, clients, communities and shareholders for the next 160 years.



D. Bryan Jordan

Chairman of the Board, President and CEO



Who We Are



Our Purpose

Help our clients unlock their full potential with capital and counsel.



Our Values

- We put clients first
- We care about people
- We're committed to excellence
- We expand access
- We foster team success



Our Action

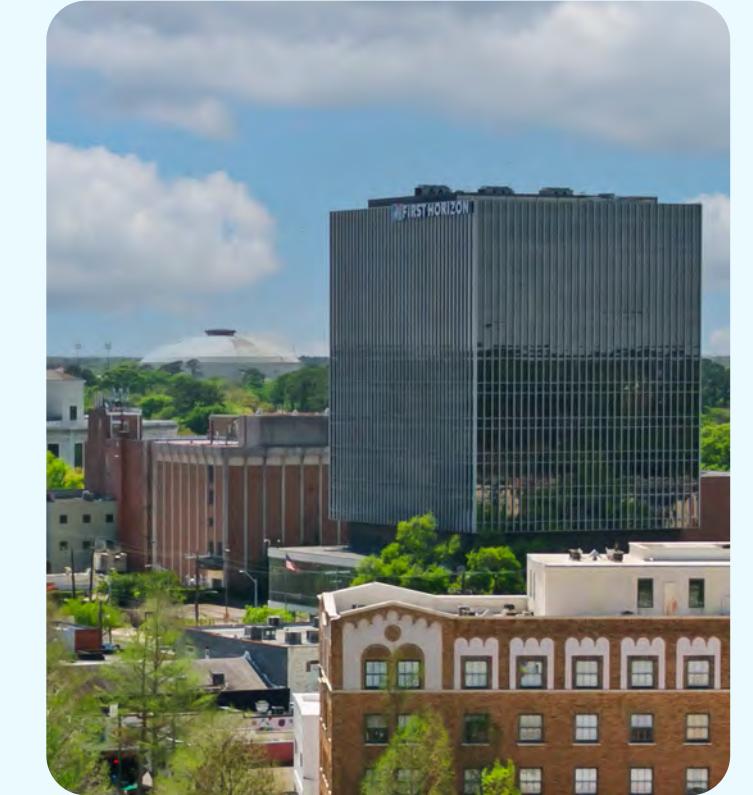
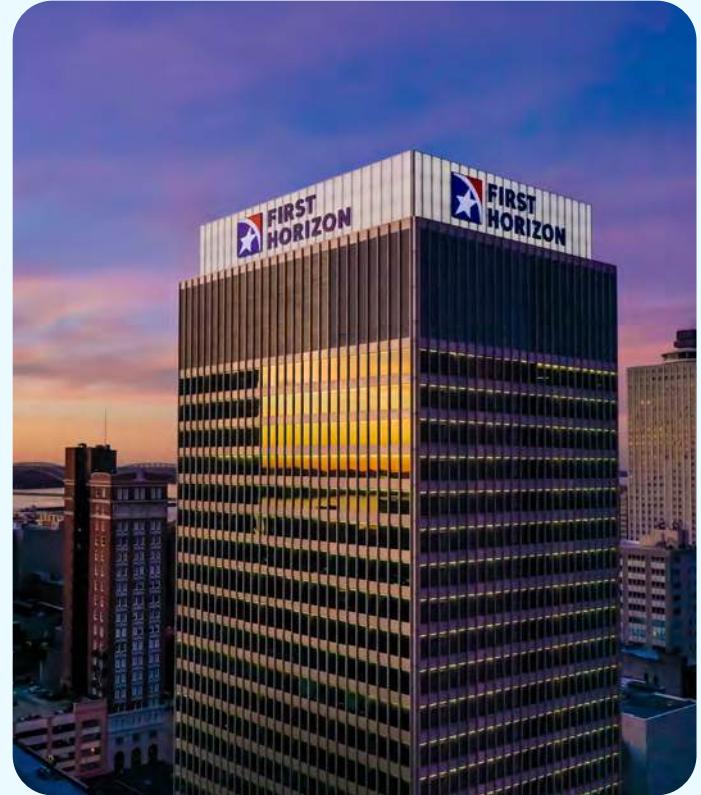
Own the moment

Listen | Understand | Deliver

Table of Contents

What's Inside

Operating responsibly and creating a more sustainable company is important to the future of our organization and the communities we serve. Our voluntary Corporate Responsibility Impact Report reflects the progress we have made in 2024 centered around the five interrelated pillars of our corporate responsibility strategy – **Clients, Associates, Communities, Environment and Governance**.



5 About First Horizon

- 6 Executive Leadership
- 7 Financial Highlights
- 8 Corporate Responsibility Commitment

10 Here for Our Clients

- 11 Client Service Teams
- 12 Client Investment Capabilities
- 13 Client Experience
- 14 Client Information Protection

16 Here for Our Associates

- 17 Investing in Our Associates
- 18 Talent Center of Excellence
- 20 Associate Engagement

21 Here for Our Communities

- 22 Community Investment Strategy
- 23 Community Reinvestment Act Program
- 25 Community Development
- 27 Partnering for Progress Spotlights

29 Here for Our Environment

- 30 Overview and Strategy
- 31 Operational Sustainability
- 32 Climate-Related Risks and Opportunities
- 34 Community Sustainability

35 Governance and Ethics

- 36 Board Composition and Governance
- 37 Board and Management Oversight
- 39 Responsible Risk Management
- 40 Policies and Statements
- 42 Awards and Recognition
- 43 SASB Index
- 43 TCFD Index
- 44 Appendix

About this Report

This Corporate Responsibility Impact Report summarizes our commitment to be *Here for Good*. It highlights our commitments, activities and programs regarding corporate responsibility and sustainability matters. Due to the continued evolution and enhancements of our sustainability efforts, this report covers our progress and programs for 2024 unless a different date is specifically noted in the text. It is intended to provide a high-level overview with selected examples; it is not a comprehensive description, financial

presentation or legal summary of those programs and activities. This report presents information we believe was accurate at the time we released the report. We have no duty and make no commitment to provide later updates. In this report we voluntarily disclose our corporate responsibility efforts by utilizing frameworks and standards developed by the Task Force on Climate-Related Financial Disclosures (TCFD) and Sustainability Accounting Standards Board (SASB). We also disclose selected information touching on

corporate responsibility and sustainability matters in our Annual Report on Form 10-K and our annual Proxy Statement, both of which are available in the Investor Relations section of our website and at www.sec.gov. This report contains forward-looking statements identified by words such as "believe," "expect," "anticipate," "intend," "estimate," "should," "is likely," "will," "going forward" and other expressions that indicate our current views of future events, trends and aspirations. These statements may or may not be followed by

or reference cautionary statements. A number of important factors could cause actual results to differ materially from those in these forward-looking statements, including those factors described in our recent 10-K, 10-Q, 8-K and other reports and filings with the SEC available in the Investor Relations section of our website and at www.sec.gov. We disclaim any obligation to update or revise any forward-looking statements that are made in this report or in any other statement, release, report, or filing from time to time.

About First Horizon

First Horizon Corporation is a leading regional financial services company, dedicated to helping our clients, communities and associates unlock their full potential with capital and counsel. Headquartered in Memphis, TN, the banking subsidiary First Horizon Bank operates in 12 states across the southern U.S. First Horizon has been recognized as one of the nation's best employers and one of the world's best banks by Forbes magazine.

In This Section

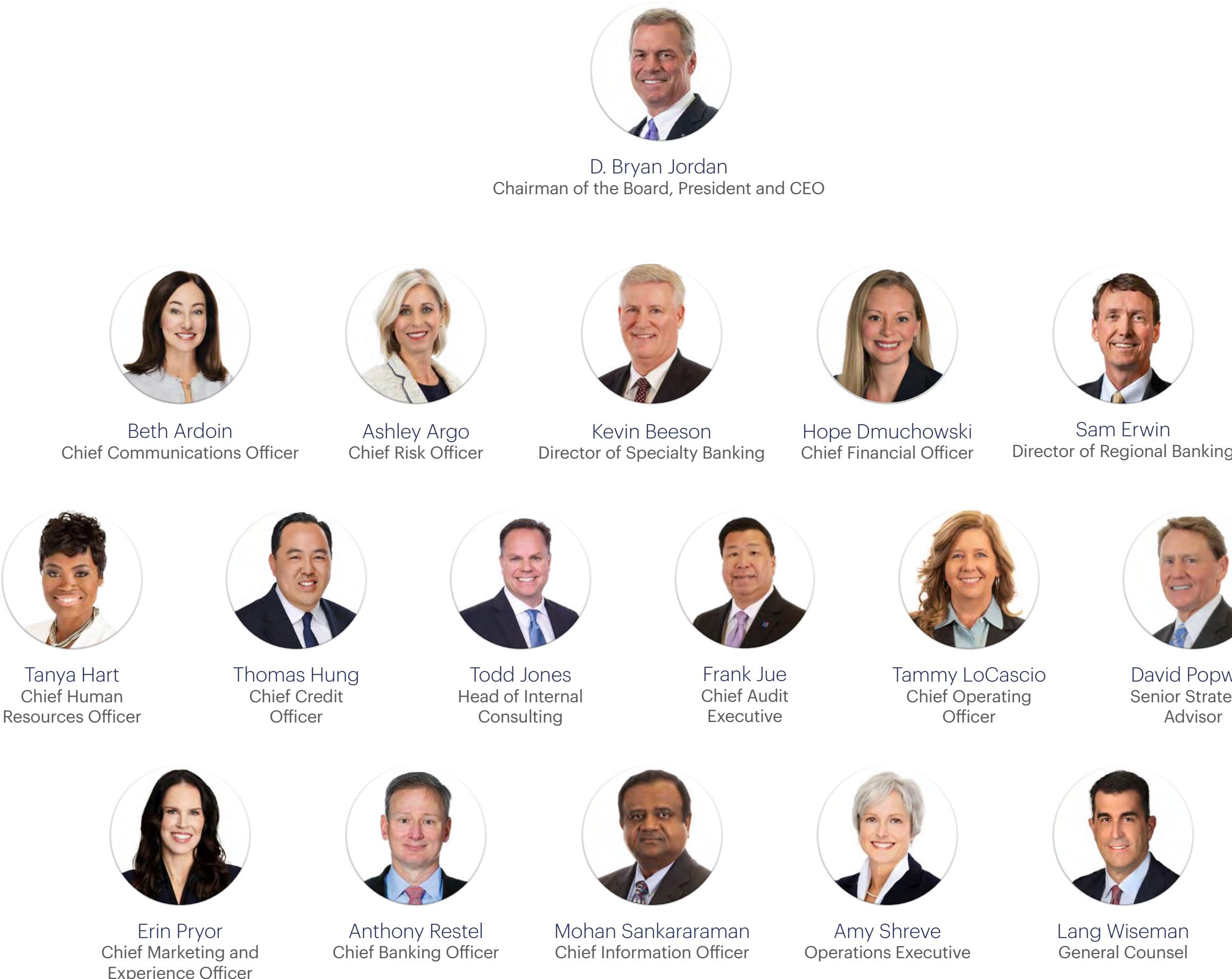
- [6 Executive Leadership](#)
- [7 Financial Highlights](#)
- [8 Corporate Responsibility Commitment](#)



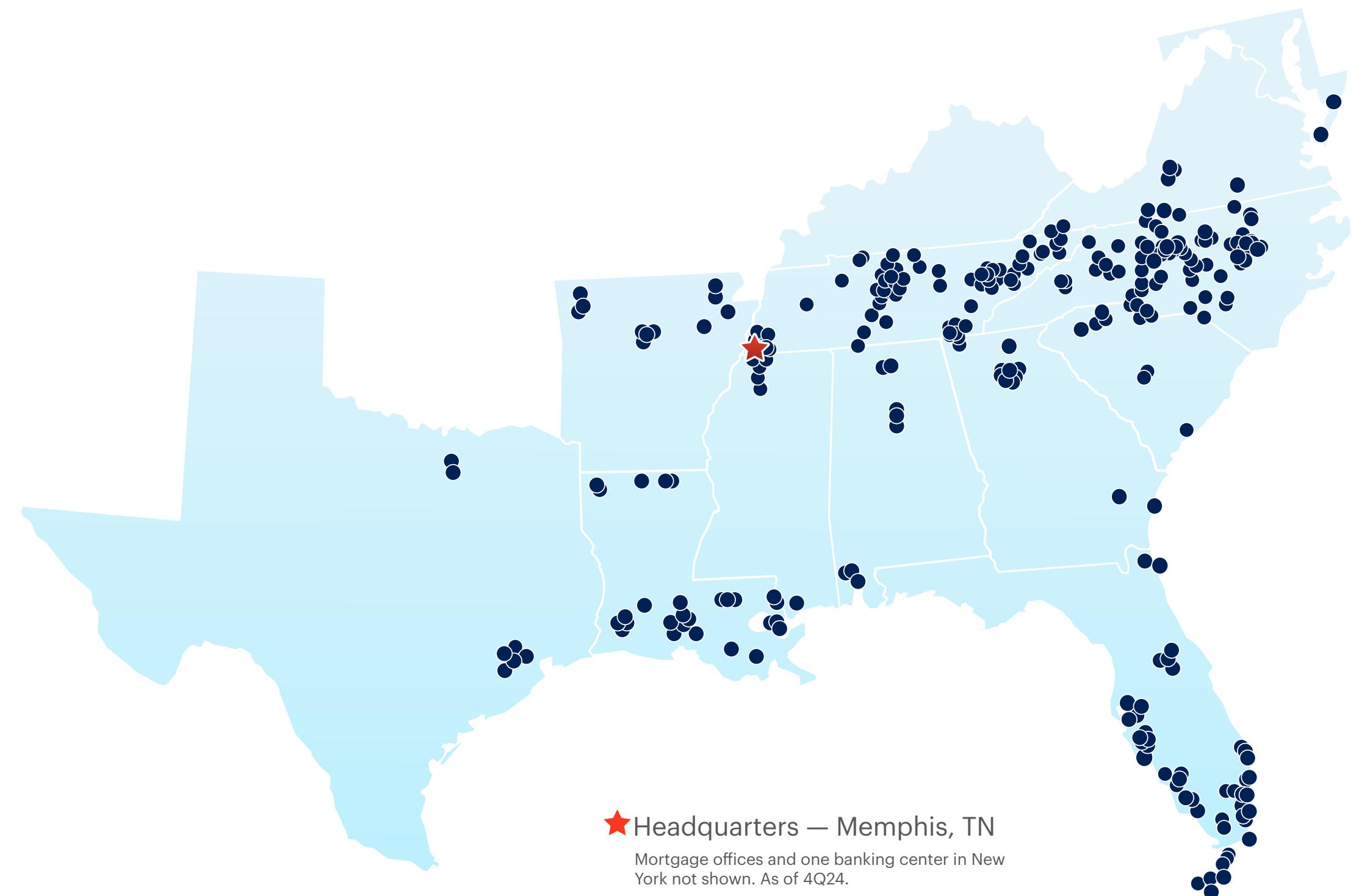
Executive Leadership Team

Our seasoned executive leadership team is committed to cultivating an engaging and people-focused culture that supports our commitment to serve our associates, clients and communities and deliver long-term value to our shareholders.

as of 07/01/2025



Banking Center Footprint



BY THE NUMBERS as of 12/31/2024

416

banking centers

12

states

~7,200

associates

\$82.2B

in assets

\$62.6B

in loans

\$65.6B

in deposits

2024 Financial Highlights¹
for the year end 12/31/2024

ROCE	8.8%
ROTCE	11%
ADJUSTED ROTCE	12.5%
ROA	1%
ADJUSTED ROA	1.1%
DILUTED EPS	\$1.36
ADJUSTED EPS	\$1.55

¹ROTCE, Adjusted ROTCE, Adjusted ROA and Adjusted EPS are non-GAAP and are reconciled to GAAP measures in the Appendix.

First Horizon leaders ring the NYSE opening bell, celebrating the 25th anniversary of the company's listing

Financial Highlights

In 2024, First Horizon demonstrated the strength of our diversified business model as the interest rate environment shifted throughout the year, successfully balancing the revenue opportunities of our counter-cyclical businesses with rate repricing across the balance sheet. We maintained our commitment to safety and soundness through a disciplined credit culture and strong capital levels, while returning capital to shareholders throughout the year. Finally, we delivered strong returns by focusing on growing and retaining profitable relationships across our business, setting a foundation for continued success in the future.

2024 Performance Highlights²

Diversified Business Model - Counter-cyclical businesses helped drive 10% growth of adjusted fee income from the previous year. 2024 ended with strong momentum, as deposit pricing responded to declining short-term interest rates and helped deliver NIM expansion in the fourth quarter.

Prudent Risk Management - Maintained a strong CET1 ratio of 11.2%, while returning \$604 million of capital to shareholders through share repurchases. Solid earnings performance and capital deployment strategies resulted in a tangible book value per share of \$12.85.

Attractive Southeast Footprint - Continued to attract new clients, while retaining existing relationships with average deposits growing 2% from 2023 and average loan balances increasing by 3%.

Extraordinary Client Base - We have established long-term and strong relationships with our clients, with over 90% client retention in 2024 and an average tenure of over nine years.

²Tangible book value per share and adjusted financial measures are non-GAAP and are reconciled to GAAP measures in the appendix.

Strategic Plan

In October of 2024, the Board of Directors approved our strategic plan centered around Our Purpose: **Help our clients unlock their full potential with capital and counsel**, supported by our value proposition that delivers big bank capabilities with the personal touch of a small bank. The plan focuses on financial performance, winning with clients, transformation at scale and empowering our team.

Key components:



Financial Performance:

- Profitable revenue growth
- Maintain strong asset quality
- Strategic investments in our people and capabilities



Win with Clients:

- Deepen client relationships
- Increase new client relationships
- Optimize to deliver efficiency



Transformation at Scale:

- Enhance digital and fraud capabilities
- Consolidate and optimize processes
- Invest in data and analytics



Empowering Our Team:

- Invest in people to elevate our performance capabilities
- Accelerate associate development
- Enhance performance management

Our Corporate Responsibility Commitment

Our corporate responsibility strategy is structured around five key pillars: Clients, Associates, Communities, Environment, and Governance. We collaborate with industry groups and advisors on regulatory developments to inform our strategy. In 2024, we refined our focus areas based on the results of our most recent stakeholder assessment, which can be found on [page 13](#) of our 2023 *Here for Good* Report. We continue to enhance our strengths and align improvements with stakeholder expectations, create partnerships and assess risks and opportunities to create a resilient business that delivers long-term shareholder value.

Our Here for Good Pillars and Focus Areas



Clients

Serve clients extraordinarily well and dedicate resources to the underbanked



FOCUS AREAS

- Privacy and cybersecurity
- Financial literacy
- Accessible banking
- Sustainable financing and investments

[READ MORE >](#)

Associates

Invest in our associates and foster a supportive and collaborative culture

[READ MORE >](#)

Communities

Strengthen our communities through strategic partnerships and investments

[READ MORE >](#)

Environment

Operate responsibly and positively influence our value chain

[READ MORE >](#)

Governance

Lead with sound governance practices

[READ MORE >](#)

Stakeholder Engagement and Feedback

We regularly seek input and feedback from our stakeholders through various channels. The chart below illustrates some examples of how we engage and topics that are frequently discussed with our stakeholders.

STAKEHOLDER	ENGAGEMENT	SAMPLE TOPICS
SHAREHOLDERS	<ul style="list-style-type: none">• Investor meetings/roadshows• Sell-side conferences• Earnings calls• Outreach calls/meetings	<ul style="list-style-type: none">• Financial performance• Governance• Long-term strategy
ASSOCIATES	<ul style="list-style-type: none">• Surveys• Intranet/SharePoint• Mentor program• Wellness program• Mid-year check-ins/year-end reviews• Matching gifts program• Leadership grants• Volunteer opportunities• Weekly newsletters• Quarterly earnings calls• Associate resource groups	<ul style="list-style-type: none">• Strategy and financial performance• Goals• Benefits and wellness• Sustainability• Community engagement• Access and support• Training and leadership development• Culture training• Flexible work time and arrangements
CLIENTS	<ul style="list-style-type: none">• Frequent meetings/touchpoints• Client surveys• Client emails, mailings and videos• Stakeholder assessment	<ul style="list-style-type: none">• Financial education• Cybersecurity• Sustainability• Challenges and opportunities• Economic environment
REGULATORS	<ul style="list-style-type: none">• Target examinations• CRO and executive meetings• Ongoing monitoring reports	<ul style="list-style-type: none">• Risk programs• Corporate changes• Regulatory updates
COMMUNITIES	<ul style="list-style-type: none">• Funding support of community programs and initiatives• Volunteer, community service and board membership by associates• Local market advisory boards• National community advisory board• Foundation support• Events and sponsorships	<ul style="list-style-type: none">• Financial literacy• Sustainability• Access and support• Education and leadership• Affordable housing• Human and health services



Associates engage during a Firstpower Council event

Here *for* Our Clients

We work hard every day to deliver value for our clients, leveraging our unique blend of **big bank muscle, small bank hustle**. Our distinctive market-centric model and depth of expertise in our specialty businesses enhance our ability to develop long-term relationships with our clients.

In This Section

- 11 Client Service Teams
- 12 Client Investment Capabilities
- 13 Client Experience
- 14 Client Information Protection



Client Service Teams

Our diversified business model provides a wide range of competitive banking products and services through the expertise of our various lines of business.

Regional

- Retail and Small Business
- Private Client and Wealth Management
- Commercial and Business Banking

Specialty

- Asset-Based Lending
- Commercial Real Estate
- Corporate Banking
- Community Investment Group
- Energy

Teams and Products

Asset-Based Lending

Financing for working capital, growth initiatives and seasonal needs for companies in wholesale distribution, manufacturing, commercial and consumer finance and factoring

Commercial Real Estate

Construction and term financing for large commercial real estate projects. Our primary focus is the financing of retail, industrial and multi-family properties

Community Investment Group

Public welfare investments in projects and businesses that qualify for federal low-income housing, new markets, historic rehabilitation and energy efficient home tax credits

Wholesale

- Correspondent Services
- Debt Capital Markets
- Fixed Income
- Franchise Finance
- Mortgage Origination
- Mortgage Warehouse Lending

- Equipment Financing/Leasing
- International Services
- Healthcare
- Loan Syndications
- Merchant Services

- Music, Sports and Entertainment
- SBA
- Renewable Energy Financing
- Treasury Management Services
- Trucking and Transportation

Corporate Banking

A broad set of credit and treasury services to public and private corporations with revenues exceeding \$50 million

Corporate Healthcare Banking

Customized financial service solutions to healthcare companies representing a wide range of the industry's sub-sectors and encompassing a nationwide geographical footprint. Supports a rapidly growing client base with capital for expansions, acquisitions, working capital, equipment, leasing and other debt and treasury management products and services

Correspondent Services

A wide range of financial services for community banks and credit unions, including financing, liquidity management and deposits and security safekeeping

Debt Capital Markets

Provides efficient and competitive capital markets access to corporate clients; enables our investment bankers to provide a breadth of capital raising options, including the underwriting, marketing and execution of a full range of debt alternatives for companies across a variety of industries and credit profiles

Energy

Financing for companies focused on upstream activities (exploration & production), midstream infrastructure (gathering, processing, transportation and water gathering, disposal and recycling systems) and compression services

Equipment Financing/Leasing

Loan and tax-advantaged leasing products for medium and large ticket equipment tailored to minimize upfront investment and optimize cash flow and tax objectives; industry specialties include transportation, manufacturing, healthcare, construction and renewables projects

Fixed Income

FHN Financial is an industry leader in fixed income sales, trading and strategies for institutional clients in the U.S. and abroad; additional products and services include debt capital markets, public finance, interest rate derivatives, loan trading and consulting, asset liability management, portfolio accounting and institutional investment advisory to assist with balance sheet management (for more details, see page 12 on FHN Financial)

Franchise Finance

Lending, deposit and treasury services for restaurant and fitness operators across the United States to support recapitalizations, acquisitions, new unit development and remodels

International Services

Customized financial solutions to businesses operating internationally, including enabling international transactions and credit, funds transfer solutions and currency exchange

Loan Syndications

Leads, structures and arranges complex financing solutions for larger, middle market borrowers that are then funded by a group of participating banks. Partners with commercial lending, commercial real estate and specialty lending teams to offer customized debt capital structures that help clients achieve their strategic objectives, such as mergers and acquisitions, recapitalizations and capital expenditures

Merchant Services

From contactless payments to online ordering, First Horizon Merchant Services offers a wide range of innovative payment solutions designed to create efficiencies and convenience

Mortgage Origination

A wide range of home loan solutions, including Conventional, Jumbo, FHA, VA and portfolio products tailored to fit each client's unique financial goals

Mortgage Warehouse Lending

Lines of credit to independent mortgage companies to fund residential mortgages sold into the secondary market

Music, Sports and Entertainment

Commercial banking, private banking and wealth advisory services to companies in the Music, Sports and Entertainment industries as well as entertainers, athletes and business professionals in these respective industries; includes loans and lines of credit, catalogue acquisition financing, songwriter contract advances, equipment financing, production financing and real estate financing

Renewable Energy Finance

Debt and tax equity project financing for renewable energy projects located in the United States; construction / tax equity bridge loans, term financing, sale and leaseback tax equity financing and focus on utility scale and

distribution for solar, battery storage and wind generation projects developed by experienced sponsors and independent power producers

SBA

Small business financing that is guaranteed by the U.S. Small Business Administration (SBA) through the SBA 7a program as well as SBA 504 loan products

Treasury Management Services

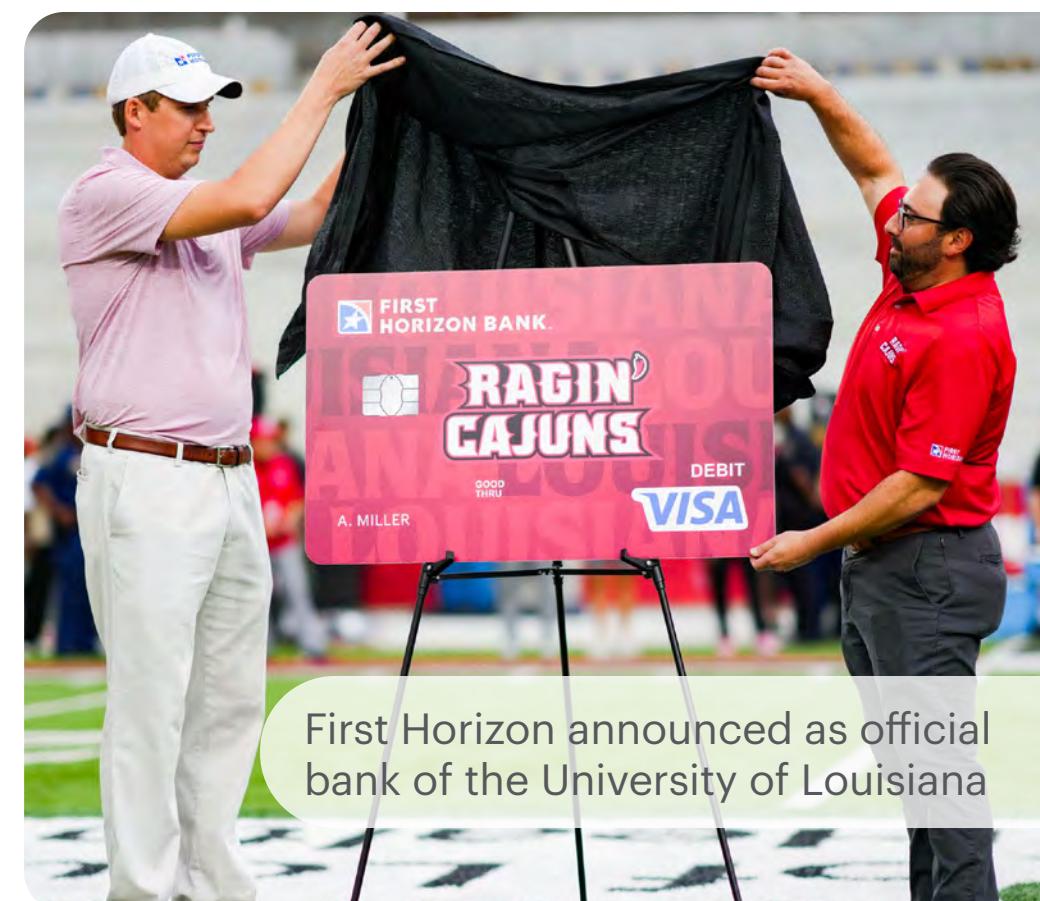
A full suite of products and services to support business clients payables, receivables, liquidity management and reporting needs; includes ACH, wire, controlled disbursements, investment and loan sweeps, fraud protection, commercial card, vault and lockbox

Trucking and Transportation

Middle market specialized group focused on the major segments of transportation, including trucking, rail, maritime, distribution and logistics. Serves private, sponsor-backed and public companies in each segment

Wealth Management

Wealth management expertise and customized advice in investments, trusts, financial planning, insurance and more to help clients reach their financial goals



First Horizon announced as official bank of the University of Louisiana

Client Investment Capabilities

First Horizon Advisors

First Horizon Advisors brings together a full range of financial resources and local, personalized service to help our clients build their financial futures. First Horizon Advisors is the trade name for wealth management products and services available from First Horizon Bank and its affiliates.

Our services include:

- Financial Planning
- Retirement
- Investment Management
- Insurance
- Brokerage
- Corporate Retirement Plan
- Family Office
- Trust

FHN Financial

FHN Financial plays an important role in providing leading services, product solutions and expert commentary to help clients manage their fixed income investment strategies and portfolios. As sustainability principles become more ingrained in the investment process, FHN Financial has been developing solutions and support to ensure our clients achieve their sustainability goals.

FHN Financial's team of strategists and industry experts have produced and supported several product innovations, educational materials and initiatives in recent years.

Portfolio Strategies FHN Financial has a published series of product primers to educate our clients on the role of sustainable bonds in each of our core markets. In addition to security-specific guidance, FHN Financial is also well-positioned as a resource on environmental, social and CRA regulations and plans continued education on these topics.

Public Finance The Public Finance group works with state and local governments to identify and finance sustainable infrastructure projects that align with each issuer's unique needs and values. Projects include renewable energy, micro grids, electric vehicle charging infrastructure and community broadband, among others. As the sustainable municipal bond market continues to mature, the Public Finance group will be ready with new and innovative financing solutions to meet issuers' needs.

Municipal Products FHN Financial's Municipal Credit Strategies Group developed a tool to help clients assess portfolio exposure to various climate-related risks, including hurricanes, wildfires and sea level rise, among others. Additional initiatives in the municipal area include expansion of our CRA platform to include green-, social- and sustainability-labelled securities.

Debt Capital Markets FHN Financial's Debt Capital Markets Group routinely works with issuers to describe the benefits of structuring and executing sustainable bond transactions in the corporate bond market. As the market for sustainable transactions continues to evolve, our team is poised to assist clients in efficiently executing transactions in the marketplace.

Corporate Products FHN Financial's Corporate Credit Strategies Group provides clients with comprehensive investment ideas across the sustainable corporate bond landscape.



Presented by First Horizon's Women of Influence
FIRST HORIZON BANK

The Knoxville market's Women of Influence strategy focuses on creating meaningful change by empowering women financially, professionally and personally. The Women of Influence strategic focus continues to evolve and has resulted in an incredible following of women from all walks of life, generations and experiences.

On February 29, 2024, Women of Influence team hosted a half day summit, titled *InfluenceHER*, with over 200 women in attendance.





Client Appreciation Day

Client Experience (CX)

Digital banking and technological capabilities are an integral part of building client relationships. We have made significant investments in technological and operational enhancements to create better client experiences and achieve efficiencies across the organization. These investments are aimed at value creation opportunities and remain focused on the criticality of cybersecurity to protect our company and clients.

The goal of First Horizon's multidimensional, technology-driven approach to elevating the client experience is to become more relevant to clients throughout their lifetimes so that we can:

- Ignite Growth
- Drive Loyalty
- Improve Bank Economics

Transforming the client experience creates opportunities to increase profitable revenue, reduce costs and drive client lifetime value, benefiting both clients and the company.

Our Approach

Our CX-driven approach takes a holistic, client-centered view of every opportunity, starting with client empathy. Prioritizing proactive experience design with technology-enabled delivery, this approach helps drive growth and innovative outcomes.

- **Customer Satisfaction (CSAT):** Remained stable in 2024 at 77% with banker-led service as a key strength
- **Net Promoter Score (NPS):** Increased in 2024 to 26 from 25 at year end 2023.

FH360

The financial industry is moving at an unprecedented pace in the age of digital transformation. In 2023, we began a commitment to deepening client-centricity by beginning implementation of FH360, technology that creates a unified view of client activity and insights across all channels. This layered view allows us to connect sales, service and marketing for personalized experiences and anticipate a client's needs. FH360 is a next-generation platform designed to streamline workflows, empower decision-making and revolutionize client engagement.

Our FH360 program focuses on modernizing the client relationship manager platform that enables associates to connect and manage relationships with prospects and clients in a whole new way while reducing operating costs. This will empower the entire bank to work smarter and be more productive with connected data and front-end unification of systems, processes and insights.

Client Feedback and Response Process

First Horizon's client comments program meets regulatory requirements and uses client feedback to ensure we are easy to do business with and provide exceptional service to every client. We empower our associates to address client concerns on a fair and equitable basis.

After clients contact the Bank, their feedback is assessed and complaints or concerns are addressed by one of the following business units:

Client Services

Most general client service issues received through the banking centers, client servicing teams and online are addressed by those first points of contact. The outcome must be reported to Customer Solutions personnel stating a full description of the issue, acknowledging the client issue was resolved, the name of the associate resolving the issue, the date the issue was received and the date the issue was resolved.

Customer Solutions

Client requests, issues and complaints that are unable to be resolved at the first point of contact or that require more research or managerial decisioning are directed to Customer Solutions, the central reporting unit responsible for managing client feedback. Customer Solutions reviews, records and researches each incident and assigns a response due date to determine, perform and document the proper course of action. Customer Solutions performs the root cause analysis for complaints received to determine and remedy underlying causes.

Financial Education and Access

The First Horizon Learning Center offers valuable, easy-to-understand resources to help individuals and businesses make informed financial decisions. From improving budgeting skills, building savings, financial planning or preparing for retirement, our expert guidance supports our clients in every phase of life.

[Learning Center](#)

Client Information Protection

In an increasingly digital world, data protection and cybersecurity are top priorities. As a key operational risk within enterprise-wide risk management, cybersecurity requires strong governance and robust control capabilities. To address this, we have established a comprehensive information security program with clearly defined policies, standards and operating procedures that strengthen our defense against evolving threats. Our ongoing investments in cybersecurity talent, advanced technologies and best practices further enhance our ability to proactively manage risks and safeguard confidential enterprise and client data. Continuous improvement practices are utilized to enhance the effectiveness and efficiency of our cybersecurity capabilities, systems and talent.

2024 Highlights

- Enhancement of Security Information and Event Management (SIEM) Capabilities

Improved log correlation and threat detection capabilities, reducing false positives and enabling faster, more precise incident response

- Implementation of Hyperautomation

Streamlined threat analysis and response through AI-driven automation, minimizing manual effort and improving response time to potential cyber threats

- Furthering Email Security Measures

Strengthened email authentication to mitigate phishing and spoofing attacks, thereby further protecting clients, employees and corporate data

- Expansion of Network Segmentation

Reduced attack surface by further isolating critical systems, limiting lateral movement of threats and enhancing overall data protection

- Client Identity and Access Management (CIAM)

Strengthened our client identity and access management capabilities by implementing advanced, machine learning-driven controls. These enhancements unify fraud detection methods to deliver real-time, contextual recommendations throughout the client journey – reducing identity theft and account takeover risk while ensuring a secure, seamless client experience.

These enhancements demonstrate dedication to staying ahead of cyber threats and fostering trust with clients and partners.

Cybersecurity

First Horizon is committed to safeguarding our clients' personal and financial data and the integrity and security of all confidential information across our enterprise. Our business practices, processes and controls are designed to uphold data protection and privacy standards, ensuring compliance with federal regulations such as the Gramm-Leach-Bliley Act, while also addressing broader cybersecurity risks across our operations.

The company's Information Security Program is governed by a Three Lines of Defense model, which includes:

- Oversight by Enterprise Risk Management, ensuring cybersecurity risk is integrated into overall risk governance
- Continuous control validation by Internal Audit, enhancing the effectiveness of our cybersecurity measures
- Independent third-party audits of select business segments to assess compliance with key regulations and frameworks, including Sarbanes-Oxley (SOX), Payment Card Industry Data Security Standard (PCI-DSS), SWIFT Customer Security Program (CSP) and System and Organization Controls (SOC) audits

Investments in new technologies and cybersecurity professionals strengthen our defenses, mitigate cybersecurity threats and adhere to regulatory requirements. Our associates and contractors receive fraud prevention and information security training annually, while dedicated personnel actively monitor First Horizon systems and networks. We dedicate substantial resources to cybersecurity to protect the confidentiality, integrity and availability of systems and data.

OUR CYBERSECURITY STRATEGY INCLUDES:

- Top-down focus on cybersecurity, driven by our Board of Directors, executive management and senior leadership
- Robust governance and oversight to enforce adherence to cybersecurity policies and standards
- Collaboration with federal regulators, law enforcement and threat intelligence organizations to enhance threat awareness and review and improve systems controls and practices and, when necessary, joint action with these organizations for investigations, knowledge sharing and information requests
- Highly skilled cybersecurity professionals leveraging proven technologies to proactively identify and mitigate threats
- Deployment of multi-layered defenses to govern, identify, protect, detect, respond and recover
- Associate awareness and job-specific training to reinforce cybersecurity best practices and fraud prevention
- Data protection guidance to clients to assist in the safeguarding of confidential information
- A vendor management program that governs third parties and validates cybersecurity requirements

Policies and Standards

Information Security governance practices are based upon IT Data security policies and standards that apply to the company's directors, officers, associates, agents, subsidiaries (both direct and indirect) and vendors. These policies and standards are designed to:

- Safeguard the security and privacy of information
- Establish requirements for the collection, use and sharing of data
- Mitigate anticipated threats or vulnerabilities that could compromise data security or integrity
- Prevent unauthorized access, use or disposal of information that could result in significant harm or inconvenience to the bank or its clients

The Information Security function operates under the oversight of Management and the Board Risk Committees, which annually review IT data security policies and standards to ensure continued effectiveness and alignment with evolving threats and regulatory expectations.

Information Security Risk Assessments

Our information security program and internal control structure are based on the ISO 27001 framework, which aligns with the National Institute of Standards and Technology (NIST) Cybersecurity Framework. We conduct regular internal and external risk and control assessments to evaluate maturity levels against regulatory guidance, control frameworks and industry standards. This includes assessments like IT enterprise risk, application risk and CIS top 18 self-assessment. We also perform NIST CSF maturity assessments, network and application penetration testing, red team exercises* and static and dynamic code testing. Additionally, we engage in cybersecurity tabletop exercises and FS-ISAC Cyber Attack Against Payment Systems (CAPS). Our comprehensive risk assessment process ensures regular evaluations to identify and mitigate IT security risks and threats throughout the organization.

* An exercise, reflecting real-world conditions, that is conducted as a simulated adversarial attempt to compromise organizational missions and/or business processes to provide a comprehensive assessment of the security capability of the information system and organization.

Multi-Layer Defense

Our risk-based information security program employs a multi-layered defense strategy, incorporating advanced network intrusion detection and prevention, malware protection, endpoint security (including antivirus and encryption), continuous threat monitoring, robust backup and recovery capabilities and strict access controls. We strengthen application security through input validation and secure session management while ensuring data protection with encryption and reliable backups. By enforcing least privilege access rights, we minimize attack surfaces. Through security awareness training, incident response planning, regular security audits and well-defined policies and procedures, we further enhance resilience against evolving cyber threats.

Threat Management and Incident Response

Our Threat Management Team utilizes a management program that regularly assesses threats and vulnerabilities to systems to maintain an appropriate control environment and effectively mitigate risk. This layered defense program includes physical access controls, network intrusion detection and prevention, malware protection, advanced persistent threat monitoring and data protection. We utilize anti-bot services to adapt to the ever-changing landscape of bot attack trends and methods to detect and mitigate internet-based traffic from malicious bots. Additionally, regular tests are performed on detection and response capabilities through incident response exercises, regular internal and external penetration tests, vulnerability scans and risk assessments. The team also has established incident response plans which define organizational structure, processes and procedures to properly identify and handle incidents that may affect the safety and security of First Horizon IT resources.

Business Continuity Plan (BCP)

The BCP defines required actions, procedures, processes, personnel, facilities and system resources necessary to ensure the safety and resiliency of associates, clients and corporate assets, in addition to redundancy of critical assets and data. The goal of the BCP is to plan for critical business functions to resume operations within 24 hours following a business interruption with minimal data loss. Our Disaster Recovery Plan and backup procedures include control requirements that enable appropriate prevention, protection, detection and reaction to conditions that could adversely affect the confidentiality, integrity and availability of our information resources. This plan is tested annually to confirm critical computer and network resources are made available and promptly recovered following unanticipated interruptions. Additional Business Continuity Plan details related to natural disasters and other risks are found in the Environmental section of this report.

Vendor Management

Our Third-Party Risk Management Program employs a structured, risk-based approach to assessing, managing and overseeing third-party relationships in compliance with First Horizon Information Security Standards and regulatory requirements. The program prioritizes relationships that could significantly impact client confidential information, disrupt bank operations or pose material cybersecurity and compliance risks.

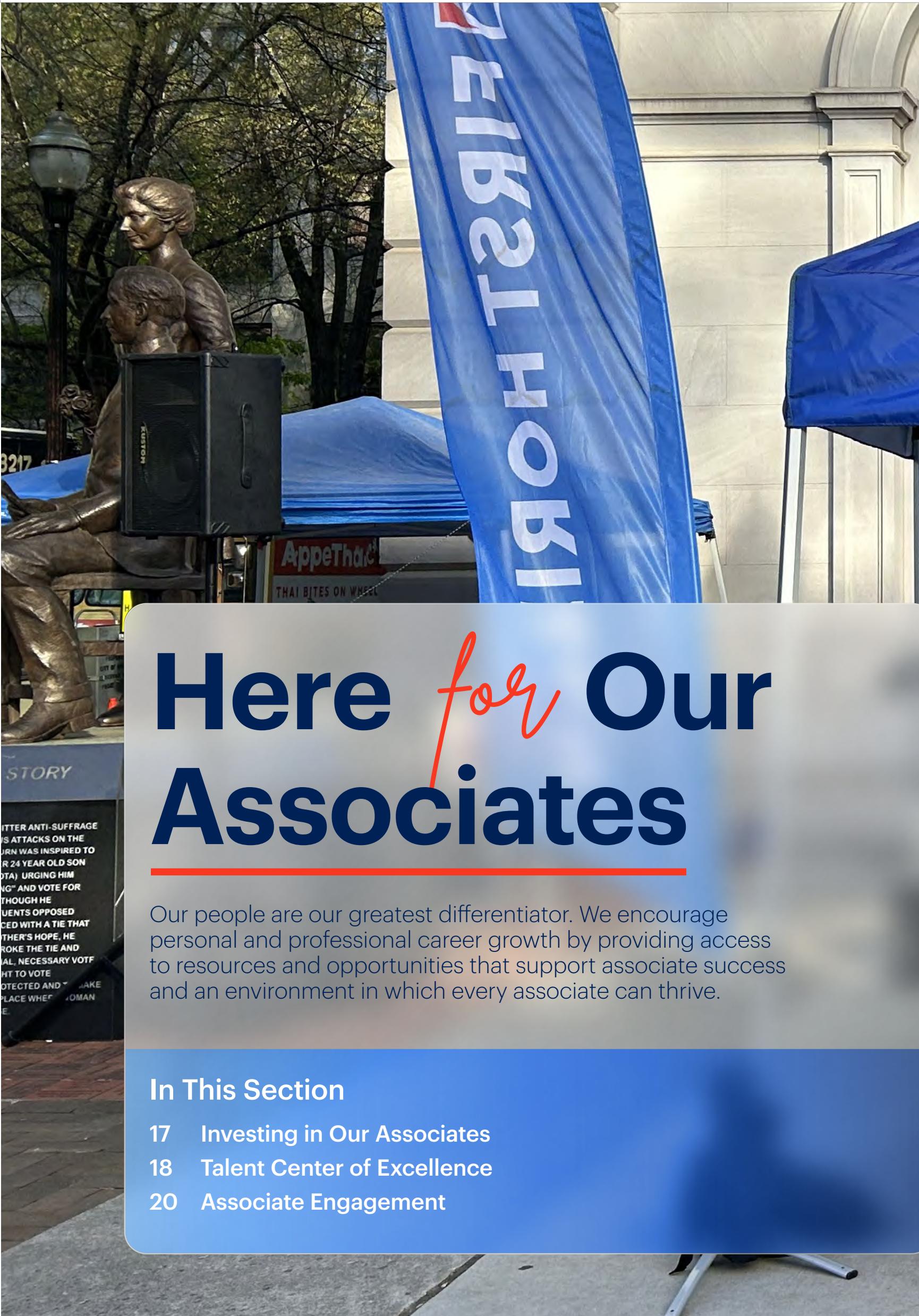
We utilize a risk-based methodology to conduct due diligence on new vendor services during onboarding and to reassess existing vendors. Additionally, we have established ongoing monitoring for critical vendor services to ensure continued security, compliance and operational resilience.

Cyber Talent and Training

First Horizon associates are required to take annual information security training. In 2024, our associates completed nearly 15,000 hours of training in a variety of cyber and privacy-related courses. Topics include secure access, secure data handling, incident reporting, proper use of corporate devices, understanding of data privacy, cloud security best practices and how to identify and respond to cyber threats. Associates participate in phishing simulations based on real world events. Specialized security awareness training for developers and users with privileged access is required.

Training and awareness for cybersecurity includes:

- Information Security Training (onboarding and annual thereafter)
- Gramm-Leach-Bliley Act (GLBA) and Red Flags Training (onboarding and annual thereafter)
- PCI-DSS Training (annual)
- Developer Secure Coding Training (annual)
- Privileged Access Training (when privilege is granted and annual thereafter)
- Phishing Simulations (bimonthly)
- Cybersecurity Working Group (quarterly cybersecurity awareness for Executive Management)
- Cybersecurity Awareness and Emerging Threat (Pulse) report (biweekly)
- Cybersecurity Companywide Awareness Articles (monthly)
- Cybersecurity Awareness Month Articles (weekly in October)
- Cybersecurity Threat Bulletins (occurrence - emerging risks)



Here *for* Our Associates

Our people are our greatest differentiator. We encourage personal and professional career growth by providing access to resources and opportunities that support associate success and an environment in which every associate can thrive.

In This Section

- 17 Investing in Our Associates
- 18 Talent Center of Excellence
- 20 Associate Engagement





Investing in Our Associates

By strategically investing in our associates through access to competitive compensation, comprehensive benefits and rewards, as well as robust development and well-being programs, we cultivate a high-performance culture that underpins the sustained success of our organization. We consistently use benchmarking data to analyze compensation, accounting for factors like role, experience and geography to help retain and attract talent.

In 2024, we added a Service Recognition Week to provide an additional time off for milestone anniversaries and an annual Inclusion Day for associates to participate in celebrations or events that are meaningful to them. Inclusion day was added effective January 2025.

Benefits and Well-being

Our Total Rewards program offers associates and their families robust benefit options as well as tools and resources to support total well-being. Associates can access benefits that support their financial, social, emotional, physical and nutritional health. The company provides several benefits at no cost to associates and covers a sizable portion of the health plan premiums through direct subsidy as well as additional funds provided through our Flexible Dollar program. We deliver a personalized Total Rewards Statement annually providing a comprehensive view of compensation as well as company and associate paid benefits.

WellnessFirst

Our corporate well-being program promotes the importance of leading a healthy lifestyle, establishing medical care and participating in health education and awareness programs. The program focuses on four key components- financial, social, emotional and physical/nutritional health. Approximately 300 associates serve as Well-being Champions, delivering messages and programming across the footprint. Associates and their spouses can also earn incentives for completing well-being activities.

Employee Assistance Program (EAP):

We are dedicated to helping our associates embrace both work and personal responsibilities. We offer associates and their family members enhanced work/life benefits through ComPsych – a full-service support network that offers life counseling and access to resources for child and elder care, education, government assistance, relocation, estate and will planning, financial planning, personal convenience and more. ComPsych's confidential services are provided at no cost to our associates.

Quantum Health:

First Horizon utilizes Quantum Health, a healthcare navigation partner dedicated to helping our associates and their families walk through all their healthcare needs. Quantum Health is the first point of contact for all things related to associate health plan benefits and coverage. A dedicated group of care coordinators assist First Horizon families in all aspects of health care from ordering a replacement ID card, locating a center of excellence for a new or existing condition, managing chronic conditions and help with claims and billing questions. All associates on the health plan are automatically enrolled at no additional cost to access the services Quantum Health provides.

Benefits include:



Family

- Adoption reimbursement up to \$15,000 per adoption and up to \$30,000 total
- Company-provided group life insurance
- Optional life insurance for associates, children and spouses
- Accidental death and dismemberment, individual disability, whole life, accident, critical illness and hospital indemnity insurance
- Family leave, up to 12 weeks
- Paid vacation, up to 4 weeks
- Paid holidays, Inclusion Day
- Sick/personal pay
- Vacation donation program
- Parental leave, Military leave/Military Caregiver leave
- Child/Dependent Care resources
- Dependent scholarships
- Associate relief program



Health

- Health, dental and vision plans
- Pharmacy benefit
- Well-being program for associates and spouses to earn additional incentives for completing well-being activities
- Healthcare navigation services
- Lifestyle coaching
- Chronic disease management and support
- EAP services
- Telemedicine virtual physical and mental health care services
- Mental health and resilience resources



Financial

- Competitive pay, \$20 per hour minimum wage
- First Horizon 401(k) savings plan
- 100% match up to 6%
- Health Savings Account with up to \$1,200 in employer contributions
- Flexible Spending Accounts
- Short and long-term disability
- Flexible Dollar program offering up to \$5,600 per year
- Free checking and financial services discounts
- Education assistance

Talent Center of Excellence (TCoE)

The multi-award winning TCoE consists of expertise and resources that provide powerful advisory experiences to increase organizational performance and value. Through the center's advisory services, in partnership with line of business leaders, First Horizon nurtures a culture of excellence where every associate can succeed.

First Horizon Career Marketplace

First Horizon's Career Marketplace provides resources to all associates to refine skills and discover new ones. By continuously building associates' capabilities, the Career Marketplace nurtures a diversified and talented bench for our organization by empowering associates to own their careers.

The Talent Center of Excellence leverages the following resources to aid in associate development.

Capability Academies
Role-based curricula programs for Treasury Management, Lending and Private Client

GetControl! Online University
Award-winning webinars and resources available to all associates, including time management and Microsoft 365 learning

LinkedIn Learning
Online learning platform available to all associates
Top skills accessed include Microsoft Excel, productivity improvement, career management, leadership and public speaking

American Bankers Association
Online content expanding access to industry-recognized certification programs

High Potential Talent Development Programs

Top-notch talent ecosystem that continuously seeks to improve talent mobility through our high-potential development programs: Ascend, Accelerate, Rise, Soar and Soar Higher

Ascend
10-month development program. Each cohort varies based on strategic business needs.

Accelerate
12-month development program. Each cohort varies based on strategic business needs.

Rise
Designed for emerging leaders with at least seven years of related experience.

Soar
Designed for leaders of people at SVP level or higher.
Soar Higher
Designed for leaders of leaders at EVP level with team focus.

FIRSTPOWER

Our culture – what we call Firstpower - is one of our competitive advantages. It is centered around our people and their performance, promoting teamwork and collaboration to achieve results. We want everyone at First Horizon to Own the Moment and operate with shared purpose and values while adapting to the ever-changing business environment.

Firstpower Council

Our Firstpower Council is charged with enhancing and promoting Firstpower Culture across all areas of the company. The Council, made up of associates from different levels and parts of the organization, serves as culture representatives to all associates and a voice to executive leaders. Members help to identify and prioritize opportunities in innovative ways to bring our culture to life.

Firstpower Week of Thanks

Each November, we celebrate Firstpower Week of Thanks, an opportunity to show appreciation to our associates who Own the Moment every day.

Culture Learning

Our Talent Development team has implemented a culture initiative that focuses on adapting to the ever-changing business environment by being accountable, innovative, open-minded, adaptable and aligned with the goals of our organization. These pillars are critical as we grow and evolve.

Culture Workshops

With a renewed focus on organizational culture, the Talent Center of Excellence recently rebranded our culture shaping workshops to Firstpower. The first workshop, Operating at Your Best, incorporates important concepts of change, alignment, accountability and teamwork. The second level, Thriving at Your Best, is designed to increase effectiveness by developing and perpetuating a healthy, high-performance culture.

OPERATING AT YOUR BEST

The purpose of the Firstpower: Operating At Your Best workshop is to help shape our culture to adapt to the demands of an ever-changing business environment. This workshop serves as a springboard for executing strategies, resulting in more success with less stress for individual leaders, their teams and the organization.

- 261 associates participated, a 32% increase over 2023
- 59% of our leader population participated in 2024
- 98% satisfaction rating

THRIVING AT YOUR BEST

Our Firstpower: Thriving At Your Best workshop helps leaders enhance their personal effectiveness, which in turn benefits overall organizational effectiveness.

- 163 leaders successfully completed the workshop series in 2024
- 100% satisfaction rating





WOMEN'S SUMMIT

EMPOWER • ENGAGE • EXCEL

In 2024, we hosted our inaugural Women's Summit in Memphis, TN. This summit was designed to empower women in our organization to excel in both their personal and professional lives.

Mentoring

To support the development of associates who desire leadership, coaching and career progression, First Horizon encourages associates to join the corporate mentoring program. Associates are matched with mentors within the company based on application similarities, primarily those associated with career paths and goals. Mentors serve as trusted coaches or guides, listening and educating to help outline possibilities for growth and development. Mentees typically sign up with an interest in developing their skills and assuming responsibility for their own growth and development. The company provides participants with developmental tools and resources. The average mentee feedback rating is 3.92 and the mentor feedback rating is 3.87 (out of 4).

Associate Resource Groups

To better connect with our colleagues, Associate Resource Groups (ARGs) serve as a vital part of the TCoE. All ARGs are open to all associates and provide opportunities for associates to build community, foster a sense of belonging and access professional growth and leadership development. ARGs are voluntary, associate-led groups that support a workplace culture enabling associates to reach their full potential. ARGs at First Horizon began in 1999 with the launch of the Women's Initiative of Memphis and have grown to include 11 groups.

- Alliance & Allies
- Asia-Pacific WAVE
- Black Inclusion Guild
- Create & Inspire
- Driven Networking Association
- Eco Champions
- HOLA!
- Military Community
- Neurological Diversity Awareness
- Women's Initiative
- Working Parents & Caregivers

Performance Management

First Horizon's performance management process was developed to ensure our associates understand expectations, receive regular feedback and are recognized for their performance. To foster success, associates are encouraged to have goals that align with the company's goals and strategy, are provided with regular and actionable feedback on performance and development opportunities and are recognized for their contribution to the organization.

The process consists of five key steps:

- Goal setting
- Regular, informal feedback
- Formal feedback via Annual Performance Reviews
- Development planning
- Rewards and recognition

Associate Retention & Turnover

We regularly track associate retention and turnover and offer various perquisites to help associates thrive, including flexible work arrangements.

Associate Training

For our associates to be successful, we believe they should have access to tools and opportunities to continue to develop their skills throughout every stage of their careers. All First Horizon associates are required to complete a variety of training courses and have access to non-required learning opportunities, including role specific courses and courses related to safety and security, systems and procedures, privacy, compliance, policies, professional development, leadership, products, services and cybersecurity.

Workplace Safety & Security

We are committed to the safety and security of our clients and associates. Our Physical Security team has oversight of contract security guard deployment and electronic security integration and maintains an Enterprise Security Console that serves as a centralized security point of contact. The Physical Security team also partners with peer financial institutions and security industry organizations to understand the evolving security landscape.

First Horizon's physical security program includes:

- Facilitation and evaluation of risk assessments
- Review of physical security standards
- Deployment of physical security countermeasures
- Development of security training
- Response to security incidents

Talent Acquisition

Our Talent Acquisition Department is dedicated to implementing strategic talent acquisition practices. The team partners with Associate Resource Group members, line of business leaders and associates to actively engage with colleges and universities throughout our footprint. This collaborative effort showcases our empowering culture, attracts top-tier talent and forges strategic partnerships aligned with data-driven insights into labor markets and statistics. We aim to continuously improve our talent acquisition practices and deliver exceptional outcomes for both candidates and the organization.

BY THE NUMBERS

ASSOCIATE RETENTION AND TURNOVER

As of 12/31/2024

9

years average tenure

16.6%

total average turnover*

34%

of job openings were filled internally

*Average turnover includes all associates no longer employed by First Horizon.

ASSOCIATE TRAINING*

1,580

total completed learning items

251,271

total number of learning hours

30.6

average number of learning hours per associate

*These numbers only include learning items inside our learning platform, myPLAN.

Associate Engagement

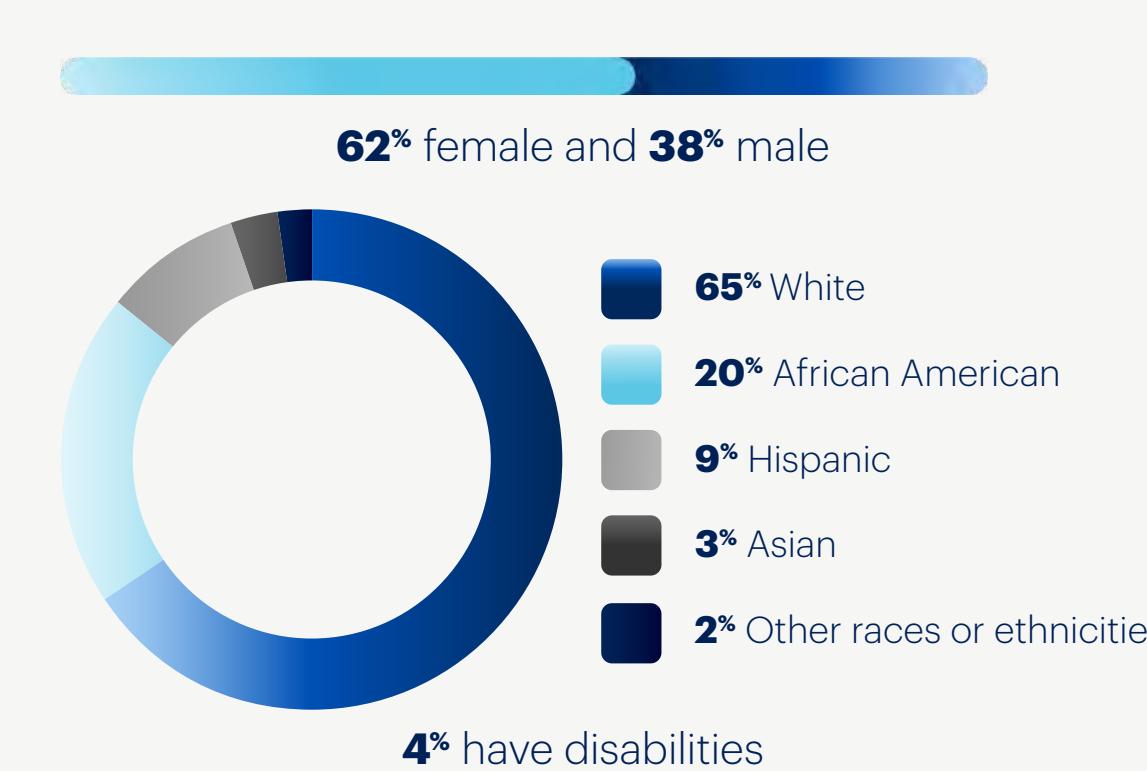
Our associates' feedback is important to creating a dynamic and competitive workplace. The TCoE partners with leadership to keep a pulse on associates' priorities and experiences. We conduct two associate surveys – an Associate Value Survey (AVS) and a well-being survey (Pulse) – each year.

Harnessing the power of adaptability, our associates have embraced change redefining our trajectory and cementing our reputation as a resilient force in the financial industry. While the 2024 survey results were excellent, we are continuously seeking opportunities for improvement. The need to address internal roadblocks and organizational obstacles remains a top priority for executive management, who continue to provide resources, infrastructure, training, learning opportunities, communication and transparency in response to survey results.

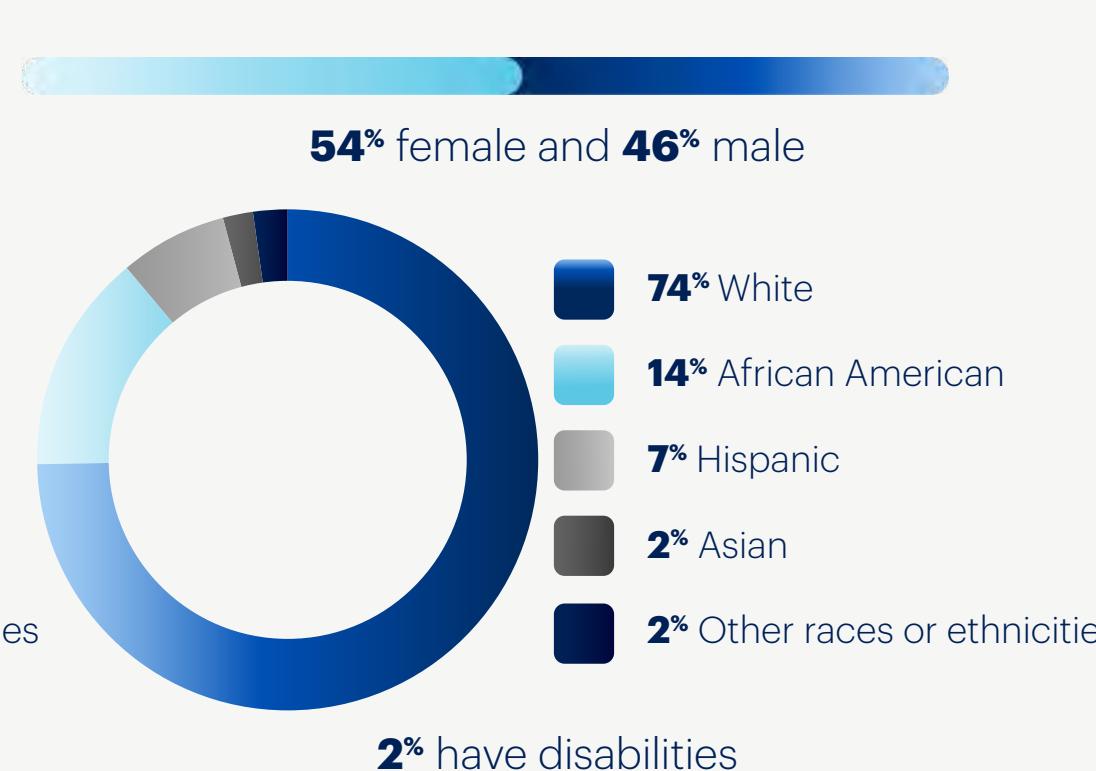
Workforce Demographics

As of December 31, 2024:

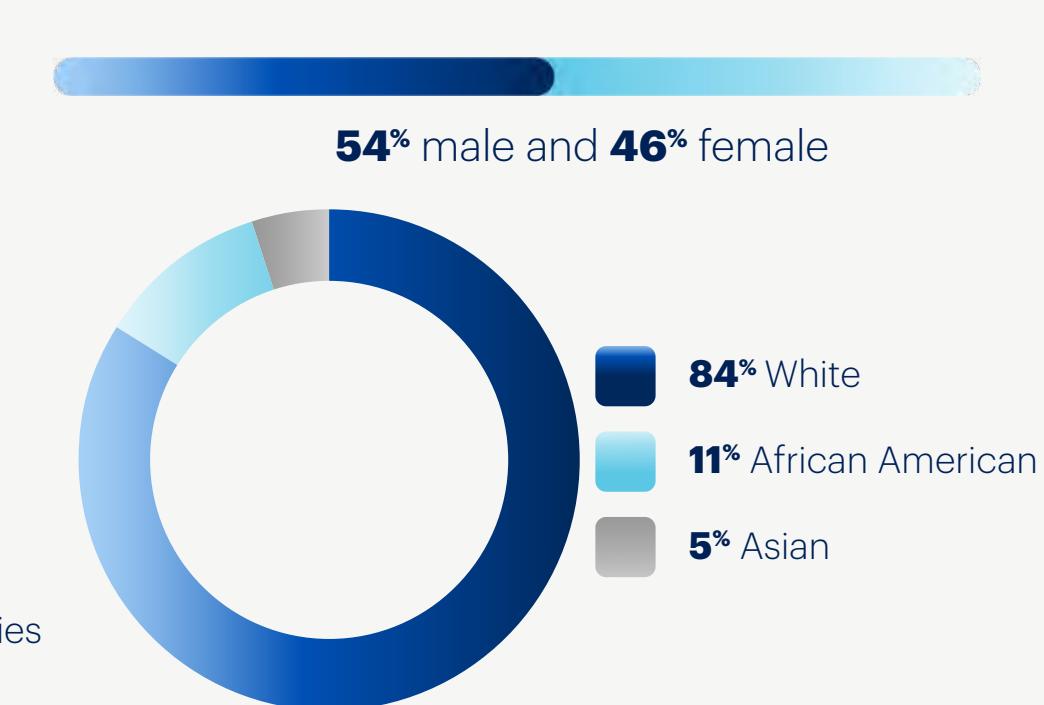
7,252 ASSOCIATES *



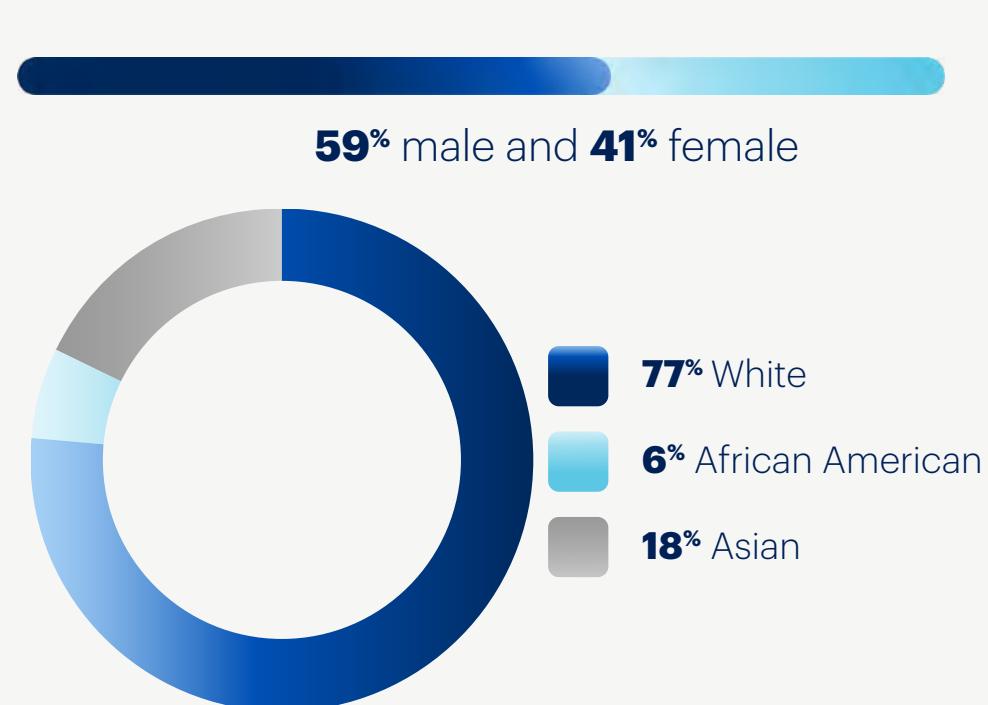
1,230 CORPORATE MANAGERS



37 OPERATING COMMITTEE MEMBERS



17 EXECUTIVE MANAGEMENT COMMITTEE



Here *for* Our Communities

Our commitment to continuously caring for our communities has always been part of our strategy and embedded in our core values. For over 160 years, we have strengthened our communities by collaborating with non-profits, community development leaders and partners to elevate and better the communities and people we serve.

In This Section

- 22 Community Investment Strategy
- 23 Community Reinvestment Act Program
- 25 Community Development
- 27 Partnering for Progress Spotlights



BY THE NUMBERS for 2024

\$20M

invested in our
communities
through First Horizon
foundations

\$10.9M

of First Horizon Foundations'
grants and sponsorships
dedicated to LMI individuals,
communities and small
businesses

26,000

hours of service
donated by
associates

\$8M+

in charitable
bank giving and
sponsorships

\$4.9M

of bank giving and
sponsorships, dedicated
to serving LMI individuals,
communities and small
businesses

Community Investment Strategy

First Horizon works closely with individuals, nonprofit and civic organizations to align resources - financial investments, donations, sponsorships, lending and service. We believe it is our responsibility and privilege to support the individuals, families and small businesses that make up the communities in which we live and work. Our Community Investment Strategy commits to enhancing the long-term economic, social health and sustainability of our communities. Through strategic partnerships and investments, we help provide greater access to financial capital, education, housing, community redevelopment and revitalization and health and human services to the communities within our footprint. Our grants are invested in a way that responds to community needs and promotes progress and prosperity across these impact areas:

- **Arts and Culture:** Emphasizing excellence and enrichment in the arts
- **Education and Leadership:** Educating and developing the next generation of leaders
- **Environmental Sustainability:** Fostering a more sustainable future
- **Financial Literacy:** Promoting financial literacy within our communities
- **Health and Human Services:** Improving the well-being of our communities
- **Housing:** Financing safe, affordable housing

Investing in Our Communities

Since inception in 1993, The First Horizon Foundation along with the Louisiana First Horizon Foundation established in 2020, have invested approximately \$170 million in our communities.

In 2024, we deployed approximately \$20 million through more than 1,800 nonprofit partners with over 50% dedicated to low- and moderate-income (LMI) areas and small businesses. In addition to financial contributions, we encourage our associates to share their time and talents with organizations that are working hard to improve our communities. As always, our associates gave generously of their time to support nonprofits and causes they care about, dedicating more than 26,000 hours to bettering the communities we call home. To recognize our associates for their service, we provide Leadership Grants to their respective nonprofit organizations. In 2024, we provided more than \$120,000 to over 146 organizations across our footprint.



160th ANNIVERSARY CAMPAIGN

Grants *for* Good

\$1.6M

To honor First Horizon's 160th anniversary, celebrate our company's ongoing strength and stability and reinforce our commitment to the communities we serve, we awarded over 160 grants totaling \$1.6 million to eligible nonprofit organizations.

[LEARN MORE >](#)



BY THE NUMBERS

for 2024

\$15.85M

in donations and sponsorships supporting low and mod income communities (54% of total foundation grants/sponsorships)

14,500+

service hours benefiting low and moderate income communities (56% of total volunteer service hours)

\$328M

community development loans

\$246M

community development investments

\$693M

home mortgage lending in LMI communities and to LMI borrowers in the bank's assessment areas

\$571M

lending to businesses in LMI communities and businesses with revenues of $\leq \$1M$ in the bank's assessment areas

Community Reinvestment Act Program

Providing access to financial resources to low- and moderate-income (LMI) individuals, communities and small businesses is an integral part of our Here for Good efforts.

Through our CRA program, we:

- Expand access to housing, support economic development and opportunity and improve financial capability and stability
- Serve our clients with CRA mortgage products, down payment assistance and financial literacy/homebuyer's education support
- Participate in appropriate local and state bond and subsidy programs to our clients
- Host Affordable Housing Symposia in our largest markets
- Partner with key community stakeholders to serve the needs of LMI communities in our footprint
- Recruit and train high-performing, CRA mortgage lenders
- Provide ongoing CRA sales and product training to our mortgage team
- Continuously review our internal CRA product offerings for potential enhancements

To guide our CRA strategy, we have a national CRA Community Advisory Board comprised of nonprofit and business leaders who provide feedback and invaluable insights into the most pressing needs of our communities. See page 28 for the full list of our National CRA Community Advisory Board.



The Florida Community Loan Fund (FCLF) is a statewide Community Development Financial Institution (CDFI) in Orlando that supports non-profits and mission-driven businesses in Florida with funding and technical help for affordable housing, supportive housing, community facilities, economic development projects, food access projects and sustainable projects benefiting LMI individuals. In 2024, FCLF has invested \$721.5 million in projects with an economic impact of \$2.2 billion, including 8,623 affordable housing units and 185 community facilities, creating 26,595 jobs and serving 2.25 million Floridians with essential services annually.

First Horizon Bank has a growing relationship with FCLF, starting with a \$25,000 loan in 2007, increasing to a \$1 million commitment in 2017 and renewed in 2024 for five more years. These investments offer stable funding to FCLF for affordable housing and community projects. Additionally, First Horizon has contributed an annual \$15,000 grant for operational support to the nonprofit CDFI.

CRA Pillars



Expand Access to Housing for LMI individuals by financing safe, affordable housing and home rehabilitation programs, including flexible and affordable mortgages and supportive housing initiatives to reduce homelessness.



Support Economic Development and Community Revitalization in LMI communities by providing small business and commercial financing, technical assistance, job training and creation, and workforce development initiatives, as well as resources to support infrastructure improvements, disaster recovery and neighborhood revitalization initiatives.



Improve Financial Capability and Stability in LMI communities through banking products and services, volunteerism, financial support for critical community services and financial literacy education programs.

CRA Products

CRA Mortgage and Mortgage Grants

First Horizon offers a CRA mortgage product line that consists of five distinct mortgage products, three of which are exclusive to First Horizon.

CRA MORTGAGE PRODUCT LINE

First Horizon Home Start Mortgage	Portfolio Product - Exclusive to First Horizon
CRA Home Ready	Exclusive to First Horizon/Derivative of Fannie Mae
Home Ready	Fannie Mae
CRA Home Possible	Exclusive to First Horizon/Derivative of Freddie Mac
Home Possible	Freddie Mac

CRA Down Payment Assistance Grant Programs:

FIRST RESPONDER GRANT PROGRAM:

- Down Payment Assistance Grant
- Grant amounts from \$6,000 - \$10,000
- Eligibility: First Responders, Medical/Health Care Workers and Educators

HOMEBUYER GRANT PROGRAM:

- Down Payment Assistance Grant
- Grant amounts from \$4,000 - \$8,000
- Eligibility: Qualifying income or Homestead collateral's income census tract

BY THE NUMBERS for 2024

30

locations

21

point credit score average improvement

51,200

people served by financial education services (since program inception)

72

small businesses created with 28 applying for a loan

7,200

clients served

4,438

referrals for bank products

2,105

unique workshops with 13,200 attendees

265

small business clients



In partnership with Operation HOPE, First Horizon offers free credit and money management counseling and workshops that cover topics such as increasing credit scores, creating a budget, improving financial health and starting small businesses. The workshops help strengthen the financial foundation of our communities and elevate individuals and families through better access to financial education, products and services.

Our HOPE Inside partnership includes 30 coaches working in banking centers across our footprint. Their primary objective is to improve the financial health of individuals, entrepreneurs and families. In 2024, we continued to build on the program and streamlined the hub and spoke model throughout the footprint using technology to reach more clients.

Our Commitment to Operation Hope's 1 Million Black Businesses (1MBB) Program

As of December 2024, we have contributed 208 service hours of our 500-hour commitment to the program with 82 associates serving as 1MBB Champions. These associates provide Black business owners and prospective entrepreneurs with information such as how to access credit and how to approach a bank for funding.

Victoria's Homeownership Journey

Victoria's path toward homeownership is a testament to the power of determination and resilience. In October 2022, fueled by her unwavering desire to create a stable home for her three teenagers, Victoria embarked on a mission to turn the dream of owning a home into reality. While juggling two jobs and pursuing her education, she maintained a tight budget and held steadfast to her vision, understanding that homeownership is not only a path to security but also an opportunity to create generational wealth.

Confronted with financial obstacles like depleted savings for her children's school needs, job transitions and the necessity of reliable transportation, Victoria's road was not easy. However, with the support of Operation HOPE and the personalized guidance of coach Kristi McCain, she embarked on a transformative financial journey. Her story demonstrates that with strong guidance and a relentless spirit, challenges can evolve into triumphs. Victoria was able to raise her credit score from 484 to 655 and build a savings cushion of over \$3,000, setting her sights on a 700 credit score and a home purchase.

This story not only highlights Victoria's incredible progress but also underscores the profound impact of support and financial education, crafting a stable future for her family.

[Victoria's Journey to Homeownership Through Operation HOPE - Operation HOPE](#)



First Horizon receives the Chairman's Hope Award at the 2024 Hope Global Forum

Community Development

To advance the underserved and under supported in our communities, the First Horizon Community Investment Group (FHCIG) works in coordination with our CRA team to evaluate community development tax credit equity investment opportunities. FHCIG makes community development investments that qualify for Low-Income Housing Tax Credits (LIHTCs), New Markets Tax Credits (NMTCs) and Historic Tax Credits (HTCs) and supports markets and partners with commercial lenders to create both community development lending and tax credit equity investment opportunities for First Horizon.

During 2024, FHCIG closed nearly \$100 million of CRA-qualified community investments across First Horizon's CRA footprint, developed a 2025 pipeline of \$216 million in community development investment opportunities and actively managed an asset portfolio of 109 community development investments, including over 11,000 units of affordable housing, generating tax credits and CRA investment credit for the Company. Of the nearly \$100 million in tax credit equity investments GHGIG made in 2024, \$84 million were LIHTCs, \$104,000 were 45L energy* and \$13 million were NMTCs.

*45L energy refers to business tax credit for eligible new or substantially reconstructed homes that meet applicable ENERGY STAR home program or DOE Zero Energy Ready Home (ZERH) program requirements.

Low-income Housing Tax Credit Investments

Arbours at Lake Charles

Arbours at Lake Charles is a new community with 96 apartments in Calcasieu Parish, Louisiana, funded by various sources, including LIHTCs and an outside construction loan. The development will feature a mix of one-, two-, and three-bedroom units, with 20% handicap accessible, and include residential buildings, a leasing center, a pool area and a maintenance building. Residents will enjoy amenities like a clubhouse with a fitness center, Wi-Fi, a pool, grilling stations, a fire pit, picnic pavilions, car wash facilities and a playground. The project will meet high construction and environmental standards, with energy-efficient units and resilient materials and is conveniently located near a primary school, restaurants, churches, grocery stores, hospitals and parks.

919 at Cross Link

919 at Cross Link in Raleigh, North Carolina will comprise 142 newly constructed rental units for families within residential buildings including 16 one-bedroom units, 80 two-bedroom units and 46 three-bedroom units. All units will benefit from low-income housing tax credit equity funds and will target households earning up to 30%, 50%, 60% and 70% of area median income (AMI). In addition, at least 10% of the units will be targeted to persons with disabilities. The units will contain a refrigerator, dishwasher, washer and dryer hook-ups, ceiling fans and a patio/balcony. The property will include an office/community center with a kitchen and a computer center, covered picnic area, gazebo, outdoor sitting area with benches and a playground.

Liberty Place

First Horizon partnered with Knoxville's Community Development Corporation and made a tax credit investment of \$6.6 million to help finance the construction of Liberty Place.

Liberty Place is a 32-unit affordable rental community on the north side of Division Street in western Knoxville, Tennessee. The property includes 32 one-bedroom garden apartments for military veterans. Twenty-seven of the 32 rental units are for veterans earning up to 30% of AMI and will be deeply subsidized. Twenty-two units will be subsidized through Veterans Affairs Supportive Housing (VASH) vouchers, which are offered as a collaborative effort between the VA and HUD and operate in a similar manner to HUD Housing Choice Vouchers (HCV), while five units will have Project Based Rental Assistance through the Section 8 program. The remaining five units will serve veterans earning up to 60% of AMI without deep subsidies.

Mid-City Lofts

Lake Charles Mid-City Lofts, LLC is set to acquire land and construct a 46-unit mixed-income building in Lake Charles, Louisiana, as part of a larger 546-unit development in the Mid-City neighborhood. This is Phase I of a project by Historic Restoration Inc Communities, funded partly by a \$40 million Choice Neighborhood Initiative grant. The first phase includes three permanent supportive housing units with assistance from Louisiana's Public Supportive Housing (PSH) Program, 25 replacement units with subsidies from project-based vouchers, eight units for those earning below 60% of the AMI and ten market-rate units. Funding sources include Federal 9% LIHTC equity, 45L energy credits equity, a \$3.5 million Community Development Block Grant (CDBG) PRIME-3 loan and loans from First Horizon. Lake Charles Mid-City Lofts LLC is also seeking a 20-year tax incentive from the local Public Trust Authority.



Town Oaks

Elmington Capital Group is developing a new multifamily housing project on a 2.85-acre site in Orlando, Florida. Located in the city's urban core, close to the downtown area, Bright Line station, Amway Center and Camping World Stadium, the development will feature a single three-story building with 71 units. The units will include 18 one-bedroom, 32 two-bedroom and 21 three-bedroom options. Designed to be affordable, the housing will accommodate households with AMI ranging from 30% to 70%, using an income averaging approach.

The project will be financed through 4% LIHTCs, a \$4.74 million Rental Recovery Loan Program (RRLP)/State Apartment Incentive Loan (SAIL), a \$600,600 Extremely Low Income (ELI) loan, and \$16 million in tax-exempt bonds from R4 Capital Funding. The development is located in a Qualified Census Tract (QCT).

Residents will benefit from energy-efficient appliances, including washers, dryers, dishwashers, garbage disposals and internet access in all units as well as a fitness center and clubhouse.



New Market Tax Credit Investments



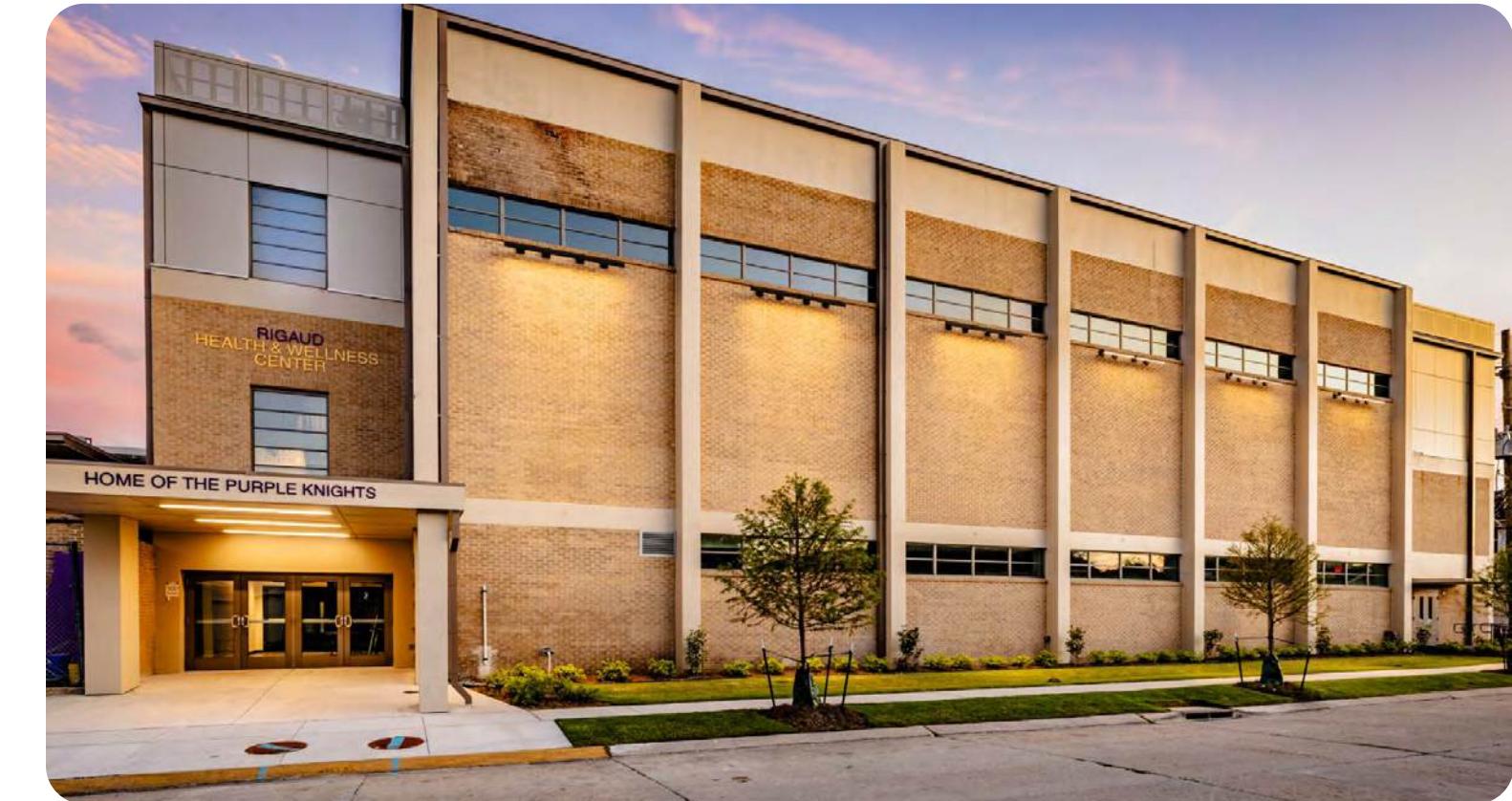
Second Harvest

In October 2024, FHCIG made a \$1.9 million NMTC equity investment in Second Harvest Foodbank of Northwest North Carolina, a non-profit that serves as the primary source of food for more than 430 local food assistance programs – including pantries, community kitchens, shelters and meal programs for children and seniors – throughout 18 counties in Northwest North Carolina. In 2021, FHCIG made a \$5.8 million NMTC equity investment in Second Harvest that helped fund the construction of its new Winston-Salem headquarters facility with accompanying technology that helped modernize and expand Second Harvest's operations and impact. FHCIG's recent NMTC equity investment in Second Harvest was to help the organization step up its prepared meals and food distribution work to support those impacted by Hurricane Helene. Six of the 18 counties Second Harvest serves were declared federal disaster areas in the wake of the storm.



Whitehaven YMCA

In August 2024, FHCIG made a \$1.6 million NMTC equity investment in Whitehaven YMCA. The project, located in Memphis, Tennessee, is part of a \$6.9 million expansion of the existing YMCA of Memphis and Mid-South's Georgette & Cato Johnson facility in the Whitehaven community, which initially opened in March 2023. The expansion includes 2,700 square feet of medical clinic space in a medically underserved area; the renovation and re-opening of an outdoor pool, which is a community hub within the neighborhood; and a 3,000 square foot Teen Achievers and Workforce Development Programming space.



St. Augustine High School

In July 2024, FHCIG made a \$1.3 million NMTC equity investment in St. Augustine High School, an all-boys, college preparatory high school in New Orleans, Louisiana. St. Augustine High School is undertaking a \$23 million project to modernize the school's infrastructure, learning spaces and athletic facilities, most of which remain in the original condition from the school's founding in 1951. The NMTC project focused on the construction of the Rigaud Health & Wellness Center, which is the school gymnasium, and addressed the extensive damage to the school's athletic building from a fire that occurred in November 2021. The ribbon cutting ceremony for the project was held in October 2024. The NMTC project allowed the school to update its outdated and inefficient facilities, strengthen the school's ability to attract students and faculty and help deliver the highest quality academic and extracurricular experience.

Partnering for Progress Spotlights



Junior Achievement

Junior Achievement offers lessons in financial literacy, work and career readiness and entrepreneurship that align with national and state educational standards. In 2024, we received a Silver U.S. President's Volunteer Service Award for our contribution and service. Our associates provided approximately 2,808 board, committee service, technical assistance and financial literacy hours to schools where the majority of the students qualify for free or reduced lunch.



Big Brothers Big Sisters

Big Brothers Big Sisters works to create and support mentoring relationships that ignite the power and promise of youth by partnering with volunteers, families and community stakeholders to defend, inspire and empower the potential that lives within every child. In 2024, the bank donated nearly \$100,000 to Big Brothers Big Sisters in markets we serve, and our associates provided approximately 384 service hours as well as mentorship and other technical assistance.



United Way

For over three decades, First Horizon has supported United Way in many of the markets we serve. Our long-standing support helps address critical community needs by partnering with United Way agencies to provide food, shelter and other essential services. In 2024, our corporate support totaled over \$842,000 and our associates provided over 800 volunteer hours, including board and committee involvement, technical assistance, financial literacy and homebuyer education.



Urban League

First Horizon has been a supporter of the Urban League of Louisiana for over 10 years in the form of sponsorships and volunteerism, including board and committee involvement. In 2024, we contributed \$75,000 and our associates provided over 280 service hours.



Habitat for Humanity

Habitat for Humanity builds strength, stability and self-reliance through shelter which in turn builds stronger communities. In 2024, First Horizon donated over \$230,000 and our associates provided over 637 hours of service supporting Habitat's mission to help families acquire the skills and access the financial education needed to be successful homeowners.



American Heart Association

First Horizon Foundation has supported the American Heart Association with \$900,000 in contributions, with 30% going to the Mid-South region. Our associates are involved in leadership roles, including President & CEO Bryan Jordan, who chaired the 2024 Heart of Memphis and Mid-South Heart Ball. We also support the Woman of Impact campaign, part of Go Red for Women, which empowers local leaders to promote heart health through education and lifestyle changes.



Can'd Aid

Nashville associates partnered with Can'd Aid to build 60 bikes for underserved youth. This was an exceptional team-building activity that fostered collaboration among our competitive bankers while providing the opportunity to give back to children in need. Volunteers presented the bikes to first grade students at a local school and hosted sessions on health, safety and financial literacy.



Boys & Girls Clubs

Boys & Girls Clubs provide safe places where young people can learn and grow. Their programs are designed to drive positive outcomes for youth, reinforce necessary life skills and further academic success, good character and citizenship and healthy lifestyles. In 2024, the bank donated over \$210,000, and our associates provided over 502 hours of service supporting the Boys & Girls Clubs mission across our footprint.

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Hope Dmuchowski
CFO
First Horizon Corporation

Tanya Hart
CHRO
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Dave Miller
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CEO
Family Houston

Melinda Taylor
Executive Director
Lafayette Habitat for Humanity



Here *for* Our Environment

Our environmental strategy is grounded in a vision to drive meaningful change and foster a sustainable future through innovative solutions and collaborative partnerships. By embracing opportunities and tackling climate risks, we aim to create lasting positive impacts for our communities and inspire others to join us on this transformative journey.

In This Section

- [30 Overview and Strategy](#)
- [31 Operational Sustainability](#)
- [32 Climate-Related Risks and Opportunities](#)
- [34 Community Sustainability](#)

Overview and Strategy

Our strategy is guided by our environmental mission statement to **preserve, restore and contribute to the prosperity of the communities we serve**. Preserving our environment continues to be a key focus in our efforts to build a sustainable future for generations to come. To adapt to changes in the climate landscape, we have taken steps which include measuring our Scope 1 & 2 greenhouse gas emissions, adopting sustainable practices, aligning with climate-related disclosure frameworks and promoting nature-based solutions, particularly associated with the “blue” economy. We look for scientific-based partnerships and projects that promote practical and effective solutions that make a meaningful impact.

Our strategy focuses on identifying and managing climate-related risks and opportunities that benefit our clients and communities. We engage with industry partners through various forums, working groups and roundtables to stay informed on best practices and gain insights into the evolving regulatory landscape. We regularly consult with leaders in the coastal resilience space to expand our expertise and better understand the complexities of future climate conditions. This approach helps us provide tailored sustainability advice to our clients, with dedicated resources for renewable energy project financing.

The Blue Economy

The blue economy encompasses the sectors of the global economy that benefit from ocean-related resources. We view it as a significant opportunity for innovation and growth. A key aspect of this is blue carbon, which focuses on the ability of ocean and coastal ecosystems to absorb atmospheric carbon. Given society’s reliance on healthy coastal ecosystems and our proximity to them, we regard the restoration and conservation of coastal wetlands as an excellent strategy for both mitigating and adapting to climate variabilities.

By improving the management and restoration of these ecosystems we can boost carbon sequestration and provide additional benefits to local communities, including increased resilience and biodiversity. The role of coastal wetlands in combating harmful emissions is gaining recognition. By investing in their restoration and conservation, governments and organizations can significantly contribute to mitigation of extreme weather events and benefit both human and wildlife populations. These ecosystems are vital for building resilience against future conditions like sea level rise and storm surges, making them essential for environmental conservation and adaptation efforts.

Client Strategy

To support our clients it is pivotal to develop a comprehensive understanding of their sustainability goals, challenges and needs. This requires engaging in meaningful conversations with clients to gauge the specific goals they wish to achieve and any obstacles they face. By gaining insight into our clients’ motivations and aspirations, we can tailor our approach to support clients in their transition to more sustainable practices. This may involve offering financial products and services that supports renewable energy, energy efficiency or environmentally friendly technologies. We are positioned to provide educational resources to guide clients through the complexities of aligning their business practices with their environmental goals. We are committed to transparent communication about the bank’s commitment to sustainability, building trust and fostering long-term relationships with clients.

Renewable Energy Project Financing

First Horizon’s Equipment Finance Division specializes in project financing and tax equity for solar and wind renewable energy facilities. Since 2017, the division has provided over \$1.5 billion in funding for renewable energy projects. This investment supports more than 5,600 megawatts of generating capacity through both direct financing by First Horizon and indirect financing as a participant.

As the market shifts toward decarbonization, we see the renewable energy sector as growing, and we are dedicated to expanding our business by investing \$250 million annually in tax equity and project financing. Our focus remains on financing utility-scale and distributed generation projects, with commitments from utility, corporate, municipal and community solar power buyers under long-term agreements.

The Circular Economy

We recognize the significance of the food, water and energy nexus and how reducing food waste and water use can decrease energy consumption. Additionally, we are exploring ways to support the circular economy, understanding from the Ellen MacArthur Foundation that such a transition can address global issues like climate change, biodiversity loss, waste and pollution. For more information on the circular economy, please [click here](#).

Environmental sustainability is crucial in the banking industry. It helps us mitigate and adapt to risks by addressing climate-related exposures, ensures compliance with evolving environmental standards, enhances corporate reputation through responsible stewardship and meets the growing consumer demand for environmentally conscious business practices. Embracing sustainability strengthens the bank’s position as a leader in responsible financial management. ”

Emily Chavis

Corporate Sustainability Officer



Operational Sustainability

Building Upgrades

Building upgrades play a crucial role in sustainable operations by enhancing energy efficiency. Implementing energy-efficient systems such as LED lighting, high-performance HVAC systems and improved insulation can reduce energy consumption, leading to lower carbon emissions. These upgrades not only help reduce the building's carbon footprint but also translate into cost savings over time due to decreased energy bills.

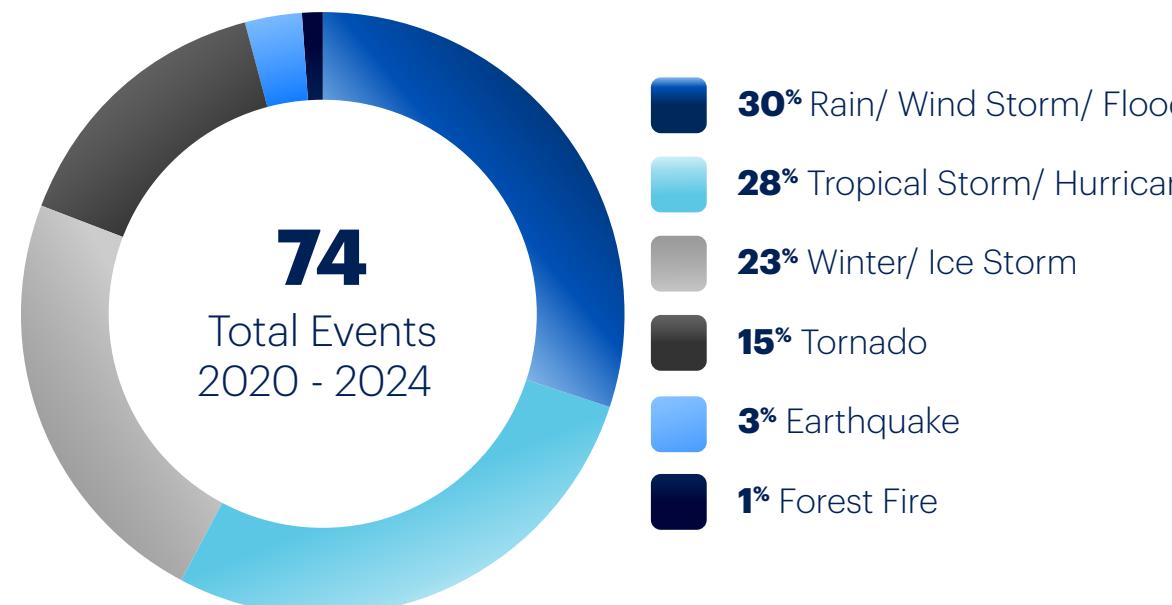
By improving indoor air quality through advanced ventilation systems upgrades, we can also enhance the well-being and productivity of the people who work in these spaces.

In 2024, we completed over 156 building upgrades totaling over \$10.3 million, including roofing, HVAC/mechanical and lighting projects, that impact our resource consumption.

Business Resilience

Our business resilience planning is focused on preparing for potential impacts on First Horizon locations, personnel, clients, technology, operations and vendors. Our primary objectives are safety and no disruption to banking services. We carefully consider various risk factors, such as climate and environmental conditions when selecting data center locations. The effects of natural disasters and the resulting costs and revenue losses due to physical damage are considered in our operational risk management processes. In the event of a business disruption, we assess the effectiveness and quality of the company's response to learn from the experience.

5-Year History of Extreme Environmental Events in Our Footprint



We regularly map and analyze potential disaster impacts, such as hurricanes and winter storms, on our portfolio. By utilizing geographical information systems (GIS), we aim to enhance our ability to visualize and analyze data, assess the impact of climate variability and extreme weather on our portfolio and transform our decision-making processes. Our experience in responding to weather events, combined with our strong ties to weather and hurricane experts, equips us to effectively understand, mitigate and address future risks.

Operational Emissions

Scope 1 emissions: Direct greenhouse (GHG) emissions that occur from sources that we control or own.

Scope 2 emissions: Indirect GHG emissions associated with the purchase of electricity, steam, heat or cooling.

Through investments in our buildings and operations, strategic site management and overall greening of the grid, we have reduced our scope 1 and 2 (location based) emissions by 40.5% from our baseline year of 2019.

Value Chain Emissions

Scope 3 emissions: indirect emissions that are a result of activities from assets we do not own or control, but that we indirectly affect in our value chain, consisting of both its upstream and downstream activities.

The GHG protocol identifies 15 reporting categories of Scope 3 emissions, intended to provide companies with a systematic framework to measure, manage, and reduce emissions across a corporate value chain. As a financial institution, our primary concern regarding Scope 3 emissions lies in Category 15, known as "Investments" or "financed emissions." These emissions are linked to our investment, lending and underwriting activities. Stakeholders are increasingly interested in the transparency of these financed emissions. However, the value of this transparency depends on the quality of the information shared, and obtaining accurate data for calculating these emissions has been a significant challenge for financial institutions.

Due to the ongoing development of various methodological approaches and unreliable data quality, we have not calculated our Scope 3 financed emissions at this time. We continue to monitor the development of calculation methodologies as well as the evolution of regulatory guidance.

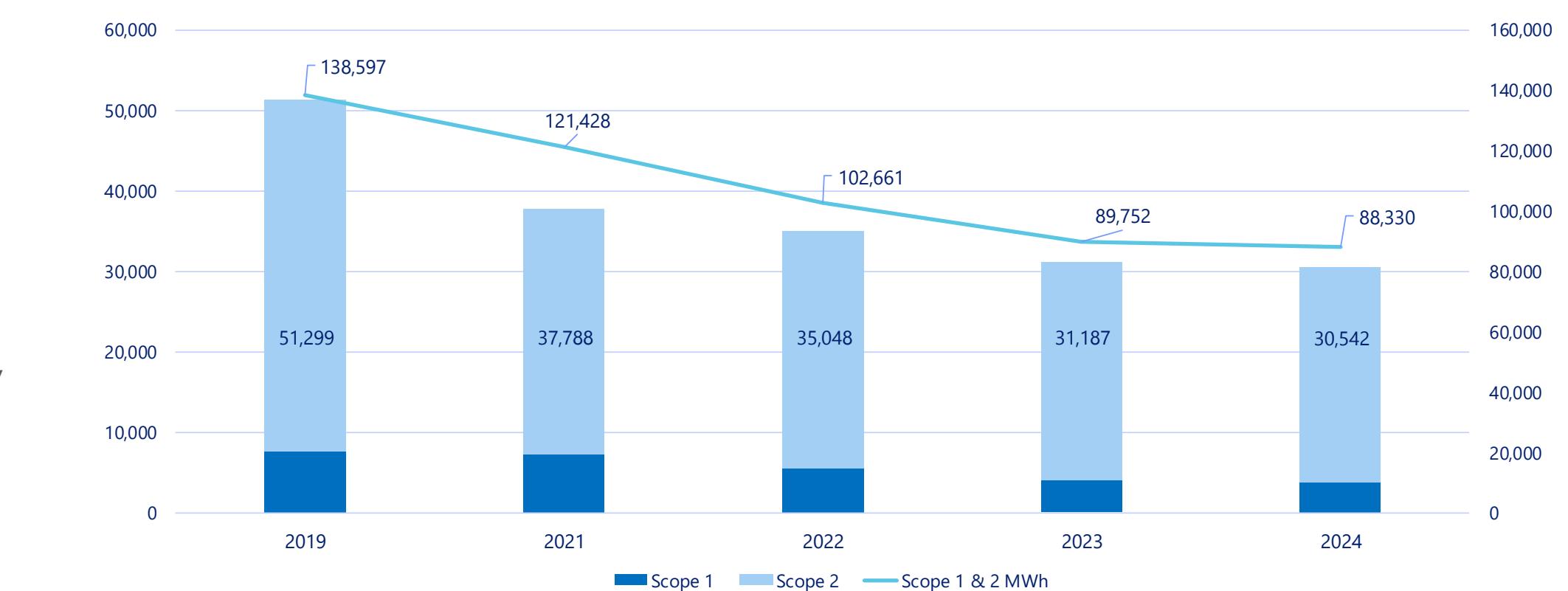
Emissions (MTCO₂e)

	YOY % CHANGE	BASELINE % CHANGE	2024	2023	2022	2021	BASELINE YEAR 2019
SCOPE 1	-9.6%	-51.6%	3,710	4,105	5,496	7,349	7,661
SCOPE 2	-0.9%	-38.5%	26,832	27,082	29,552	30,439	43,639
SCOPE 1 & 2	-2.1%	-40.5%	30,542	31,187	35,048	37,788	51,299

Usage (MWh)

	YOY % CHANGE	BASELINE % CHANGE	2024	2023	2022	2021	BASELINE YEAR 2019
SCOPE 1	-7.7%	-51.8%	18,931	20,501	28,034	38,490	39,306
SCOPE 2	0.2%	-30.1%	69,399	69,251	74,627	82,938	99,291
SCOPE 1 & 2	-1.6%	-36.3%	88,330	89,752	102,661	121,428	138,597

Scope 1 & 2 Emissions



Dark blue labels indicate total Scope 1 & 2 emissions (MTCO₂e), teal line indicates usage (MWh)
MWh: megawatt hour
MTCO₂e: Metric tons of carbon dioxide equivalent
Source: Engie using GHG protocol; location-based emissions



Climate-Related Risks and Opportunities

We believe that climate-related risks have the potential to impact multiple risk types over various time horizons. Following the Task Force on Climate Related Financial Disclosures (TCFD) recommendations, we identify climate-related risks as either physical or transition risks. Visit the [TCFD Knowledge Hub](#) for more information.

Physical Risks: Physical risks resulting from climate-related variability can be event driven (acute) or longer-term shifts (chronic) in climate patterns. **Acute physical risks** may have financial implications, such as direct damage to assets and indirect impacts from supply chain disruption. **Chronic physical risks** might impact financial performance through changes in water availability, sourcing and quality, food security, and extreme temperature changes affecting premises, operations, supply chain, transport needs and employee safety.

Transition Risks: Transitioning to a lower-carbon economy may entail extensive policy, legal, technology and market changes to address mitigation and adaptation requirements related to climate variability. Depending on the nature, speed and focus of these changes, transition risks may pose varying levels of financial and reputational risk to organizations.

Environmental Time Horizons

EXAMPLES OF RISKS	SHORT TERM 0-5 YEARS	MEDIUM TERM 5-10 YEARS	LONG TERM GREATER THAN 10 YEARS
	EXAMPLES OF OPPORTUNITIES		
Variability in governmental scrutiny and compliance costs associated with evolving climate-related policies.	Shifts in market demands related to the transition to a low-carbon economy.	Heightened physical impacts of climate-related variability, such as increased frequency and severity of extreme weather events and economic stability of our communities.	Financial products or services that meet the growing demand from consumers and businesses.
Financial products or services that meet the growing demand from consumers and businesses.	Financing renewable energy projects, supporting clients through the energy transition and leveraging technology to offer innovative solutions.	Sustainable finance and community resilience through strategic partnerships and investments.	

Fireflies in Gatlinburg, TN

Climate-Related Physical and Transition Risk

Climate risk is not a stand-alone risk but can manifest itself in different areas of our risk taxonomy. We have identified potential climate-related physical and transition risks across the various risk types listed in the chart below.

RISK TYPE	PHYSICAL RISKS	TRANSITION RISKS
REPUTATIONAL	Impact of stakeholder opinions based on the bank's climate commitments	Impact of stakeholder perception and opinions on progress toward climate commitments
STRATEGIC	Impact of inadequate planning or strategy regarding climate risk	Impact of policy changes and shifts in market demand
CREDIT	Impact on repayment capacity and collateral value as a result of climate impacts	Asset quality deterioration of clients within carbon-intensive industries resulting from climate change-related policy, legal or market impacts
MARKET	Devaluation of assets due to acute and chronic physical impacts	Elevated market dysfunction, shifts in demand and price volatility
OPERATIONAL	Impact of severe weather events on facilities, associates or vendors; resiliency of the bank's technology	Increase in operating costs to incorporate requirements for regulatory and legislative changes; change management associated with processes
COMPLIANCE	Noncompliance due to business and market disruptions from severe weather events	Increase in costs and impacts of meeting new climate-related regulation and guidance requirements
LEGAL	Potential client or associate harm from climate-related event claims	Increased time and costs allocated to efforts to support climate disclosures as well as climate-related litigation
LIQUIDITY	Impact on availability and accessibility of capital in markets for certain sectors and industries	Impact of climate-related events on economic activity, deposit trends and other funding capabilities

Climate-Related Risk and Opportunity Identification and Management

We conduct various portfolio analyses to identify and monitor potential physical and transition risk exposure. These assessments enable us to identify industries and geographies that are more susceptible to climate-related risks and provide insights into how these risks might affect our clients, profitability and credit portfolio. By maintaining a well-diversified portfolio, we effectively mitigate over-exposure to specific industries and geographies.

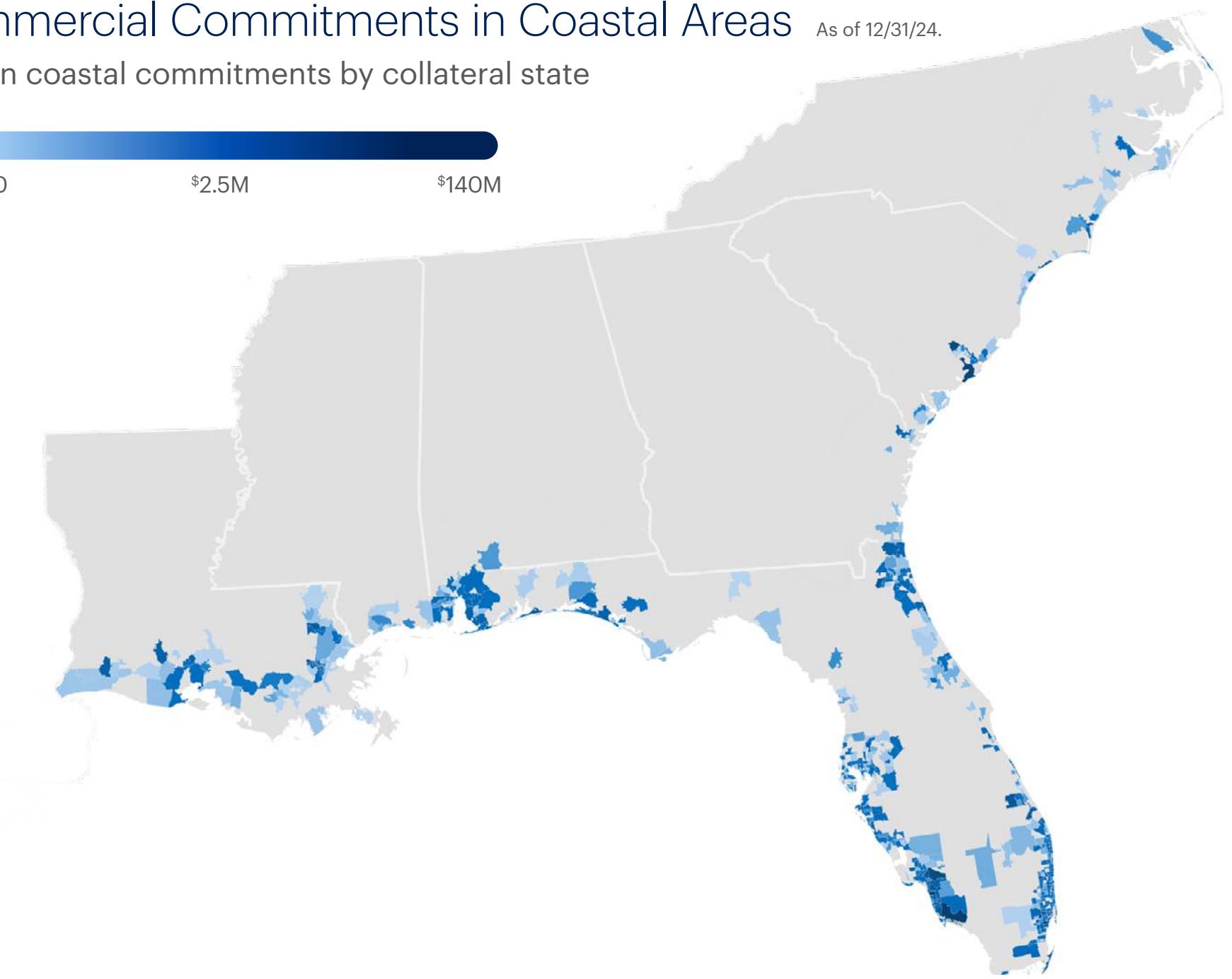
Physical Risks and Opportunities

We evaluate acute physical risk that is event-driven, including severe weather events, such as hurricanes, tornadoes, heat or cold waves, floods, and chronic physical risk associated with long-term events. We also look at the increase of development in event-prone areas.

Commercial Commitments in Coastal Areas

As of 12/31/24.

\$9.2B in coastal commitments by collateral state



Scenario Analysis

Climate scenario analysis can help organizations identify and assess the potential impacts of future climate conditions. Estimating the long-term effects of climate variations in the banking industry is challenging due to the inherent uncertainties and complexities associated with its impacts on financial institutions. Predicting and quantifying these risks can be difficult due to the long-term and unpredictable nature of climate variations, associated models and significant data gaps.

Starting with qualitative scenario narratives, we can begin to examine the potential range of climate-related impacts on our business. Applying a reasonable range of scenarios to potential risk exposures we can evaluate the impacts on our strategy and identify potential sensitivities. We continue to look for ways to enhance our analysis and assess the potential impacts of climate-related risks to our business.

Transition Risks and Opportunities

We have identified the portion of our loan portfolio that is most likely to be impacted by transition risks and opportunities related to a transition to a lower-carbon economy. For industry selection, we utilized the TCFD and SASB frameworks, as well as internal analysis, peer disclosures and advice from advisors.

INDUSTRY	% OF POTENTIAL COMMERCIAL EXPOSURE	RISK RATIONAL	OPPORTUNITY
Agriculture	0.28%	Agricultural production requires energy, either directly in the form of fossil fuels or electricity or indirectly through energy-intensive inputs such as fertilizer. Intensity of greenhouse gas (GHG) emissions vary depending on the agricultural product. Physical risks include a wide range of shocks and stresses such as floods, droughts, intense storms, untimely rain, hail, frost, variability in yields, shifts in average growing conditions and more.	Investment in alternative proteins, synthetic biology solutions, regenerative agriculture and new land use methods to improve yields and decrease the use of agrochemicals.
Automotive & Gas Stations	3.03%	Evidence suggests the share of electric vehicles entering the market will increase over the next several years, putting increased transition risk on traditional automotive and gas stations.	Opportunities exist for this industry to increase efficiency of internal combustion engine vehicles and convert a portion of production to electric vehicles. Other transition opportunities include hybrids, rideshare and autonomous driving.
Chemicals	1.05%	Chemical production produces substantial GHG emissions, and organic chemical manufacturing relies heavily on non-renewable carbon feedstocks. Physical risks such as floods, droughts, extreme temperatures and climate-related disruption in supply chains will continue to pose risks, including operational disruption and physical damage	The chemical sector is carbon intensive but is also an enabler of the low-carbon transition. The sector has significant opportunities to develop activities and products to reduce its carbon emissions, especially as it transitions to a circular economy* and develop lower-carbon feedstock via synthetic biological routes.
Oil & Gas	3.86%	Pressure to decarbonize in the Oil & Gas sector is expected to continue to build although the pace is likely to be uneven across different regions. The changes in policies, and associated uncertainties, lead some companies to de-prioritize decarbonization and create the need to catch up should these regulations tighten again.	The pace of transition is likely to be uneven and will take time. Companies have become focused on transition plans and developing a strategy for providing solutions by investing in clean-tech and renewable solutions.
Mining & Metals	0.61%	Declining demand for coal in power generation as well as investors withdrawing or limiting exposure to coal. This sector also requires large energy use in the manufacturing of product.	Lower carbon energy systems tend to be more metal-intensive and some companies in this sector could provide solutions in the energy transition.
Plastics	0.21%	Pressure to eliminate single-use plastic could put pressure on demand for plastic products and manufacturing. This sector currently uses a large amount of non-renewable carbon feedstocks and faces transition risk.	Those that find a way to materially participate in the circular economy* are likely to reduce reliance on single-use plastic and could outperform.
Transportation	3.32%	Pressure around air emissions and carbon regulation could add increased cost of capital and research and development. This sector has traditionally relied heavily on fossil fuels and could face stricter targets for emissions and fuel efficiency.	Opportunities exist to use new technologies to address lower-emissions standards and increased fuel-efficiency requirements, including transport vehicles (cars, ships, planes, rail) that run on a range of traditional and alternative fuels.
TOTAL	12.36%		

*For more information on the circular economy see page 30.

Community Sustainability

Woods Hole Oceanographic Institution (WHOI): Ocean Alkalinity Enhancement Research Accelerator

The Woods Hole Oceanographic Institution (WHOI), considered the world's leading ocean science institution, is uniquely equipped to deliver impactful scientific and engineering outcomes that help society leverage the full potential of ocean resources while addressing resource depletion and extreme weather risks. WHOI's initiatives are set to transform ocean exploration, with support from First Horizon to the Research Acceleration Fund. This strategic funding and support will foster research and discoveries that benefit society at large by unlocking new scientific trajectories and insights into global challenges, such as future climate conditions and food security.

The Research Acceleration Fund emphasizes nurturing the next generation of ocean scientists. By providing essential resources for emerging researchers, the fund enhances their capability to pursue innovative research avenues, secure future funding, and establish promising careers in ocean science.

WHOI offers critical, unbiased information to scientists, policymakers, and the public, fostering informed decision-making in marine resource management and industries. The Research Accelerator at WHOI aims to provide insights that inform proactive ocean and marine policy development, benefiting the ecological health of the oceans and the communities reliant upon them.

First Horizon Bank's investment specifically supports the Ocean Alkalinity Enhancement (OAE) Research Accelerator, which seeks to combat atmospheric carbon dioxide through innovative methods. The LOC-NESS Research Program assesses the environmental impacts of OAE off the U.S. Northeast coast, exploring its effects on marine communities. These critical efforts are poised to advance understanding and drive the preservation of vital ocean ecosystems in the face of shifting environmental conditions.

Blue Carbon Update

In 2024, the South Carolina Sea Grant made significant strides in education, inventorying needs and data acquisition and modeling for the blue carbon portal, building strong partnerships and gathering valuable research. Together, First Horizon, the East Tennessee State University (ETSU) Research

Corporation, and the South Carolina Sea Grant Consortium integrated the research and developments from the South Carolina Sea Grant into a larger Blue Carbon Cost Tool being developed by The Nature Conservancy – Global Climate & Ocean Program. The dedicated research team worked diligently to incorporate data from Florida and Puerto Rico coastal wetland areas into this tool.

Shelby Farms Park Conservancy

First Horizon has been an ongoing supporter of Shelby Farms Park Conservancy. Shelby Farms Park is one of the largest urban parks in America and serves as a vital green space for recreation, conservation, and education in the heart of Memphis. This partnership is a continued demonstration of the bank's dedication to creating positive impacts by investing in spaces that offer recreational opportunities and contribute to the ecological health of the region. Through our partnership, First Horizon has contributed both financial resources and volunteer efforts to enhance the park's facilities, programs, and overall accessibility, ensuring that it remains a treasured asset for generations to come.

Max McGraw Wildlife Foundation

We also support the Max McGraw Wildlife Foundation, an organization dedicated to advancing conservation through research, education, and advocacy. By partnering with the foundation, First Horizon demonstrates its commitment to environmental sustainability and the preservation of wildlife habitats. This collaboration helps facilitate the foundation's various programs that focus on the coexistence of human activities and wildlife conservation. Through financial contributions and active engagement, we aid in the foundation's mission to better understand wildlife ecology and to promote sustainable use of natural resources.

The support from First Horizon also extends to fostering educational initiatives conducted by the Max McGraw Wildlife Foundation. These initiatives seek to inform and inspire future generations about the importance of wildlife conservation and the role of ecosystems in maintaining environmental health. By investing in educational outreach and research, First Horizon helps the foundation cultivate a deeper public appreciation for conservation efforts and develop innovative solutions to pressing environmental challenges. This partnership underscores our broader commitment to community enrichment and environmental stewardship, ensuring a balance between human development and ecological integrity.



Rebuilding and Restoring our Communities

In 2024, First Horizon demonstrated a steadfast commitment to disaster relief efforts, addressing the challenges posed by natural disasters with compassion and resilience. Following severe weather events, including hurricanes and significant flooding, the company promptly mobilized resources to support affected associates, clients and the broader communities.

Providing essential supplies, critical services and financial support, the company collaborated with various organizations, including local authorities, non-profits, and community groups, along the support of our associates, to bring immediate help to those devastated by the storms.

In addition, we offered tailored solutions for individuals and businesses, such as loan deferments and flexible payment options, to provide financial relief and ease the immediate financial burden on affected communities.

Through these coordinated efforts, we reinforced our role as a trusted bank of choice and community partner, dedicated to helping our associates and clients during times of need and working alongside our communities to recover and rebuild stronger than before. Our disaster relief initiatives in 2024 highlighted not only the company's commitment to corporate responsibility but also its ability to drive positive change and resilience in the face of challenges.

Governance and Ethics

Our governance and ethics strategy is rooted in a commitment to transparency, integrity and accountability, ensuring that every decision we make aligns with our core values and stakeholder expectations. By fostering a culture of ethical leadership and robust governance, we aim to build trust and drive sustainable success across our organization and the communities we serve.

In This Section

- 36 Board Composition and Governance
- 37 Board and Management Oversight
- 39 Responsible Risk Management
- 40 Policies and Statements
- 42 Awards and Recognition



Board Composition and Governance

Board Composition and Governance as of 12/31/2024

PRACTICE	FIRST HORIZON
Number of directors	13
Independence % of directors	92% (12 of 13)
Independence on key* board committees	100%
Is there majority voting for directors (in uncontested elections)?	Yes
Must director tender resignation if fails to receive majority vote?	Yes
Average director age	65 years
Average director tenure	9 years
Board refreshment	7 new directors in the past 5 years
Does the company disclose a director skills matrix?	Yes
Are CEO and Chairman of the Board separate?	No
Is the Chairman of the Board independent?	No
Is there an independent Lead Director?	Yes
Director terms	One year
Does the company disclose stock ownership guidelines for directors?	Yes
Mandatory retirement age**	72, for non-employee directors
Retirement age waivers	Board may waive each year for up to 3 additional terms
Resignation tender if director has major job change (other than promotion)?	Yes
Directors on more than two other public company boards	None
Annual board and committee self-evaluations?	Yes
Annual individual director evaluations?	Yes
Third party engaged to conduct Board and director evaluations?	Yes; every 3 years or as determined by the Nominating & Corporate Governance committee
Incumbent director attendance at Board and committee meetings in 2024	Average attendance > 96%
Total Board meetings held in 2024	4
Total Board committee meetings held in 2024	45
Do directors meet in executive session without management?	Yes, generally at each regular Board meeting
Anti-hedging policy for directors and executives?	Yes
Code of Business Conduct and Ethics?	Yes
Code of Ethics for Senior Financial Officers?	Yes
Compliance and Ethics Program Policy?	Yes
Board oversight of cybersecurity?	Yes, by Risk Committee
Audit committee financial experts?	3 on Audit Committee

* Key board committees are Audit, Compensation, and Nominating and Corporate Governance.

** Under the provisions of our merger agreement with IBERIABANK Corporation, the mandatory retirement provisions did not apply to directors Compton, Davidson, Jordan, Kemp, Maples, Palmer, Reed, Stewart or Taylor from the closing date of the merger (July 1, 2020) until the third anniversary of the merger (July 1, 2023).

Board Experience and Qualifications

DIRECTOR SKILLS AND CHARACTERISTICS	# OF DIRECTORS
CEO/PRESIDENT Experience as CEO, President or similar position at a firm or major operating division.	9
FINANCE/ACCOUNTING Audit company financial expert, CFO or experience (including oversight experience) in accounting or financial planning and analysis.	9
BANKING/FINANCIAL SERVICES INDUSTRY Executive experience in banking, investment banking, broker-dealer or insurance.	5
STRATEGIC PLANNING/LEADERSHIP Experience defining the strategic direction of a business or organization; service in a significant leadership position.	13
PUBLIC COMPANY Experience as a public company director or executive officer.	12
INFORMATION TECHNOLOGY/CYBERSECURITY Experience implementing information technology and cybersecurity systems or managing a business in which such systems play a significant role.	8
DIGITAL INNOVATION/FINTECH Experience in the use of technology to facilitate business operations and customer service.	8
ENVIRONMENTAL MATTERS Experience understanding, evaluating and managing environmental risks and opportunities.	6
HUMAN CAPITAL MANAGEMENT Experience in workforce management, compensation, and opportunity efforts, culture, succession planning and talent management.	12
RISK MANAGEMENT Experience with understanding and managing risk in a large organization.	12
LEGAL/REGULATORY/ETHICS/COMPLIANCE MATTERS Experience (including oversight experience) managing legal, regulatory, ethical and compliance risks and obligations.	10
MARKETING/RETAIL DISTRIBUTION Experience in building and maintaining customer relationships.	11

Executive Compensation

The Compensation Committee independently determines the CEO's salary and bonus during an executive session, generally annually, based on the CEO's performance results from the previous year and peer CEO salary data from both management and independent compensation consultants. While the CEO participates in setting his personal performance plan, he does not participate in deciding his own salary.

For other executive officers and members of the CEO's executive management committee, the CEO recommends salary levels to the Committee (and in the cases of the Chief Audit Executive, Chief Risk Officer, and Credit Assurance Services Director, other Board committees review and approve their compensation as well). These recommendations may include a short list of alternatives or single-item suggestions, which are developed with the help of consultants for advice and peer comparison data. Management provides various presentations and analyses to help the Committee make compensation decisions throughout the year. The Committee's independent consultant reviews all major proposals and advises the Committee. For more information on executive compensation see [2025 proxy statement](#).

Board and Management Oversight

We believe a solid governance structure is critical to managing corporate responsibility related risks and opportunities. We have established disciplined and transparent governance and continue to educate and engage the Board on this topic. The charts below lay out our governance structure:

Board Oversight

Board of Directors

Oversees the Company's management of corporate responsibility matters.

Nominating and Corporate Governance Committee

Formally charged with oversight of the management of corporate responsibility and climate-related matters.

Risk Committee

Assist the Board in its oversight of risk management, which includes climate-related and reputational risks, business resilience and our risk appetite statement.

Management Oversight

Management Risk Committee

Reviews and approves First Horizon's Enterprise Risk Management framework which identifies a variety of risks, including climate-related issues and other sustainability factors.

Sustainability Leadership Team

Develops and executes sustainability strategy, including climate-related matters.

Strategic Working Groups

Corporate Responsibility Working Group

Cross-segment team that informs overall sustainability strategy and goal setting; meets quarterly to help verify we are considering all risks and opportunities related to these matters.

Task Forces

Acts as a support and advisory body to oversee the implementation of First Horizon's strategy around sustainability and governance topics to discuss risks and opportunities and operationalize the strategy.

Environmental Task Force

Ensures successful implementation of environmental efforts, operationalizes ideas and focus areas, and identifies areas of additional opportunity.

Social Task Force

Brings together key leaders from CRA, HR, Sustainability, Community Relations and Foundations to confirm alignment on focus areas and priorities.

Disclosure Task Force

Provides monthly check-in with legal, financial reporting, risk, investor relations and sustainability to discuss disclosure, regulatory updates and other important matters.

Reputational Task Force

Cross functional leadership team that monitors changing operating conditions and identifies and develops plans to mitigate potential reputational risks.

The Board & Its Committees

In accordance with its Bylaws, the Company is managed under the direction of, and all corporate powers are exercised by or under the authority of, its Board of Directors. The Board has six standing committees: the Audit Committee, the Compensation Committee, the Executive Committee, the Information Technology Committee, the Nominating and Corporate Governance committee and the Risk Committee. The charter of each of these six standing committees is currently available on our website.

Audit Committee

The Audit Committee (1) assists the Board of Directors in its oversight of (a) the Company's accounting and financial reporting principles and policies and internal controls and procedures, (b) the integrity of the Company's financial statements, (c) the Company's compliance with legal and regulatory requirements, (d) the independent auditor's qualifications and independence, and (e) the performance of the independent auditor and Company's internal audit function; and (2) prepares the report to be included in the Company's annual proxy statement pursuant to the proxy rules of the Securities and Exchange Commission. The Committee is also responsible for ensuring appropriate disclosures and coordinating with the Company's Independent Auditor and Internal Auditor. The Audit Committee receives reports from the Chief Audit Executive regarding risk governance, risk assessment and risk management, the adequacy of the Company's policies and compliance with legal and regulatory requirements. These include reports from the IT Audit area on the Company's information security, including risk assessment and planning relating to cybersecurity, network security and physical security. The Audit Committee also reviews associate complaints or material reports or inquiries received from regulators or government agencies and management's responses; meets periodically with the Company's Chief Risk Officer to discuss any risk and compliance matters that may have a material effect on the Company's financial statements or internal controls; discusses any significant compliance issues raised in reports or inquiries received from

regulators or government agencies; reviews periodic reports regarding the effectiveness of the Compliance and Ethics Program; and discusses with the General Counsel pending and threatened claims that may have a material impact on the financial statements.

Compensation Committee

The purposes of the Compensation Committee are, among other things, (1) to discharge the Board's responsibilities relating to the compensation of executive officers, including the CEO and the other members of the CEO's Executive Management Committee, or EMC, (2) to produce an annual report on executive compensation for inclusion in the Company's proxy statement, in accordance with the rules and regulations of the Securities and Exchange Commission, (3) to identify and recommend to the Board individuals for appointment as officers, and (4) to evaluate the executive officers, including the CEO and the other EMC members. The Compensation Committee is responsible for compensation-related risks. The charter of the Committee requires the Committee to oversee our compliance with all applicable laws and regulations relating to (i) appropriate management of the risks associated with incentive compensation programs or arrangements or (ii) public, regulatory, or other reporting associated with such risks, programs or arrangements.

Executive Committee

The Executive Committee is authorized to exercise, from time to time during intervals between the meetings of the Board of Directors, all authority of the Board of Directors, except as otherwise provided in the Executive Committee Charter. The Committee's responsibilities include, but are not limited to, oversight of the Company's stock repurchase program; approval of the opening of banking centers; review of management reports on business operations; review and approval of acquisitions and divestitures except as otherwise noted in the Committee's Charter.

Information Technology Committee

The Information Technology Committee assists management in understanding information technology trends, developing and maintaining an information technology strategy, and managing major information technology investments and assists the Board in overseeing information technology matters.

Nominating & Corporate Governance Committee

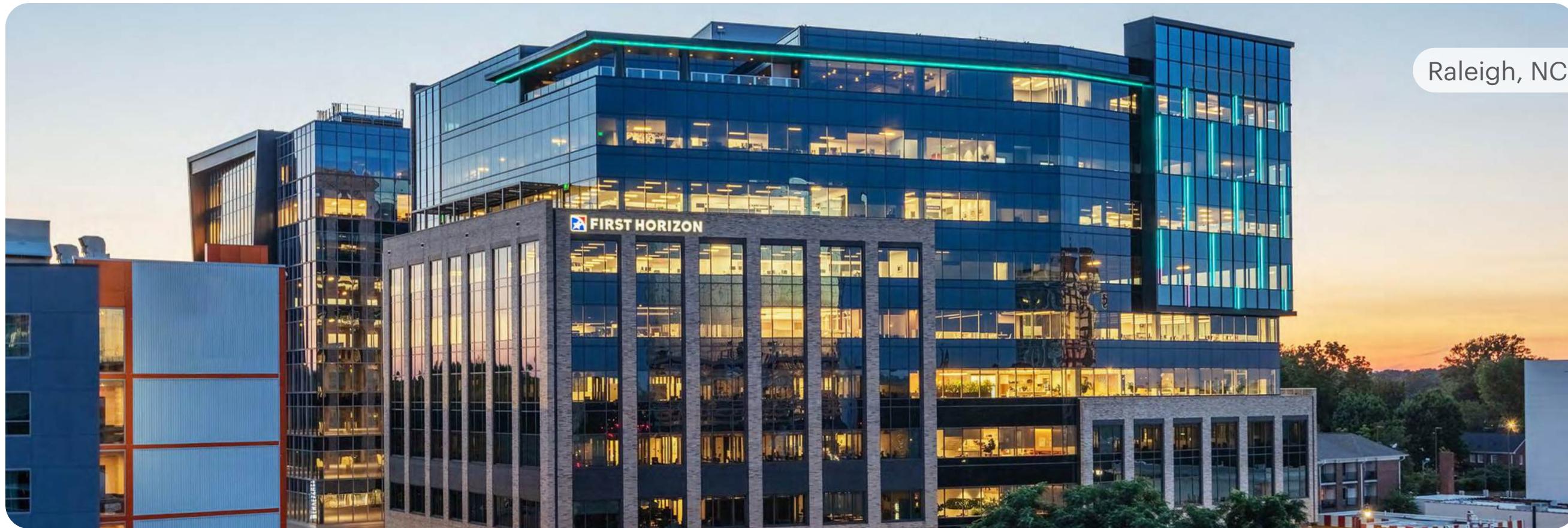
The Nominating & Corporate Governance Committee assists in identifying and recommending director candidates, developing and recommending to the Board a set of corporate governance principles applicable to the Company and overseeing the evaluation of the Board and management. The Nominating & Corporate Governance Committee is also responsible for overseeing risks relating to the Company's governance structure and Board succession, as well as those relating to the Company's management of, and commitment to, corporate responsibility matters and reporting.

Risk Committee

The Risk Committee has, as its sole and exclusive function, responsibility for the risk management policies of the Company's global operations and oversight of the operation of the Company's global risk management framework. The Committee's charter authorizes and directs it to assist the Board in its oversight of (i) the establishment and operation of the Company's enterprise risk management framework, including policies and procedures establishing risk management governance, risk management procedures, risk control infrastructure, and processes and systems for implementing and monitoring compliance with the framework with respect to the management of reputational, strategic, credit, market, operational, compliance, legal, liquidity, and capital adequacy risks, including emerging risks, (ii) the adoption, implementation and periodic review of significant risk management and compliance policies and (iii) the Company's risk appetite statement.



Nashville, TN



Responsible Risk Management

First Horizon's operating philosophy is safety and soundness, profitability, and growth, in that order.

The Company's Risk Management organization (Risk Management Group) provides objective oversight of risk. The Risk Management Group translates the Company's overall risk appetite into approved limits, oversees the development of framework and formal policies and approvals that govern risk-taking activities, assesses risks and issues independent of the first line of defense, and has responsibility for risk aggregation and reporting across the enterprise.

The Company's Risk Appetite Statement articulates our view towards risk-taking to ensure stability and profitability, protecting stakeholders' interests. This statement provides a common framework and comparable measures for the Board of Directors and executive management to communicate, understand and assess the level of risk they are willing to accept.

Our Strategic Plan and Risk Appetite Statement are aligned and include an approach to risk and reward that is consistent with ensuring appropriate financial strength and operational resilience over the long-term. Our strategy enables us to deliver on our purpose, attract and retain our clients, and drive strong financial performance. Keeping the client experience at the center of our decisions is critical. We are well-positioned to protect profitability, accelerate transformation, and elevate people and our communities while further enhancing our risk programs and infrastructure to handle the scale and regulatory expectations of a company approaching the Large Financial Institution (LFI) requirements threshold.

Risk Management Role

The Risk Management Group proactively works with business units, senior management and functional experts to establish appropriate standards, monitor business practices in relation to those standards and ensure that management continuously focuses on key risks in the Company's business and emerging trends that may change the Company's risk profile.

The Management Risk Committee (MRC) is the management committee responsible for overseeing the Company's adherence to the risk management policies and procedures governing its operations. The MRC is a forum for reviewing the activities of supporting committees that manage and oversee specifically identified areas of potential risk and for addressing any other risks separately identified by the MRC. The MRC reviews and the Board Risk Committee approves, First Horizon's Enterprise Risk Management framework which identifies a variety of risks.

The Corporate Responsibility Working Group, which meets quarterly, includes representatives from various functional areas of the Company to help ensure we consider all risks and opportunities.

Approach to Risk Management

Our three lines of defense model effectively manages risk across the enterprise. It clearly delineates roles and responsibilities and provides clarity and transparency in risk ownership and risk monitoring oversight.

FIRST LINE OF DEFENSE

The Company's lines of business and business units are the primary risk-takers and are responsible for identifying, assessing, monitoring, mitigating, and managing risks associated with their business activities. They determine and execute their strategies, which position them closest to the changing nature of risks and therefore put them in the best position to manage, closely monitor, and mitigate those risks.

SECOND LINE OF DEFENSE

The Company's Risk Management Group provides objective oversight of risk-taking activities. The members of this group translate the Company's overall risk appetite into approved limits, oversee the development of frameworks, policies and approvals that govern risk-taking activities, assess risks and issues independent of the first line of defense, and are responsible for risk aggregation and reporting across the enterprise.

THIRD LINE OF DEFENSE

Internal Audit and Credit Assurance Services provide independent and objective assessment of the design and execution of the Company's internal control system, including management systems, risk governance, and policies and procedures.

Compliance Overview

First Horizon operates a comprehensive, effective and efficient Compliance Risk Management Program (CRMP). The Board of Directors is ultimately responsible for the Company's CRMP, including its effective implementation by management and the Chief Compliance Officer. The program performance is overseen by the Compliance Risk Committee with final reporting to the Management Risk Committee and Board Risk Committee. The CRMP is designed to facilitate a strong compliance culture to protect the Company, its associates, Board of Directors and shareholders from significant regulatory and reputational risk while ensuring our clients are provided with exceptional service and protected from harm.

The objectives of the Company's Compliance Management Program are to:

- Provide compliance oversight and a monitoring framework to help detect, mitigate and, as appropriate, remediate compliance risks and issues
- Ensure that regulatory requirements are incorporated into business processes, as appropriate, and that line of business management and associates understand their responsibility to meet these requirements
- Verify that the bank's products and services are designed, offered and administered on terms consistent with applicable regulatory requirements
- Provide an effective and efficient framework to disseminate information throughout the organization and respond to regulatory changes in a timely manner
- Reduce regulatory risk through the promotion of a strong compliance culture and continued high-quality client service
- Develop and maintain a sound compliance risk management system that is integrated into the overall framework for product design, delivery and administration (i.e., throughout the entire life cycle of the product or service)

Policies & Statements

Anti-Bribery & Anti-Corruption Statement

Our ethical business policies prohibit our associates from making or accepting any improper payments. We operate in compliance with all applicable regulations and laws, including the U.S. Foreign Corrupt Practices Act and similar laws. We have a board-approved Prohibited Receipts and Payments Policy that states that no officer, director, associate, agent or attorney of First Horizon Corporation, First Horizon Bank or any of their direct or indirect subsidiaries shall corruptly solicit, demand, accept or agree to accept anything of value (excluding compensation and expenses paid in the usual course of business) for himself or herself or a third party, intending to be influenced or rewarded in connection with any transaction or business of First Horizon. The policy also provides that no officer, director, associate or agent of First Horizon shall directly or indirectly give or offer a bribe, kickback or similar payment or consideration to any person or entity for any reason.

Bank Secrecy Act (BSA)/Anti-Money Laundering (AML)/Office of Foreign Assets Control (OFAC)

First Horizon is dedicated to being a trusted financial institution and combating money laundering. We diligently work to provide responsible, ethical banking services and verify our clients' identities to prevent any misuse of our bank. All associates are required to complete an annual BSA/AML/OFAC training. Board members also receive annual BSA/AML/OFAC training. In addition, targeted training is provided covering Fraud and Security Awareness and Commercial Loan Fraud.

The purpose of our board-approved BSA Policy and Program (which also covers AML and OFAC) is to ensure First Horizon's compliance with the related regulations through its BSA/AML/OFAC Compliance Program. The policy and program establish steps that must be taken to meet the requirements of the regulations. Key processes addressed include collecting and verifying the identity of clients for the Customer Identification Program (CIP), identifying beneficial owners of entities, establishing processes for the monitoring, identification and reporting of suspicious activity and performing initial and ongoing OFAC sanctions screenings on all clients. The Chief Compliance Officer and the Enterprise Bank Secrecy Act Compliance Officer, in conjunction with the Compliance

Risk Committee, formulate the BSA Policy and Program and recommend changes as appropriate. The Policy and Program are reviewed at least annually, and any recommended changes are approved by the Board.

Code of Business Conduct & Ethics

The board-adopted Code of Business Conduct and Ethics outlines the overarching principles that guide the conduct of our business. Among other topics, the code covers conflicts of interest, confidentiality, insider trading, political activities and associate matters. Our Code of Business Conduct and Ethics applies to all associates, officers and directors of First Horizon and its subsidiaries and, in certain cases, to its agents and representatives as well. First Horizon has also adopted a Code of Business Conduct and Ethics for Senior Financial Officers, a Compliance and Ethics Program Policy and many other policies with specific guidance on ethical matters. Our human resources, legal, compliance and corporate security teams work together to oversee the handling of hotline submissions, Electronic Incident Reports and annual training on matters relating to these ethics codes and policies. Associates can anonymously report unethical or illegal activity in the workplace via the Ethics Hotline at 800-217-3031.

Code of Business Conduct for Suppliers

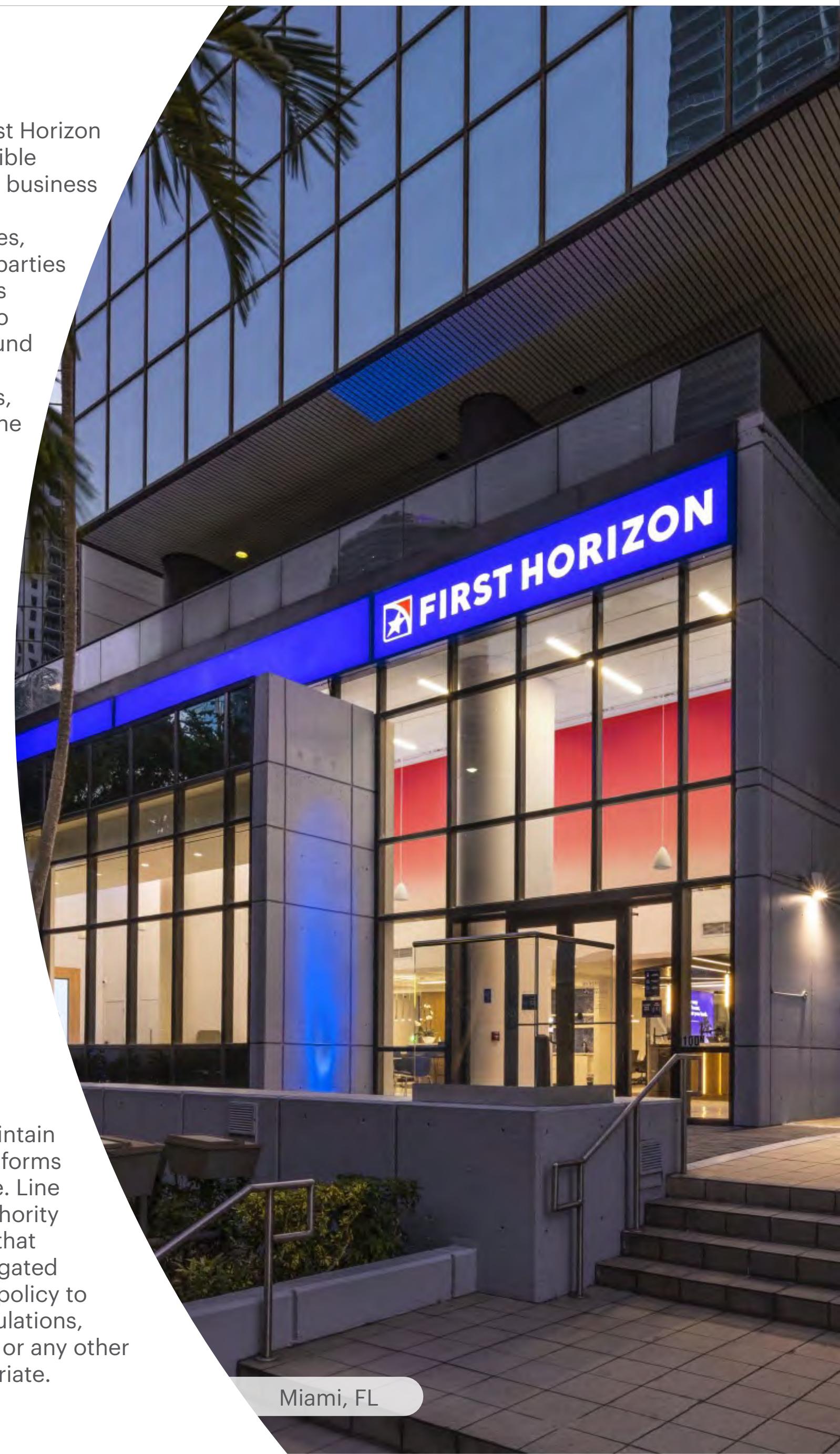
First Horizon seeks to outperform competition fairly and has a legacy of succeeding with honest business practices and superior performance. Consistent with the First Horizon Code of Business Conduct and Ethics that sets the basic standards for associate conduct, we have adopted a Code of Business Conduct for Suppliers that establishes our expectations for our suppliers (i.e., third parties that provide goods or services to First Horizon). The Code of Business Conduct for Suppliers defines our expectations for suppliers related to conducting their business legally and ethically and covers topics such as bribery, confidentiality, fair dealing, human rights, non-discrimination and harassment, recordkeeping and reporting.

Fair and Responsible Banking and Marketing

The Company's Fair and Responsible Banking policy covers Fair Lending, marketing and UDAAP (Unfair, Deceptive, or Abusive Acts or Practices) to create a consistent and

common focus on treating all clients fairly. First Horizon ensures that the principles of fair and responsible banking are incorporated into its overall client business strategy. Fair Lending and UDAAP are integral parts of the Company's policies and procedures, marketing efforts and relationships with third parties involved in banking processes. The Company's management believes that this commitment to fair and responsible banking is a good and sound business practice that allows the Company to serve a wide range of clients and communities, which is essential to the economic vitality of the Company and the communities it serves. To fulfill its commitment to fair and responsible banking, the Company has empowered and requires each of its officers, associates and agents to use their best personal and professional efforts and resources to always offer products and services that meet the needs of all clients and communities on a fair and equitable basis. The Company will not tolerate noncompliance by any of its officers, associates or agents in serving its clients and potential clients. Internal controls, system automation and monitoring by the three lines of defense are in place to ensure compliance.

The Chief Compliance Officer in conjunction with the Compliance Risk Committee is responsible for maintaining a Fair Lending Compliance Program overseen by the Fair Lending Officer that provides for a system of internal controls to ensure ongoing compliance, monitoring and training for appropriate personnel. Each Line of Business, including marketing, is responsible for conducting transactions in compliance with the Fair Lending Laws and regulations. Line of Business Management will implement and maintain appropriate compliance procedures, training, forms and monitoring systems to ensure compliance. Line of Business Management may delegate its authority to appropriate company officers' to carry out that responsibility. The Board of Directors has delegated authority to the Risk Committee to revise this policy to address changes in Fair Lending laws and regulations, internal reorganization affecting the company or any other reason the Risk Committee may deem appropriate.



Miami, FL



Knoxville, TN

Political Involvement

Our Code of Business Conduct and Ethics includes the following statement on political matters: The Company is subject to certain limitations and/or prohibitions under federal and state law concerning political contributions and political activities. In addition, the Company is allowed to engage with federal, state and local officials, but may be required to register as a lobbyist when doing so, and there are restrictions on the gifts that company associates may give to government officials. Because applicable federal and state laws and regulations in this area are quite technical, company directors, officers and associates should seek the guidance of the Company's General Counsel before engaging in any political activities that involve the Company.

Certain associates may also be solicited for contributions to the First Horizon Political Action Committee (PAC). All contributions are voluntary. In general, directors, officers and associates of the Company may voluntarily engage in personal political activities as long as they do so on their own time and without Company resources. However, certain directors, officers and associates are subject to restrictions on their personal political activities under federal and state law or under Company policies and procedures. These individuals must comply with the policies and procedures adopted by their respective business lines concerning personal political activities. The Company notifies associates who are subject to these restrictions.

Human Rights Statement

First Horizon respects individual human rights and is committed to operating our Company in an environment where everyone is treated with dignity. While we believe our government and policymakers are primarily responsible for the laws and regulations that enable the preservation and protection of human rights, our Company values and business practices support our belief that all people should be treated fairly and with respect.

We are firmly committed to non-discrimination and equal access for our associates, clients and suppliers. First Horizon's Code of Business Conduct and Ethics outlines the principles that guide the conduct of every aspect of our business. Our Code of Business Conduct and Ethics applies to all associates, officers and directors of the First Horizon and its subsidiaries and, in certain cases, to our agents and representatives.

Our Commitment

Everyone will be treated without discrimination or harassment based on race, color, religion, sex, sexual orientation, gender identity, national origin, age, veteran status or disability. First Horizon and our subsidiaries are also committed to a position of lending fairness and to making available meaningful services to all of our clients and communities on a fair and equitable basis.

Any associate who engages in unlawful activities or violates First Horizon's Code of Business Conduct and Ethics or any of the Company's policies is subject to disciplinary action, including dismissal.

First Horizon honors our commitment to human rights by:

- Conducting our business in a manner that is consistent with the fundamental human rights principles described in the United Nations Universal Declaration of Human Rights.
- Requiring all associates to complete Code of Business Conduct and Ethics training upon hire, and annually thereafter, and to certify upon completing each training session that they have read, and that they understand, the Code.
- Instituting a Corporate Responsibility working group to help us build stronger communities and guide our responsible business practices. The Corporate Responsibility Working Group meets quarterly to review, recommend and report to the Executive Management Committee and the Board of Directors on corporate responsibility business and reputation topics.
- Protecting the privacy of client information. All associates, even after leaving the company, must comply with the policies described in our Privacy Policy.
- Establishing multiple ways for associates and clients to raise concerns, ask questions, and report potential policy violations or unethical or suspicious behaviors with confidence and without fear of retaliation.
- Operating our business in accordance with all applicable lending, labor, safety, health, anti-discrimination, and other workplace regulations and laws.
- Adopting a Code of Business Conduct for Suppliers that establishes our expectations for our suppliers (i.e., third parties that provide goods or services to First Horizon), consistent with the First Horizon Code of Business Conduct and Ethics that sets the basic standards for associate conduct.

Other Corporate Governance Documents

Our Board has adopted the following key corporate governance documents. These are available, along with several other governance documents on our website.

Corporate Governance Guidelines provide our directors with guidance as to their legal responsibilities, promote the functioning of the Board and its committees, and establish a common set of expectations as to how the Board should perform its functions.

Code of Ethics for Senior Financial Officers promotes honest and ethical conduct, proper disclosure of financial information and compliance with applicable governmental laws, rules and regulations by our senior financial officers and other associates who have financial responsibilities.

Awards and Recognition

First Horizon strives to strengthen the lives of our associates, clients and communities. We are honored to be recognized for our efforts to provide a best-in-class workplace and support our clients and communities in extraordinary ways.

- ABF Journal: Top Women in Asset-Based Lending (Tamika Morris)
- American Banker Most Powerful Women in Banking (Hope Dmuchowski)
- American Banker Most Powerful Women in Banking (Tammy LoCascio)
- American Banker Most Powerful Women in Banking: Next (Natalie Flanders)
- American Banker Most Powerful Women in Banking: Team
- American Legion Post 2 (Knoxville) Lester Speeks Awards for Services to the Veteran and Military Community
- AVA Digital Award: Website redesign (platinum)
- AVA Digital Award: Podcast (gold)
- Big Brothers Big Sisters of the Central Gulf Coast: Big of the Year (Virginia Knight)
- Business Alabama: Rising Stars (Ken Brown)
- Cape Coral Breeze: Best Bank
- Chattanooga Times Free Press: Best of the Best - Bank
- CityView Magazine: Best Banking – Personal
- CityView Magazine: Best Banking – Commercial
- Commercial Appeal: Top Workplaces
- Communicator Awards: Individual Episodes – Finance
- Dave Thomas Foundation for Adoption's Top 100 Most Adoption-Friendly Workplaces
- Financial Brand: Top 100 Banks Using Social Media
- Financial Management Association: Outstanding Financial Executive (Tracy Bell)
- Forbes Magazine: America's Best Employers for Women
- Forbes Magazine: America's Best-In-State Banks (AL)
- Forbes Magazine: America's Best-In-State Banks (TN)
- Forbes Magazine: America's Best-In State Employers (TN)
- Forbes Magazine: Best Employers for New Grads
- Forbes Premier: America's Dream Employers
- Fortune Magazine: Fortune 1000 List
- Gartner Digital IQ Index (Gifted ranking, #1 in Regional banks)
- GOBanking Rates: Best Money Market Accounts (Virtual Bank)
- GOBanking Rates: Best Southwest Regional Banks
- Great Place to Work certified
- Greenwich Coalition (19 awards)
- Hendersonville Standard: Sumner County Main Street Awards-Best Bank
- Junior Achievement of South Florida: Volunteer Organization of the Year
- Junior Achievement USA: President's Volunteer Service Award
- Knoxville News Sentinel: Best Bank
- Knoxville News Sentinel: Top Workplaces
- Leadership Memphis: Change Maker (Bryan Jordan)
- Leadership Memphis: Kate Gooch Leadership Award (Vernon Stafford)
- Memphis Business Journal: HR Impact (Jaime Dunn)
- Memphis Business Journal: Super Women in Business (Erin Pryor)
- Memphis Business Journal: Best Places to Work
- Memphis Business Journal: Women Who Lead-General Business (Susan Springfield)
- Memphis Business Journal: Women Who Lead-Finance & Investment (Keva Latham)
- Memphis Flyer: Best of Memphis – Best Local Bank or Credit Union (2nd Place)
- Mobile Bay Magazine: 40 Under 40 (Sarah Kitsos)
- Nashville Post: In Charge-Finance (Carol Yochem)
- New Orleans CityBusiness: Money Makers (Tim Finn)
- New Orleans Police and Justice Foundation: Corporate Responsibility Award
- Newport Plain Talk: Best Bank Executive (Trevor Cates)
- Newsweek: America's Most Responsible Companies
- Ponte Vedra Recorder: Best Bank
- Ponte Vedra Recorder: Best Boss (Felicia Cox)
- Ponte Vedra Recorder: Best Lender (James Sole)
- Rutherford Cable: Partner of the Year
- SHRM Memphis: James House Williamson HR Excellence Award (Dr. Mario Brown)
- SHRM Memphis: HR Professional Excellence Award (Carla Willard)
- Summit International Awards - Marketing Effectiveness: Financial Marketing (platinum)
- Summit International Awards – Creative: Product/service (bronze)
- Telly Awards: Non-broadcast, General-Social Issues (Narrative & Scripted-Bronze)
- Telly Awards: Non-broadcast, General-Social Issues (Workplace Culture-Bronze)
- Tennessee Center for Performance Excellence (TNCPE): 2024 Commitment Award
- The Financial Technology Report: Top 25 WealthTech Companies
- The Tennessean: Top Workplaces
- This is Alabama: Women Who Shape the State (Tracy Bell)
- Time Magazine: America's Best Mid-Size Companies
- Time Magazine: World's Best Companies
- Training APEX Award: Top 125
- Triangle Business Journal: Corporate Leadership (Laua Bunn)
- VETS Indexes Recognized Employer
- Webex Customer Award: Webex Luminary (Jason O'Dell)
- Women We Admire: Top 50 Women Chief Investment Officers for 2024 (Tracy Bell)



SASB Index

COMMERCIAL BANK TOPIC	SASB ID	ACCOUNTING METRIC	2024 DATA	2023 DATA
DATA SECURITY	FN-CB-230A.1	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of account holders affected	Not disclosed	Not disclosed
	FN-CB-230A.2	Description of approach to identifying and addressing data security risks	See client protection section on page 14	See client protection section on page 25
FINANCIAL INCLUSION & CAPACITY BUILDING	FN-CB-240A.1	(1) Number and (2) amount of loans outstanding qualified to programs designed to promote small business and community development	1. 103 loans 2. \$328M community development loans	1. 90 loans 2. \$355M community development loans
	FN-CB-240A.2	(1) Number and (2) amount of past due and non-accrual loans qualified to programs designed to promote small business and community development	Not Disclosed	Not Disclosed
	FN-CB-240A.3	Number of no-cost retail checking accounts provided to previously unbanked or underbanked clients	Low-cost: Access Checking: 2,431 accounts The fee for this account is a flat monthly amount, with no fees charged for overdrafts Access Checking: \$5	Low-cost: Access Checking: 2,425 accounts The fee for this account is a flat monthly amount, with no fees charged for overdrafts Access Checking: \$5
	FN-CB-240A.4	Number of participants in financial literacy initiatives for unbanked, underbanked or underserved clients	We have taught 5,535 hours in 2024. See page 23 for more on our initiatives	We have taught 8,047 hours in 2023.
INCORPORATION OF ESG FACTORS IN CREDIT ANALYSIS	FN-CB-410A.1	Commercial and industrial credit exposure, by industry	2024 10-K table page 9	2023 10-K table page 7
	FN-CB-410A.2	Description of approach to incorporation of environmental, social and governance (ESG) factors in credit analysis	First Horizon may encourage escalation and additional due diligence when underwriting requests around sectors and industries that may present environmental, social and governance risks in our lending activities, but we recognize that risk management and business selection decisions are complex.	Not currently applicable; Are considering best practice for incorporating for the future
BUSINESS ETHICS	FN-CB-510A.1	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice or other related financial industry laws or regulations	No litigation of that type is disclosed in our current financial statements	No litigation of that type is disclosed in our current financial statements
	FN-CB-510A.2	Description of whistleblower policies and procedures	See code of ethics	See code of ethics
SYSTEMIC RISK MANAGEMENT	FN-CB-550A.2	Description of approach to incorporation of results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy and other business activities	Page 84 of 10-K for capital risk and adequacy	Page 90 of 10-K for capital risk and adequacy
ACTIVITY METRICS	FN-CB-000.A	(1) Number and (2) value of checking and savings accounts by segment: (a) personal and (b) small business	Not disclosed	Not disclosed
	FN-CB-000.B	(1) Number and (2) value of loans by segment: (a) personal, (b) small business and (c) corporate	Not disclosed	Not disclosed

TCFD Index

GOVERNANCE	PAGE NUMBER
Describe the Board's oversight of climate-related risks and opportunities	Page 37
Describe management's oversight of climate-related risks and opportunities	Page 37
STRATEGY	
Describe the climate-related risks and opportunities the organization has identified over the short, medium and long-term	Pages 32-33
Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy and financial planning	Pages 32-33
Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario	Pages 33
RISK MANAGEMENT	
Describe the organization's processes for identifying and assessing climate-related risks	Pages 32-33
Describe the organization's processes for managing climate-related risks	Page 39 (managed in accordance with our enterprise-wide risk appetite framework)
Describe how processes for identifying, assessing and managing climate-related risks are integrated into the organization's overall risk management	Page 39 (managed in accordance with our enterprise-wide risk appetite framework)
METRICS AND TARGETS	
Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process	Pages 31-33
Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions and the related risks	Pages 31
Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets	Not applicable

Appendix

Consolidated Non-GAAP To GAAP Reconciliation

		2024	2023
Adjusted Diluted EPS			
Net income available to common ("NIAC") (GAAP)	a	\$738	\$865
Plus total notable items (after-tax) (Non-GAAP) (a)		\$105	\$(59)
Adjusted Net income available to common shareholders (Non-GAAP)	b	\$843	\$806
Diluted Shares (GAAP)	c	544	562
DILUTED EPS (GAAP)	a/c	\$1.36	\$1.54
ADJUSTED DILUTED EPS (NON-GAAP)	b/c	\$1.55	\$1.43
Adjusted Net Income ("NI") and Adjusted Return on Assets ("ROA")			
Net Income ("NI") (GAAP)		\$794	\$915
Plus Tax effected notable items (Non-GAAP) (a)		\$97	\$(59)
Adjusted NI (Non-GAAP)		\$891	\$856
NI (annualized) (GAAP)	d	\$794	\$915
Adjusted NI (annualized) (Non-GAAP)	e	\$891	\$856
Average Assets (GAAP)	f	\$81,822	\$81,683
ROA (GAAP)	d/f	0.97%	1.12%
ADJUSTED ROA (NON-GAAP)	e/f	1.09%	1.05%
Return on Average Common Equity ("ROCE")/ Return on Average Tangible Common Equity ("ROTCE")/ Adjusted ROTCE			
Net income available to common shareholders ("NIAC") (annualized) (GAAP)	g	\$738	\$865
Adjusted Net income available to common shareholders (annualized) (Non-GAAP)	h	\$843	\$806
Average Common Equity (GAAP)	i	\$8,391	\$7,852
Intangible Assets (GAAP) (b)		\$1,674	\$1,720
Average Tangible Common Equity (Non-GAAP)	j	\$6,717	\$6,132
Equity Adjustment (Non-GAAP)		\$20	\$(68)
Adjusted Average Tangible Common Equity (Non-GAAP)	k	\$6,737	\$6,064
ROCE (GAAP)	g/i	8.80%	11.01%
ROTCE (NON-GAAP)	g/j	10.99%	14.10%
ADJUSTED ROTCE (NON-GAAP)	h/j	12.51%	13.28%

(a) Amounts adjusted for notable items as detailed on the [page 45](#).
 (b) Includes goodwill and other intangible assets, net of amortization.
 Numbers may not foot due to rounding.
 Quarterly, Unaudited (\$s millions, except per share data)

	2024	2023
Tangible Common Equity (Non-GAAP)		
(A) Total equity (GAAP)	\$9,111	\$9,291
Less: Noncontrolling interest (a)	\$295	\$295
Less: Preferred stock (a)	\$426	\$520
(B) Total common equity	\$8,389	\$8,476
Less: Intangible assets (GAAP) (b)	\$1,653	1,696
(C) Tangible common equity (Non-GAAP)	\$6,737	\$6,779
Tangible Assets (Non-GAAP)		
(D) Total assets (GAAP)	\$82,152	\$81,661
Less: Intangible assets (GAAP) (b)	\$1,653	\$1,696
(E) Tangible assets (Non-GAAP)	\$80,499	\$79,965
Period-end Shares Outstanding		
(F) Period-end shares outstanding	524	559
Ratios		
(A)/(D) Total equity to total assets (GAAP)	11.09 %	11.38 %
(C)/(E) Tangible common equity to tangible assets ("TCE/TA") (Non-GAAP)	8.37 %	8.48 %
(B)/(F) Book value per common share (GAAP)	\$16.00	\$15.17
(C)/(F) Tangible book value per common share (Non-GAAP)	\$12.85	\$12.13

(a) Included in Total equity on the Consolidated Balance Sheet.
 (b) Includes goodwill and other intangible assets, net of amortization.
 Numbers may not foot due to rounding.
 Quarterly, Unaudited (\$s millions, except per share data)

Appendix

Notable Items

	2024	2023
Summary of Notable Items:		
Gain on merger termination	—	\$225
Net merger/acquisition/transaction-related items	—	\$(51)
Loss on AFS portfolio restructuring	\$(91)	—
Gain/(loss) related to equity securities investments (other noninterest income)	—	\$(6)
Net gain on asset disposition (other noninterest income less incentives)	—	\$7
FDIC special assessment (other noninterest expense)	\$(9)	\$(68)
Other notable expenses *	\$(29)	\$(75)
TOTAL NOTABLE ITEMS (PRE-TAX)	\$(129)	\$33
Tax-related notable items **	—	\$35
Preferred Stock Dividend***	\$(7)	—

Quarterly, Unaudited, In Millions

Numbers may not foot due to rounding

* 4Q24, 3Q24, 2Q24, 1Q24 and 3Q23 include \$3 million, \$2 million, \$3 million, \$5 million and \$10 million of restructuring expenses; 3Q24 and 2Q23 each include \$15 million of Visa derivative valuation expenses and 2Q23 includes a \$50 million contribution to First Horizon Foundation.

**4Q23 and 2023 include a \$48 million after-tax benefit primarily from the resolution of IBERIABANK merger-related tax items; 2023 also includes after-tax notable items of \$24 million related to the surrender of approximately \$214 million in book value of bank owned life insurance policies, partially offset by an \$11 million benefit from merger-related tax items.

*** 2Q24 and 2024 include \$7 million deemed dividends on the redemption of \$100 million par value of Series D Preferred Stock.

	2024	2023
Impacts of Notable Items		
NONINTEREST INCOME:		
Gain on merger termination	—	\$(225)
Securities (gains)/losses	\$91	\$6
Other noninterest income	—	\$(9)
TOTAL NONINTEREST INCOME	\$91	\$(229)
Noninterest expense:		
Personnel expenses:		
Salaries and benefits	—	\$(4)
Incentives and commissions	\$(8)	\$(49)
Total personnel expenses	\$(9)	\$(52)
Outside services	\$(5)	\$(7)
Other noninterest expense	\$(24)	\$(136)
TOTAL NONINTEREST EXPENSE	\$(37)	\$(196)
Income before income taxes	\$129	\$(33)
Provision for income taxes *	\$32	\$26
Preferred stock dividends **	\$(7)	—
Net income/(loss) available to common shareholders	\$105	\$(59)
EPS impact of notable items	\$0.19	\$(0.11)

Quarterly, Unaudited, In Millions

Numbers may not foot due to rounding

* 4Q23 and 2023 include a \$48 million after-tax benefit primarily from the resolution of IBERIABANK merger-related tax items; 2023 also includes after-tax notable items of \$24 million related to the surrender of approximately \$214 million in book value of bank owned life insurance policies, partially offset by an \$11 million benefit from merger-related tax items.

** 2Q24 and 2024 include \$7 million deemed dividends on the redemption of \$100 million par value of Series D Preferred Stock.

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