

Huntington Supplier Code of Conduct

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Introduction

Huntington is devoted to making customer's lives better, helping businesses thrive, and strengthening the communities we serve. We at Huntington are committed to Doing the Right Thing to have a positive impact on our customers, colleagues, shareholders, and communities. Doing the Right Thing means thinking before acting. We Do the Right Thing with a . . .

- **Can-Do Attitude**
"Enthusiastically work and succeed together."
- **Service Heart**
"Inclusive spirit to put yourself in each other's shoes – then help."
- **Forward Thinking**
"Always look ahead for ways to be the very best."

At Huntington, we act with uncompromising ethics and integrity in all we do. This Supplier Code of Conduct ("Code") sets forth Huntington's minimum expectations for Suppliers when interacting with our customers or when otherwise acting on our behalf. Suppliers are responsible for being aware of and establishing systems designed to ensure compliance with the expectations in this Code related to ethical business practices, labor and human rights, health and safety, environmental responsibility, community investments, privacy and confidentiality, artificial intelligence and reporting concerns.

General Expectations

We encourage our Suppliers to share our commitment to Doing the Right Thing by embracing the responsibilities outlined in this Code.

Huntington's Suppliers must operate in accordance with professional standards, laws and regulations, this Code, and agreements with Huntington. Huntington expects that each Supplier's policies and actions will support Huntington's commitment to Doing the Right Thing. Obeying the law in letter and in spirit is the foundation of Huntington's ethical standards. While not every potential situation can be covered in a Code such as this, Huntington always strives for its Suppliers to conduct themselves using common sense, good judgment, courtesy, and respect for others.

If there are any laws or specific terms in a Supplier's agreement with Huntington that are in conflict with any provision of this Code, then the law and terms of the agreement will override the provision of this Code. We recognize that many of our Suppliers maintain their own codes of conduct or business ethics requirements. Suppliers are expected to adhere to the most restrictive requirements applicable to them.

Scope

A "Supplier" is any third party, firm, or individual that provides a product or service (i) directly to Huntington; or (ii) to Huntington's customers through a contractual relationship that is in place between your organization and Huntington. The following persons, entities, and organizations (collectively referred to as Suppliers) are covered by this Code and are thereby subject to its provisions:

- Vendors, consultants, agents, contractors, temporary workers, and other third parties working on behalf of Huntington or its customers; and
- The owners, officers, directors, employees, consultants, affiliates, contractors and subcontractors of these organizations and entities.

Ethical Business Practices

At Huntington, we are committed to acting with uncompromising integrity in all that we do, and we insist that our Suppliers aspire to the same high standards of honesty, fairness, and integrity in their business dealings. Our Suppliers must refrain from all illegal or improper activities, including misrepresentations, fraud, corruption, embezzlement, bribery, antitrust and/or similar actions.

Gifts, Meals & Entertainment

The provision of gifts can be misinterpreted or suggest the appearance of an improper exchange. Huntington and its Suppliers are both responsible for ensuring that such practices do not violate the law, appear improper, or create an actual or perceived conflict of interest.

Gifts, meals, entertainment, or favors given to Huntington colleagues by Suppliers are discouraged. Suppliers may not directly or indirectly offer, give, solicit, or accept anything of value to influence a decision, avoid a disadvantage, or secure an improper benefit. Limited exceptions are permissible when the gift, meal or entertainment is of nominal value (generally \$200 or less), infrequent (no more than twice in a 12-month period), and not offered or accepted as an inducement to entering into or continuing any business transaction, or to influence a Huntington decision or action. Giving Huntington colleagues cash or cash equivalent gifts (including gift cards) of any value is prohibited.

Below are examples of gifts that may be permissible.

- Advertising or promotional items of nominal value (e.g., hats, mugs, or t-shirts)
- Non-monetary gifts of nominal value related to commonly recognized events or occasions such as weddings, holidays, or the birth or adoption of a child; and/or
- Civic, charitable, educational, or religious awards for recognition of service and accomplishment

Suppliers may provide gifts, meals and entertainment when it is lawful and ethical, infrequent, customary, and reasonable in value. Air travel and overnight accommodations may not be provided in connection with entertainment. Under no circumstances should a Supplier provide a gift, meal, entertainment, or other favor to a Huntington colleague in a position to influence any business decisions related to a Supplier and/or during requests for proposal or contract negotiations.

Anti-Bribery and Anti-Corruption

Bribery and other forms of corruption are illegal and contrary to Huntington's values. Huntington is committed to maintaining integrity in its business practices and complies with anti-bribery and anti-corruption laws. Our Suppliers must act with honesty, fairness, and integrity in their business dealings with or on behalf of Huntington. Suppliers may not directly or indirectly offer, give, solicit, or accept anything of value to or from any third party, customer, domestic or foreign government official, or any other person to influence a decision, avoid a disadvantage, or secure an improper benefit on behalf of Huntington.

Additionally, Suppliers and their personnel are responsible for knowing and developing policies and procedures to ensure compliance with anti-bribery and anti-corruption laws in the jurisdictions in which they operate.

Anti-Money Laundering

Suppliers are prohibited from engaging in illicit activities, including, but not limited to, money laundering, human trafficking or terrorism financing.

Anti-trust and Competition

Suppliers are responsible for being aware of and adhering to applicable anti-trust and competition laws and regulations. When dealing with or on behalf of Huntington, Suppliers are required to comply with anti-trust and competition laws and regulations.

Conflicts of Interest

Huntington is committed to promoting fair competition among our potential Suppliers. We require our Suppliers to disclose any actual, perceived or potential conflicts of interest (1) prior to entering into a business relationship with Huntington and/or (2) as they arise.

Labor and Human Rights

Creating an Inclusive and Respectful Workplace

Inclusion is core to who we are and essential to what we do. Our commitment is reflected by an understanding and acceptance of diverse points of view, experiences, skills and backgrounds.

We also know that inclusion supports and strengthens the communities we serve. Through our inclusive supplier base, we gain a better understanding to the needs of the marketplace. Working together, we contribute toward economic development, job creation, and stronger communities. We actively look to engage Suppliers with similar values and business principles to reflect respect for the human rights of people with whom, and the communities in which, they do business.

Anti-Discrimination/Harassment and Non-Retaliation

Huntington provides equal opportunity in all aspects of its business and will not tolerate illegal discrimination or harassment of any kind based on membership in any protected category protected by law. Huntington also prohibits unlawful retaliation. Suppliers are expected to (1) maintain a discrimination, harassment and retaliation-free work environment, (2) comply with all applicable employment and labor laws, and (3) maintain policies against workplace discrimination, harassment and unlawful retaliation.

Forced Labor and Child Labor

We respect human rights. Huntington's commitment includes using only voluntary labor. We do not use child, prison, or forced labor, and we do not violate any modern slavery laws. Suppliers must be committed to and have respect for the protection and preservation of human rights, and are expected to implement practices and policies to prevent the use of child, prison and forced labor, slavery, or human trafficking in Supplier's operations and facilities.

Compensation and Working Hours

Suppliers are required to comply with all applicable wage and hour laws and laws governing employee compensation and work hours.

Health and Safety

Working Conditions

Huntington provides safe, secure, and productive working environments for its colleagues and expects its Suppliers to provide the same. At a minimum, Huntington's Supplier's work environments must meet or exceed all applicable laws regulating the occupational safety and health of its employees. For more information about Huntington's Environmental Health and Safety Policy, please refer to the [Environmental Health and Safety Policy Statement](#) located on Huntington's Investor Relations website.

Huntington acknowledges that it cannot require or set the compensation of its Suppliers' workforce, but Huntington encourages its Suppliers to adopt policies and practices that reflect Huntington's Values, including Huntington's efforts to provide a livable wage to its colleagues and ensure pay equality regardless of gender, race, or membership in any protected category.

Workplace Violence

Huntington is committed to maintaining a safe, secure work environment and will not tolerate any acts or threats of workplace violence. Suppliers are expected to maintain a safe and non-violent work environment free from threats, intimidation and physical harm.

Drug and Alcohol-Free Workplace

Huntington also is committed to providing a drug and alcohol-free workplace and encourages its Suppliers to do the same when conducting business for or on behalf of Huntington.

Environmental Responsibility

At Huntington, we believe in looking out for each other to improve lives and make our communities stronger. Environmental and social stewardship are critical elements in the business decisions that we make daily, and we strive to do the right thing for people and the planet. Huntington recognizes the importance of working towards a healthy and sustainable future, understanding the interrelationship between communities, the environment, and how we conduct business.

Huntington is dedicated to increasing our environmental performance and reducing our carbon footprint. Huntington's efforts align with the guidance outlined in respected frameworks like the U.N. Sustainable Development Goals, the Taskforce on Climate-Related Financial Disclosures, and the principles of the Paris Agreement. Suppliers are encouraged to conduct operations in a similar manner and expected to comply with all applicable environmental laws. Additionally, Huntington has established public goals to reduce its Scope 1 and 2 emissions as defined by and calculated in accordance with the Greenhouse Gas Protocol. Huntington encourages its Suppliers to do the same and to monitor for changes in the regulatory environment that may require certain environmental or climate-related disclosures.

In order to meet evolving regulatory requirements and improve data quality around our environmental and

climate-related risk management practices, Huntington may, from time to time, reach out to certain Suppliers. Huntington encourages Suppliers to proactively respond to these requests and contact us with questions they have. We are committed to working with our Suppliers collaboratively.

Community Investments

Huntington is dedicated to strengthening and supporting the communities we serve. We encourage our Suppliers to regularly engage with and make efforts to serve and strengthen their communities.

Privacy and Safeguarding Confidential Information

Huntington requires its Suppliers to protect any confidential information of Huntington, its customers, its colleagues, or other related parties that the Supplier obtains in its work with Huntington. Suppliers must not use or disclose such confidential information unless permitted by Huntington or required by applicable law or regulation. Huntington also expects that, at a minimum, its Suppliers will comply with all applicable privacy and information security laws and regulations regarding confidential information, including the sharing, storage, processing, and transmission of such information. Suppliers must report events that impact or may impact the confidentiality, integrity, or availability of confidential information in accordance with the terms of our agreement.

Artificial Intelligence

Huntington requires that its Suppliers understand and manage the risks of artificial intelligence (AI) throughout the AI lifecycle. In managing these risks, Suppliers must consider all trustworthy AI principles described in the NIST AI Risk Management Framework.

When providing products and services to Huntington, Suppliers must offer optionality on the use of AI, including opting into (not out of) the use of AI. Before introducing new AI into products and services Huntington receives from Suppliers, Suppliers must provide advance notice to their Huntington business segment relationship managers. Suppliers must also provide reasonable documentation and assistance to Huntington to evaluate the use of AI in these products and services.

Reporting Concerns

Huntington values our relationships with each of our Suppliers and we believe that this Code and the values included in it will help to make people's lives better, help businesses thrive, and strengthen the communities we serve.

We thank our Suppliers for following this Code. If there are any questions or ethical concerns, please contact Maria Lepore, Chief Procurement Officer, at 614-480-5249. Alternatively, you may report any concerns or suspected unethical behavior to Huntington's Ethics Hotline (800) 620-8601 or www.HuntingtonBancshares.ethicspoint.com (administered by a third party providing the ability to report concerns anonymously, if preferred).