

Huntington Service Provider Code of Conduct

Huntington Bancshares Incorporated and its affiliates (“Huntington”) are committed to making people’s lives better, helping businesses thrive and strengthening the communities we serve. We at Huntington are committed to Doing the Right thing for our customers, colleagues, shareholders and communities. 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.”

We expect our Service Providers to share this commitment to do the right thing by embracing the social, environmental, and ethical responsibilities outlined in Huntington’s Service Provider Code of Conduct (“Code”).

A “Service Provider” 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 Service Providers) are covered by the Service Provider Code of Conduct and 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.

This Code sets forth Huntington’s expectations for Service Providers that Huntington engages in areas including ethical business practices, labor and human rights, health and safety, diversity, environmental responsibility, privacy and confidentiality. Obeying the law in letter and in spirit is the foundation of Huntington’s ethical standards. Huntington expects its Service Providers to operate in accordance with professional standards, laws and regulations, this Code and agreements with Huntington and expects that each Service Provider’s policies and actions will support Huntington’s commitment to Doing the Right Thing. While not every potential situation can be covered in a Code such as this, Huntington always expects its Service Providers to conduct themselves using common sense, good judgment, courtesy and respect for others and be responsible for their actions. If there are any specific terms in a Service Provider’s contract with Huntington that are in conflict with any provision of this Code, then the terms of the contract will override the provision of this Code.

Ethical Business Practices

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

The provision of gifts can be misinterpreted or suggest the appearance of an improper exchange. Gifts, entertainment or favors from customers, prospective customers, Service Providers or other employees are discouraged. Limited exceptions are permissible when the gift or entertainment is of nominal value and not offered or accepted as an inducement to entering into or continuing any business transaction, or to influence a decision or action of Huntington. The following are examples of permissible circumstances:

- Gifts or favors based on family or personal relationships when the personal relationship, rather than the business relationship, is the motivating factor;
- Advertising or promotional items of reasonable value;
- 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
- Civic, charitable, educational or religious awards for recognition of service and accomplishment.

Service Providers may provide entertainment when it is lawful and ethical, infrequent, and customary and reasonable in value. Air travel and overnight accommodations may not be provided in connection with entertainment. Under no circumstances should a Service Provider provide a gift, entertainment or other favor to a Huntington colleague in a position to influence Service Provider selection or contract negotiations during requests for proposal or contract negotiations.

Labor and Human Rights

Huntington is firmly committed to providing equal opportunity in all aspects of its business and will not tolerate illegal discrimination of any kind. Huntington also expects its Service Providers to comply with all applicable employment laws; to maintain policies against workplace discrimination, harassment, unlawful retaliation, abuse and violence; and to prevent the use of child or forced labor, slavery or human trafficking in Service Provider's operations and facilities. Huntington acknowledges that it cannot require or set the salaries of its Service Providers' workforce, but Huntington encourages its Service Providers 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.

Health and Safety

Huntington is committed to providing safe and productive working environments for its colleagues and encourages its Service Providers to provide the same for its employees. At a minimum, Huntington expects that each Service Provider's working environments will meet or exceed all applicable laws regulating the occupational safety and health of its employees. Huntington also is committed to providing a drug and alcohol-free workplace and expects its Service Providers to do the same.

Diversity

Huntington colleagues respect diversity in each other, our customers and Service Providers and the communities we have the privilege of serving. Huntington expects Service Providers to treat others with dignity and respect all diverse backgrounds, experiences and cultures.

We know that supporting diverse businesses supports the entire business community. We are committed to economic inclusion by expanding relationships with minority-, women-, LGBT-, disabled-, and veteran-owned business enterprises (“Diverse”). With an inclusive supplier base, we gain a better understanding to the needs of the marketplace. Working together, we are able to contribute toward economic development, job creation and stronger communities. We actively look to engage Diverse Service Providers throughout our businesses and encourage our Service Providers to also engage Diverse Service Providers in their businesses.

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 on a daily basis and we strive to do the right thing for our people and for the planet. We encourage our Service Providers to also help to protect their people and the planet in their work and at their facilities.

Privacy and Confidentiality

Huntington expects its Service Providers to protect any confidential information of Huntington, its customers, its employees or other related parties that the Service Provider obtains in its work with Huntington and that Service Providers not disclose such confidential information unless permitted by Huntington. Huntington also expects that, at a minimum, its Service Providers 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.

At Huntington, we value our work with each of our Service Providers 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 that Huntington serves.

We thank our Service Providers for following this Code. If there are any questions please contact Maria Lepore, Chief Procurement Officer, at 614-480-5249.