	Huntington Bancshares Incorporated Policy		
	Title: Investor Relations Public Disclosure and Access Policy	Version: 1.7	Page: 1 of 12
Number: ROC-1103	Approved By: Risk Oversight Committee	Policy Level: Board	
Owner: Director of Investor Relations	Reviewed By: Risk Oversight Committee	Policy Approval Date: December 2019 Anticipated Review Date: December 2020	
This policy must be read and followed in conjunction with all other applicable policies, standards, training, and guidelines as may be in effect at Huntington.			

Policy Statement/Purpose

This policy sets forth the guiding principles and requirements applicable to Huntington's public disclosures in order to comply with legal and regulatory requirements of the SEC's Regulation Fair Disclosure (Reg. FD), and thereby minimize the possibility, and related liability, associated with externally disclosing material non-public information about the Company. It covers all external information disclosure venues and channels including written statements made in the Company's annual and quarterly reports, news and earnings releases, letters to shareholders, speeches by senior management, oral statements, and information contained on the Company's Internet home page.

This policy also incorporates analysts/investor access standards to Company representatives to assure equitable access, as much as is practically possible given Company resource constraints, and so that analysts/investors can have realistic expectations regarding the nature, frequency, and breadth of such Company representative access.


Executive Summary

Huntington (Company) is committed to providing timely, accurate and complete information consistent with legal and regulatory requirements including Regulation Fair Disclosure (Reg. FD) to enable orderly and fair trading of its securities in the marketplace. Disclosure will be accomplished in a manner that provides all analysts/investors with equal access to Company information. In particular, when material non-public information is disseminated, it will be done on a broad basis. Selective disclosure of material non-public information in violation of Reg. FD is prohibited.

The Company realizes that in order to conduct high quality research, make recommendations, and assess business prospects that have reasonable and adequate bases, analysts/investors must be able to communicate directly with company representatives. Only through such dialogue can analysts/investors fully assimilate and understand the wealth of information in the Company's public disclosure documents.

Applicability/Scope

This policy applies to Company employees and directors. It applies to disclosures in SEC-filed documents and written statements made in the Company's annual and quarterly reports, news and earnings releases, letters to shareholders, speeches by senior management and information contained on the Company's Internet home page. It covers oral statements made in group and/or individual meetings with analysts/investors, phone calls with analysts/investors and interviews with the media as well as press conferences. This covers all requests from analysts/investors outside the Company seeking access to company representatives so that they have a clear understanding and expectations regarding such access.

	Huntington Bancshares Incorporated Policy		
	Title: Investor Relations Public Disclosure and Access Policy	Version: 1.7	Page: 2 of 12
Number: ROC-1103	Approved By: Risk Oversight Committee	Policy Level: Board	
Owner: Director of Investor Relations	Reviewed By: Risk Oversight Committee	Policy Approval Date: December 2019 Anticipated Review Date: December 2020	
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Key Terms, Definitions and Abbreviations

“Material” Information - Information about the Company is “material” if:

1. There is substantial likelihood that a reasonable analyst and/or an existing and/or potential investor would consider it important in making an investment decision, and/or
2. The information significantly alters the "total mix" of the information in the marketplace about the Company.


Company information that could be considered "material" includes:

- Earnings information
- Mergers, acquisitions, and divestitures
- New products
- Changes in control
- Change in auditors
- Events regarding the Company's securities (e.g., splits, dividends, calls for redemption, repurchase plans)
- Material changes in the Company's capital structure
- Changes in the regulatory environment or relationships with regulators that would have a significant impact on financial performance or competitiveness of the Company
- Changes in credit ratings or relationships with credit rating agencies
- Significant changes in the credit quality outlook of the Company's portfolios
- Changes in accounting policies either internally or externally driven (e.g., FASB) that would have a significant impact on financial results
- Major litigation
- Changes in senior executive officers.

Information is “non-public” if it has not been disseminated by the Company in a manner making it available to analysts/investors generally (e.g., through a press release, an SEC filing, a webcast that has been publicly announced beforehand in accordance with Reg. FD, etc.)

Analysts: Sell-side analysts working at firms that write equity/fixed income research reports (e.g., Goldman Sachs, Merrill Lynch, etc.) and buy-side analysts that write internal research reports working at investment companies that make equity or fixed income investments (e.g., Fidelity Management & Research, Wellington Management, etc.). Also applies to analysts at rating agencies that rate the Company's debt (e.g., Moody's Investors Service, Standard and Poor's Financial Services, etc.).

Investors: Retail shareholders and/or portfolio managers working at investment companies that make equity or fixed income investments (e.g., Fidelity Management & Research, Vanguard, Ohio State Teachers Pension, etc.).

	Huntington Bancshares Incorporated Policy		
	Title: Investor Relations Public Disclosure and Access Policy	Version: 1.7	Page: 3 of 12
Number: ROC-1103	Approved By: Risk Oversight Committee	Policy Level: Board	
Owner: Director of Investor Relations	Reviewed By: Risk Oversight Committee	Policy Approval Date: December 2019 Anticipated Review Date: December 2020	
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Lines of Defense - There are three lines of defense: First, Second, and Third; and Business Support Units

- **First Line of Defense** - Business Segment (Front Line Units)
- **Second Line of Defense** - Corporate Risk Management, Risk Shared Services/Quality Assurance & Credit Administration (Independent Risk Management)
- **Third Line of Defense** - Internal Audit/Credit Review
- **Business Support Units (BSU)** – Examples include HR, Legal and part of Accounting and Finance

Rules and Requirements

Roles and Responsibilities

First Line of Defense

- Assess and effectively manage risks associated with their activities and ensure that policies, procedures and corporate standards are appropriately implemented within their Segment

Investor Relations:

- Oversee all Company interaction with analysts and investors
- Prepare and disseminate all investor-related public disclosures
- Provide assistance to Corporate Communications to ensure non-investor-related public disclosures are consistent with applicable investor-related policies, rules, and regulations

Second Line of Defense


- Oversee risk-taking activities, and independently assess risks and issues

Chief Risk Officer along with the Executive Leadership Team:

- Determinations of the materiality of non-public information inadvertently disclosed will be made by the DIR/ADIR and/or CFO in consultation with the General Counsel (GC) and the Chief Risk Officer (CRO) or their representatives.
- The Director of Investor Relations is responsible for ensuring that management's responsibilities pursuant to this policy are achieved; including a routing of this policy at least annually to the Executive Leadership Team members and others likely to be contacted directly by analysts / investors.

Third Line of Defense

- Provide independent and objective assurance that Huntington's governance, policies and procedures, risk management activities, and internal controls are appropriately designed and operating effectively

	Huntington Bancshares Incorporated Policy		
	Title: Investor Relations Public Disclosure and Access Policy	Version: 1.7	Page: 4 of 12
Number: ROC-1103	Approved By: Risk Oversight Committee	Policy Level: Board	
Owner: Director of Investor Relations	Reviewed By: Risk Oversight Committee	Policy Approval Date: December 2019 Anticipated Review Date: December 2020	
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Internal Audit:

- Consider requirements, risks, controls, and procedures related to this Policy in its independent risk assessment and audit plan development processes
- Record identified exceptions to this Policy through audit findings in ERMS, as deemed necessary

Business Support Units (BSU) including Finance and Accounting:

Business support units do not engage in activities designed to generate revenue or reduce expenses, nor provide operational or technology support. Therefore, Huntington does not maintain direct second line oversight of these functions. Refer to the Enterprise Risk Management and Risk Appetite Framework on which documents and which business units fall into business support units and fall into the first and second line.

- Provide input to the Company's strategic plan
- Promote a risk-aware culture
- Provide guidance and insight relative to areas of expertise
- Implement policies, procedures and controls (as appropriate) to enable effective execution
- Provide risk information through appropriate governance committees

Objectives

COMPANY REPRESENTATIVES


The Company has designated the Chief Executive Officer (CEO), Chief Financial Officer (CFO), Director of Investor Relations (DIR), Assistant Director of Investor Relations (ADIR), and its Investor Relations Officer(s) (IRO) as the Company's authorized Representatives to analysts/investors and securities markets professionals. The Company also has designated the Treasurer as a primary Representative with analysts from the credit ratings agencies. Company Representatives are listed in Attachment A.

Certain line of business heads and other individuals may also be designated from time to time and for a specific situation as Company Representatives relating to matters pertaining to their specific areas of responsibility (e.g., investor visits, investor presentations, investor days, etc. Also refer to the "Corporate Access" section and "Communicating with Analysts" paragraphs D and E below).

To the degree possible, all public disclosures of information about the Company and communications with analysts/investors will be made by authorized Representatives after having consulted with the DIR/ADIR. As such, the DIR/ADIR will be kept informed of all material information about the Company.

DETERMINATION OF MATERIAL NON-PUBLIC INFORMATION AND NEED FOR DISCLOSURE

Determinations of the materiality of non-public information will be made by the DIR/ADIR and/or CFO in consultation with the General Counsel (GC) and the Chief Risk Officer (CRO) or their representatives. A

	Huntington Bancshares Incorporated Policy		
	Title: Investor Relations Public Disclosure and Access Policy	Version: 1.7	Page: 5 of 12
Number: ROC-1103	Approved By: Risk Oversight Committee	Policy Level: Board	
Owner: Director of Investor Relations	Reviewed By: Risk Oversight Committee	Policy Approval Date: December 2019 Anticipated Review Date: December 2020	
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representative of Corporate Communications and others, such as line of business heads, will be consulted as warranted by the situation and/or time requirements of Reg. FD. Such discussions will also include a determination of whether or not public disclosure of the information is required.

A. Situations Not Requiring Disclosure

If the information is not material or has been previously made public, the Company will not make a public disclosure of the subject information.

B. Situations Requiring Public Disclosure

In accordance with Reg. FD, the Company will simultaneously disclose material nonpublic information in "intentional" disclosure situations.

The Company will promptly disclose (i.e., the later of 24 hours or commencement of the next day's trading) material nonpublic information in "non-intentional" disclosure situations. In each such case, the procedures described in "Statement Preparation and Content for Releasing Material Non-Public Information" and "Releasing Material Non-Public Information" will be followed.

C. Commenting on Rumors

So long as it is clear that the Company is not the source of a marketplace rumor, the authorized Spokespersons will respond consistently to rumors, saying, "It is Company policy not to comment on market rumors or speculation."

Should the Nasdaq request the Company make a definitive statement in response to a marketplace rumor, the DIR/ADIR in conjunction with the CFO, GC, and CRO will consider the matter and make a recommendation to the CEO on whether to make a policy exception.


D. Social Media/Internet Chat Rooms/Electronic Message Channels

In accordance with the Company's Social Media Policy, colleagues, contractors and vendors are prohibited from speaking or acting on behalf of Huntington, or creating the perception of doing so, with respect to its business operations, financial results, or issues affecting the company unless they have been authorized to do so by a member of Corporate Communications.

STATEMENT PREPARATION AND CONTENT FOR RELEASING MATERIAL NON-PUBLIC INFORMATION

A. Preparation/Review

The DIR/ADIR will prepare and/or review Company statements, including press releases and scripts for analyst meetings and investor presentations with the assistance of and/or review by the GC and others as warranted.

	Huntington Bancshares Incorporated Policy		
	Title: Investor Relations Public Disclosure and Access Policy	Version: 1.7	Page: 6 of 12
Number: ROC-1103	Approved By: Risk Oversight Committee	Policy Level: Board	
Owner: Director of Investor Relations	Reviewed By: Risk Oversight Committee	Policy Approval Date: December 2019 Anticipated Review Date: December 2020	
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B. Completeness and Accuracy

Company statements will present information in an accurate, complete, and fair manner.

C. Consistency

It is the Company's objective that all statements of similar or recurring Company information be consistent, both as to timing and content.

D. Appropriate Cautionary Language

Every Company statement that contains a projection will include appropriate "forward-looking" safe harbor language in accordance with the Private Securities Litigation Reform Act of 1995 wherein all applicable risk factors, which may have a bearing on the subject matter of the statement or on the Company's overall performance as it relates to the statement can be ascertained.


RELEASING MATERIAL NON-PUBLIC INFORMATION

A. Widespread Dissemination

1. The Company will issue a press release to the financial news services, major wire services and newspapers in markets having a significant relationship to the Company. In support of this, the Company will provide "push" technology capabilities for electronic notification of such releases.
2. The Nasdaq will be notified in advance (e.g., 20 minutes) of the press release and a copy will be provided by either direct posting to the Nasdaq electronic dissemination web site, email or fax. If the press release is issued during normal trading hours, the Nasdaq will be notified as early as possible.
3. If a Company presentation or management interview will follow the issuance of the press release, it will be disseminated simultaneously through a webcast and/or by teleconference capability. Instructions on how to participate in such a web broadcast/conference call, including replay information, will be included in the press release.
4. The statement and, if appropriate and available, any related materials (e.g., management presentation, conference call transcripts, etc.) will be filed with the SEC on Form 8-K or other appropriate form.
5. For regularly scheduled press releases and conference calls, such as for the disclosure of earnings information, the Company will issue to the public, advance notice of the conference call and webcast information.

B. Review of Third Party Comments for Accuracy

The Company may review articles that restate or discuss Company statements for accuracy, and will promptly alert third parties that misstate material factual information.

	Huntington Bancshares Incorporated Policy		
	Title: Investor Relations Public Disclosure and Access Policy	Version: 1.7	Page: 7 of 12
Number: ROC-1103	Approved By: Risk Oversight Committee	Policy Level: Board	
Owner: Director of Investor Relations	Reviewed By: Risk Oversight Committee	Policy Approval Date: December 2019 Anticipated Review Date: December 2020	
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INFORMATION FLOW

The Company will not disrupt or threaten to disrupt the free flow of information to analysts / investors in an attempt to inappropriately influence their view of the Company.

COMMUNICATIONS WITH ANALYSTS

A. Previously Disclosed Historical or Generally Known Information

Analysts (sell-side and buy-side) are recognized as an important means by which the investment community can learn about the Company and its performance, strategies, markets and historical trends. The Company, primarily through the DIR/ADIR/IRO, may provide information to analysts about the Company with respect to previously disclosed historical information, or facts that are generally known. However, analysts must independently formulate their estimates of the Company's future performance or stock price.

B. No Assistance With Analyst Reports


The Company will not assist analysts in the preparation of their reports and/or earnings projections regarding the Company. After publication, if material errors in previously disclosed historical or factual information are noted, the Company will contact the analyst noting such errors. Prior to publication of their reports, analysts may request the DIR, ADIR, and/or IRO review for factual accuracy only those portions of their research report that do not contain or disclose conclusions, recommendations, valuations, or price targets. The DIR, ADIR, and/or IRO may review for factual accuracy only those portions of an analyst's research report that does not contain or disclose the conclusions, recommendations, valuations, or price targets, prior to publication and with the permission of the Analyst. The Company must not explicitly or implicitly request information that would disclose the conclusions, recommendations, valuations, or price targets, or comment on these matters. The Company will only comment on historical or forward-looking information that is in the public domain.

C. Analyst Meetings and Conference Calls

From time to time, the Company will conduct self-hosted and/or interactive conference calls with analysts and investors as warranted (e.g., coincident with the release of quarterly earnings or a major Company announcement). When these occur, they will be done in accordance with provisions of the section "Releasing material non-public information".

D. One-on-One Meetings

It is the Company's general practice to maintain an "open door" policy in granting and/or initiating visits between management and analysts and investors. Such meetings may be initiated by analysts or investors (e.g., Visiting Analyst Program), management (e.g., Investor Calling Program), or third parties such as brokers (e.g., broker-sponsored dinners or conference breakout sessions). Such

	Huntington Bancshares Incorporated Policy		
	Title: Investor Relations Public Disclosure and Access Policy	Version: 1.7	Page: 8 of 12
Number: ROC-1103	Approved By: Risk Oversight Committee	Policy Level: Board	
Owner: Director of Investor Relations	Reviewed By: Risk Oversight Committee	Policy Approval Date: December 2019 Anticipated Review Date: December 2020	
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meetings will generally be scheduled between the date of the quarterly earnings release and fifteenth business day of March, June, September, and December.

E. DIR/AIDR/IRO Presence

To the degree possible, the DIR/ADIR/IRO will be present during conversations (phone or face-to-face) between Company Representatives and outside third parties, such as analysts or investors. The DIR/ADIR/IRO may interrupt a conversation and advise the Representative not to respond to certain questions as appropriate. Further, Company Representatives must contact the DIR/ADIR prior to such conversations. If for any reason such conversations take place without the DIR/ADIR/IRO present, then the DIR/ADIR is to be notified as soon as possible thereafter regarding the nature and content of the conversation.

PUBLIC COMMENT ON ANALYST PROJECTIONS AND COMPANY PROJECTIONS

A. No Comment

The Company will not comment on analyst projections, and will not make Company projections except in broadly disseminated public disclosures or in SEC filed documents. The Company will not refer to or distribute analysts' projections other than limited internal distribution to broaden the understanding of analyst perceptions of the Company, competitors, or industry issues.

B. Incorrect Attribution of a Projection to the Company

If a projection is incorrectly attributed to Company sources, either directly or indirectly, the DIR/ADIR will publicly deny Company responsibility for the information, and reaffirm that the Company has no comment on the accuracy of the projection.


C. Correct Attribution or Apparent Company Source

If a projection is correctly attributed to a Company source, or its nature makes it likely that there was a Company source, the DIR/ADIR will publicly confirm or deny the accuracy of the information provided by the source.

CORPORATE ACCESS

A. The Company will not:

1. Discriminate among recipients of information disclosed by the Company based on the recipient's prior research, opinions, recommendations, earnings estimates, or conclusions;
2. Deny, or threaten to deny, information or access to Company representatives in an attempt to influence the research, recommendations, or actions of analysts and investment professionals; or

	Huntington Bancshares Incorporated Policy		
	Title: Investor Relations Public Disclosure and Access Policy	Version: 1.7	Page: 9 of 12
Number: ROC-1103	Approved By: Risk Oversight Committee	Policy Level: Board	
Owner: Director of Investor Relations	Reviewed By: Risk Oversight Committee	Policy Approval Date: December 2019 Anticipated Review Date: December 2020	
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3. Attempt to influence the research, recommendations, or actions of analysts or investment professionals by exerting pressure through other business relationships.

B. The Company will provide access to Company representatives to analysts/investors as noted in Item D below, and will make available upon request a copy of this policy.

C. Defining Access


Access is defined as the ability to have a discussion directly with a Company representative, either in a one-on-one or group situation. Such discussions may take one of several forms including, but not limited to:

1. Annual meetings,
2. Telephone or email access to the DIR, ADIR, Treasurer, and/or IRO,
3. Teleconferences,
4. Meetings initiated by the Company,
5. Meetings concurrent with regularly scheduled brokerage conferences or other special events,
6. Meetings initiated by analysts/investors either at the Company's offices or their own, and
7. Publicly accessible webcasts using freely available Internet technology with pre-notification and the opportunity to pose questions.

D. Prioritizing requests for access

Given limitations regarding the number of Company representatives and their availability, the Company will follow the guidelines outlined below in prioritizing requests for access:

1. All analysts/investors, without regard to any prioritization criteria, will be granted access to the DIR, ADIR, and/or IRO. Access to other Company representatives will be granted based on the availability of the Company representative consistent with items 2-5 noted below.
2. Sell-side analysts receiving the highest priority will be from well-recognized research firms where the respective analyst has demonstrated, through published research or other means, in-depth knowledge of the Company and/or the industry.
3. Buy-side analysts or investors receiving the highest priority will be those representing the top 50 shareholders, or a firm having the potential to become one of the top 50 shareholders, of the Company's common stock, as determined by shareholder targeting methodologies, and/or by working knowledge of the DIR, ADIR, and/or IRO.
4. Positive or negative recommendations and/or opinions about the Company will not be a basis for granting, denying, or prioritizing requests for access.
5. As much as is practically possible, the Company will generally follow a first-requested-first-granted approach to scheduling requests for access to Company representatives and if specifically requested, will make a good faith effort to grant access to Company representatives other than the DIR, ADIR, and/or IRO.
6. Should a meeting be canceled, the Company will make every effort to reschedule the meeting as quickly as possible consistent with the section "Communication with analysts".

	Huntington Bancshares Incorporated Policy		
	Title: Investor Relations Public Disclosure and Access Policy	Version: 1.7	Page: 10 of 12
Number: ROC-1103	Approved By: Risk Oversight Committee	Policy Level: Board	
Owner: Director of Investor Relations	Reviewed By: Risk Oversight Committee	Policy Approval Date: December 2019 Anticipated Review Date: December 2020	
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Management Responsibility/Accountability

Investor Relations is responsible for ensuring that review and approval of this policy by the Risk Oversight Committee occurs at least annually.

This policy may be modified, discontinued, or replaced at any time, at Huntington's discretion. Investor Relations under the direction of the Director of Investor Relations is responsible for maintaining this policy.

The Director of Investor Relations is responsible for ensuring that management's responsibilities pursuant to this policy are achieved; including a routing of this policy at least annually to the Leadership Team members and others likely to be contacted directly by analysts / investors.

Risk Evaluation System

Determinations of the materiality of non-public information inadvertently disclosed will be made by the DIR/ADIR and/or CFO in consultation with the General Counsel (GC) and the Chief Risk Officer (CRO) or their representatives. A representative of Corporate Communications and others, such as line of business heads, will be consulted as warranted by the situation and/or time requirements of Reg. FD. Such discussions will also include a determination of whether or not public disclosure of the information is required.

Risk Reporting


In the event a violation is discovered, the Director of Investor Relations, CFO, Chief Risk Officer, and General Counsel, or their representatives, will discuss potential actions to be taken regarding the incident (e.g., 8-K filing). Additional members of Senior Management and/or Board members may be included in the discussion.

Risk Boundaries

Investor Relations in conjunction with Finance and Accounting Segment Risk are responsible for creating and monitoring any risk limits that may be deemed necessary.

Violations of Policy

Noncompliance may be subject the colleague and/or Board member to disciplinary action outlined in Huntington's Code of Conduct and Ethics.

	Huntington Bancshares Incorporated Policy		
	Title: Investor Relations Public Disclosure and Access Policy	Version: 1.7	Page: 11 of 12
Number: ROC-1103	Approved By: Risk Oversight Committee	Policy Level: Board	
Owner: Director of Investor Relations	Reviewed By: Risk Oversight Committee	Policy Approval Date: December 2019 Anticipated Review Date: December 2020	
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Exceptions to Policy

Exceptions to the policy are not permitted.


Policy Revision History & Reference Information

Policy Revision History	
Date Approved	Brief Revision Description
July 2012	Jay Gould was replaced as the ADIR by Mark Muth and noted in Attachment A.
May 2013	David Anderson replaces Don Kimble as CFO as noted in Attachment A
April 2014	Howell D. "Mac" McCullough III replaces David Anderson as CFO as noted in Attachment A
February 2015	Mark Muth replaces Todd Beekman as DIR as noted in Attachment A. No replacement was named for ADIR.
December 2015	Objective D, Social Media, aligned with HBI Social Media Policy
December 2016	Communications with Analysts, Section B, aligned with Investor Relations Analyst / Investor Access Policy
December 2017	Brian Vereb named ADIR as noted in Attachment A
December 2019	The Investor Relations Analyst / Investor Access Policy was incorporated into this policy. Zachary Wasserman replaced Howell D. "Mac" McCullough, III, as CFO in Attachment A

Regulatory Citations: <i>Regulations or Laws that are referenced in this policy</i>
SEC Regulation Fair Disclosure (FD)

Guiding Policy References:	
Reference #	Policy Name

Implementing References:	
Reference #	Standard/Procedure/Program Name
	Investor Relations SEC-Disclosure Compliance Procedures

	Huntington Bancshares Incorporated Policy		
	Title: Investor Relations Public Disclosure and Access Policy	Version: 1.7	Page: 12 of 12
Number: ROC-1103	Approved By: Risk Oversight Committee	Policy Level: Board	
Owner: Director of Investor Relations	Reviewed By: Risk Oversight Committee	Policy Approval Date: December 2019 Anticipated Review Date: December 2020	
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Appendices and Attachments	
Location/File Name	Description of Appendix or Attachment
Attachment A	Authorized Representatives

ATTACHMENT A – AUTHORIZED REPRESENTATIVES

Stephen D. Steinour	Chairman, President	CEO
Zachary Wasserman	Sr. Executive Vice President	CFO
Mark Muth	Senior Vice President	DIR
Brian Vereb	Vice President	ADIR
None Appointed	--	IRO
Derek Meyer	Executive Vice President	Treasurer