

Huntington Service Provider Code of Conduct

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Introduction

Huntington Bancshares Incorporated and its subsidiaries and affiliates (“Huntington”) are 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 Code sets forth Huntington’s minimum expectations for Service Providers when interacting with our customers or when otherwise acting on our behalf. Service Providers are responsible for being aware of and establishing systems designed to ensure compliance with the expectations in Huntington’s Service Provider Code of Conduct (“Code”) related to ethical business practices, labor and human rights, health and safety, environmental responsibility, and privacy and confidentiality.

General Expectations

We encourage our Service Providers to share our commitment to Do the Right Thing by embracing the social, environmental, and ethical responsibilities outlined in this Code.

Huntington’s Service Providers must operate in accordance with professional standards, laws and regulations, this Code, and agreements with Huntington, and Huntington expects that each Service Provider’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 Service Providers to conduct themselves using common sense, good judgment, courtesy, and respect for others.

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

Scope

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 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 Service Providers aspire to the same high standards of honesty, fairness, and integrity in their business dealings. Our Service Providers 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 Service Providers 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 Service Providers are discouraged. Service Providers 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 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 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 Service Provider provide a gift, meal, entertainment, or other favor to a Huntington colleague in a position to influence any business decisions related to a Service Provider 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 Service Providers must act with honesty, fairness, and integrity in their business dealings with or on behalf of Huntington. Personnel of Service Providers 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, Service Providers and their personnel are responsible for knowing and developing policies and procedures to ensure compliance with anti-bribery and anti-corruption laws in the jurisdiction in which they operate.

Anti-trust

Huntington complies with all applicable anti-trust and competition laws. Service Providers 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, Service Providers must refrain from participating in any potentially anticompetitive behavior.

Conflicts of Interest

Huntington is committed to promoting fair competition among our potential Service Providers. We require our Service Providers to disclose any actual or potential conflicts of interest prior to entering into a business relationship with Huntington and as they arise.

Labor and Human Rights

Diversity

Diversity, equity, and inclusion are core to who we are and essential to what we do. Our commitment to diversity reflects an understanding and acceptance of diverse points of view, experiences, and backgrounds.

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 Service Providers”). 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.

Anti-Discrimination

Huntington provides equal opportunity in all aspects of its business and will not tolerate illegal discrimination or harassment of any kind. Huntington also expects its Service Providers to comply with all applicable employment and labor laws; and to maintain policies against workplace discrimination, harassment, unlawful retaliation, and abuse and violence.

Forced Labor and Child Labor

Huntington does not engage in or support the illegal use or child labor or modern slavery. Huntington is committed to preventing modern slavery and human trafficking in all respects. Service Providers are expected to implement practices and policies to prevent the use of child labor, forced labor, slavery, or human trafficking in Service Provider’s operations and facilities.

Health and Safety

Working Conditions

Huntington provides safe, secure, and productive working environments for its colleagues and encourages its Service Providers to provide the same. At a minimum, Huntington's Service Provider's working environments will meet or exceed all applicable laws regulating the occupational safety and health of its employees.

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.

Drug and Alcohol-Free Workplace

Huntington also is committed to providing a drug and alcohol-free workplace and encourages its Service Providers 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 on a daily basis, and we strive to do the right thing for our people and for the planet. Huntington recognizes the importance of working towards a healthy and sustainable future and its potential to impact communities and the environment through its practices as a business. We monitor and frame our approach with guidance from the U.S. Climate Finance Working Group, which has set principles intended to provide a framework for financing the transition to a low-carbon economy.

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, World Economic Forum agenda, and the principles of the Paris Agreement. Service Providers 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 service providers to do the same.

In order to meet evolving regulatory requirements and improve data quality around environmental impact, Huntington may, from time to time, reach out to certain service providers to obtain information about their environmental and sustainability business practices, including greenhouse gas (GHG) emissions. Huntington encourages service providers to proactively respond to these requests. We are committed to working with our service providers to understand how we can jointly have a positive impact on the environment.

Community Investments

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

Privacy and Confidentiality

Huntington requires its Service Providers to protect any confidential information of Huntington, its customers, its colleagues, or other related parties that the Service Provider obtains in its work with Huntington. Service Providers 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 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.

Artificial Intelligence

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

When providing products and services to Huntington, Service Providers 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 Service Providers, Service Providers must provide advance notice to their Huntington business segment relationship managers. Service Providers must also provide reasonable documentation and assistance to Huntington to evaluate the use of AI in these products and services.

Reporting

At Huntington, we value our relationships 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 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).