

Our Role and Fiduciary Acknowledgement for Retirement Accounts

The Huntington Investment Company, doing business as Huntington Financial Advisors (hereinafter, “HFA,” “we” or “us”) provides the following acknowledgment for purposes of complying with the U.S. Department of Labor’s (“DOL”) Prohibited Transaction Exemption 2020-02 (“PTE 2020-02”), where applicable. This acknowledgment is effective on February 1, 2022, or such later date as may be set forth by the DOL.¹

Fiduciary Acknowledgment. This acknowledgment applies when HFA provides investment advice or recommendations to you regarding retirement and other tax-qualified accounts² (“Retirement Accounts”). When we provide “investment advice”³ to you regarding your Retirement Accounts, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing Retirement Accounts. When providing investment recommendations, the way we make money creates certain conflicts with your interests, so we operate under a special rule that requires us, to act in your best interest and:

- Meet a professional standard of care (give prudent advice);
- Not put our financial interests ahead of yours (give loyal advice);
- Avoid misleading statements about our conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about our conflicts of interest.

Limitations to our Acknowledgement of Fiduciary Status. This fiduciary acknowledgment is limited to investment advice and recommendations provided by HFA to Retirement Accounts only. It does not create an ongoing duty to monitor your accounts or create or modify a contractual obligation or fiduciary status under any state or federal laws other than the retirement laws. Additionally, we are not fiduciaries under the retirement laws when we provide:

- General information and education about the financial markets, asset allocations, financial planning illustrations and the advantages and risks of particular investments;
- General information and education about issues and options that should be considered when deciding whether to rollover or transfer Retirement Account assets to us;
- Recommendations about investments held in accounts that are not Retirement Accounts or held in accounts at financial institutions other than HFA and for which we do not act as broker of record;
- Recommendations that you execute at another financial institution;
- Transactions or trades you execute without a recommendation from us, or that are contrary to, or inconsistent with, our recommendation; and
- Recommendations that do not meet the definition of fiduciary “investment advice” in Department of Labor regulation section 2510.3-21.

Plan to IRA Rollovers. We may provide (1) *general information and education* to you about the factors you should consider when deciding whether to move retirement assets to HFA, or (2) a *recommendation* that you move your retirement assets to HFA. If we provide a rollover recommendation, our analysis of the costs and services of your retirement plan depends on the information you provide to us (or in certain circumstances, information we obtain from third-parties about the plan (or similar types plans)).

IRA Transfers. If HFA recommends that you move assets from an IRA at another financial institution to HFA, we determined that the recommendation is in your best interest for these reasons:

¹ This disclosure is provided to comply with the DOL’s PTE 2020-02. If there is a conflict between this disclosure and your agreement with HFA, this disclosure will govern.

² Retirement Accounts include workplace retirement plans, IRAs, such as Traditional, Roth and SEPs, and other similar accounts.

³ Fiduciary investment advice is investment advice for a fee or other compensation rendered on a regular basis pursuant to a mutual understanding that such advice will serve as a primary basis for your investment decision, and that is individualized to the particular needs of your IRA or plan account.

- Greater services and/or other benefits can be achieved with the HFA IRA; and
- The costs associated with HFA IRA are justified by these services and features.

Notwithstanding whether a recommendation has been made, for any assets you decide to transfer/roll over from an employer-sponsored plan or move from an IRA at another financial institution now or in the future, you should: (1) evaluate the investment and non-investment considerations important to you in making the decision; (2) review and understand the fees and costs associated with a HFA IRA; (3) recognize that higher net fees (if applicable) will substantially reduce your investment returns and ultimate retirement assets; and (4) understand the conflicts of interest raised by the financial benefits to HFA resulting from your decision to roll or transfer assets to a HFA IRA.

Advisory Services. If HFA recommends that you add retirement assets to an advisory program at HFA, we determined it is in your best interest based on your stated investment profile because:

- The account services and features include one of more of the following: ongoing account monitoring, discretionary management, holistic investment advice, access to affiliated/third party managers, and/or automatic account rebalancing; and
- The asset-based costs associated with HFA advisory program(s) are justified by these services and features.

Brokerage Services and Products. If HFA recommends that you add retirement assets to a brokerage account (or product) at HFA, we determined it is in your best interest based on your stated investment profile because:

- The account services and features include one of more of the following: no or *de minimis* account minimums, fees paid on a transactional basis, and the ability to maintain concentrated and illiquid positions; and
- The transaction-based costs associated with HFA brokerage account are justified by these services and features.

Notwithstanding whether a recommendation has been made, for any assets you decide to move into a brokerage or advisory account, you should: (1) evaluate the investment and non-investment considerations important to you in making the decision; (2) review and understand the fees and costs associated with the account; (3) recognize that higher net fees (if applicable) will reduce your investment returns and ultimate retirement assets; and (4) understand the conflicts of interest raised by the financial benefits to HFA resulting from your decision to move assets into the account.

You are responsible for updating us if your investment objectives, risk tolerance and financial circumstances change.



More Information Regarding Fees, Services and Conflicts. For a description of our fees, services, and conflicts of interest, please refer to our Form CRS, Brokerage Brochure, and Form ADV (if applicable) available at <https://www.huntington.com/Personal/Investments-Overview/disclosures>.

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Huntington Financial Advisors® is a service mark and trade name under which The Huntington Investment Company offers securities and insurance products and services. The Huntington Investment Company is a registered broker-dealer, member FINRA and SIPC, and registered investment advisor with the U.S. Securities and Exchange Commission (SEC). The Huntington Investment Company is a wholly-owned subsidiary of Huntington Bancshares Incorporated.

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