

DISCLOSURE REGARDING CONFLICT OF INTEREST

Pledging Assets in Fiduciary Accounts

The Huntington National Bank (“Huntington”) acts in a fiduciary capacity with respect to your account (“Fiduciary Account”)

In the course of providing services, there may be situations where a conflict arises between your interests as the grantor/owner of the Fiduciary Account and the interests of Huntington. Huntington believes it is important that you are fully informed regarding these conflicts and is required to take reasonable steps to identify and adequately manage conflicts of interest.

This document contains important information regarding a conflict of interest that can arise in connection with the pledging of assets in fiduciary accounts. Please read it carefully.

The Conflict of Interest

As the grantor/owner of the Fiduciary Account you are entitled to pledge the assets of the Fiduciary Account to secure a loan from Huntington through its Private Bank, Commercial, Retail or other businesses. If you engage in such a transaction, Huntington may, in turn, take a security interest in the assets of your Fiduciary Account to secure the loan, in accordance with the terms of the applicable loan agreements.

When Fiduciary Account assets are pledged as collateral for a loan from Huntington, an inherent conflict of interest exists because Huntington, as a fiduciary, must optimize the investment performance of the Fiduciary Account, while Huntington, as a lender, has an interest in conserving the collateral.

How the Conflict of Interest Is Managed

Huntington’s regulators have issued rules and guidance regarding conflicts of interest and it is Huntington’s policy to adhere to such rules and guidance. In this instance, Huntington’s regulators allow Huntington to make a loan to a Fiduciary Account, to a grantor of a revocable trust, or to a principal of an agency account and hold a security interest in assets of the grantor’s or principal’s Fiduciary Account, if the transaction is fair to the account and is not prohibited by applicable law. In accordance with these requirements, Huntington has the following procedures in place to manage the conflict of interest:

- First, Huntington provides you with this disclosure to ensure that you are aware of the disclosure and able to make an informed decision regarding your Fiduciary Account.
- Second, Huntington continues to manage the Fiduciary Account solely in the interests of the Fiduciary Account owner, grantor and account beneficiaries, in accordance with its general fiduciary responsibilities.
- Third, Huntington ensures that the loan is permitted under applicable legal guidance.

If You Have Questions or Concerns

If you have questions or concerns regarding the conflict of interest disclosed above, please contact your relationship manager.