

The Huntington Investment Company
41 S High Street
HC0429
Columbus, OH 43215



Annual Disclosure Notice

This Annual Disclosure Notice is intended for customers with a Huntington Investment Company (“HIC” or the “Firm”) account and contains important information regarding that account. We encourage you to read this notice carefully and contact your HIC representative with any questions. In addition, you may review additional disclosures, including our current Customer Relationship Summary, Brokerage Fee and Commission Schedule, and Advisory Fee Schedule, at any time by contacting your Financial Advisor, calling us at (800) 332-4600, or visiting our website at www.huntington.com/personal/investments-overview/disclosures.

Please note that Huntington Financial Advisors® (“HFA”) is a federally registered service mark and a 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 of the Financial Industry Regulatory Authority (“FINRA”) and the Securities Investor Protection Corporation (“SIPC”), and a registered investment adviser with the United States Securities and Exchange Commission (“SEC”). The information contained in this Disclosure Notice is applicable to all HIC accounts.

Included in this notice is information regarding:

- Business Continuity Plan
- Investor Education & Protection
- Trading Risk Disclosures
- Penny Stocks
- Marijuana-Related Securities & Activities
- Digital Assets
- Margin Disclosure Statement
- Order Routing Information
- Electronic Funds Transfer Service
- Complaints

Business Continuity Plan

A plan is maintained by HIC to continue business throughout varying degrees of circumstances, which in the absence of the plan, would otherwise disrupt HIC’s ability to conduct business. In the plan, HIC has endeavored to consider and prepare for a broad range of scenarios of varying severity. Preparation includes the establishment of arrangements for alternative facilities, systems and staffing to strive to minimize the impact of any such event. Resumption of service is dependent on the nature of the incident at hand.

For example, should there be an event that would prevent HIC from conducting business in its primary operational facility, the plan is designed to enable resumption of essential functions in a backup facility within the same business day. As to the matter of customers’ ability to place trades, through re-direction of phone lines and access to internet trading capabilities, our expectation is that, so long as the securities markets remain open, trading would not be disrupted.

While there can be no guarantee to its effectiveness, HIC has a high level of confidence that through its careful planning and periodic testing, the Firm’s preparation provides a reasonable strategy to effectively manage a business recovery operation. For more information, contact your HIC representative.

Investor Education and Protection

HIC is a FINRA member. The website address for FINRA is www.finra.org. An investor brochure is posted and available on the FINRA website, which also includes information describing FINRA’s BrokerCheck tool available at www.brokercheck.finra.org. The FINRA BrokerCheck Hotline number is (800) 289-9999.



You may also obtain information about SIPC via its website, which is www.sipc.org. The website contains a Frequently Asked Questions section and a Brochure. SIPC can also be reached at (202) 371-8300.

In addition, HIC is registered with the SEC and the Municipal Securities Rulemaking Board (“MSRB”). The website address for the SEC is www.sec.gov. The website address for the MSRB is www.msrb.org. An investor brochure is posted and available on the MSRB website that describes the protections that may be provided by MSRB rules and how to file a complaint with an appropriate regulatory authority.

You can also find more information about HIC and its representatives at:

www.huntington.com/personal/Investments-Overview/disclosures

Complaints

You may direct any complaints to the HIC representative listed on your account statement, or you may contact our HIC Client Services team by telephone at (800) 322-4600, Mondays through Fridays, 8:00 A.M. to 5:00 P.M. ET. Alternatively, you can forward written complaints to the following address:

Huntington Investment Company
41 S High Street
HC0729
Attention: Compliance Department
Columbus, OH 43215

Trading Risk Disclosures

There are risks associated with extended hours trading. Extended hours trading is defined as trading outside of the regular trading hours for the primary exchange of the security being traded. Regular trading hours generally means between 9:30 a.m. and 4:00 p.m. ET, Monday through Friday for trades in equity securities, and between 8:00 a.m. and 6:30 p.m. ET, Monday through Friday for trades in fixed income securities. These risks include:

- **Lower Liquidity**: Liquidity refers to the ability of market participants to buy and sell securities. Generally, the more orders that are available in a market, the greater the liquidity. Liquidity is important because with greater liquidity it is easier for investors to buy or sell securities and, as a result, investors are more likely to pay or receive a competitive price for securities purchased or sold. There may be lower liquidity in extended trading hours as compared to regular market hours. As a result, an order may only be partially executed, or not executed at all.
- **Higher Volatility**: Volatility refers to the changes in price that securities undergo when trading. Generally, the higher the volatility of a security, the greater its price swings. There may be greater volatility in extended hours trading than in regular market hours. As a result, an order may only be partially executed, or not executed at all, or an order may receive an inferior price in extended hours trading than it would during regular market hours.
- **Changing Prices**: The prices of securities traded in extended hours trading may not reflect the prices either at the end of regular market hours or upon the opening the next morning. As a result, an order may receive an inferior price in extended hours trading than it would during regular market hours.
- **Unlinked Markets**: Depending on the extended hours trading system or the time of day, the prices displayed on a particular extended hours trading system may not reflect the prices in other concurrently operating extended hours trading systems dealing in the same securities. Accordingly, an order may receive an inferior price in one extended hours trading system than it would in another extended hours trading system.

- **News Announcements:** Issuers may make news announcements that affect the prices of their securities after regular market hours. Similarly, important financial information is frequently announced outside of regular market hours. In extended hours trading, these announcements may occur during trading, and if combined with lower liquidity and higher volatility, may cause an exaggerated and unsustainable effect on the price of a security.
- **Wider Spreads:** The spread refers to the difference between the price at which a security can be bought and the price for which it can be sold. Lower liquidity and higher volatility in extended hours trading may result in wider-than-normal spreads for a particular security.
- **Lack of Calculation or Dissemination of Underlying Index Value or Intraday Indicative Value:** For certain derivative securities products, an updated underlying index value may not be calculated or publicly disseminated in extended trading hours. Since the underlying index values are not calculated or widely disseminated during the opening and late trading sessions, an investor who is unable to calculate implied values for certain derivative securities products in those sessions may be at a disadvantage to market professionals.

Day Trading

Day trading is defined as the regular transmission by a customer on intra-day orders to affect both purchase and sale transactions in the same security or securities. There are risks associated with day trading, and generally you will pay commissions on each trade. The total daily commissions that you pay on your trades will add to your losses or significantly reduce your earnings.

Day trading is generally not appropriate for someone of limited resources, limited investment or trading experience, or a low risk tolerance. You should be aware of advertisements or other statements that emphasize the potential for large profits as a result of day trading. Day trading can lead to large and immediate financial losses. You should be prepared to lose all of the funds that you use for day trading. In particular, you should not fund day trading activities with retirement savings, student loans, second mortgages, emergency funds, funds set aside for purposes such as education or home ownership, or funds required to meet your living expenses.

Day trading requires in-depth knowledge of the securities markets and trading techniques and strategies. In attempting to profit through day trading, you must compete with professional, licensed traders employed by securities firms. You should have appropriate experience before engaging in day trading.

Mutual Fund Purchases

If you purchase shares in a mutual fund company, you should be aware of the following:

- The fund's prospectus contains information about the fund's risks, features, and expenses.
- Sales charges on front-end load mutual funds, commonly called 'A' shares, will immediately reduce principal.
- Sales charges on back-end load mutual funds, commonly called 'B' or 'C' shares, will be taken from principal at the time of redemption according to a surrender schedule contained in the prospectus; this is known as a contingent deferred sales charge (CDSC), and over time may incur higher overall charges than front-load mutual funds.
- Mutual funds should be considered a long-term investment.
- When liquidated, mutual fund shares will be sold at the current market value, which may be higher or lower than the amount you paid for the shares.
- Mutual fund sales charges can be reduced by purchasing larger amounts of the fund. These are called "breakpoints." This can be done at the time of initial purchase or over a 13-month period by using a letter of intent.

- Some mutual fund companies offer a “right of reinstatement,” which allows you to re-purchase shares of the same fund family without paying a sales charge within a specified time period after selling the shares.

Penny Stocks

HIC prohibits the purchase, addition, or sale of a “penny stock,” which is defined by the Firm as an equity security that is priced at less than \$5.00 per share and does not trade on a national securities exchange such as the NYSE or NASDAQ. The prohibition does not apply to investment advisory accounts where a third-party manager purchases a penny stock, or in limited situations in a brokerage account. If we determine that a security in your account is a penny stock, as defined above, the security will be restricted from trading. You will be asked to transfer that security out of the account and we can decline any instruction to sell that security.

Marijuana-Related Securities and Activity

We will prohibit solicited purchases of all known marijuana-related securities, and we may also prohibit trading in other marijuana-related securities under certain circumstances.

We are unable to maintain accounts for customers who are employed by, or receive a substantial amount of their income from, a marijuana-related business or other marijuana-related activity. We are also unable to maintain accounts for customers who use their HIC account to send or receive funds with a marijuana-related business or for other marijuana-related activity.

Digital Assets

We prohibit the following activity that involves digital assets, which is sometimes called cryptocurrency, virtual currency or e-currency:

- Initial Coin Offerings (“ICO”);
- Solicited customer trading of an exchanged-based security that conducts digital asset-related business;
- Customer trading of digital asset futures;
- Promoting or helping set up structures for customers to invest in or hold digital assets;
- Opening or maintaining an account or wallet for (or acting as) a digital asset promoter, administrator, broker or exchange;
- Knowingly accepting customer funds that come from digital assets; and,
- Knowingly extending credit to customers to purchase or hold digital assets (at the Firm or outside the Firm).

Examples of digital assets include, but are not limited to, Bitcoin, Monero, Ethereum and Ripple.

Margin Disclosure Statement

Securities purchased on margin are the Firm's collateral for the loan to you. If the securities in your account decline in value, then so does the value of the collateral supporting your loan. As a result, we can take action including, but not limited to, issuing a margin call and/or selling securities or other assets in any of your accounts held with us to maintain the required equity in the account. It is important that you fully understand the risks involved in trading securities on margin, including the following:

- You can lose more funds than you deposit in the margin account.
- We can force the sale of securities or other assets in your account(s).
- We can sell your securities or other assets without contacting you.
- You are not entitled to choose which securities or other assets in your account(s) are liquidated or sold to meet a margin call.

- We can increase the "house" maintenance margin requirements at any time and are not required to provide you advance written notice.
- You are not entitled to an extension of time on a margin call.

Order Routing Information

HIC operates pursuant to the (k)(2)(ii) exemptive provisions of SEC Rule 15c3-3 and does not hold customer funds or securities. HIC, acting as agent for its customers, introduces customers to National Financial Services, LLC ("NFS"), its clearing broker-dealer. NFS provides multiple brokerage services including, among other things, carrying customer cash and margin accounts and clearing all equity and options transactions for such accounts.

HIC routes equity securities and equity options orders to NFS pursuant to a fully disclosed clearing arrangement. NFS selects the exchanges or broker-dealers for execution on behalf of HIC.

Some of the exchanges or broker-dealers may provide payments to NFS depending upon the characteristics of the order and any subsequent execution. However, other than the clearing arrangement with NFS, HIC does not have any arrangement with the execution venues and HFA does not receive any payment for order flow from NFS or the execution venues. NFS is responsible for disclosing any payment for order flow arrangements separately to HIC customers.

Each quarter, NFS also prepares order routing reporting of HIC customers' non-directed orders subject to SEC Rule 606, including the type and the identity of the broker-dealers or exchanges receiving these orders. The quarterly reporting is available at www.huntington.com/personal/Investments-Overview/disclosures.

A copy of the most recent quarterly reporting is also available to you upon request. Upon written request to HIC or NFS, you may also obtain the identity of the broker-dealer or exchange executing your trade and the associated time of execution on any of your equity trades placed within the last six months.

Electronic Funds Transfer Services

You can send electronic payments or receive electronic deposits to or from your HIC account, if we permit it and if processed through the processing networks that we use. If we receive notice that an electronic deposit was sent by mistake, or was intended for another customer or account, we may deduct the amount of that deposit from your account.

Call us or write to us as soon as you can if you think your statement or receipt is wrong or if you need more information about a transaction. You may call our toll-free number, (800) 322-4600, or write to The Huntington Investment Company, 41 South High St. HC0729 Columbus, Ohio 43215. We must hear from you no later than 60 days after we sent (or made available) the FIRST statement on which the problem or error appeared. Please provide the following information:

- Your name and account number.
- A description of the error or the transfer you are unsure about and explain as clearly as you can why you believe it is an error or why you need more information.
- The dollar amount of the suspected error.

NOTE: If you tell us orally, we may require that you also send us your complaint or question in writing so that we receive it within ten (10) business days.

We will determine whether an error occurred within ten (10) business days after we hear from you and will correct any error promptly. If we need more time, however, we may take up to 45 days to investigate your concern. . If we



decide to do this, we will provisionally credit your account within 10 business days for the amount you think is in error, so that you will have use of the money during the time it takes us to complete our investigation. If we ask you to put your suspected error or inquiry in writing and we do not receive it within 10 business days, we are not required to provisionally credit your account.

When the investigation is complete, we will make any necessary or appropriate adjustments to your account. We will tell you the results within 3 business days after completing our investigation. If we decide that there was no error or the error was different than you described, we will send you a written explanation. If we determine that there was an error, we will correct the error within 1 business day after we determined the error occurred. You may ask for copies of the documents that we used in our investigation.

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The Huntington Investment Company is a wholly owned subsidiary of Huntington Bancshares Incorporated. Huntington and the Huntington Brandmark are federally registered service marks of Huntington Bancshares Incorporated.

Investment and insurance products are: **NOT A DEPOSIT • NOT FDIC INSURED • NOT GUARANTEED BY THE BANK • NOT INSURED BY ANY FEDERAL GOVERNMENT AGENCY • MAY LOSE VALUE**

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