

HUNTINGTON BANCSHARES INCORPORATED INVESTOR RELATIONS ANALYST / INVESTOR ACCESS POLICY

I. GENERAL GUIDELINES

A. Objective

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 (see Disclosure Policy).

Concurrent with its Disclosure Policy, 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.

This policy outlines 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.

B. Company Representatives

The Company has designated the Director of Investor Relations (DIR), Assistant Director of Investor Relations (ADIR), and its Investor Relations Officer(s) (IRO) as the Company's primary representatives. These individuals are listed in Attachment A.

The Chief Executive Officer (CEO), Chief Financial Officer (CFO), as well as certain line of business heads and other individuals may also be designated as Company representatives from time to time and for a specific situation relating to matters pertaining to their specific areas of responsibility, consistent with Item III below.

II. 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.

III. 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

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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, 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 web casts 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.

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6. Should a meeting be canceled, the Company will make every effort to reschedule the meeting as quickly as possible consistent with Section V of the Company's Disclosure Policy.

IV. REVIEWING ANALYST REPORTS AND/OR MODELS

- A. 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.**
- B. 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.**

(Also refer to Section V.B. of the Disclosure Policy)

Adopted: August 2004

Revised: July 2007, May 2008, August 2010

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ATTACHMENT A –AUTHORIZED REPRESENTATIVES

Jay S. Gould
Todd Beekman
None appointed

Sr. Vice President	DIR
Sr. Vice President	ADIR
	IRO

Revised: August 2010