

	Huntington Bancshares Incorporated Policy	
	Title: Investor Relations Public Disclosure and Access Policy	Policy Level: Board, Enterprise
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Policy Owner: Director of Investor Relations	Publication Date: April 28, 2026	Effective Date: April 21, 2026
Policy Contact: Eric Wasserstrom	Next Review Date: April 30, 2027	
The information contained herein is confidential and proprietary information of Huntington. This policy must be read and followed in conjunction with all other applicable policies, standards, training, and guidelines in effect at Huntington.		

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1. Executive Summary

This policy sets forth the requirements applicable to Huntington’s public disclosures to comply with legal and regulatory requirements of the SEC’s Regulation Fair Disclosure (Reg. FD). It covers all external information disclosure venues and channels including written statements made in the Company’s annual and quarterly reports, news and earnings releases, letters to shareholders, speeches by senior management, oral statements, and information contained on the Company’s website.

This policy also sets forth requirements for 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.

2. Applicability

This policy applies to Directors of the Board and all Huntington colleagues, including but not limited to, colleagues who perform activities related to SEC filed documents and written statements made in the Company’s annual and quarterly reports, news and earnings releases, letters to shareholders, speeches by senior management, information contained on the company’s website, group or individual meetings or phone calls with analysts/investors, interviews with the media and press conferences.

3. Key Definitions

Material information: information about the Company where:

- there is substantial likelihood that a reasonable analyst and/or an existing and/or potential investor would consider it important in making an investment decision, and/or
- the information significantly alters the ‘total mix’ of the information in the marketplace about the Company

Company information that could be considered material includes:

- Earnings information
- Mergers, acquisitions, and divestitures
- New products
- Changes in control
- Change in auditors
- Events regarding the Company’s securities (e.g., splits, dividends, calls for redemption, repurchase plans)
- Material changes in the Company’s capital structure
- Changes in the regulatory environment or relationships with regulators that would have a significant impact on financial performance or competitiveness of the Company
- Changes in credit ratings or relationships with credit rating agencies
- Significant changes in the credit quality outlook of the Company’s portfolios
- Changes in accounting policies either internally or externally driven (e.g., FASB) that would have a significant impact on financial results
- Major litigation
- Changes in senior executive officers.

Non-public information: information that has not been disseminated by the Company in a manner making it available to analysts/investors generally (e.g., through a press release, an SEC filing, a webcast that has been publicly announced beforehand in accordance with Reg. FD, etc.)

Analysts: Sell-side analysts working at firms that write equity/fixed income research reports (e.g., Goldman Sachs, Bank of America Securities, etc.) and buy-side analysts that write internal research reports working at investment companies that make equity or fixed income investments (e.g., Fidelity Management & Research, Wellington Management, etc.). Also applies to analysts at rating agencies that rate the Company's debt (e.g., Moody's Investors Service, Standard and Poor's Financial Services, etc.).

Investors: Retail shareholders and/or portfolio managers working at investment companies that make equity or fixed income investments (e.g., Fidelity Management & Research, Vanguard, Ohio State Teachers Pension, etc.).

4. Requirements

Huntington 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 must be done by an authorized company representative in a manner that provides all analysts/investors with equal access to Company information. In particular, when material non-public information is disseminated, the authorized company representative must ensure the dissemination is performed on a broad basis. Material non-public information must not be selectively disclosed in violation of Reg. FD.

4.1. Determination of Material Non-Public Information and Need for Disclosure

Determinations of the materiality of non-public information must be made by the DIR/ADIR and/or CFO and depending on level of expertise required, with consultation with the General Counsel (GC) and/or the Chief Risk Officer (CRO) or their representatives. A representative of Corporate Communications and others, such as line of business heads, must be consulted as warranted by the situation and/or time requirements of Reg. FD. Such discussions must also include a determination of whether or not public disclosure of the information is required.

4.1.1. Situations Not Requiring Disclosure

If the information is not material or has been previously made public, a company representative should not make a public disclosure of the subject information.

4.1.2. Situations Requiring Public Disclosure

In accordance with Reg. FD, the Company must simultaneously disclose material nonpublic information in 'intentional' disclosure situations.

The Company must promptly disclose (defined by Reg. FD as the later of 24 hours or commencement of the next day's trading) material nonpublic information in 'non-intentional' disclosure situations. In each such case, the procedures described in "Statement Preparation and Content for Releasing Material Non-Public Information" and "Releasing Material Non-Public Information" must be followed.

4.1.3. Commenting on Rumors

The authorized Spokespersons must respond consistently to rumors, saying, "It is Company policy not to comment on market rumors or speculation."

Should the situation arise where the Company would make a definitive statement in response to a marketplace rumor, the CEO, upon recommendation from DIR/ADIR, CFO, GC, and CRO can allow a company spokesperson to make a statement.

4.1.4. Social Media/Internet Chat Rooms/Electronic Message Channels

In accordance with the Company's Social Media Policy, colleagues are prohibited from speaking on behalf of Huntington or creating the perception of doing so regarding business operations, financial results, or other sensitive matters, unless expressly authorized by Corporate Communications.

4.2. Statement Preparation and Content for Releasing Material Non-Public Information

4.2.1. Preparation/Review

The DIR/ADIR must prepare and/or review Company statements, including press releases and scripts for analyst meetings and investor presentations with the assistance of and/or review by the GC and others as warranted by the level of expertise required.

4.2.2. Completeness and Accuracy

Company statements must present information in an accurate, complete, and fair manner.

4.2.3. Consistency

All statements of similar or recurring Company information should be consistent, both as to timing and content.

4.2.4. Appropriate Cautionary Language

Every Company statement that contains a projection must include appropriate 'forward-looking' safe harbor language in accordance with the Private Securities Litigation Reform Act of 1995 wherein all applicable risk factors, which may have a bearing on the subject matter of the statement or on the Company's overall performance as it relates to the statement can be ascertained.

4.3. Releasing Material Non-Public Information

4.3.1. Widespread Dissemination

- 1) Authorized company representatives must issue press releases to the financial news services, major wire services and newspapers in markets having a significant relationship to the Company. In support of this, the Company should provide 'push' technology capabilities for electronic notification of such releases.
- 2) The Nasdaq must be notified by an authorized company representative at least 10 minutes in advance of the press release and a copy must be provided by either direct posting to the Nasdaq electronic dissemination web site, email or fax. If the press release is issued during normal trading hours, the Nasdaq must be notified as early as possible.

- 3) If a Company presentation or management interview that contains material information, follows the issuance of the press release, an authorized company representative must ensure it is disseminated simultaneously through a webcast and/or by teleconference capability. Instructions on how to participate in such a web broadcast/conference call, including replay information, must be included in the press release.
- 4) The statement and, if appropriate and available, any related materials (e.g., management presentation, conference call transcripts, etc.) must be filed by an authorized company representative with the SEC on Form 8-K or other appropriate form.
- 5) For regularly scheduled press releases and conference calls, such as for the disclosure of earnings information, the authorized company representative must issue to the public, advance notice of the conference call and webcast information.

4.3.2. Review of Third Party Comments for Accuracy

The Company may review articles that restate or discuss Company statements for accuracy, and should promptly alert third parties that misstate material factual information.

4.4. Information Flow

The Company must 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.

4.5. Communications with Analysts

4.5.1. Previously Disclosed Historical or Generally Known Information

Analysts (sell-side and buy-side) are recognized as an important means by which the investment community can learn about the Company and its performance, strategies, markets and historical trends. The Company, primarily through the DIR/ADIR/IRO, may provide information to analysts about the Company with respect to previously disclosed historical information, or facts that are generally known.

4.5.2. No Assistance with Analyst Reports

The Company must not assist analysts in the preparation of their reports and/or earnings projections regarding the Company. After publication, if material errors in previously disclosed historical or factual information are noted, the Company may contact the analyst noting such errors. 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. 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 representatives must only comment on historical or forward-looking information that is in the public domain.

4.5.3. Analyst Meetings and Conference Calls

From time to time, the Company may conduct self-hosted and/or interactive conference calls with analysts and investors as warranted (e.g., coincident with the release of quarterly earnings or a major Company announcement). When these occur, they must comply with provisions of the section "Releasing material non-public information".

4.5.4. One-on-One Meetings

It is the Company's general practice to maintain an 'open door' policy in granting and/or initiating visits between management and analysts and investors. Such meetings may be initiated by analysts or investors (e.g., Visiting Analyst Program), management (e.g., Investor Calling Program), or third parties such as brokers (e.g., broker-sponsored dinners or conference breakout sessions). Such meetings should be scheduled between the date of the quarterly earnings release and the 22nd calendar day of March, June, September, and December.

4.5.5. DIR/AIDR/IRO Presence

To the degree possible, the DIR/ADIR/IRO should be present during conversations (phone or face-to-face) between Company Representatives and outside third parties, such as analysts or investors. The DIR/ADIR/IRO may interrupt a conversation and advise the Representative not to respond to certain questions as appropriate. Further, Company Representatives must contact the DIR/ADIR prior to such conversations. If for any reason such conversations take place without the DIR/ADIR/IRO present, then the DIR/ADIR must be notified as soon as possible thereafter regarding the nature and content of the conversation.

4.6. Public Comment on Analyst Projections and Company Projections

4.6.1. No Comment

The Company will not comment on analyst projections and will not make Company projections except in broadly disseminated public disclosures or in SEC filed documents. The Company will not refer to or distribute analysts' projections other than limited internal distribution to broaden the understanding of analyst perceptions of the Company, competitors, or industry issues.

4.6.2. Incorrect Attribution of a Projection to the Company

If a projection is incorrectly attributed to Company sources, either directly or indirectly, the DIR/ADIR should publicly deny Company responsibility for the information and reaffirm that the Company has no comment on the accuracy of the projection.

4.6.3. Correct Attribution or Apparent Company Source

If a projection is correctly attributed to a Company source, or its nature makes it likely that there was a Company source, the DIR/ADIR should publicly confirm or deny the accuracy of the information provided by the source.

4.7. Corporate Access

4.7.1. The Company must 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.
- 3) Attempt to influence the research, recommendations, or actions of analysts or investment professionals by exerting pressure through other business relationships.

4.7.2. The Company must

- 1) Provide access to Company Representatives to analysts/investors as noted below
- 2) Make available, upon request, a copy of this policy

4.7.3. 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, Treasurer, 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
- 7) Publicly accessible webcasts using freely available Internet technology with pre-notification and the opportunity to pose questions

4.7.4. Prioritizing Requests for Access

Given limitations regarding the number of Company representatives and their availability, the Company should follow the guidelines outlined below in prioritizing requests for access:

- 1) All analysts/investors, without regard to any prioritization criteria, should be granted access to the DIR, ADIR, and/or IRO. Access to other Company representatives should 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 should 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 should 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, must make a good faith effort to grant access to Company representatives other than the DIR, ADIR, and/or IRO.
- 6) Should a meeting be canceled, the Company must make every effort to reschedule the meeting as quickly as possible consistent with the section "Communication with analysts".

5. Roles and Responsibilities

The Company has designated the Chief Executive Officer (CEO), Chief Financial Officer (CFO), Director of Investor Relations (DIR), Assistant Director of Investor Relations (ADIR), and its Investor Relations Officer(s) (IRO) as the Company's authorized Representatives for purposes of engagement with analysts/investors and securities markets professionals. The Company also has designated the Treasurer as a primary Representative with analysts from the credit ratings agencies.

Certain line of business heads and other individuals may also be designated from time to time and for a specific situation as Company Representatives relating to matters pertaining to their specific areas of responsibility (e.g., investor visits, investor presentations, investor days, etc.)

To the degree possible, all public disclosures of information about the Company and communications with analysts/investors should be made by authorized Representatives after having consulted with the DIR/ADIR. As such, the DIR/ADIR must be kept informed of all material information about the Company.

6. Governance of this Policy

Investor Relations is responsible for ensuring that review and approval of this policy by the Risk Oversight Committee occurs at least annually.

This policy may be modified, discontinued, or replaced at any time, at Huntington's discretion. The Director of Investor Relations is responsible for maintaining this policy.

The Director of Investor Relations is responsible for ensuring that management's responsibilities pursuant to this policy are achieved; including Reg FD compliance training and a routing of this policy at least annually to the Leadership Team members and others likely to be contacted directly by analysts / investors.

In the event a violation is discovered, the Director of Investor Relations, CFO, Chief Risk Officer, and General Counsel, or their representatives, must discuss potential actions to be taken regarding the incident (e.g., 8-K filing). Additional members of Senior Management and/or Board members may be included in the discussion.

Investor Relations in conjunction with Finance and Accounting Segment Risk are responsible for creating and monitoring any risk limits that may be deemed necessary.

6.1. Escalation

The Policy Owner has primary responsibility for the interpretation of the requirements of this policy. If the Policy Owner or another party determines that an escalation is necessary, the matter should be escalated by the Policy Owner to the governing committee for consideration and decisioning. See the [Risk Governance Framework](#) and the Risk Pillar Frameworks for additional information on escalation protocols.

6.2. Policy Exceptions

A policy exception is an approved permission to not comply with a policy requirement. The request must be submitted by the impacted business segment/unit and must be approved by the Policy Owner before policy noncompliance occurs. Policy exceptions against requirements based in law or regulation are not allowed.

See Section 4.5.5 of the [ROC2405 Enterprise Policy on Governance and Policies](#) for additional detail, including requirements regarding the duration, changes, and closures of exceptions.

6.3. Policy Violations

A policy violation is an observation of policy noncompliance after it occurs. The identifying party must advise the Policy Owner of the violation. Policy violations do not have a duration; they are recorded as a one-time event.

Violations of policies by individual colleagues may be subject to disciplinary action outlined in Huntington's Code of Conduct and Ethics.

Policy violations, including those that require remediation, must be reviewed against the criteria for a Finding in accordance with RMC-1201 *Issues Management Policy*. If a violation is determined not to meet the criteria for a Finding, the identifying party must document the rationale in the violation description.

See Section 4.5.5 of the [ROC2405 Enterprise Policy on Governance and Policies](#) for additional detailed requirements regarding policy violations.

7. Definitions

See [Key Terms & Definitions](#) on *Essentials* for HBI common key terms, definitions, and abbreviations.

8. Contacts

Table 1. Contacts

Title	Name	Email
Director of Investor Relations	Eric Wasserstrom	huntington.investor.relations@huntington.com

9. Revision History

Table 2. Revision History

Revision History:	
Date Approved	Brief Revision Description
December 2015	Objective D, Social Media, aligned with HBI Social Media Policy
December 2016	Communications with Analysts, Section B, aligned with Investor Relations Analyst / Investor Access Policy
December 2019	The Investor Relations Analyst / Investor Access Policy was incorporated into this policy.
January 2022	Changed general timing of one-on-one meetings with analysts from fifteen business days to fifteen calendar days to align closer to trading blackout time windows. Updated table of Authorized Representatives in Appendix A to reference titles only and removed colleague names.
February 2024	Renewal; no material changes
February 2026	Changes to align to ROC2405 requirements and EP&G template.
April 2026	Approved by Join Risk Oversight Committee and republished on Essentials.

Appendix 1 References

AP 1.1 Authoritative Sources

Table 3. Authoritative Sources

Authoritative Sources:
SEC Regulation Fair Disclosure (FD)

AP 1.2 Supporting Documents

Table 4. Supporting Documents

Supporting Document References:	
Reference #	Document Name
	Investor Relations SEC-Disclosure Compliance Procedures
LRC-1501	Social Media Policy

Appendix 2 List of Policy Requirements

Table 5. List of Policy Requirements

List of Policy Requirements contained in this Policy (“must” statements)			
No.	Reference Section	Requirements	Is the requirement subject to policy exceptions? (Y/N)?
1)	4.1	DIR/ADIR and/or CFO and depending on level of expertise requires, with consultation with the General Counsel (GC) and/or the Chief Risk Officer (CRO) or their representatives must make determinations of the materiality of non-public information.	N
2)	4.1.2	The Company must simultaneously disclose material nonpublic information in ‘intentional’ disclosure situations.	N
3)	4.1.2	The Company must promptly disclose (defined by Reg. FD as the later of 24 hours or commencement of the next day’s trading) material nonpublic information in ‘non-intentional’ disclosure situations.	N
4)	4.1.2	In each such case, the procedures described in “Statement Preparation and Content for Releasing Material Non-Public Information” and “Releasing Material Non-Public Information” must be followed.	N
5)	4.1.3	The authorized Spokespersons must respond consistently to rumors, saying, “It is Company policy not to comment on market rumors or speculation.”	N
6)	4.2.1	The DIR/ADIR must prepare and/or review Company statements, including press releases and scripts for analyst meetings and investor presentations with the assistance of and/or review by the GC and others as warranted by the level of expertise required.	N
7)	4.2.2	Company statements must present information in an accurate, complete, and fair manner.	N
8)	4.2.4	Every Company statement that contains a projection must include appropriate ‘forward-looking’ safe harbor language in accordance with the Private Securities Litigation Reform Act of 1995 wherein all applicable risk factors, which may have a bearing on the subject matter of the statement or on the Company’s overall performance as it relates to the statement can be ascertained.	N
9)	4.3.1.1	Authorized company representatives must issue press releases to the financial news services, major wire services and newspapers in markets having a significant relationship to the Company. In support of this, the Company should provide ‘push’ technology capabilities for electronic notification of such releases.	N

List of Policy Requirements contained in this Policy (“must” statements)			
No.	Reference Section	Requirements	Is the requirement subject to policy exceptions? (Y/N)?
10)	4.3.1.2	The Nasdaq must be notified by an authorized company representative at least 10 minutes in advance of the press release and a copy must be provided by either direct posting to the Nasdaq electronic dissemination web site, email or fax. If the press release is issued during normal trading hours, the Nasdaq must be notified as early as possible.	N
11)	4.3.1.3	If a Company presentation or management interview that contains material information, follows the issuance of the press release, an authorized company representative must ensure it is disseminated simultaneously through a webcast and/or by teleconference capability. Instructions on how to participate in such a web broadcast/conference call, including replay information, must be included in the press release.	N
12)	4.3.1.4	The statement and, if appropriate and available, any related materials (e.g., management presentation, conference call transcripts, etc.) must be filed by an authorized company representative with the SEC on Form 8-K or other appropriate form.	N
13)	4.3.1.5	For regularly scheduled press releases and conference calls, such as for the disclosure of earnings information, the authorized company representative must issue to the public, advance notice of the conference call and webcast information.	N
14)	4.4	The Company must 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.	N
15)	4.5.2	The Company must not assist analysts in the preparation of their reports and/or earnings projections regarding the Company.	N
16)	4.5.2	The Company must not explicitly or implicitly request information that would disclose the conclusions, recommendations, valuations, or price targets, or comment on these matters.	N
17)	4.5.2	The company representatives must only comment on historical or forward-looking information that is in the public domain.	N
18)	4.5.3	When the Company conducts self-hosted and/or interactive conference calls with analysts and investors, they must comply with provisions of the section “Releasing material non-public information”.	N
19)	4.5.5	Company Representatives must contact the DIR/ADIR prior to conversations with outside third parties, such as analysts or investors. If for any reason such conversations take place without the DIR/ADIR/IRO present, then the DIR/ADIR must be notified as soon as possible thereafter regarding the nature and content of the conversation.	N

List of Policy Requirements contained in this Policy (“must” statements)			
No.	Reference Section	Requirements	Is the requirement subject to policy exceptions? (Y/N)?
20)	4.7.1	The Company must 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. 3) Attempt to influence the research, recommendations, or actions of analysts or investment	N
21)	4.7.2	The Company must 1) Provide access to Company Representatives to analysts/investors as noted in item D 2) Make available, upon request, a copy of this policy	N
22)	5	To the degree possible, all public disclosures of information about the Company and communications with analysts/investors should be made by authorized Representatives after having consulted with the DIR/ADIR. As such, the DIR/ADIR must be kept informed of all material information about the Company.	N
23)	6	In the event a violation is discovered, the Director of Investor Relations, CFO, Chief Risk Officer, and General Counsel, or their representatives, must discuss potential actions to be taken regarding the incident (e.g., 8-K filing). Additional members of Senior Management and/or Board members may be included in the discussion.	N
24)	6.2	A policy exception request must be submitted by the impacted business segment/unit and must be approved by the Policy Owner before policy noncompliance occurs.	N
25)	6.3	The identifying part of a policy violation must advise the Policy Owner of the violation.	N
26)	6.3	Policy violations, including those that require remediation, must be reviewed against the criteria for a Finding in accordance with RMC-1201 <i>Issues Management Policy</i> . If a violation is determined not to meet the criteria for a Finding, the identifying party must cement the rationale in the violation description.	N