



CODE OF BUSINESS CONDUCT AND ETHICS

Introduction

Huntington requires high standards of professional and ethical conduct from its directors, officers, and employees. Huntington's reputation with its shareholders and prospective investors for honesty and integrity is key to the success of the Company.

Reference in this Code of Business Ethics and Conduct (the "**Code**") to "Huntington" or the "Company", means Huntington Exploration Inc. Reference to "**employees**", means all directors, officers, employees and senior managers of affiliates of Huntington, and where appropriate, contractors and subcontractors of the Company and its affiliates.

This Code is intended to document the principles of conduct of ethics to be followed by all Huntington employees. This Code reflects the Company's commitments to a culture of honesty, integrity and accountability and outlines the basic principles and policies with which all employees are expected to comply.

In addition to following this Code in all aspects of their business activities, employees are expected to seek guidance in any case where there is a question about the compliance with both, the letter and the spirit of the Company's policies and applicable laws. This Code covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide all employees of the Company. Violation of the law, the Company's governance policies or this Code is grounds for disciplinary action up to and including, but without limitation, immediate termination of employment or directorship.

Compliance with Law

Compliance with the letters and the spirit of all laws, rules and regulations applicable to the Company is critical to the Company's reputation and continued success. All employees must at all times respect and obey the law and should avoid any situation that could be perceived as improper, unethical or indicate a casual attitude towards compliance with the law. No employee shall commit or condone an illegal act or instruct another employee to do so. Not all employees are expected to know the details of all laws, but it is important to know enough to determine when to seek advice from supervisors, managers or other appropriate personnel.

Conflicts of Interest

A conflict of interest occurs when an individual's private interest interferes, or appears to interfere, in any way with the interests of the Company or any of its affiliates. A conflict situation can arise when an employee takes actions or has interests that may make it difficult to perform his or her work for the Company or any affiliate objectively and effectively. Conflicts of interest also arise when an employee, or a member of his or her family, receives improper benefits as a result of his or her position in the Company or its affiliates.

Loans to, or guarantees of obligations of, such persons are likely to pose conflicts of interest, as are transactions of any kind between the Company or its affiliates and any other organization in which an employee or employee's family member has an interest.

Activities that could give rise to conflicts of interest are prohibited unless specifically approved by the Board of Directors of Huntington. It is not always easy to determine whether a conflict of interest exists; therefore, an employee should immediately report any potential conflict of interest to the Company's CEO and Audit Committee Chairman.

Corporate Opportunities

Employees are prohibited from taking for themselves personally opportunities that arise through the use of corporate property, information or position of personal gain. Employees are also prohibited from competing with the Company and its affiliates directly or indirectly. Employees owe a duty to the Company and its affiliates to advance the legitimate interests of the Company and its affiliates when the opportunity to do so arises.



Confidentiality

Employees must maintain the confidentiality of all information entrusted to them by the Company or that otherwise comes into their possession in the course of their employment, except when disclosure is authorized by the CEO of the Company or legally mandated. Confidential information, such as personal employee information, must be used for authorized purposes only and in accordance with applicable legislation.

Confidential information includes all non-public information that may be of use to competitors, or harmful to the Company or its customers or business partners, if disclosed. It also includes information that others have entrusted to the Company and employees.

The obligation to preserve confidential information continues even after the employees leave the Company or its affiliates.

Protection and Proper Use of Company Assets

All employees should endeavor to protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's success. Any suspected incidents of fraud or theft should be immediately reported for investigation.

Company assets, such as funds, products or computers may only be used for legitimate business purposes or other purposes approved by management. Company assets must never be used for illegal purposes.

The obligation to protect the Company's assets includes proprietary information. Proprietary information includes any information that is not generally known to the public or would be helpful to the Company's competitors. Examples of proprietary information include intellectual property, business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data or reports.

Unauthorized use or distribution of this information is a violation of Company policy. It may also be illegal and may result in civil and criminal penalties.

The obligation to preserve proprietary information continues even after an employee leaves the Company or its affiliates.

Integrity of Records and Financial Reports

Honest and accurate recording and reporting of information is critical to the Company's financial reporting obligations as a public company and the ability to make responsible business decisions. All transactions must be supported by accurate documentation in reasonable detail and properly recorded. All Company's books, records, accounts and financial statements must be maintained in reasonable detail, must truthfully, accurately and appropriately reflect the Company's transactions and must conform to applicable legal and accounting requirements and to the Company's system of internal controls. Depending on their position within the Company, employees may be called upon to provide necessary information to ensure that the Company's public reports are complete and accurate.

Business records and communications may become public through legal or regulatory disclosures or investigations or the media. In all communications, including emails, informal notes, or internal memos, employees should avoid exaggeration, derogatory remarks, legal conclusions or inappropriate characterizations of people and companies.

Insider Trading

Employees who have access to confidential information are not permitted to use or share that information for stock trading purposes or for any other purpose except the conduct of the business of the Company. All non-public information about the Company and its affiliates should be considered confidential. To use non-public information for personal financial benefit or to "tip" others who might make an investment decision on the basis of this information is unethical and illegal.

The Company is committed to compliance with all applicable laws, rules, and regulations, including laws and regulations applicable to the Company's securities and trading in such securities, as well as any rules promulgated by



any exchange on which the Company's shares are listed or quoted for trading.

Fair Dealing

The principle of fair competition is basic to all of the Company's operations. Huntington seeks competitive advantages through fair and honest means and superior performance, never through unethical or illegal business practices. Each employee should endeavor to deal fairly with the Company's customers, suppliers, competitors and employees. When dealing with suppliers and other third parties, the Company:

- prohibits employees from accepting any bribe, kickback, or improper payment from anyone;
- requires clear and precise communication in the Company's contracts, its advertising, its Literature, and its other public statements and seeks to eliminate misstatements of fact or misleading impressions; and
- prohibits employees from otherwise taking unfair advantage of the Company's suppliers, or other third parties, through manipulation, concealment, abuse of privileged information or any other unfair-dealing practice.

Discrimination and Harassment

Huntington values the diversity of its employees and is committed to providing equal opportunity in all aspects of employment. Abusive, harassing or offensive conduct is unacceptable, whether verbal, physical or visual. Examples include derogatory comments based on racial or ethnic characteristics and unwelcome sexual advances. Employees are encouraged to speak out when a co-worker's conduct makes them uncomfortable. Any employee who believes that he or she has been subjected to sexual or other harassment should immediately advise their supervisor or, in instances in which they feel uncomfortable approaching their supervisor, discuss their concern with another manager, CEO or the Chairman of the Audit Committee.

Safety and Health

Both the Company, its employees and contractors are responsible for maintaining a safe and healthy workplace by following safety and health rules and practices. The Company is committed to keeping its workplaces free from hazards. Employees should report any accidents, injuries, unsafe equipment, practices or conditions immediately to a supervisor or other designated person. All reports should be in written form and will be kept on file with the Company to ensure that appropriate actions have been taken. Safety of employees and contractors are of utmost importance to the Company; any and all recommendations for improvement are always welcome. In order to protect the safety of all employees, employees must report to work in condition to perform their duties and free from the influence of any substance that could prevent them from conducting work activities safely and effectively.

Use of E-Mail, Internet and Telephone Services

E-mail, internet and telephone services provided by the Company must never be used for personal gain or any improper purpose. Sending or downloading information that could be insulting or offensive to another person is forbidden. Such information includes sexually explicit material or jokes, unwelcome propositions, ethnic or racial slurs, or any other message that could be viewed as harassment.

Employees should not download copyrighted materials, should not copy material that is not licensed to the Company and should follow the terms of a license when using material that is licensed to the Company. No changes should be made to licensed materials without the prior consent of the Company. Employees are discouraged from downloading any material commonly known to be sources of viruses, such as screensavers and games.

Employees agree to always "stop and ask" if the employee receives any email that solicits personal or Company information. There will never be a demand from management, on any email requests, of soliciting information that is not initiated with a phone call discussion. Employees must not open any unusual attachments that they would not normally receive during the course of their workday. In addition, it is the responsibility of the employee to immediately report to either the CEO or CFO any email which either appears suspicious and/or that the employee has already opened that is of a suspicious nature.



E-mail messages, voicemail messages, and computer information are considered the Company's property and an employee should not have any expectation of privacy. Management reserves the right to review any employees' emails and correspondence at any time.

Political Activities and Contributions

Huntington respects and supports the right of its employees to participate in political activities. However, these activities should not be conducted on Company time or involve the use of any Company resources such as telephones, computers or supplies. Employees who participate in political activities must make every effort to ensure that they do not leave the impression that they speak or act for the Company. Employees will not be reimbursed for personal political contributions.

Extremist political views that promote any type of hate or racist views by an employee will be grounds for dismissal. These include employees demonstrating support on any public (inclusive of web-based) platforms. As an employee of the firm, you accept responsibility of being a representative of the Company, whose actions both during work hours and non-work hours could potentially impact the reputation of the Company.

The Company will not make any direct financial donations or contributions to political parties or candidates.

Authorized spokespersons may occasionally express the Company's views on local and national issues that affect the Company's operations. In such cases, Company funds and resources may be used, but only when permitted by law and by any guidelines set by the Board.

Dealing with Public Officials

Employees are prohibited from offering or soliciting gifts, payments or other benefits to or from a public official as inducement to procuring or keeping business or having law or regulation enacted, defeated or violated.

When not prohibited by law, employees are allowed to give public officials gifts but only if such gifts are presented in a manner that clearly identifies the Company and the occasion warrants the presentation. All such gifts shall be of reasonable value. On special historic or ceremonial occasions, senior officers of the Company may publicly give gifts of more than nominal value to public institutions and public bodies. All gifts intended for public officials or institutions must be approved in advance by the Chairman of the Board and CEO with details of such gifts provided to the CFO for reporting purposes.

These guidelines apply at all times, and do not change during traditional gift-giving seasons.

From time to time, employees may entertain public officials, with courtesies such as meals and beverages, tickets to sporting or cultural events, but only under the following conditions:

- it is legal and permitted by the entity represented by the official;
- the entertainment is not solicited by the public official;
- it arises out of the ordinary course of business;
- it cannot be construed as a bribe or payoff;
- it does not involve lavish expenditures, considering the circumstances; and
- the settings and types of entertainment are reasonable and appropriate to employees, their guests and the business at hand.

Gifts and Entertainment

The Company acknowledges that business gifts and entertainment are customary to developing and maintaining good business relationships among business partners. Such courtesies include meals and beverages, tickets to sporting or cultural events, discounts not available to the general public, travel, accommodation and other merchandise or services.



Even though such gifts and entertainment are customary, such courtesies cannot compromise, or appear to compromise, the ability to make objective and fair business decisions. Therefore, offering or receiving any gift, gratuity or entertainment that might be perceived to unfairly influence a business relationship must be avoided. These guidelines apply at all times, and do not change during traditional gift-giving seasons.

Employees are prohibited from soliciting gifts, entertainment, gratuities, or any other personal benefit or favor of any kind from current or potential suppliers or business partners.

No gift or entertainment should ever be offered, given, provided or accepted by any employee of the Company, or by any family member of an employee, unless it:

- is not a cash gift;
- is consistent with customary business practices;
- involves reasonable expenditures not excessive in value;
- cannot be construed as a bribe or payoff;
- does not violate any applicable laws or regulations.

Unsolicited entertainment may only take place in settings that are reasonable, appropriate and fitting to employees, their hosts, and the business at hand.

In some international or traditional cultures, it is customary to give unsolicited or overly generous gifts to employees, the return of which may be construed as an affront to the giver. In such cases, the gift must be reported to both the Company's CEO and CFO who will, together, determine whether or not the gift will be retained and whether or not the gift will be transferred to the ownership of the Company.

Employees should discuss with their supervisor any gifts or proposed gifts if they are uncertain whether they are appropriate.

Use of Agents

Agents or other non-employees cannot be used to circumvent the law. Employees will not retain agents or other representatives to engage in practices that run contrary to this Code.

Compliance and Reporting of any Illegal or Unethical Behavior/Whistle Blower Policy

Employees are required to report all potential or perceived breaches of this Code. If a situation requires that an employee's identity be kept secret, the company will protect anonymity. The Company will strive to ensure that all questions or concerns are handled fairly, discreetly and thoroughly.

If an applicable individual has any concerns about accounting, audit, internal controls or financial reporting matters which he or she considers to be questionable, incorrect, misleading or fraudulent, the applicable individual is urged to come forward with any such information, complaints or concerns without regard to the position of the person or persons responsible for the subject matter of the relevant complaint or concern.

The company has adopted a Whistle Blower Policy that allows an employee to put concerns in writing on a confidential basis.

Please see the Company's **Whistle Blower Policy**.

This Code is not intended to address all of the situations an employee may encounter. Since all situations cannot be anticipated, an employee may be confronted by circumstances not referred to in this Code. Employees are encouraged to use best judgment and common sense. Good intentions and failure to seek timely advice or report a situation will not excuse violations of this code.



Policy against Retaliation

The Company prohibits any employee from retaliating or taking adverse action against anyone for raising suspected conduct violations or helping to resolve a conduct concern. Any individual who has been found to have engaged in retaliation against an employee for raising, in good faith, a conduct concern or for participating in the investigation of such a concern may be subject to discipline, up to and including immediate termination of employment or other business relationship. If any individual believes that he or she has been subject to such retaliation, that person is encouraged to report the situation as soon as possible to the Audit Committee Chairman, in accordance with provisions of this Code.

Relationship to Other Policies

All Company policies apply to employees. If such person is a director, applicable corporate law and any guidelines of the Board of Directors in force from time to time will guide him or her procedurally in his or her position as a director. In addition, if such person is a member of a committee of the Board of Directors, the applicable committee charter(s) should guide his or her conduct in carrying out his or her duties on such committee. In the event of any conflict between such policies and this Code, the terms of this Code shall govern.

No Rights Created

This Code is a statement of fundamental principles and key policies and procedures that govern the conduct of the Company's business. It is not intended to and does not, in any way, constitute an employment contract or an assurance of continued employment or create any rights in any employee, director, client, supplier, competitor, shareholder or any other person or entity.

Waivers of this Code

Waivers of this Code may be made only by the Board of Directors. Any such waiver will be promptly disclosed to the extent required by applicable laws or stock exchange regulations.

The CEO shall be responsible to ensure that all employees are made aware of this Code on an annual basis. All directors, officers, project managers, and general managers of the Company and its subsidiaries are required to sign an acknowledgement of adherence to this Code.

Appendix A: Code of Business Conduct and Ethics Acknowledgement

Updated as of: January 8, 2021

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APPENDIX A

CODE OF BUSINESS CONDUCT AND ETHICS ACKNOWLEDGEMENT

I hereby certify that:

I have reviewed and understand Huntington's (the "Company ") Code of Business Conduct and Ethics. I am in compliance with the Company's Code of Business Conduct and Ethics.

I have reported to the Chairman of the Audit Committee any relationship or other circumstance that does or could put me in conflict with the interests of the Company, and will do so if any such circumstance or relationship arises in the future.

I have no knowledge of the occurrence of any practice that was not in compliance with the Company's Code of Business Conduct and Ethics that was not reported to the Chairman of the Audit Committee.

I am aware of the Code of Business Conduct and Ethics ongoing requirements to advise the Chairman of the Audit Committee immediately of any violations of policies and procedures outlined in our Code of Business Conduct and Ethics.

Name

Position Title

Signature

Date