



Supplier Code of Conduct

Our Values

At Truist, we live our core values of trustworthy, caring, one team, success, and happiness. These values ensure we conduct business in a way that upholds high ethical standards to build upon our foundation of integrity and principled business conduct. We are committed to conducting ourselves with integrity, delivering high-quality goods and services while in compliance with applicable laws, regulations and standards of business conduct. Furthermore, we are committed to meeting those expectations, and we expect to hold our Suppliers to the highest principles of ethical conduct.

This Truist Supplier Code of Conduct sets out specific expectations of our Suppliers. To the extent Suppliers subcontract any portion of their operations or obligations, the standards set forth in this Code apply to those subcontractors. The utmost standards of integrity are expected in all transactions. Each Supplier must act responsibly in all aspects, and ensure no illegal, exploitative, or abusive conditions exist, either in their own operations or in their respective third party operations. Truist reserves the right to review, monitor, and verify compliance with this Code, and will take action up to and including terminating its business relationship with any Supplier who is unwilling to comply with this Code.

Purpose



The Truist Supplier Code of Conduct (“Code”) outlines Truist’s expectations for environmental, human rights, anti-bribery and anti-corruption, and inclusion and diversity policies and practices for Suppliers with whom Truist engages. The Code is representative of the Truist Code of Ethics governing Truist’s own teammates, and is also guided by the Universal Declaration of Human Rights and the International Labour Organization’s Fundamental Conventions. Truist expects its Suppliers to conduct their operations in accordance with any applicable professional standards, laws and regulations, and consider the spirit of the Code.

While the Code provides general guidance about the standards of integrity and business conduct, no Code can address every situation. As a result, this Code is not a substitute for individual responsibility and accountability to exercise good judgment and obtain guidance on proper business conduct.

Applicable laws, legal requirements and contractual agreements with Suppliers inform the specific applications of this Code, and the specific terms of a Supplier’s contract with Truist will override any conflicting provisions of this Code. This Code does not constitute an employment contract or create an employment relationship between Supplier employees and Truist.

We recognize the actions of our Suppliers have the potential to impact Truist’s reputation and ability to best serve our key stakeholders. To that end, every Supplier should aspire to ensure its employees and representatives, regardless of their country of operation, understand our expectations as set forth in this Code.



Value Inclusion and Diversity

Truist believes it takes a diverse combination of people and ideas to foster creativity and a more competitive company. Truist is committed to fostering an inclusive environment where we acknowledge, respect and employ all dimensions of diversity, and where all teammates have the opportunity to maximize their contributions to clients and communities. Truist also believes institutions achieve optimal performance by establishing inclusion and diversity in business practices -- including developing relationships with highly capable and qualified diverse Suppliers.

Truist strives to ensure our Suppliers reflect who we are as a community and company. Suppliers are expected to incorporate inclusion and diversity policies and practices to strengthen their operations and supply chain, while enriching our communities through economic advancement.



Ethical Business Practices

Ethical business practices are at the forefront of the internal Code of Ethics that Truist teammates follow. Truist believes that anti-bribery and anti-corruption practices, labor, human rights, and safety practices are essential to inspiring and building better lives and communities.

To support anti-bribery and anti-corruption regulations and ethics, Suppliers should not directly or indirectly provide or give gifts, benefiting Truist or Truist teammates in efforts to influence business decisions; especially during an open sourcing engagement. Gifts of cash or cash equivalents are never acceptable. Suppliers should never make payments or donations to political campaigns to gain favor or to influence Truist business decisions, to benefit Truist, or to increase the likelihood of working with Truist.

Additionally, suppliers should never create incentive compensation arrangements for their personnel such that personnel are incentivized to sell Truist products in a manner that would be considered unfair or abusive to Truist clients or potential clients.

Environmental and Social Responsibility

At Truist, our environmental, social, and corporate governance contributions are more than a responsibility—they're an opportunity to fulfill our purpose to inspire and build better lives and communities. Truist announced a goal of Net-Zero Greenhouse Gas Emissions by 2050 to help build a better quality of life for the communities in which we live and work. By doing our part as a corporate citizen to help build a better quality of life for the communities in which we live and work, we hope to inspire others to do the same and create a ripple effect of meaningful change.

Truist seeks to engage Suppliers who are environmentally conscious and demonstrate a holistic sustainability perspective to better serve clients and communities. To that end, Suppliers should comply with all applicable environmental laws. Suppliers should take proactive measures to mitigate any environmental impacts; promote environmental responsibility in the course of business and through the production of goods or services provided to Truist; establish sustainability goals; and encourage the development and diffusion of environmentally friendly technologies.



Labor and Human Rights

At Truist, we are guided by our purpose, mission, and values, a set of core principles that outline our unwavering commitment to inspiring and building better lives for all. These promises extend to our fundamental belief in human rights—that everyone deserves to be treated with dignity, equity, and respect, and that we will be fair, ethical, and responsible in all of our business practices, as expressed in our human rights statement.

We respect the following principles and external standards:

- International Labour Organization’s Fundamental Conventions
- United Nations’ Guiding Principles on Business and Human Rights
- United Nations’ Universal Declaration of Human Rights

We expect the suppliers with which we do business to respect labor and human rights, governed by their policies and guiding principles that align with Truist, and at a minimum, to comply fully with applicable laws and regulations in the conduct of their business.



Child Labor

As defined by the International Labor Organization, child labor is any “work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development”. All suppliers must follow ILO conventions ([Minimum Age Convention No. 138](#) and [Worst Forms of Child Labour Convention No. 182](#)) related to child labor.

Suppliers should take preventative steps to ensure that they do not employ anyone under applicable legal minimum age of employment.

Modern Slavery

Truist has a zero tolerance for modern slavery, forced labor and human trafficking in any form.

Suppliers must not tolerate or participate in slavery, servitude, forced or compulsory labor, human trafficking, or child labor in their business or supply chain. They must align with the United Nations Guiding Principles on Business and Human Rights.

Fair Wages

Suppliers must comply with their local wage and hour laws, including overtime pay requirements. They must respect and abide by the standards the International Labor Organization’s Fundamental Conventions.



Non-Discrimination and Harassment

Suppliers are expected to make all employment-related decisions without regard to race, color, religion, citizenship or national origin or ancestry, caste, age, gender or sex, sexual orientation, gender identity or expression, transgender status, pregnancy or pregnancy-related medical conditions, disability, genetic information, marital status, familial status, military and veteran status, or any other classification protected by law.

Suppliers are also expected to maintain policies and protections against workplace and supplier discrimination, violence, abuse, and harassment.

Freely Chosen Employment

Where legally permitted, Truist expects suppliers to allow employees to join or form trade unions, to bargain collectively, or to conduct similar activities.

Health and Safety

Truist expects our suppliers to comply with all applicable federal, state, and local occupational safety and health (OSH) regulations, and to provide a safe and healthy work environment. Suppliers should take proactive measures to prevent workplace hazards.



Violations of Our Code

Violations of the Code, including the failure to report potential violations, may result in termination of the relationship, open contracts, and possible legal liability. Truist expects teammates and Suppliers to report violations of this Code - particularly violations that raise criminal, civil or regulatory concerns - to the aligned Truist Business Relationship Manager.

Please direct any questions to [Truist Sourcing and Supply Management](#).



¹Truist Master Services Agreement - Equal Opportunity Clause. Without limiting the generality of Section 2.2.1, Supplier and its approved subcontractors, if any, will abide by the requirements of 41 CFR §§ 60-1.4(a), 60-300.5(a) and 60-741.5(a). These regulations prohibit discrimination against qualified individuals based on their status as protected veterans or individuals with disabilities, and prohibit discrimination against all individuals based on their race, color, religion, sex, sexual orientation, gender identity, national origin, protected veteran status, or disability. Moreover, these regulations require that covered prime contractors and subcontractors take affirmative action to employ and advance in employment individuals without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, protected veteran status, or disability.