

Supplier Code of Conduct

A Message to All Third-Party Suppliers

In today's competitive environment, it is vital to have a clear vision and strong principles to guide our actions. PNC has long demonstrated a commitment to integrity and corporate responsibility, and its commitment has only deepened as it has grown into one of the leading financial services companies in the country. Our <u>Code of Business Conduct and Ethics</u> and our values convey our strengths and create a solid foundation for ethical business behavior. For PNC, adherence to our code, compliance with laws and regulations, and support of fundamental human rights are cornerstones in conducting business.

Similar to how we ask our employees to uphold PNC's values, we encourage third parties who provide goods and services to PNC to operate in accordance with PNC's core values, to comply with all applicable laws and regulations, and to implement practices and guidelines that address the issues below that aren't required by law. After all, we recognize that the actions of our third parties have the potential to impact PNC's reputation and ability to best serve our key stakeholders. That said, every third-party supplier should aspire to ensure that its employees and representatives, regardless of their country of operation, understand our expectations as set forth in this code, which covers four key elements:

Ethical Business Practices

As a Main Street bank, we are committed to delivering on each of our strategic priorities while looking out for the best interests of all of our stakeholders, including our customers, communities, employees and shareholders. Our focus on operating with integrity drives us to help our customers achieve their goals while also strengthening our communities, reducing our environmental impact and empowering our employees to grow. In alignment with this commitment and focus, we encourage our third parties to aspire to the highest standards of integrity in their respective business dealings. This includes avoiding, monitoring and quickly addressing any and all forms of unethical business practices and illegal or improper activity.

Furthermore, we take our customers' data privacy and security seriously and expect the same from our third parties, who must protect PNC customer data, among other confidential data, in accordance with applicable laws, contract terms and prevailing industry practices.

Human Rights in the Workplace

PNC is committed to equal employment opportunity and encourages our third parties to be similarly inclusive and nondiscriminatory. PNC's corporate contracts outline our expectation that third-party suppliers comply with all applicable laws, including those regarding wages, child labor and discrimination in hiring and employment practices, in the countries in which they operate. We also ask that our third parties provide an inclusive and supportive working environment—free of harassment and discrimination—in which all employees are valued and empowered to succeed.

Furthermore, third parties are expected to provide a safe and non-violent work environment that is free of threats, intimidation and physical harm and that is committed to accident prevention.

Environmental Stewardship

PNC has long been committed to reducing the environmental impact of its internal operations. Through this commitment, we have realized significant energy, water and cost savings and created healthier work environments. As our suppliers represent a diverse range of industries, each of which faces unique challenges, we encourage them to identify their greatest environmental impacts and to implement practices, guidelines and policies to help mitigate these impacts.

In addition, PNC expects its third parties to comply with all applicable environmental laws and regulations in the countries in which they operate. We also encourage them to make reasonable efforts to monitor and address (as needed) their own suppliers' environmental practices.

Furthermore, we ask our third parties to inform us about any environmentally-friendly products or services that they offer and that may be appropriate for PNC. Finally, we may occasionally ask them to respond to assessments that evaluate their environmental performance and compliance.

Community Investments

PNC is committed to help strengthen the communities where we live and work by providing resources that improve education, create stability and enhance well-being. As part of our philanthropic commitment, for example, PNC engages with nonprofits in the communities where we have a significant presence to enhance educational opportunities—with an emphasis on early childhood education—and to promote community growth through economic development. While each of our third parties and their respective communities are unique, we expect our third-party suppliers to be responsible corporate citizens by regularly engaging with and applying their resources to help strengthen their communities.

Finally, PNC is constantly working to increase its controllable spending with small- and diverse-owned businesses and encourages its third parties to do the same.

Violation of the Code

Some of this code is aspirational in nature, while other areas are integrated into the terms and conditions of PNC's services and purchase agreements. While a third party's failure to adhere to this code may not result in contract termination, it may impact future business opportunities between PNC and the non-conforming third party. That said, we expect our suppliers to have documented practices, guidelines and policies that support their sustainable business practices and that ensure that they are best serving their respective stakeholders while minimizing their risks.