



Our Commitment to Human Rights

To better serve our communities, clients and employees, it is important to have a clear vision and strong principles to guide our actions. PNC has long demonstrated a commitment to living our values and corporate responsibility, and our commitment has only deepened as we have grown into one of the leading financial services companies in the country. Our [Code of Business Conduct and Ethics](#) and our [Values](#) convey our strengths and create a solid foundation for the basis of this Human Rights Statement.

For PNC, adherence to our Code, compliance with laws and regulations, and support of fundamental human rights are cornerstones in conducting business. PNC understands the responsibilities that come with being a large financial services provider and seeks to make decisions that are grounded in our Values, consistent with corporate responsibility commitments and reflective of our commitment to our stakeholders.

This Human Rights statement is guided by international human rights principles encompassed by the [United Nations Universal Declaration of Human Rights](#).

Upholding Human Rights Across our Stakeholder Groups

Our Employees

PNC's success is driven by our employees and their ability to support our clients, investors, and community members. We are committed to treating our employees with fairness and dignity and respecting their human rights.

We have a longstanding commitment to [Diversity & Inclusion](#), which is embedded within our values and culture. PNC seeks to further build equity into our programs, processes, and policies.

We offer equal opportunity employment and do not tolerate unethical or inappropriate behavior. PNC also does not tolerate any employment discrimination, harassment or retaliation because an employee made a good faith report of an alleged violation, and carefully investigates and takes appropriate action in response to complaints of unfair workplace treatment.

As a condition of employment, all PNC employees are required to complete annual training on ethics-related topics included in PNC's Code of Business Conduct and Ethics. Additionally, every employee's performance review includes a risk management goal that ensures employees are focused on and accountable for the ethical requirements of their work.

Workplace Health, Safety, and Security

The safety and security of our employees and customers is always a priority at PNC.

We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. While we can't guarantee the safety of every employee in every situation, we can ensure they know what actions to take if their safety is at risk.

Our Business Continuity and Enterprise Crisis Management teams developed a comprehensive Life Safety@PNC program that has given PNC a consistent approach to managing any life safety event, and



ensure all employees and contractors are fully aware of the policies and procedures, as well as the proper actions to take if an event were to occur.

Life safety events could include:

- a natural disaster;
- a terrorist attack;
- an active shooter situation; or
- any other situation that threatens lives.

PNC recently launched a mobile application to house all LifeSafety@PNC resources while on the go.

Forced Labor and Human Trafficking

PNC opposes the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking within our operations and within our suppliers.

Our Clients and Customers

PNC strives to make lending decisions that balance the needs of our customers and prospective customers with the interests of our other stakeholders, including investors, communities, and employees. PNC recognizes that these decisions must also consider evolving environmental, social, human rights and reputational risk considerations. PNC's Environmental and Social Risk Management (ESRM) framework, described within this statement, strives to capture these nuances by embedding a deep commitment to stakeholder engagement in the risk management process.

Privacy

Our customers trust us to safeguard their personal and financial information — a responsibility that tops our list of priorities. PNC's [Privacy and Security Center](#) provides details on PNC security and privacy practices that secure customer information while protecting individual privacy. In addition, it offers a robust set of guidance and support for how customers can protect themselves from becoming victims to fraud and identity theft.

Our Communities

We recognize that we are part of the communities in which we operate. We engage with communities through constructive dialogue, ensuring that we are listening to, learning from, and considering their views as we conduct our business. We engage with a wide range of civil society and stakeholders on human rights issues related to our business when appropriate. This includes issues within our company, across our value chain and in business relationships of all kinds.

At PNC, we are committed to making a positive difference by leveraging the power of our resources to help all move forward financially. This purpose informs our company's values and reinforces our mission to help our communities grow and prosper. One of PNC's priorities is financial access and inclusion. We define this priority as PNC's programs or policies that cover access to financial products; financial education and literacy initiatives; financial well-being; diverse customers; and the expansion of financial access to a broader customer base.



For many years, our commitment to Diversity & Inclusion has helped to guide our efforts around economic empowerment, but we recognize that we must do more to challenge systemic racism and drive change in the areas in which we can have the greatest impact.

PNC has a longstanding and dedicated Women's Business Development focus based on growing recognition of women as financial decision-makers and influencers. The financial control that women wield in their households, workplaces and communities is well documented, and PNC wants to support this growth through initiatives focused on gender equity. In 2022, PNC launched its Minority Business Development Group in an effort to deliver products, solutions and resources for the fast-growing area of minority-owned small businesses and to promote their effective growth, development and sustainability.

As a national Main Street bank, PNC's commitment to building deep and meaningful relationships with our clients is unwavering, as is our focus on helping them move forward financially. That starts with our regional presidents, who live and work in the markets they serve. Our regional presidents and their market teams are personally invested in the success of the community and forge deep relationships with their clients, partners, and neighbors. Decisions are made at a local level with a focus on the local impact. In addition, our regional presidents are responsible for upholding our commitment to corporate responsibility, delivering on each of our strategic priorities while looking out for the best interests of all our stakeholders.

Supplier Management and Engagement

Just as we expect our employees to uphold our corporate values, we encourage those who provide us with goods and services to follow similar practices and guidelines. Our [Supplier Code of Conduct](#) covers four key areas: ethical business practices, human rights in the workplace, environmental stewardship and community investments.

Supplier Diversity

[PNC's Supplier Diversity Program](#) seeks to develop relationships with business enterprises that are at least 51% owned, operated, and controlled by minorities; women; lesbian; gay; bisexual and transgender individuals, veterans; service-disabled veterans; people with disabilities; and small and disadvantaged business enterprises. Our company's commitment to an inclusive culture is reflected in our supplier relationships.

Human Rights and PNC Business Practices

Environmental and Social Risk Management (ESRM)

Our governance of [Environmental and Social Risk Management \(ESRM\)](#) seeks to balance financial priorities with environmental, human rights, social and reputational risks as we pursue our brand purpose of helping all our stakeholders move forward financially. We assess, mitigate, and manage environmental and social risks at both the portfolio and individual transaction levels through a framework that includes portfolio analysis, stress testing, and policies and procedures to govern our underwriting and portfolio management practices. Our approach is regularly reviewed by senior management and overseen by our Board of Directors.



ESRM Rapid Risk Screen

PNC's Rapid Risk Screen extends ESRM screening across the entire Corporate & Institutional Banking (C&IB) lending portfolio. The tool is agnostic in terms of both industry and transaction value, and — as its name suggests — is designed to provide a quick and easy way to identify and resolve significant environmental, social, or reputational risks early in the life cycle of a transaction.

The Rapid Risk Screen tool inserts a pause into the transaction vetting process for us to consider whether the entity being financed, or the purpose of the financing, may have a significant actual or perceived impact on human rights or the environment, or conflict with PNC's core values.

Some examples of human rights impacts that the Rapid Risk Screen is intended to identify include:

- Indigenous people
- Landowners
- Areas of historical, cultural, or natural importance
- Access to a community's water, air, food, recreation
- The safety of a community/ business and its workers

For more information on ESRM and our responsible lending processes, review our [Environmental and Social Policy Guidance for Responsible Lending](#).

Anti-Money Laundering

PNC has adopted and implemented a risk-based, enterprise-wide Anti-Money Laundering and Sanctions Program (AML Program) that is designed to comply with all applicable laws and regulations regarding sanctions, money laundering, terrorist financing, and other financial crimes. The AML program includes a Customer Identification Program designed to identify and verify all customers, and where applicable, beneficial owners, to the extent warranted by the risk of money laundering or terrorist financing, or as required by regulation, as well as performing Customer Due Diligence and Enhanced Due Diligence on higher risk customers. To learn more about PNC's AML program visit [Compliance Program | PNC](#).

Responsible Artificial Intelligence

In accordance with the [Organisation for Economic Co-operation and Development \(OECD\) Principles on Artificial Intelligence \(AI\)](#), PNC has a set of Responsible AI Principles that describe how PNC approaches the important topics of privacy, transparency, and possible bias, among others, that are in focus when building and using AI. We also have processes to help identify and address potential bias in AI models and ensure that bias does not affect downstream processes.

United Kingdom Modern Slavery Act

In alignment with our commitment to corporate responsibility, we are committed to combatting modern slavery, including slavery, servitude, forced labor and human trafficking. We strongly support the Modern Slavery Act, which aims to eradicate modern slavery in commercial organizations with operations in the U.K. We are committed to helping ensure that there is no modern slavery, including human trafficking, in our supply chain or in any part of our business, as we believe it is our role to act ethically in all our business relationships and to implement and enforce effective systems and controls



to prevent all forms of slavery in our supply chains. To read PNC's Modern Slavery Act statement, please visit <http://www.pnc.com/ukmodernslaveryact>.

Our Progress

At PNC, we are proud of our progress—but we are also aware that the road ahead of us remains long. We are committed to continuously improving our practices to ensure we are doing the right thing for our stakeholders and the world.

We measure our progress against our organization-wide objectives and the [United Nations Sustainable Development Goals \(SDGs\)](#), a global framework for organizations from all sectors to contribute to a more inclusive and sustainable society.

Additional information about our corporate responsibility efforts, including important legal disclosures and information, is available on our [Corporate Responsibility website](#). For more information on PNC's commitments and progress that serve all of our stakeholders, view our [Corporate Responsibility Report](#).