

# **Regions Supplier Code of Conduct**

At Regions, we hold ourselves to high standards of ethics and integrity which reflect our corporate values to **put people first, do what is right, focus on your customer, reach higher, and enjoy life**. Our values support our mission and business strategy, which are based on *shared value:* what we do as a business should benefit everyone we serve—our customers, associates, communities, and shareholders. We see our suppliers and vendors of goods and services ("suppliers") as an extension of Regions. This is why we expect our suppliers to display the same high standards of integrity, operate responsibly, and support our mission of creating shared value.

This Supplier Code of Conduct ("Supplier Code") sets forth Regions' expectations for working conditions, human rights, ethical business practices, and environmental conservation as applicable to our suppliers. At a minimum, Regions requires its suppliers and their subcontractors to fully comply with all laws and regulatory requirements applicable to their business activities. We seek, however, to do business with suppliers that go beyond legal and regulatory compliance and help us achieve our commitments to environmental and social objectives.

No code can address every issue that one may encounter; therefore, if you have questions about any of the information in this Supplier Code, or what is expected of you, please contact Regions at **supply.partners@regions.com**. The provisions in this Supplier Code are in addition to and should not be construed as amending, replacing, or superseding the provisions of any applicable written agreement between the supplier and Regions or its affiliates.

**Applicability to Suppliers' Affiliates:** Regions expects our suppliers to hold their affiliates, subcontractors, next-tier suppliers, and similar persons/entities (collectively, "affiliates") to the same standards contained in this Supplier Code.

# Labor and Human Capital

Regions seeks to work with suppliers whose values match our own—those that promote diversity and inclusion, treat employees with respect and dignity, invest in the lives of their employees, provide a safe working environment that is also free from discrimination and harassment, and adhere to fundamental human rights standards.

**Wages and Working Hours:** Suppliers must provide wages and benefits that meet or exceed local legal requirements and be in compliance with local working hour laws; however, Regions encourages suppliers to commit to improve and invest in the lives of employees and their families by paying economically viable wages to its employees.

**Health and Safety:** Suppliers are expected to provide and maintain a working environment that, at a minimum, meets applicable occupational health and safety laws and regulations in the geographic regions and locales where they operate and conduct business.

**Human Rights:** Regions supports the protection and preservation of human rights, and this commitment is set out in our Human Rights Statement. At a minimum, suppliers and their subcontractors must comply with all applicable labor laws and regulations in the geographic regions and locales where they operate and conduct business. Regions also expects that the entities with which we do business similarly respect individual human rights and conduct their business operations free from human rights abuses, such as child or forced/compulsory labor, slavery, and human trafficking.

Suppliers shall ensure that all work is voluntary and shall not traffic persons or use any form of slave, forced, bonded, indentured, or prison labor. Involuntary labor includes the transportation, harboring, recruitment, transfer, receipt, or employment of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. Suppliers shall not withhold employees' original government-issued identification and travel documents nor impose unreasonable restrictions on movement within the workplace or upon entering or exiting company-provided facilities. Suppliers shall ensure that employees' contracts clearly convey the conditions of employment in a language understood by the employees. Employees shall not be required to pay employers' or their agents' recruitment fees or other similar fees to obtain their employee.

**No Harassment and Anti-Discrimination:** As explained more fully in the Regions Code of Business Conduct and Ethics ("Code of Business Conduct"), Regions is committed to maintaining a work environment that is free from harassment and discrimination and in which associates at all levels can devote their full attention and best efforts to the job. As such, we expect our suppliers to comply with applicable anti-discrimination laws and laws prohibiting harassment and retaliation.

**Raising of Concerns:** We expect our suppliers to have a process through which employees can raise workplace concerns without fear of retaliation. This mechanism should be transparent and understandable to employees and should ensure the protection of whistleblowers.

# **Ethical Business Practices**

Regions strives to conduct business according to the highest ethical and moral standards, as evidenced by the Code of Business Conduct. Suppliers are expected to adhere to all applicable provisions of the Code of Business Conduct, aspiring to the highest standards of integrity and refraining from illegal or improper activities, including corruption, fraud, misrepresentation, extortion, bribery, and any other activity that may give an appearance of impropriety.

**Dealings with Regions' Associates:** The Code of Business Conduct includes restrictions on our associates' dealings with suppliers, including restrictions on giving and receiving gifts and other items of value, as well as prohibitions on certain outside business ventures, investments, and lending relationships. Regions' suppliers shall not induce or cause any Regions' associate to violate the Code of Business Conduct.

**Anti-Corruption:** Suppliers are required to comply with the U.S. Foreign Corrupt Practices Act, the Bank Bribery Act, and any other applicable anti-corruption laws. At a minimum, under no circumstances may a supplier working for or on behalf of Regions offer or provide anything of value to a government official or a labor organization official for the purpose of (i) influencing the offeree or recipient to take or refrain from taking any official action for the benefit of the supplier or Regions, or (ii) inducing the offeree or recipient to conduct business with the supplier or Regions.

**Confidentiality and Security:** If we share confidential information with suppliers, we require that suppliers protect that information and do not access, share, or disclose it except as contemplated by our agreement. Suppliers must comply, and assure the compliance of their affiliates, with applicable laws and regulations, including, but not limited to, privacy laws, securities laws, record retention requirements, and data destruction requirements. Suppliers must

ensure that they have in place and use appropriate security, including cybersecurity, physical security, and internal controls, to protect the confidential information. Suppliers must have written agreements in place with affiliates who may have access to Regions' confidential information, which include confidentiality and security requirements at least as strenuous as those required of suppliers by Regions and must monitor affiliates for compliance with such agreements.

**Licensing and Permitting:** Suppliers are expected to acquire and maintain all licenses, permits, certifications, and similar approvals that are legally required to operate their businesses.

Reporting Illegal or Unethical Conduct: Suppliers are expected to report actual or suspected illegal or unethical conduct by a Regions' associate or by a Regions' supplier or other individual(s) acting on behalf of and/or for the benefit of Regions via email to vendorcomplaints@regions.com.

# **Environmental Sustainability**

Regions recognizes the environmental challenges that face our planet and we believe that doing our part to address them embodies our value of doing what is right. Our Environmental Sustainability Policy Statement demonstrates our commitment to operating responsibly, and we expect our suppliers to support Regions' sustainability efforts through the services they offer, as well as through their own operations.

Regions expects suppliers to operate in compliance with all applicable environmental laws and work to minimize their use of natural resources and any negative impact their operations have on the environment. Accordingly, suppliers should endeavor to measure and reduce their energy and water use, waste generation, greenhouse gas emissions, environmental contamination, and other environmental impacts as applicable to their operations. Regions may also request that suppliers engage with Regions on their sustainability programs and performance. Additionally, all materials used by suppliers must comply with applicable rules, laws, and regulations regarding the prohibition or restriction of specific substances to ensure safe and responsible handling, storage, movement, reuse, recycling, and disposal.

# **Supplier Diversity and Inclusion**

Regions is committed to building strong business relationships with a wide range of high-quality and diverse suppliers. We regard these relationships as being good for society, good for our communities, good for business, and good for strengthening our competitive advantage. Our business relationships with diverse suppliers make a positive impact on the communities we serve, stimulate demand for consumer and business banking services, and ultimately, drive more value for Regions. We also understand that our relationship with our suppliers extends to their affiliates. As such, we expect our suppliers to strive to build similar business relationships with diverse suppliers as well.