

Wells Fargo Supplier Code of Conduct

At Wells Fargo, we are committed to running our business in a manner that benefits our communities, the economy, and our environment. Our vision is to satisfy all our customers' financial needs and help them succeed financially.

In order to effectively run our business, Wells Fargo engages numerous suppliers, companies that have direct contractual relationships with Wells Fargo, to provide various goods and services. These mutually beneficial relationships enhance the value of the products and services we are able to offer our customers, and create long-lasting collaborative relationships within our communities.

We firmly believe our suppliers and their actions are an extension of our own actions and reputation, and expect our suppliers to demonstrate strong values and ethical practices. Many concepts in this document reference, emphasize, and reinforce additional expectations placed on our suppliers through complimentary programs related to risk, information security, and corporate responsibility.

It is important to Wells Fargo that our suppliers operate in a way that is consistent with our <u>Vision and Values</u>, including compliance with all applicable laws and regulations, contract terms, and this Supplier Code of Conduct. It is the responsibility of each supplier to ensure its employees and representatives maintain a thorough understanding of our expectations as set forth in this document.

This Code of Conduct is subject to periodic updates and revisions reflecting Wells Fargo's culture of continuous improvement. These updates not only mirror the evolving needs of our diverse and rapidly evolving supply base, but support the ongoing alignment of the Code to internal operations and supporting programs.

I. Ethical Business Practices

At Wells Fargo, we earn the trust of our customers, communities, and shareholders by maintaining the highest ethical standards, and we often go beyond the law and above industry standards in many situations. We constantly monitor and refine our business and risk management practices, and ensure we perform ethically and with integrity.

Similarly, we expect our suppliers to aspire to the highest standards of integrity in their business dealings. This includes refraining from any and all forms of illegal or improper activity, including corruption, misrepresentation, extortion, embezzlement, bribery, or unethical practices in the extraction of, trade in or <u>utilization of conflict minerals</u>. We also expect our suppliers to engage in ethical employment practices, including the ethical treatment of their employees and suppliers.

While we recognize that our suppliers' policies and approaches to managing human rights risks may vary, we strive to ensure respect for human rights throughout our operations, as expressed in Wells Fargo's <u>human rights statement</u>, and we expect our suppliers to do the same. Wells

Fargo requires its suppliers to comply with all applicable laws relating to human rights, including those intended to eliminate modern slavery and human trafficking.

Transparency and disclosure are important to Wells Fargo. We expect our suppliers to disclose any potential conflicts of interest prior to initiating their relationship with Wells Fargo, and we expect fair competition among our potential suppliers, contractors and other vendors

We take our customers' privacy and confidentiality concerns seriously, and we expect the same from our suppliers. All confidential and protected information, including and especially any Wells Fargo customer data, is to be protected by the supplier in accordance with applicable laws, prevailing industry practices, and contract terms.

II. Environmental Stewardship

In 2012 Wells Fargo released a new <u>environmental commitment</u> with a comprehensive set of goals and metrics that we can use to measure our progress. <u>Our commitment</u>, inspired through conversations with stakeholders, focuses on three areas: encouraging stronger communities, accelerating a "greener" economy, and reducing the environmental impact of our operations. We strive to run our company as efficiently as possible and protect our natural resources for future generations.

We encourage our suppliers to join us in implementing systems designed to minimize their impact on the environment. This includes the development of processes to reduce greenhouse gas emissions, increase energy efficiency, reduce water consumption, and increase waste diversion from landfills. Wells Fargo values business relationships with suppliers who have developed and implemented internal programs fostering a culture of sustainability and increasing environmental stewardship in the local community.

III. Community Investment

When it comes to <u>investing in our communities</u>, we understand one size doesn't fit all. Every city, every neighborhood, and every resident has unique challenges, needs, and stories. We invest our talent, expertise and financial resources to help communities succeed - listening, learning and partnering with key stakeholders to create local solutions for local needs. We support suppliers who share these same values and act as <u>responsible corporate citizens</u> in their own communities. All suppliers are encouraged to engage with their communities to help foster economic development and contribute to the social and environmental sustainability of the communities in which they operate.

We also expect our suppliers to join us in our <u>commitment to diversity</u>, and to ensure that they do not discriminate in their hiring and retention policies and practices. Wells Fargo will continue to strive towards increasing our controllable spending with certified diverse-owned businesses', and we expect our suppliers to work to provide business opportunities to competitive diverse suppliers as well.

This Supplier Code of Conduct does not constitute a contract, and nothing contained herein is intended to create or convey any rights, actions, or remedies to any person or entity.