

## **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 to corporate responsibility. That commitment has only deepened as we have grown into one of the leading financial services companies in the country. Our <a href="Code of Business Conduct and Ethics (Code)">Code</a>) and our <a href="Values">Values</a> convey our areas of focus and serve as the foundation 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 our <u>corporate responsibility commitments</u> and reflective of our commitment to all of our stakeholders including employees, customers, communities, and shareholders. We expect our suppliers to uphold similar ideals.

This Human Rights statement is guided by international human rights principles encompassed by the United Nations Universal Declaration of Human Rights.

## <u>Upholding Human Rights Across our Stakeholder Groups</u>

## **Our Employees**

Our products and services, our solutions and, ultimately, our success all come down to one factor: our people.

We strive to keep all aspects of our employees' wellbeing in focus and foster a culture of inclusion and authenticity. We succeed as a company when our employees feel connected, respected and engaged in collaborative teams. We are focused on growth, not just as a company, but as individuals – ensuring our employees have access to opportunities for lifelong learning, professional development, visibility and access into what's possible for their career at PNC.

Fostering an inclusive culture where all employees have equal opportunities to succeed starts with ensuring access to tools and resources they need. PNC's Accessibility Office works with all stakeholder groups to set and execute a strategy for doing just that. It includes welcoming and respectfully responding to requests for needed accommodations.

As a cornerstone to our belief in equity and access, PNC has an <u>equal employment opportunity policy</u> in compliance with the law, to afford equal opportunity to all applicants and existing employees without regard to race, color, religion, national origin, gender, sexual orientation, gender identity/expression, age, ancestry, marital status, genetic information, family medical history, disability, military or protected veteran status, or any other basis that would be in violation of any applicable ordinance or law. PNC does not permit, condone, or tolerate unlawful discrimination, bias or harassment.

Creating safe places to conduct business is essential to our employees, our customers, our company and our brand. That is why we take concrete action to protect our employees and the communities and people we serve.

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.



#### **Our Clients and Customers**

No matter what happens, safeguarding the availability of products and services for our customers is essential. We're also committed to protecting our customers and treating them fairly.

Our customers trust us to safeguard their personal and financial information — a responsibility that tops our list of priorities. PNC's <u>Security and Privacy Center</u> 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 of fraud and identity theft.

At PNC, we are committed to helping our customers take the next step forward in their financial lives — wherever they are in their personal journey. We make that step possible through convenient products designed for every phase of life and every financial goal. We believe that one simple step today can make all the difference for our customers' financial future.

### **Our Communities**

Our customers and employees live and work in the communities we serve, and we recognize the importance of caring for all the places we operate. As a Main Street bank, we believe that being part of the community means more than doing business. That's why working to strengthen and serve our communities is at the heart of our business model. When our communities prosper, so does PNC.

For many years, our commitment to communities has helped guide our economic empowerment efforts. But we recognize that we must do more to help challenge systemic racism and drive change. We are committed to actively and consciously working toward equity with kindness, compassion and — most importantly — a clear sense of responsibility. Launched on January 1, 2022, and scheduled for completion in 2025, the PNC Community Benefits Plan is our pledge to help drive that success through \$88 billion in loans, investments and other financial support to bolster economic opportunity for low- to moderate-income (LMI) individuals, communities and people of color.

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. PNC launched its Minority Business Development Group 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.

The PNC Foundation's priority is to form partnerships with community-based nonprofit organizations to enhance educational opportunities, with an emphasis on early childhood education, and to promote the growth of communities through economic development initiatives.

PNC Grow Up Great is our signature charitable program. It is a \$500 million, multi-year, bilingual initiative that began in 2004 to help prepare children from birth to age 5 for success in school and life. As part of this initiative, the PNC Foundation has earmarked funds for grants to nonprofit organizations that work to improve school readiness. By focusing our support on high-quality early childhood education, we aim to positively impact school readiness and contribute to stronger, smarter and healthier children, families and communities.



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**

As explained in our <u>Supplier Code of Conduct</u>, we expect our suppliers to uphold our expectations around ethical business practice. This Code covers four key areas: ethical business practices, human rights in the workplace, environmental stewardship, and community investments.

PNC has a robust <u>Supplier Diversity program</u> and we are committed to including diverse suppliers in our sourcing processes. We track and monitor our corporate spending with diverse firms including both Tier 1\* and Tier 2\*\* spend. By tracking Tier 2 spend, PNC encourages its suppliers to work with more diverse-owned businesses as subcontractors to provide products and services to PNC. PNC is committed to economically strengthening and growing businesses owned by veterans and service-disabled veterans, women, minorities, individuals with disabilities and LGBTQ+ individuals, as well as Small and Disadvantaged Business enterprises as defined by the Small Business Administration.

# **Human Rights and PNC Business Practices**

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 provides additional insight into how we manage stakeholder engagement and risk management processes for industries our stakeholders consider sensitive in compliance with all laws and regulations. We do not discriminate against any lawful industry.

PNC's Bank Secrecy Act (BSA) / Anti-Money Laundering (AML) and Sanctions Program sets forth minimum BSA/AML and sanctions standards designed to ensure that PNC is providing compliant products and services and conducting business activities in compliance with applicable laws, rules and regulatory guidance. Our enterprise policies address anti-bribery, anti-corruption, money laundering and terrorist financing. All employees can report suspicious activity, including laundering and terrorist financing, through established channels. To learn more about PNC's AML program visit Compliance Program | PNC.

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<sup>\*</sup>Tier 1 suppliers are diverse-owned businesses who directly invoice PNC for products and services rendered.

<sup>\*\*</sup> Tier 2 suppliers are non-diverse suppliers who invoice PNC, but who ultimately direct those funds to diverse-owned businesses to perform the work required



In accordance with the Organisation for Economic Co-operation and Development (OCED) Principles on Artificial Intelligence (AI), PNC strives to ensure the responsible use of AI and Machine Learning (ML) through the adherence to six principles: accountability; transparency, explainability and accuracy; diversity and inclusion; fairness; reliability and security; and privacy.

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. See <a href="PNC's Modern Slavery Act statement">PNC's Modern Slavery Act statement</a> for more information.

## **Our Progress**

At PNC, we're committed to doing the right thing for our shareholders, customers, communities and employees. We do this work because it helps our stakeholders succeed, and because it helps our business succeed, and we continuously refine our strategies to address the changing needs of the various constituencies we serve. 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. We also align our disclosures against industry frameworks like the Global Reporting Initiative (GRI) and the Sustainability Accounting Standards Board (SASB).

Additional information about our corporate responsibility efforts, including important legal disclosures and information, is available on our <u>Corporate Responsibility website</u>. For more information on PNC's commitments and progress that serve all of our stakeholders, view our <u>Corporate Responsibility Report</u>.