

SunTrust Vendor Code of Conduct and Ethics

SunTrust is committed to Lighting the Way to Financial Well-Being for our teammates, clients, and shareholders. The SunTrust Vendor Code of Conduct and Ethics (“Code”) lays out SunTrust’s expectations for environmental, human rights, anti-corruption, and diversity and inclusion policies and practices for vendors with whom SunTrust engages. The Code is representative of the SunTrust Code of Business Conduct and Ethics governing all SunTrust teammates, and is guided by the Universal Declaration of Human Rights and the International Labour Organization’s Fundamental Conventions. SunTrust expects its vendors to conduct their operations in accordance with any applicable professional standards, laws and regulations, as well as this Code and to enact and enforce policies in support of these values.

While the Code provides general guidance about the standards of integrity and business conduct, no code can address every situation. As a result, this Code is not a substitute for individual responsibility and accountability to exercise good judgment and obtain guidance on proper business conduct.

Applicable laws, legal requirements and contractual agreements with vendors inform the specific applications of this Code, and the specific terms of a vendor’s contract with SunTrust will override any conflicting provisions of this Code.

Respect the Environment

SunTrust seeks to engage suppliers and service providers who are environmentally conscious and demonstrate a holistic sustainability perspective to better serve clients and communities. To that end, vendors should comply with all applicable environmental laws. Vendors should document and post safety practices to reduce the risk of injury or death; take proactive measures to mitigate any environmental impacts; promote environmental responsibility in the course of business and through the production of goods or services provided to SunTrust; and encourage the development and diffusion of environmentally friendly technologies.

Ethical Business Practices

Ethical business practices are at the forefront of the internal SunTrust Code of Business Conduct and Ethics that SunTrust teammates follow. SunTrust believes that anti-corruption practices, labor and human rights are essential to Lighting the Way to Financial Well-being for clients and communities. In respect of human rights, vendors should comply with all applicable employment laws; ensure against the use of child or forced labor in any operations or facilities; and maintain policies and protections against workplace discrimination, violence, abuse and harassment.

To support anti-corruption regulations and ethics, vendors should not directly or indirectly provide or give money, gifts (valued over \$100), or other compensation benefiting SunTrust or SunTrust teammates in efforts to influence business decisions. Vendors should not make payments or donations to political campaigns to gain favor or to influence SunTrust business decisions, to benefit SunTrust, or to increase the likelihood of working with SunTrust.

Value Inclusion and Diversity

SunTrust believes it takes a well-rounded combination of people and ideas to foster creativity and a more competitive company. SunTrust is committed to fostering an inclusive environment where we acknowledge, respect and employ all dimensions of diversity and where all teammates have the opportunity to maximize their contributions to clients and communities. SunTrust also believes institutions achieve optimal performance by establishing diversity in business practices --including developing relationships with high-quality diverse suppliers.

Vendors are expected to value and incorporate diversity and inclusion policies and practices in operations and their supply chain.