Fifth Third Bancorp (Fifth Third) prides itself on maintaining the highest ethical standards and commitment to our core values which include integrity, teamwork and collaboration, respect and inclusion, and accountability.

We rely on suppliers for a variety of products and services to support our company and the successful delivery of products and services to our customers. Developing sound supplier relationships helps us to continue to improve our performance and market position, and to uphold our responsibilities to our customers, employees, and communities.

Fifth Third’s Supplier Code of Conduct sets forth Fifth Third’s expectations for ethical, human rights, labor, and environmental standards throughout our supplier network. It is expected that the Fifth Third’s suppliers demonstrate the same level of commitment to ethical business practices. To avoid any ethical conflict, we ask for our suppliers’ full adherence to this code and assurance that it is communicated to the appropriate officers and employees within your organization.

Our suppliers are required to uphold these responsible business practices throughout the supply chain by encouraging the same of their next level suppliers. Suppliers are expected to comply with the content of this Code, along with all applicable laws, regulations, and standards of the States and Countries both in which they are headquartered, and in which business is conducted. Suppliers may be asked to provide a written attestation agreeing that they have read, understand, and will abide by the terms of this code.

If this Code is incorporated by reference into any Supplier agreement, then that agreement will be self-supporting as evidence of attestation. This Code covers the following areas: Being a Fifth Third Partner, Business Ethics, Labor, Human Rights, and Social Responsibility and Environmental Management and Sustainability.

**Being a Fifth Third Partner**

At Fifth Third, we believe that strong supplier relationships are key to our ability to deliver value to our customers. Suppliers play a critical role in helping Fifth Third achieve its business objectives by supplying the quality products and services that allow us to remain efficient and innovative.

We are interested in the value suppliers can bring to our company. We not only want to know what products and services suppliers offer, but we also want to be sure our relationship will be a good fit for a supplier’s business and ours.

The information in this Code will help define our prospective supplier requirements.
Business Ethics

We expect our suppliers to aspire to the highest standards of integrity in their business dealings. A fundamental part of our commitment to integrity is adhering to the letter and the spirit of applicable laws, regulations, and applicable policies. In no case, shall a supplier use illegal or unethical means or methods when acting on behalf of Fifth Third. We expect our suppliers to adhere to the following expectations:

• **Fair and Honest Dealings:** Suppliers should disclose any potential conflicts of interest before initiating their relationship with Fifth Third, or as soon as the supplier becomes aware of a conflict after initiating a relationship, and we expect fair competition among our potential suppliers, contractors, and subcontractors.

• **Gifts and Entertainment:** Political contributions must not be made on behalf of or as a representative of Fifth Third, to influence business relationship, or to request influence of a political figure in favor of the company. Suppliers may not offer or provide gifts or entertainment to Fifth Third employees while an RFP is pending or in such an amount or frequency that could give the appearance of a conflict of interest.

• **Raising Concerns:** We expect our suppliers to provide a healthy working environment where their employees can report concerns or misconduct in good faith without fear of retaliation.

• **EthicsLine:** The EthicsLine has been established for employees, suppliers, and others to report information regarding conduct that is inconsistent with Fifth Third’s Code of Conduct, the Fifth Third Supplier Code of Conduct, or places the company’s reputation is at risk. The EthicsLine is operated 24 hours a day, seven days a week by an independent administrator and you may choose to remain anonymous. To utilize the EthicsLine by phone call 877-FOR-5353 or via the web at [https://53.alertline.com](https://53.alertline.com).

• **Complying with Laws, Regulations, and Policies:** Fifth Third is committed to full adherence with all laws, regulations, and policies, as such we expect all suppliers to comply with all applicable laws, regulations, and policies.

• **Competition and Anti-trust Laws:** Fifth Third is committed to fair dealing and open competition and expects suppliers to comply with all antitrust “fair competition” and “fair dealing” laws. Unfair advantage may not be taken through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practices.

• **Anti-Money Laundering:** Suppliers must not finance terrorists or those engaged in illicit activities including money launderers, international narcotics traffickers, and those engaged in activities related to the proliferation of weapons of mass destruction. Suppliers must comply with anti-money laundering and anti-terrorist financing laws, rules, and regulations.

• **Bribery, Fraud, Embezzlement:** Suppliers must refrain from bribery, fraud, embezzlement, extortion, or similar action as well as unfair or deceptive acts or practices.

• **Unfair, Deceptive, or Abusive Acts or Practices:** Suppliers must treat our customers fairly and lawfully and refrain from engaging in any unfair, deceptive, or abusive act or practice.
Risk Management

Fifth Third is committed to remaining financially strong and resilient as well as protecting our clients and reputation.

In the normal course of business, Fifth Third may incorporate supplier solutions into our processes. Both customers and regulators expect us to manage these outsourcing arrangements so that services are delivered seamlessly. Ineffective or misaligned supplier practices can lead to negative consequences for our customers, our company, and our communities.

Risk management is a core component of Fifth Third’s onboarding process and our ongoing relationships. As good stewards of Fifth Third’s assets, and responsible business people, we require potential suppliers to fulfill their obligations with the same level of care and diligence that we would.

We seek to maintain appropriate controls related to outsourced arrangements through a pre-execution structured due diligence process as well as post-execution ongoing monitoring, including business continuity and financial health testing where appropriate.

- **Operational Risk:** Suppliers are expected to maintain an operational risk management framework corresponding with their risk profile, including the identification of processes and risk, design and execution of controls, and ongoing monitoring and reporting. As such, Fifth Third may require its suppliers to provide information about operational risk management. In addition, suppliers are required to escalate timely material operational risks that may impact Fifth Third or our customers.

- **Business Continuity:** Suppliers must maintain a comprehensive business continuity program that addresses the loss of the facilities, technology, or human capital necessary to support Fifth Third. We frequently request collaborative disaster recovery testing with our suppliers to evaluate their resiliency and identify any potential issues that would impact service delivery.

- **Privacy and Data Protection:** Fifth Third expects its suppliers to protect all of its data, including customer information, under applicable privacy, information security, and data protection laws, regulations, and industry standards.
Labor, Human Rights, and Social Responsibility

At Fifth Third, we consider human rights paramount, and we work to preserve human rights throughout our company and our supplier population. We apply these principles to our employees, suppliers, clients, communities, and other stakeholders. Fifth Third does not tolerate corruption, discrimination, harassment, intimidation for any reason, or forced or child labor or slavery in any form. We expect our suppliers to take all necessary measures to address human rights issues within their operations. These measures may include:

- **Occupational Health and Safety:** Provision of a safe and hygienic working environment through proactive management and controls that minimize health and safety risks and support accident prevention for all personnel, bearing in mind the prevailing knowledge of the industry, the requirements of local health and safety laws, and any specific hazards, wherever personnel performs duties, such as, factories, warehouses, workshops, offices, vehicles, external facilities or other work, dining, and recreational spaces. Additionally, suppliers will provide and maintain for all personnel and stakeholders a work environment that meets or exceeds applicable federal, country, state, provincial and municipal laws regulating occupational safety and health.

- **Freely Chosen Employment:** Ensuring that all work is completed voluntarily and without slavery, servitude, forced or compulsory labor, and human trafficking.

- **Avoidance of Child Labor:** Child labor should not be employed. The term ‘child’ refers to any person less than 15 years of age unless the minimum age for work or mandatory schooling is stipulated as being higher by local law, in which case the stipulated higher age applies in that locality.

- **Working Hours:** Working hours must be limited according to national or local law, including breaks.

- **Wages and Benefits:** Being responsible for employee compensation and payment of fair wages. All employees should be paid a fair wage commensurate with prevailing industry conditions or the minimum wage, whichever is higher. Any overtime should be voluntary and compensated appropriately.

- **Avoidance of Discrimination and Harassment:** Promoting a workplace free from discrimination, harassment (sexual, physical, mental), victimization, or any other form of inappropriate behavior or abuse on any grounds (including, but not limited to: age, disability, ethnic origin, gender, gender identity, nationality, marital status, parental status, physical appearance, political convictions, pregnancy, race, religious beliefs, sexual orientation, social origin or status, economic status, union affiliation or employment status—salaried or hourly, full-time, part-time, seasonal, intern).
Labor, Human Rights, and Social Responsibility (cont.)

- **Grievance:** Demonstration of formal mechanisms allowing employee grievances regarding human and labor rights violations to be properly filed addressed and resolved without fear of perceived or actual retaliation.

- **Whistle-blowing and Anti-Retaliation:** Demonstration of formal mechanisms allowing employees to raise concerns of operational or business practices that violate laws, regulations, or company values and for the concerns to be properly filed addressed and resolved without the fear of retaliation.

- **Diversity:** Fifth Third views diversity and inclusion as a critical component of our core growth strategy. Our sourcing decisions, contracts and management of supplier relationships will reflect and promote the Inclusion and Diversity principles of Fifth Third. In alignment with these principles, Fifth Third expects suppliers to extend and expand the economic opportunities to other diverse and minority owned suppliers in the sub-contracting process. Fifth Third will continue to invest in robust innovative strategies and solutions that expand the economic opportunities for our diverse suppliers by leveraging industry, non-profit, and internal partnerships.

- **Human Rights:** All suppliers and their subcontractors should be guided by fundamental principles of human rights as set forth in the United Nations Universal Declaration of Human Rights.
Environmental Management and Sustainability
At Fifth Third, our Core Value of Taking Accountability requires that we recognize and hold ourselves accountable for the potential impact that our operations, lending, and investment decisions have on communities and the environment. Environmental sustainability is essential to the success of our business and to the health of the communities where we live and serve. We expect our suppliers to operate with this principle in mind, and to make every effort to measure, reduce and mitigate the environmental impacts of their operations, especially in the areas of energy, water, and paper usage, greenhouse gas emissions and waste generation.

Suppliers should conduct their operations and business in a way that protects the environment. We expect suppliers to understand their environmental impact and pursue actions that will allow Fifth Third and our communities to thrive in the future. Suppliers should support continued innovation in our strategy, products, and services by finding new ways to deliver services that meet customers’ and communities’ long-term sustainability goals. Suppliers must also comply with all applicable environmental laws and regulations.

Supplier Monitoring
Fifth Third may conduct annual compliance surveys or ad hoc requests to confirm compliance with this Supplier Code of Conduct. However, Fifth Third expects that suppliers will actively audit and monitor their day-to-day management processes concerning the Code of Conduct and provide evidence upon request.

Any material waivers of this Code for executive officers or directors of Fifth Third Bancorp may be made only by the Board of Directors of Fifth Third upon the recommendation of the Audit Committee; waivers will be publicly disclosed as required by SEC or NASDAQ rules. Any waivers of this Code for other employees may be made by the Conflicts Council as outlined in the Code. Waiver of a specific provision of this Code with respect to an individual shall not operate as a waiver of that individual’s compliance with other requirements of this Code. 1) Nothing in this Code or any other Fifth Third agreement or policy is intended to prohibit or restrict you from participating in, testifying, or assisting in any investigation, hearing, whistle blower proceeding, or filing a complaint with any federal, state, or local government agency or commission, including providing documents or other information without notice to Fifth Third. 2) If a report is made against and employee and the investigation is substantiated, prompt and corrective action will be taken, up to and including termination of employment.

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