



## SUPPLIER CODE OF CONDUCT

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### **Purpose**

As America's socially responsible bank, Amalgamated Financial Corp. ("AB") holds itself and its Suppliers to the highest standards of conduct. Ethics, transparency, sustainability, and respect for human rights are at the core of our business practices. We expect our Suppliers to do the same. While we prioritize doing business with other B Corps and women and minority owned businesses, we expect any supplier to uphold similar values as those listed in the following Supplier Code of Conduct ("Code"). References to AB herein also include Amalgamated Bank (the "Bank") and all other subsidiaries of AB and the Bank, and references to the Board include the Board of Directors of AB, the Bank and each other subsidiary.

This Code sets forth AB's expectations for ethical conduct, human rights, labor, and environmental standards throughout our operations and supplier value chain. The principles contained within this code are guided by the United Nations' Universal Declaration of Human Rights and the International Labor Organization's Fundamental Conventions. Local legal requirements, labor law, and other contractual arrangements with Suppliers inform the specific applications of this code. In the event of conflict between the terms of a Supplier's contract with AB and the provisions of this code, the contract terms will prevail.

AB expects its Suppliers and service providers to conduct their operations in accordance with this code and to enact and enforce policies in support of these principles. Suppliers are expected to extend these principles not only within their own companies, but further down the supply chain. Suppliers whose policies are in alignment with this code are considered more favorably during the Supplier selection process. The elements of the AB Supplier Code of Conduct are as follows:

### **Ethical Conduct**

We expect all our Suppliers to adhere to the highest ethical standards, as well as adhere to all applicable law and regulations, including all anti-trust and fair-trade policies. All our Suppliers are required to avoid any situations in which personal interests may conflict or may appear to conflict with the interests of AB or its Clients.

No payments should be made to AB employees in an effort to influence actions or gain an advantage with the company. AB does not allow acts that would be or would be perceived to be bribery or corruption in any form.

Suppliers should not give or offer anything of value to employees, government officials in connection with services for AB, or other corporate representatives of AB. As well, AB employees are prohibited from soliciting, encouraging or accepting gifts from Suppliers.

#### *Working Hours, Wages, and Benefits*

Suppliers are expected comply with all applicable wage and hour labor laws and regulations governing employee compensation, reimbursements, taxes and working hours. We expect all our Suppliers to commit to a maximum number of hours of work for their hourly employees of 8 hours per day or 48 hours per week. In addition, we expect all our Suppliers to provide for an adequate standard of living for all employees.

Suppliers are expected to refrain from using wage deduction as a disciplinary measure under any circumstances. We expect our Suppliers to pay for overtime labor at a rate no lower than 125% of the regular rate, and the premium rate legally required by applicable laws and regulations. Suppliers are expected provide information detailing the Supplier's policies on working hours, overtime, wages, and benefits to all employees.

#### *ETHICS HOT LINE*

AB has established an Ethics Hotline for employees, Suppliers and others to report information regarding conduct that is inconsistent with AB's [Code of Conduct](#) or places AB's reputation at risk. The Ethics Hotline is operated by a third party.

All contacts made to the Ethics Hot Line can be anonymous to the extent permitted by applicable laws and regulations. If a Supplier raises an ethical issue and does not believe it has been addressed, they should raise it with another of the contacts listed in AB's Code of Conduct available on its website.

AB does not tolerate acts of retaliation against any director, officer or employee who makes a good faith report of known or suspected acts of misconduct or other violations of this code. Please call 855-375-2300 to report a concern of unethical behavior.

#### *Supplier Diversity and Inclusion*

AB believes strongly in fostering an inclusive and diverse environment. Suppliers are expected to value and incorporate diversity and inclusion policies and practices in operations and their supply chain. AB's Vendor Management team takes into consideration qualified women-owned, minority-owned, LGBT-owned and other small businesses, as those businesses are an integral part of the community AB serves. In addition, AB takes into consideration a Supplier's stance on civil rights, and its adherence to non-discriminatory practices. AB prioritizes hiring Suppliers that utilize union labor with collective bargaining rights.

## *Human Rights*

AB is an equal employment opportunity employer that is committed to ensuring full compliance with the letter and spirit of all laws regarding fair employment practices and non-discrimination and expects that all of its Suppliers shall also fully comply with all laws regarding fair employment practices and non-discrimination, and the International Labor Organization's Minimum Age Convention. We do not tolerate corruption, discrimination, harassment or forced or child labor or slavery in any form.

AB policy prohibits discrimination, harassment, and intimidation in any form: verbal, written, physical or visual, including but not limited to discrimination, harassment, or intimidation based on a person's race, sex, gender, pregnancy, gender identity or expression, color, creed, religion, national origin, nationality, citizenship, immigration status, age, disability, genetic information, marital status, sexual orientation, culture, ancestry, familial or caregiver status, military status, veteran's status, socioeconomic status, unemployment status, status as a victim of domestic violence or other basis prohibited by law. Discrimination, harassment or intimidation that is unlawful, impacts recruitment, promotion, or remuneration, or otherwise violates AB policies whether committed by or against a manager, co-worker, client or Supplier visitor is prohibited. Retaliation against individuals for raising claims of discrimination or harassment is expressly prohibited. Complaints regarding such behavior should be reported to the AB Ethics Hotline, or the respective primary AB business contact. Suppliers are expected to recognize and respect the right of employees to freedom of association and collective bargaining and to not infringe on employees' ability to form or join a union of their choosing.

We have a zero-tolerance policy for modern slavery, which includes slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty in order to exploit them for personal or commercial gain. We expect all of our Suppliers to be committed to acting ethically and with integrity in all of their business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in their business and supply chains. AB's statement on Human Rights can be found [here](#).

## **Health, Safety, and Security**

Suppliers will provide and maintain for all personnel and stakeholders a work environment and health and safety management system that meets or exceeds applicable federal, country, state, provincial and municipal laws regulating occupational safety and health.

## **Respect for the Environment**

AB 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, Suppliers should comply with all applicable environmental laws. Suppliers 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 AB; and encourage the development and diffusion of environmentally friendly technologies.

### **Confidentiality**

Certain AB financial and non-financial information such as customer information, business plans, marketing strategies, methods of doing business, pricing information, analytical models or methods, computer software, source code, databases, inventions, employee/worker information and ideas and works of authorship are deemed to be proprietary, confidential and may include confidential information protected by law. Suppliers with access to such information about AB must not disclose it to anyone outside of AB, or to others inside of AB who do not need it to perform their business functions. As applicable, Suppliers will be required to execute a non-disclosure agreement when being considered for business with AB.

### **Insider Trading**

The securities laws of the United States, and many other countries, strictly prohibit the trading of securities by persons who possess material non-public information (“MNPI”) about the issuer of such securities, and also prohibit the disclosure of such information to others, commonly called “tipping.” In the course of performing services for AB, a Supplier could potentially have access to MNPI, either about AB or one of AB’s clients. As a matter of compliance with law, it is crucial that any such Supplier keep the MNPI strictly confidential, not disclose it to any third party, and not trade upon it. Also, a Supplier may gain access to MNPI in its performance of services for another client, in which case it would be equally crucial that the Supplier not disclose that information to AB.

### **Roles and Responsibilities**

AB will make a best effort to ensure all Suppliers comply with the standards set herein where possible and reasonable in the normal course of business.

AB’s Vendor Management Department is responsible for the implementation of this Code of Conduct.

Board oversight: The Board or a committee of its designation acknowledges that it has the ultimate responsibility for overseeing Supplier-related activities in accordance with this Code of Conduct. The Board adopts this Code of Conduct in order to guide AB and AB’s management to whom the Board has delegated responsibility for Supplier-related activities, in managing risk that may arise from third party relationships. These persons include those who are involved in any of the following activities: i) evaluating Suppliers, ii) selecting Suppliers, iii) negotiating or approving contracts, iv) managing Supplier relationships, or v) assessing risks.

### **Compliance Assurance**

Suppliers are expected to self-monitor their compliance with this Code of Conduct while conducting business with or on behalf of AB, and to inform us in a timely manner of any non-compliance. We reserve the right to monitor compliance with this code using a reasonable and risk-based approach and framework that is suitable for small and diverse-owned businesses as

well as larger businesses with more mature compliance programs. This may include verification through self-assessment/questionnaires and/or other means of due diligence. If requested, vendors are expected to provide written information, including, policies, procedures and data regarding the topics included in this Code of Conduct. Any Supplier that does not comply fully with this code, is expected to remediate any lapses to AB's satisfaction in a timely manner. Failure to agree upon a remediation plan, or failure to implement it, could adversely affect ability to be awarded additional work and/or result in termination. Correspondingly, AB may choose to give preference to suppliers that demonstrate superior environmental and social standards.

### *Review and Approval*

This Code of Conduct is to be annually reviewed, revised as needed and approved by the Board of Directors or a designated committee.