Supplier Code of Conduct

Purpose & Ambition

At Citizens, we are guided by our Credo: to perform our best everyday so we can do more for our customers, colleagues, communities, and shareholders. This Credo brings to life our internal values. We strive to always exceed customer expectations, do the right thing, think long term, and work together. We are firmly committed to doing business with companies that share these values.

Our suppliers play a critical role in helping us execute our mission. Having a shared set of values when it comes to doing business together is important, as it impacts our stakeholders, the quality of our products and services, and our reputation for honesty, professionalism, and fairness. We view our suppliers, and their actions, as an extension of our own actions and reputation. Our Supplier Code of Conduct articulates these shared values and serves as a set of guiding principles that govern our supplier relationships. We expect our suppliers to achieve full adherence with this Code of Conduct, to communicate it as necessary to key leaders and employees, and to extend it throughout their supply chain. This is in addition to the requirement that our suppliers comply with all applicable laws, regulations, and standards in the local communities, states, and countries where they do business.

Labor, Social Responsibility, & Human Rights

Citizens is committed to providing an environment that affords everyone equal employment opportunity and will not tolerate discrimination of any kind. Citizens expects its suppliers to maintain and enforce policies against discrimination, harassment, workplace violence, and inhumane treatment. Suppliers should maintain a safe and healthy workplace for their employees through proactive management and controls that minimize safety risks and prevent accidents, injuries, and exposure to health risks wherever employees conduct business. Work environments should meet or exceed the standards required by any applicable occupational health and safety laws and regulations relevant to a supplier's specific industry and geography of operations.

Employment with our suppliers must be freely chosen. Citizens has a zero-tolerance policy for child or forced labor in any form, as well as slavery and human trafficking. A 'child' is any person under the age of 15 (or 14 where the law of the country permits certain restricted forms of work) or under the minimum age for mandatory schooling, whichever is greater. Citizens suppliers should provide fair and competitive wages and benefits to their employees that meet or exceed the requirements of applicable laws. Working hours should also comply with applicable laws. Any overtime should be voluntary and compensated appropriately.

Citizens is committed to respecting human rights in all aspects of its business and supply chain, as outlined in the UN Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights. All Citizens suppliers should fully embrace and be guided by these principles in addition to complying with relevant human rights laws and mandates.

Employees should have access to confidential grievance mechanisms and systems should be in place to protect employees against retaliation for raising and elevating workplace concerns.

Inclusion

Citizens aspires to be a trusted and active advocate for an inclusive workplace and society. Our Culture of Inclusion focuses on ensuring all people are valued, respected and heard, increasing representation in our workforce, developing an inclusive talent pipeline, embedding inclusive behaviors in our culture and teams, mitigating bias in our business decisions, promoting fairness, and facilitating access to capital for small and underrepresented businesses. We expect suppliers to share this commitment and incorporate policies and practices into their business to achieve an inclusive workplace free of discrimination and harassment. This includes maintaining talent recruitment and development programs focused on building a workforce that reflects the supplier's customer base and the communities in which they live and conduct business.

Our commitment to inclusion extends into our supply chain and the supply chains of our suppliers. We recognize an inclusive supply chain provides jobs, builds wealth, and develops sustainable economic pathways for all. Citizens seeks to amplify the positive impact of our supply chain by encouraging our suppliers to develop their own inclusive supply chains. Our goal is to achieve a supply chain that is reflective of the markets we serve, and accessible and efficient for all suppliers with whom we work.

Climate Impact

Citizens is committed to supporting positive climate impact by reducing our operational emissions, supporting our clients and customers, assessing climate-related risk, and disclosing our progress along the way.

In response to this global challenge, Citizens is taking steps to reduce our carbon footprint, energy consumption, waste production, and water use. We measure and track our environmental performance against publicly stated climate goals, proactively implement projects and processes to reduce our environmental footprint and publicly disclose progress and challenges annually.

Citizens suppliers must comply with all applicable environmental laws and regulations and strive to exceed those requirements by implementing policies and practices that reduce their carbon footprint, better protect and preserve the environment, and aim to limit the rise in global temperature. We expect suppliers to measure their greenhouse gas emissions, set public goals for reducing those emissions, take meaningful action to do so, and disclose progress and challenges annually using widely accepted methods and public disclosures frameworks. Actions should prioritize the needs of local communities in which the supplier operates, center communities that will be disproportionately impacted by climate change in decision making, and ideally bring co-benefits to those communities.

Business Conduct & Ethics

Citizens' successful business operations depend not only on the competence of our directors, officers and colleagues, but also on having a reputation for honesty, integrity, and lack of bias in the conduct of our business affairs. Our commitment to the highest level of ethical conduct and integrity extends through every layer of the bank and is an integral part our mission to help our customers, colleagues, and communities reach their potential. To this end, it is important that our suppliers are also acting at the highest level of ethical conduct. A detailed list of our expectations and standards for ethical business practices can be found in the Third Party Resource Code. Vendors should pay particular attention to:

- Section 3. Protection of Customer and Company Assets including 3.1 Fair Dealing
- Section 4. Conflicts of Interest including 4.1 Preferential Treatment in Providing Services, and 4.2 Gifts Entertainment, and Other Things of Value.

Suppliers should maintain core standards of ethical conduct for their company and ensure that their employees – who provide services to Citizens – abide by that code. Additionally, it is expected that supplier employees assigned to and working on behalf of Citizens are provided with the Third Party Resource Code, so that they are aware of these expectations and know how to report suspected violations or inappropriate behavior.

Any information regarding violation of this Code, company policy, laws or regulations, can be reported anonymously through the Right Call hotline via a toll-free phone call 1-877-495-4727 or online. All telephone calls and Web reports made to Right Call will be managed externally by NAVEX Global, an independent third-party that is a leading provider of comprehensive reporting programs.