

# Wells Fargo Supplier Code of Conduct

At Wells Fargo, we're guided by a common effort to help our customers succeed financially. We are committed to running our business in a manner that benefits our communities, the economy, and our environment

To effectively run our business, Wells Fargo engages numerous entities to provide various goods and services. "Supplier" is the general term utilized within this Code to reflect these relationships, however all concepts and expectations within this Code are applicable across our global third-party relationships including Vendors, Vendor Affiliates, Vendor Personnel, Dependent Providers, Subcontractors, and Agents.

These mutually beneficial relationships enhance the value of the products and services we offer our customers, and create stronger communities through diversity and inclusion, economic empowerment, and environmental sustainability.

We firmly believe our suppliers and their actions are an extension of our own actions and reputation. We expect our suppliers to demonstrate strong values and ethical practices. Additionally, this Code emphasizes and reinforces additional expectations placed on our suppliers through complimentary third party programs related to risk, information security, and corporate responsibility.

We expect our suppliers to operate in a way that is consistent with our [Code of Ethics and Business Conduct \(PDF\)](#), all applicable laws and regulations, contract terms, and this Supplier Code of Conduct. It is the responsibility of each supplier to ensure its employees and representatives maintain a thorough understanding of our expectations as set forth in this and other relevant documents.

This Supplier Code of Conduct is subject to periodic updates and revisions reflecting Wells Fargo's culture of continuous improvement. Regular updates not only mirror the evolving needs of our diverse and rapidly evolving corporate responsibilities and goals, but they ensure the ongoing alignment of the Supplier Code of Conduct to internal operations, supporting programs, and our supplier base.

## I. Ethical Business Practices

At Wells Fargo, we earn the trust of our customers, communities, and shareholders by maintaining the highest ethical standards while often going beyond the law and above industry standards. We constantly monitor and refine our business and risk management practices to ensure we perform ethically and with integrity.

Similarly, we expect our suppliers to pursue the highest standards of integrity in their business dealings. This includes refraining from any and all forms of illegal or improper activity, including corruption, misrepresentation, extortion, embezzlement, bribery, or unethical practices in the extraction of, trade in or [utilization of conflict minerals](#)<sup>1</sup>.

Footnote:

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We also expect our suppliers to engage in ethical employment practices, including the treatment of their employees, sub-contractors, and suppliers.

Wells Fargo encourages its suppliers to provide a [living wage](#)<sup>1</sup> to its employees and throughout its supply chain. Compensation and benefits should aim to provide an adequate standard of living, including compensation for overtime at a premium rate. In addition, Wells Fargo expects its suppliers to implement compensation programs that are transparent and fair, including appropriate disclosure to employees, equal pay for equal work, and proper oversight of management.

Wells Fargo values transparency. We expect our suppliers to disclose any potential conflicts of interest prior to initiating their relationship with Wells Fargo, and we expect fair competition among our potential suppliers, contractors, and other vendors

We take our customers' [privacy and confidentiality](#) concerns seriously, and we expect the same from our suppliers. All confidential and protected information, including and especially any Wells Fargo customer data, is to be protected by the supplier in accordance with applicable laws, prevailing industry practices, and contract terms.

## II. Respecting Human Rights

Wells Fargo strives to engage with suppliers whose values and business principles reflect their respect for the human rights of the people with whom, and the communities in which, they do business. We continuously expand human rights capabilities within our third-party environment, embedding relevant content across our sourcing, contracting, and third-party risk programs. While we recognize each supplier has varying policies and approaches to human rights, we expect our suppliers to adhere to the standards and values expressed in Wells Fargo's [human rights statement](#).

Wells Fargo expects its suppliers to comply with all applicable laws relating to human rights, including those intended to identify, mitigate, and monitor activities with risk of modern slavery, human trafficking, and forced or exploitive prison labor. Wells Fargo has instituted a cross-functional Human Rights and Modern Slavery Community of Practice to inform, assist, and advise senior management regarding human rights and modern slavery issues, impacts, and initiatives. Additionally, our annual UK Modern Slavery Act (UKMSA) disclosure outlines our approach to addressing the issue of modern slavery in our business operations and supply chain.

## III. Environmental, Social and Governance (ESG) Stewardship

At Wells Fargo, we are working to embed environmental sustainability throughout our products, services, operations, and culture to drive efficiencies and responsible resource use while creating comfortable, safe, and healthy workplaces for our stakeholders. We encourage our suppliers to join us in implementing systems designed to minimize negative impacts on the environment. This includes the development of processes to reduce greenhouse gas emissions, increase energy efficiency, reduce water consumption, and increase waste diversion from landfills. Wells Fargo values business relationships with suppliers who have developed and implemented internal programs fostering a culture of sustainability and environmental stewardship in the local and global community.

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We encourage our suppliers to track and publicly report relevant data across their own operations, products, and service offerings. In particular, we encourage our suppliers to set and publicly report greenhouse gas and/or renewable energy targets amongst their other carbon accounting, sustainability, human rights, and climate programs.

Wells Fargo's ESG targets and commitments can be found by visiting [Goals and Reporting](#).

## IV. Community Investment

When it comes to [investing in our communities](#), Wells Fargo understands one size doesn't fit all. Every city, neighborhood, and resident is faced with unique challenges, needs, and stories. We invest our talent, expertise, and financial resources to help communities succeed – by listening, learning, and partnering with key stakeholders to identify local solutions for local needs. We also support suppliers who share these same values and act as [responsible corporate citizens](#) in their own communities. All suppliers are encouraged to engage with their communities to help foster economic development and contribute to the social and environmental sustainability of the communities in which they operate.

We also expect our suppliers to join us in our [commitment to "diversity, equity and inclusion"](#), and to ensure they do not discriminate in their hiring and retention policies and practices. Additionally, Wells Fargo will continue to strive towards increasing our controllable spending with [certified diverse-owned businesses](#), and we expect our suppliers to work to provide business opportunities to competitive diverse suppliers as well.

*This Supplier Code of Conduct does not constitute a contract, and nothing contained herein is intended to create or convey any rights, actions, or remedies to any person or entity.*