



## Code of Business Conduct and Ethics for Suppliers

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### PURPOSE

Synovus Financial Corp. and its subsidiaries (collectively, the “Company”) have established this Code of Business Conduct and Ethics for Suppliers (the “Code”) to cover a wide range of business practices and procedures for its third party business partners, vendors, consultants, and suppliers (collectively, the “Suppliers”).

### SCOPE

This Code outlines basic principles to guide all Suppliers of the Company. The Company expects the same high standards of integrity and ethical conduct from its Suppliers as from its own team members and directors.

The Company desires to engage in and promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships, and to comply with all applicable laws. Suppliers must conduct themselves accordingly and seek to avoid even the appearance of improper conduct.

The Code and any additional information will be provided to Suppliers during their onboarding with the Company and/or at adoption of this Code by the Risk Committee of the Board of Directors.

If a local, state or national law conflicts with any policy in this Code, Suppliers must comply with the law; however, if Suppliers’ customs or policies conflict with this Code, Suppliers must comply with the Code unless a waiver is provided by the Company as described under Section 11 below. The specific terms of a Supplier’s contract with the Company will override any conflicting provisions of this Code.

### POLICY

#### 1. Compliance with Laws, Rules and Regulations

Obeying the law, both in letter and in spirit, is the foundation on which this Company’s ethical standards are built. The financial services industry is subject to extensive regulation by a number

of federal and state agencies responsible for the administration and enforcement of a variety of important statutes. The Company is committed to full compliance with these statutes and the rules and regulations promulgated under them by the regulatory agencies. The Company will abide by the highest standards of integrity in our interaction with these agencies. All Suppliers must respect and obey the laws and all applicable rules and regulations of the cities, states and countries in which they operate.

## **2. Anti-Bribery and Anti-Corruption**

The Company is committed to conducting its business with the highest standards of ethics and expects all people and entities working on its behalf, including its Suppliers, to uphold this commitment and to refrain from offering bribes and accepting improper kickbacks or payments. To assist those Suppliers involved in the Company's international banking activities and other interactions with foreign-based parties, the Company maintains a Foreign Corrupt Practices Act Compliance Policy ("FCPCA Policy") that applies to all Suppliers as well as the Company's officers, directors and team members. In addition, the Company expects its Suppliers to refrain from offering any other corrupt expenditures of funds for bribes, kickbacks or improper gratuities.

## **3. Corporate Gifts, Meals, Trips and Entertainment**

Suppliers are prohibited from providing anything more than modest gifts, meals and entertainment to team members, customers or other constituencies of the Company. Provision of meals, refreshments, trips and entertainment from a Supplier is subject to certain requirements and must be approved per Company policy. In no event shall any gift, meal or entertainment be offered, given or provided by any Supplier if it: (1) is a cash gift, (2) is inconsistent with customary business practices, (3) is excessive in value, (4) can be construed as a bribe or payoff, and (5) violates any laws or regulations.

## **4. Human Rights and Labor Standards**

The Company conducts its business in a manner that is aligned with the fundamental human rights principles described in the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct. The Company expects its Suppliers to operate in an environment where everyone is treated with dignity and respect in accordance with the Company's Human Rights Statement and to respect such human rights within the Suppliers' own workplace environment and in its business dealings with the Company.

Suppliers are prohibited from using forced labor, whether in the form of prison labor, indentured labor, bonded labor, or otherwise. Suppliers are required to comply with applicable child labor laws and employ only workers who meet the applicable minimum legal age requirement in their localities, states and countries of operation. The Company expects all Suppliers to comply with all applicable wage and hour labor laws and regulations governing employee compensation and working hours in their countries of operation.

## **5. Environmental and Social Responsibility**

The Company understands and appreciates the environmental challenges that face our planet over the long-term and seeks to engage Suppliers who are good stewards of environmental sustainability. As such, Suppliers should comply with all applicable environmental laws. In addition, the Company encourages all Suppliers to make reasonable efforts to monitor and

address their own environmental practices and to take proactive measures to mitigate any environmental impacts and promote environmental responsibility in the course of their business.

## **6. Record-Keeping, Accounting, Auditing and Disclosure**

The Company requires honest and accurate recording of information in order to provide accurate reports and make responsible business decisions. As such, the Company expects that all Suppliers' financial reports, accounting records, auditing records, public disclosures, research reports, expense accounts, timesheets and other similar documents must accurately and clearly represent the relevant facts or the true nature of the transactions memorialized therein and must conform to both applicable legal requirements and the Supplier's own system of internal controls.

## **7. Fair Dealing and Non-Discrimination**

The Company expects that its Suppliers respect and deal fairly and ethically with the Company, its team members and customers. The Company expects that its Suppliers will not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information or misinformation of material facts or any other intentional unfair dealing practice. Moreover, the Company believes in fair and open competition and expects all Suppliers to comply with all applicable antitrust and competition laws and regulations.

Open communication is encouraged at all levels. Discrimination or harassment by Suppliers based on age, race, creed, color, national origin, sex, gender, pregnancy, sexual orientation, marital status, religion, veteran status, gender identity, disability, citizenship, military service or obligation, genetic information or on any other basis prohibited by law is not tolerated.

## **8. Diversity**

The Company is committed to creating a diverse and inclusive environment. As a part of that commitment, the Company believes that leading institutions achieve optimal performance by ensuring fair and non-discriminatory access to suppliers and by proactively developing supply chain relationships with qualified, U.S. based, certified, minority, woman, and veteran owned business as well as small businesses. A cornerstone of this policy is the expectation that the Company's Suppliers will participate in the Company's supplier diversity initiative by actively encouraging qualified diverse suppliers to bid for available subcontracting opportunities and use good faith and commercially reasonable efforts to maximize the use of the diverse vendors and subcontractors consistent with the efficient performance of any relationship with the Company. In addition, the Company expects its Suppliers to actively promote a diverse and inclusive work environment by recruiting, developing and retaining diverse talent of all types to work with the Company as a part of its service offerings.

## 9. Confidentiality

The Company expects all Suppliers to maintain the confidentiality of all information entrusted to them and to use such information only for legitimate business purposes of the Company.

## 10. Insider Trading

Suppliers who have access to confidential information are not permitted to use or share that information for stock trading purposes or for any other purpose except the conduct of the Company's business. All non-public information about the Company, its customers, business partners and vendors should be considered confidential information. To use non-public information for personal financial benefit or to "tip" others who might make an investment decision on the basis of this information is not only unethical but also illegal. Suppliers who have access to any such material, confidential information shall not trade in the Company's stock.

## 11. Waivers of the Code of Business Conduct and Ethics for Suppliers

Any waiver of this Code for Suppliers may be made only by the Risk Committee or the Corporate Governance and Nominating Committee of the Board. Any such request for a waiver shall be in writing and shall be filed with the Company's General Counsel's Office at least 45 days before the meeting of the Risk Committee or the Corporate Governance and Nominating Committee of the Board at which such request is to be considered.

## 12. Reporting any Illegal or Unethical Behavior

Anyone aware of a violation of this Code or any Company policy or legal requirement must report that violation. In reporting violations, **we encourage Suppliers to first contact their Company business partner or discuss it with the Company's General Counsel's Office.** If that is not appropriate, or if you wish to remain anonymous, call (800) 240-1242, the Company's toll-free Helpline. The Helpline is administered by Navex, an independent, third party administrator who assigns your call a unique identification number that you can refer to during any follow-up calls. The Helpline is staffed 24 hours a day, seven days a week for your convenience.

It is the policy of the Company not to allow retaliation for reports of misconduct by others made in good faith by Suppliers. Suppliers are expected to cooperate in internal investigations of misconduct.

## 13. Privacy and Data Protection

Suppliers shall commit to protecting the reasonable privacy expectations of personal information of every party that such Supplier does business with, including other suppliers, customers, consumers and employees. The Company expects all Suppliers to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, or shared. Suppliers are prohibited from disclosing confidential and nonpublic information without a permitted valid business purpose and proper authorization from the Company.

## 14. Health and Safety

The Company is dedicated to providing a secure and safe environment for team members, customers, and third-party service providers. The Company will maintain compliance with all applicable environmental and health and safety laws. As such, the Company expects Suppliers to uphold the same standard of regard for all applicable regulations.

## 15. Annual Certification

All Suppliers that are designated as “critical or high risk suppliers” of the Company shall certify compliance with this Code upon entering into a new contractual relationship with the Company or upon renewal or amendment of an existing contractual relationship with the Company.

## RESPONSIBILITIES

The Policy Owner is responsible for:

- Development, implementation, and maintenance of the Policy in accordance with the Synovus Policy Management Policy
- Defining, approving, and implementing processes and procedures and ensuring their consistency with the Policy

Approval Authorities

- Policy Governance Team
- Executive Risk Committee
- Risk Committee of the Board

Company Management is responsible for ensuring the Policy and associated standards, processes and procedures are properly communicated and understood within their respective organizational units.

Team Members, Contractors, Part-Time and Temporary workers, and those employed by others to perform work for Synovus are responsible for familiarizing themselves and complying with the Policy and the associated processes provided by Company management.

## ENFORCEMENT

Failure to comply with the Policy and associated standards and processes can result in disciplinary actions which may include but not be limited to termination of any underlying contractual relationship with the Supplier and/or legal action by Synovus.

## REVIEW AND REVISION

The Policy will be reviewed by the Policy Owner at least annually or upon significant changes in the law and will be approved by the appropriate committees annually per the “Responsibilities” section of this Policy.