



# Supplier Code of Conduct



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## Purpose

The SVB Supplier Code of Conduct (“Code”) sets forth the minimum principles SVB Financial Group and its subsidiaries and affiliates (collectively, “SVB”) expect Suppliers to follow when doing business with SVB. As SVB is a multi-national organization, this Code should be read as applying globally although there may be differences in application for specific regions. Local legal requirements, labor law, and specific contractual agreements are the mechanisms by which the Code will be applied and shall supersede this Code if there are any inconsistencies.

The Code of Conduct is based on SVB’s core values which are enterprising, ethical, driven, dedicated, and united. These core values are what helps SVB maintain the highest level of service for its customers and acts as a differentiator in the marketplace. SVB expects its Suppliers to act in accordance with the Code and enforce policies that support these principles as well as its strategic ESG initiatives that are built to address critical, long-term sustainability needs for SVB, its stakeholders and the world around us. If, in the sole judgment of SVB, a Supplier has violated this Code, SVB shall have the right to terminate the Supplier relationship immediately and without penalty to SVB.

## Compliance with Laws

SVB requires that Suppliers comply with all applicable laws and regulations. In addition, Suppliers shall be responsible for compliance with all immigration, labor and employment laws and regulations applicable to Supplier personnel performing any services for SVB.

## Gifts and Entertainment

Suppliers shall not give or offer anything to SVB employees or other SVB representatives in an effort to influence actions or gain an advantage with SVB. SVB does not tolerate acts that are or would be perceived to be bribery or corruption in any form. SVB expects its Suppliers to comply with all federal, state, provincial and municipal laws including all antitrust and fair-trade policies.

## Diversity Equity and Inclusion (DE&I)

SVB is dedicated to expanding its commitments and investments to create a more diverse, equitable and inclusive company culture and innovation ecosystem. We are intentionally and strategically funding a world where every client and employee has the opportunity to bring their bold ideas to life. We also know that diverse perspectives and inclusive environments ignite new ideas to power innovation. That is why SVB is building a culture of belonging with a global workforce that celebrates greater dimensions of diversity and reflects the markets we strive to serve. This includes partnering to purchase goods and services from diverse enterprises owned by historically underrepresented minority groups, and diverse groups including women, veterans, people with disabilities and the LGBTQ+ community. SVB expects its Suppliers to share a similar commitment to DEI and demonstrate inclusive business practices by hiring diverse talent and contracting with certified diverse enterprises for business opportunities. For more information, please see SVB’s [Supplier Diversity commitment](#).

## Labor and Human Rights

SVB believes all workers deserve a fair and ethical workplace. Workers must be treated with the utmost dignity and respect, and Suppliers shall uphold the highest standards of human rights. SVB expect the following from its Suppliers:

### Living Wages

- SVB is committed to providing competitive compensation and benefits that support its employees' needs, including health and retirement benefits. As part of our commitment, SVB expect its Suppliers to provide their employees with fair compensation that meets or exceeds the requirements of applicable laws and regulations.

### Freely Chosen Employment

- SVB prohibits its Suppliers from using any form of forced labor, prison labor, human-trafficking and/or slavery.

### No Child Labor

- SVB's Suppliers must not use child labor within their organizations or supply chains. This includes anyone under the legal minimum working age for employment of applicable jurisdiction.

### No Discrimination or Harassment

- Supplier shall not discriminate against any worker based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by country law, in hiring and other employment practices. Supplier shall not require pregnancy or medical tests,

except where required by applicable laws or regulations or prudent for workplace safety, and shall not improperly discriminate based on test results.

- Supplier shall commit to a workplace free of harassment and abuse. Supplier shall not threaten workers with, or subject them to, harsh or inhumane treatment, including but not limited to verbal abuse and harassment, psychological harassment, mental and physical coercion, and sexual harassment.

### Safe Working Conditions

- Supplier shall provide and maintain a safe work environment and integrate sound health and safety management practices into its business. Workers shall have the right to refuse unsafe work and to report unhealthy working conditions.

## Ethics and Conflicts of Interest

Suppliers shall disclose all actual or potential conflicts of interest due to either business or personal relationships with customers, business associates, competitors of SVB, or with SVB employees. Should Suppliers discover a potential conflict of interest, contact an SVB relationship manager.

SVB requires its Suppliers to conduct themselves in a fair, reasonable and honest manner. Supplier shall not engage in corruption, extortion, embezzlement, or bribery to obtain an unfair or improper advantage. Supplier shall abide by all applicable anti-corruption laws and regulations of the countries in which it operates, including the Foreign Corrupt Practices Act (FCPA) and applicable international anticorruption conventions.



## Environmental, Social and Governance (ESG)

SVB recognizes the significant societal, ecological and economic threats of climate change. SVB is deepening the integration of climate risks and opportunities into its business. This includes setting internal targets like reducing its own emissions and taking steps to achieve carbon neutral operations, including business travel, and 100% renewable electricity by 2025. Given our own goals and our work to support the innovation economy, SVB expect its Suppliers to manage environmental impacts and to operate in an environmentally friendly manner to the best of their ability. Suppliers shall comply with all applicable environmental laws and regulations.

## Accuracy and Completeness of Books and Records

For Suppliers (“Company”) involved in providing accounting or financial statement services, you must adhere to the following guidelines:

- Do not make false, intentionally improper, or misleading entries in the books and records of the Company.
- Provide complete and accurate information in response to inquiries from SVB’s regulators and auditors, both internal and external.
- Do not establish or maintain undisclosed or unrecorded funds or assets of the Company for any purpose except when obsolete or surplus.

- All payments made by, or on behalf of the Company, for any purpose will be fully defined and are to be made only for the purpose described in the documents and records of the Company supporting the payment.
- Submit all documents reflecting a binding element of a contract with a customer that is not reflected in the final transaction documents (such as “side letters” including those made by email) to the Finance department.
- If you participate in the development or the review of SVB’s financial reports, you must provide full, fair, accurate, timely and understandable disclosure in reports and documents that SVB files with, or submits to, the Securities and Exchange Commission and in other public communications made by SVB.

## Compliance

Complying with the Supplier Code of Conduct is a condition of service to SVB. We ask that Suppliers read this document carefully, considering the spirit as well as the letter of the policies detailed here. Failure to comply with this Code of Conduct may result in corrective action up to and including termination of contract.