

## **Vendor Code of Conduct**

### **Purpose**

The SVB Vendor Code of Conduct (“Code”) sets forth the minimum principles we expect our vendors to follow when doing business with the bank. As 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 being 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. The bank expects our vendors to act in accordance with the Code and enforce policies that support these principles. If, in the sole judgment of SVB, a vendor has violated this Code, SVB shall have the right to terminate the vendor relationship immediately and without penalty to SVB.

### **Compliance with Laws**

SVB requires that vendors comply with all applicable laws and regulations in the conduct of the Company’s business.

In addition, vendors shall be responsible for compliance with all immigration, labor and employment laws and regulations applicable to vendor personnel performing any services for SVB.

### **Confidential Information**

Vendors shall at least use the same care and precaution in protecting SVB’s Confidential Information as you use to protect your own highly confidential, proprietary information and trade secrets. Safeguarding confidential information concerning our customers is essential in maintaining client trust and compliance with data security laws and regulations. It is the policy of SVB that confidential information acquired from a client must be held in the strictest confidence.

You must not disclose financial or other information regarding SVB to any outside parties unless it has been published in public filings with the SEC, or otherwise made available to the public through authorized news releases. You shall ensure that your employees shall not use any material non-public information to engage in any insider trading related to SVB Financial Group.

### **Use of SVB Name and Social Media**

Vendor shall not use SVB's or SVB affiliates' names or trademarks in connection with any advertising or promotional materials or activities, in a Web site, in a press release, or in other written, electronic, magnetic or laser media communications, or Services, materials or products provided to, third parties.

You should not communicate about anything relating to Silicon Valley Bank’s business unless you are specifically authorized to do so.

### **Gifts and Entertainment**

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

### **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 vendors shall uphold the highest standards of human rights. Vendor 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

Vendor 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. Vendor 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.

Vendor shall commit to a workplace free of harassment and abuse. Vendor 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.

### **Ethics and Conflicts of Interest**

Vendors 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 you discover a potential conflict of interest, contact your SVB relationship manager.

SVB requires our vendors to conduct themselves in a fair, reasonable and honest manner. Vendor shall not engage in corruption, extortion, embezzlement, or bribery to obtain an unfair or improper advantage. Vendor 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 anti-corruption conventions.

### **Accuracy and Completeness of Books and Records**

For vendors 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 e-mail) 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.