

## **EQUITABLE BANK THIRD PARTY CODE OF CONDUCT**

### **1. Purpose and Scope**

At Equitable Bank (“Equitable” or the “Bank”), we are committed to doing our part in building a better society for all Canadians. Please refer to the Bank’s [Code of Conduct](#) (the “Code”) for more information on Equitable’s principles that guide us to do the right thing.

Consistent with the Code, the Bank’s aim is to exceed the highest degree of ethical conduct by actively sourcing products and services from sustainable third party organizations who show a strong commitment to human rights, ethics, and the environment. As such, the Bank has developed this Third Party Code of Conduct (the “TP Code”) which aligns with Equitable’s own corporate values (of Respect, Integrity, Service, Empowerment and Agility) and outlines the principles and minimum expectations that we either desire or require our suppliers, vendors, partners, service providers, and subcontractors (collectively, “Third Party Organizations” or “TPOs”) across Canada who currently conduct business with Equitable and who may in the future conduct business with Equitable to have or adhere to.

The implementation of this TP Code represents the Bank’s intent to engage with Third Party Organizations who uphold values and encourage business practices that are consistent with its own.

### **2. Required Principles and Expectations**

Equitable has a requirement that Third Party Organizations that we engage with will, at a minimum, adhere to the following values, activities, and processes:

#### **(A) Compliance with Laws and Regulations**

- (i) Legal and Regulatory Compliance: comply with the rule of law in all operating jurisdictions and align with regulatory requirements based on the nature of the business.
- (ii) Bribery and Corruption: prohibit actions enabling bribery and corruption, and avoid engaging in any activities that would put Equitable at risk of violating anti-bribery and anti-corruption laws.
- (iii) Anti-Money Laundering (AML) and Anti-Terrorist Financing (ATF): conduct business in full compliance with AML and ATF laws and regulations, including but not limited to reporting of suspicious behaviour to avoid legal sanctions, financial penalties and reputational damage.
- (iv) Taxation: comply with obligation to pay taxes in each jurisdiction of operation, and do not evade taxes or facilitate tax evasion on behalf of other organizations or individuals.

#### **(B) Managing Conflicts of Interest**

- (i) Promoting Moral and Ethical Behaviour: act ethically and with integrity to manage unethical conduct.

- (ii) Conflicts of Interest: avoid improperly influencing Equitable's employees to gain preferential treatment and transparently report any real, potential, or perceived conflicts with the interests of Equitable.
- (iii) Gifts and Entertainment: use gifts and entertainment in the spirit of business courtesy and relationship management, rather than to create a sense of obligation or influence to gain improper advantage.

### **(C) Protecting Information**

- (i) Insider Trading: TPOs, including their representatives and employees, should refrain from trading in or short selling shares of EQB Inc., or any other publicly traded company, while in possession of material nonpublic information.
- (ii) Managing non-public information: comply with non-disclosure agreements to maintain confidentiality of all non-public information, material or non-material.
- (iii) Privacy and Information Security: comply with the *Personal Information Protection and Electronic Documents Act* and limit the use of information collected to the identified purpose at the time of collection. Implement sound cybersecurity practices to minimize vulnerability and comply with Equitable's [Privacy Agreement](#).
- (iv) Data Retention and Destruction: retain data only for the identified purpose and length of business relationship with Equitable and destroy data that is no longer required for business purposes and ensure compliance with any non-disclosure/confidentiality agreements with Equitable

## **3. Desired Principles and Expectations**

Equitable has a desire that, whenever possible, Third Party Organizations that we engage with or will engage with will, at a minimum, have and follow the below-noted values, activities, and processes:

### **(A) Supporting Personal Integrity**

- (i) Human rights: protect human rights in business engagements, in line with the Universal Declaration of Human Rights and abide by applicable human rights legislation.
- (ii) Health and Safety: provide a safe, healthy work environment that considers both physical and mental health and abide by applicable health and safety laws.
- (iii) Fair Labour Practices: implement a zero-tolerance policy for child or forced labour, slavery, human trafficking, and comply with relevant local labour laws related to wages distributed and working conditions provided.

### **(B) Practicing Corporate Social Responsibility**

- (i) Environmental Sustainability: engage in activities that support a transition to a low carbon economy, establish processes to measure one's own environmental

footprint, and work partners across the value chain to share emission reduction strategies and data to enable increasingly accurate carbon accounting.

- (ii) Community Leadership: operate as an active member of local communities through donations of varying formats, such as time, resources, or financial support.
- (iii) Diversity: exceed minimum standards by actively committing to inclusion, diversity, equity, accessibility, and anti-racism, and complying with applicable non-discrimination legislation. Equitable will not work with TPO's that we know discriminate or tolerate harassment, be that related to race, national or ethnic origin, gender, religion, sexual orientation, gender identity, gender expression, age, marital status, family status, language preference, nor any physical, developmental, or mental disability.
- (iv) Responsible Sourcing, Outsourcing and Subcontracting: if outsourcing or subcontracting services, seek such third parties that will uphold similar principles, activities and processes discussed in this TP Code.
- (v) Contingency Planning and Business Continuity: implement a plan to address threats to continuity, test the plan regularly, and revisit strategies on a recurring basis to ensure effectiveness.

#### **4. Compliance with the TP Code**

The principles within this TP Code will serve as Equitable's guide as we manage our relationships with our TPO's and will form part of our evaluation criteria during our procurement processes. Equitable reserves the right to monitor a TPO's compliance to this TP Code and conduct audits of their environment in this regard.

Third Party Organizations who work for or with the Bank and who are in receipt of this TP Code agree to:

- (i) adhere to the requirements and expectations set out in this TP Code; and
- (ii) deliver accurate and complete information in order to facilitate any due diligence efforts undertaken by the Bank with respect to compliance with this TP Code.

In the event of a perceived or actual breach of this TP Code, an anonymous report can be made using the details in the "Reporting Breaches" section in the Bank's [Code of Conduct](#). All potential breaches of the TP Code will be treated seriously by Equitable and appropriate action will be taken, if necessary, which may include, but is not limited to, the discontinuation of our relationship with any such breaching TPO's.

For any additional questions about our TP Code, please feel free to speak to your closest Equitable point of contact (who may further re-direct you) and/or email [thirdpartycode@eqbank.ca](mailto:thirdpartycode@eqbank.ca)