TIAA

U.S. Supplier Code of Conduct

United by a shared vision to take care of people, act with integrity, and deliver excellence.

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For more than 100 years, TIAA has maintained the highest ethical standards in serving our clients, making a difference for the individuals, institutions and communities we serve. Global Supplier Services underscores the values of TIAA, its participants and clients by demonstrating fundamental principles that are crucial to an organization on a mission to help our clients and participants reach their financial goals:

- Equitable and inclusive engagement of diverse, disadvantaged and small business enterprises;
- Deliver value through skillful financial management;
- Emphasis on Suppliers operating ethically, responsibly and promoting sustainable practices;
- Transparency through communication of goals and results, integrity through moral behaviors, compliance with policies and procedures.

We are grateful to Suppliers who have contributed to TIAA's trusted character and reputation over the years and for exemplifying values of inclusivity, equity, diversity, sustainability and zero tolerance of discrimination in any form.

A Supplier's performance and adherence to high business standards is an important and integral part of the value chain for TIAA. TIAA promotes and expects the application of high legal, ethical, environmental, and employee-related standards within our own business and among our Suppliers. TIAA's commitment to integrity and professionalism is set forth in our Code of Business Conduct, which provides a clear set of standards for all of our business conduct. We believe that deviations from or violations of the Code of Business Conduct are unacceptable, and that our employees, clients or Suppliers should feel empowered to raise concerns without any fear of retaliation or discrimination. Therefore, we provide an Ethics Helpline to deal with sensitive ethical issues.

This Supplier Code of Conduct sets forth the minimum standards of business conduct we expect from all of our Suppliers. Suppliers shall notify TIAA as soon as reasonably possible if it becomes aware that action connected with the Supplier's performance of the Services could reasonably be considered to impact TIAA's business and/or reputation.

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Compliance with the law

Suppliers are expected to maintain strict compliance with all applicable laws in their country of operation. These may include, among others: the Gramm-Leach-Bliley Act (including privacy and safeguarding of customer information); the Bank Secrecy Act and Anti-Money Laundering (BSA/AML) laws; the Office of Foreign Assets Control (OFAC) regulations; and consumer protection laws and regulations, including with respect to fair lending and unfair, deceptive or abusive acts or practices. Suppliers are required to comply with all international, national, state, and local laws and ordinances as well as all lawful orders, rules, regulations, codes, and treaties governing the goods and services to be provided.

Antitrust

Suppliers are required to comply with all applicable antitrust and competition laws and regulations. Suppliers are not to share or exchange any price, cost or other competitive information or engage in any collusive conduct with any third party with respect to any proposed, pending or current TIAA procurement.

Bribery/Anti-Corruption

Suppliers acting on behalf of TIAA must comply with the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, as well as all local laws dealing with bribery of government officials. TIAA strictly prohibits giving anything of value to any person or entity where the purpose is to obtain an improper business advantage. Bribery can include not just the payment of money, but the transfer of anything of value including lavish entertainment or travel expenses, a future job offer, or political or charitable donations.

TIAA does not tolerate acts of bribery whether they involve government officials or individuals in the commercial and private sector.

Conflicts of Interest

Suppliers should have no relationship, financial or otherwise, with any employee of TIAA that might create a conflict of interest, or even the appearance of conflict. For example, Suppliers should not employ or otherwise make payments to any employee of TIAA during the course of any transaction between the Supplier and the Company. Friendships outside of the course of business are inevitable and acceptable, but Suppliers should take care that any personal relationship is not used to influence the TIAA employee's business judgment.

If a Supplier's employee is a family relation (e.g. spouse, partner, parent, sibling, grandparent, child, grandchild, in-law) to an employee of TIAA, or if a Supplier has any other relationship with an employee of TIAA that might represent a conflict of interest, the Supplier should disclose this fact to TIAA or ensure that the TIAA employee does so.

International Trade Law

TIAA expects all Suppliers to abide by applicable international trade laws. This includes laws and regulations pertaining to working conditions, health and safety, human rights, and child labor. Suppliers are not to transfer TIAA technical information to any third party without the express, written permission of TIAA, and to comply with all applicable trade control laws and regulations in the import, export, re-export or transfer of goods, services,

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software, technology or technical data including any restrictions on access or use by unauthorized persons or entities.

Suppliers are also expected to comply with all applicable economic sanctions programs administered by bodies such as the U.S. Office of Foreign Assets Control (OFAC), the United Nations, the European Union, and other relevant authorities. This includes prohibitions on doing business with sanctioned countries, entities, or individuals on restricted party lists.

Human Rights

TIAA does not tolerate any form of forced labor or human trafficking, and will not knowingly work with Suppliers who engage in these practices or permit their subcontractors to engage in these practices. Suppliers should put into place measures that ensure workers are not exploited by third party labor providers, such as recruiters or agencies. Additionally, Suppliers must not engage in or support human trafficking and are encouraged to implement due diligence measures to ensure that no human trafficking exists within their extended supply chains.

Voluntary Labor

Suppliers must employ all workers on a voluntary basis free from any threat of violence, threats of criminal penalty, and restrictions on freedom of movement. Supplier shall not use any prison, slave, bonded, forced, indentured, or debt induced labor, or engage in any other forms of compulsory labor, or any other forms of slavery or human trafficking.

Minimum Age

Under no circumstances will Suppliers employ workers under the age of 15 or under the minimum age for work or mandatory schooling as specified by the local law, whichever is higher. When young workers are employed they must not do work that is mentally, physically, socially or morally dangerous or harmful or interferes with their schooling by depriving them of the opportunity to attend school. In the case of hazardous work, the minimum age is 18.

Employment Practices

Suppliers shall only employ workers who are legally authorized to work in their facilities and are responsible for validating workers' eligibility to work through appropriate documentation. All work shall be voluntary, and workers shall be free to leave work or terminate their employment upon reasonable notice.

Worker Documentation

Suppliers may not require workers to deposit original identification documents, travel documents or any other personal legal documents upon commencing employment.

Migrant Labor

TIAA recognizes the unique legal, social, and cultural situations that migrant workers face and requires Suppliers to ensure that any migrant workers are treated with dignity, respect, and in accordance with the same standards that apply to the non-migrant workforce.

Privacy

Suppliers shall respect and protect the privacy rights of its workers whenever it gathers private information or implements worker monitoring practices.

Recruitment & Security

Suppliers shall ensure that if third-party recruitment agencies are used they are compliant with the provisions of this Code and all applicable laws. Suppliers recruiting foreign contract workers either directly or through third party agencies shall be responsible for payment of all recruitment-related fees and expenses. When a Supplier retains direct or contracted workers to provide security to safeguard its personnel and property, the Supplier will make sure that security personnel apply the standards in this code.

Fair and Equal Treatment

TIAA believes all workers deserve an equal opportunity to succeed based on their work, talent, and commitment, and should always be treated with fairness and respect.

Non-Discrimination & Harassment

TIAA encourages an inclusive and supportive working environment free from harassment and intimidation and expects that workers should be treated with respect and dignity at all times. TIAA requires Suppliers to comply with all applicable laws regarding discrimination in hiring, compensation, advancement, discipline, termination, retirement or other employment practices. Suppliers must also maintain a workplace free of discrimination, harassment, victimization, and any other form of inappropriate behavior or abuse on any grounds including but not limited to age, health, disability, ethnic or social origin, caste, gender, gender identity, nationality, race, sexual orientation, marital status, parental status, pregnancy, political convictions, religious beliefs, union affiliation, or veteran status. Suppliers are expected to maintain an environment free of harassment, violence and abuse (physical or verbal) at all times.

Business Opportunity

Our Supplier decisions, contracting process, and management of Supplier relationships will promote and reflect the principles of the TIAA Office of Business Opportunity. TIAA expects its Suppliers to demonstrate their commitment to equal opportunity within their own workforces and by promoting workforce diversity throughout their own supply chains.

Benefits, Compensation, and Hours

TIAA expects Suppliers to provide workers with fair and equal compensation for hours worked, and that all work is conducted on a voluntary basis.

Wages & Benefits

Suppliers must pay workers on time, in accordance with legal requirements, and in all circumstances, wages must be paid on at least a monthly basis and in the name of the individual performing the work. Workers are to be provided with a total compensation package that includes wages, overtime pay, benefits and paid leave which meets or exceeds the legal minimum standards or appropriate prevailing industry standards, whichever is higher. In addition to compensation for regular hours of work, workers shall be compensated for overtime hours at such premium rate as is legally required in the country of employment or, in those countries where such laws do not exist, at a rate at least equal to their regular hourly compensation rate. Compensation terms established by legally binding collective bargaining agreements are implemented and adhered to without bias.

Working Time & Rest Days

Suppliers must ensure that its workers work in compliance with all applicable laws and mandatory industry standards pertaining to regular working hours, and overtime hours, including breaks, rest periods, holidays, and parental (maternity and paternity) leaves. In absence of law, the Supplier shall not require a regular work week over 60 hours, and workers shall be allowed at least one day off after six consecutive days of work.

Wage Statement

Supplier will provide workers access to an itemized wage statement for each pay period clearly indicating the components of their compensation (hours, pieces, or units produced), including exact amounts for wages, benefits, incentives bonuses, and deductions. Deductions of pay other than those legally mandated, may not be made without the express and written consent of the worker, and under no circumstances may be made as a form of discrimination or punishment.

Living Wage

The Supplier shall ensure workers are provided a living wage, sufficient to meet basic needs for workers, and their entitled official dependents, and to provide some discretionary income.

Health and Safety

TIAA expects the Suppliers' operations, facilities, and procedures to protect and promote worker health and safety.

Workplace Environment

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Suppliers shall provide all workers with a safe and healthy working environment. At a minimum, potable drinking water, adequate lighting, temperature, ventilation, sanitation facilities, and personal protective equipment must be provided together with equipped work stations at no cost. In addition, facilities must be constructed and maintained in accordance with the standards set by applicable laws and regulations.

Hazardous Materials & Product Safety

The Supplier shall identify hazardous materials, chemicals and substances, and ensure their safe handling, movement, storage, recycling, reuse and disposal. Supplier shall comply with material restrictions and product safety requirements set by applicable laws and regulations. Suppliers shall ensure that key workers are aware of and trained in product safety practices.

First Aid

Supplier shall establish and maintain appropriate first aid equipment at the facility and make it available to workers at all times. The location of the equipment shall be prominently marked and communicated to workers. Supplier maintains records of health and safety training and accidents and injuries at the workplace.

Emergency Preparedness

The Supplier shall be prepared for emergency situations. This includes worker notification and evacuation procedures, emergency training and drills, appropriate first-aid supplies, appropriate fire detection and suppression equipment, and adequate exit facilities. The Supplier shall regularly train workers on emergency planning and responsiveness.

Housing Conditions

If a Supplier provides employee housing, it must be voluntary or complementary, and dormitory facilities shall be constructed and maintained in accordance with all applicable laws and regulations, and they shall be clearly segregated from the factory and production area. All dormitory buildings shall be clean and safe and workers shall be able to enter and leave the dormitory buildings freely at any hour. There shall be clean toilet facilities, access to potable water, and sanitary food preparation and storage facilities. All dormitory facilities shall also provide workers with reasonable personal space, adequate heat and ventilation and clean shower and bathrooms.

Environmental Management

TIAA requires its Suppliers to comply with all applicable environmental regulations and to demonstrate continual improvement of its environmental performance.

Environmental Permits & Reporting

Suppliers shall make sure that it obtains, keeps current, and follows the reporting guidelines of all the required environmental permits and registrations to be at any time legally compliant.

Resource Consumption, Pollution Prevention & Waste Minimization

Suppliers shall optimize its consumption of natural resources, including energy and water. Supplier shall implement and demonstrate sound measures to prevent pollution and minimize generation of solid waste, wastewater and air emissions. Prior to discharge or disposal, Supplier shall characterize and treat wastewater and solid waste appropriately and according to applicable laws and regulations.

Measurement & Monitoring

Suppliers shall continuously monitor their energy and natural resource usage, emissions, discharges, carbon footprint and disposal of wastes, and take a progressive approach to minimize negative impacts on the environment. TIAA may periodically request that Suppliers disclose certain aspects of their environmental impact monitoring.

Training

Training should be provided to all personnel on environmental policies and procedures to ensure effective implementation and compliance.

Communication and Reporting

Suppliers shall take appropriate steps to ensure the principles of this Code are communicated to their employees. Suppliers shall also take appropriate steps to ensure the principles of this Code are adopted and applied by employees, Suppliers, agents, and contractors that are providing services to TIAAand/or its affiliates.

Protecting Confidential Information/Data Privacy and Security

TIAA expects our Suppliers to protect confidential information. Unless otherwise documented in an Agreement between Supplier and TIAA, Suppliers must adopt and maintain processes to provide reasonable protections for personal, proprietary and confidential information, including information that they access, receive or process on behalf of TIAA. Suppliers should recognize that unauthorized use or disclosure of such information may have personal, legal, reputational and financial consequences for the Supplier, individuals whose personal information may be implicated, and for TIAA. In addition, Suppliers must comply with all applicable privacy / data protection and information security laws and regulations.

Artificial Intelligence (AI)

TIAA, our affiliates, and subsidiaries support innovation that is responsible, ethical, fair, transparent, and subject to rigorous oversight and governance. With the recent proliferation of artificial intelligence (AI)

technology, including generative AI, machine learning (ML), large language models, and similar technology (Technology) we understand that Suppliers may be looking to incorporate such Technology into your products and services or to train your models on the data, content, or other materials (Materials) with which you are entrusted to perform contracted services on behalf of or for TIAA.

We take the privacy and security of our Materials very seriously, and we remind Suppliers that you may only use our Materials to perform services for TIAA, in accordance with the terms set forth in our agreement. Suppliers may not use our Materials in any Technology without first notifying us and giving us the opportunity to assess and explicitly consent to such use. In addition, we do not permit the use of our Material with such Technology, even if it is anonymized or de-identified, to enhance your products for your benefit or for another party's benefit.

Material Non-Public Information

Suppliers may be exposed to a wide range of sensitive data and information and may learn material information about securities, the financial markets, customers, competitors and other companies. Unless otherwise documented in an Agreement between Supplier and TIAA, TIAA expects Suppliers to comply with applicable federal securities laws which govern insider trading. Federal laws prohibit the purchase or sale of securities by any entity or individual possessing material non-public information ("MNPI") which includes without limitation information they possess as a result of their association with the TIAA organization, related to that security or proprietary funds and accounts. Accordingly, Suppliers and their employees must keep material non-public information confidential and may not buy or sell shares or other securities, derivatives or financial instruments relevant to such information until the information becomes public or is no longer material. Advising others to trade in a security while in possession of MNPI is also a violation of federal securities laws and is prohibited.

Books & Records

Unless otherwise documented in an Agreement between Supplier and TIAA, Suppliers shall maintain accurate and transparent books, records and accounts to demonstrate compliance with applicable laws.

Audits & Monitoring

Unless otherwise documented in an Agreement between Supplier and TIAA, TIAA reserves the right to audit compliance with this Code and other TIAA policies at any time. This includes legal, technical, financial, regulatory, and operational audit of Supplier policies and procedures, including subcontractors as needed. TIAA further reserves the right to monitor, record, review, access and disclose all data and communications created, sent, received, stored or downloaded using TIAA resources as it deems appropriate, subject to applicable laws and regulations. Audits and monitoring activities may also include on-site facility inspections including worker interviews and a review of Supplier records, procedures, systems, controls, and business practices. Such audits are conducted by TIAA or its appointed partner. If an audit identifies a violation of this Code, Suppliers shall act promptly to correct the situation to satisfaction, with a corrective action plan.

Grievance Processes

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The early identification and resolution of issues is critical to TIAA maintaining strong relationships with our clients, colleagues, and Suppliers. If you have reason to believe that any TIAA employee, or anyone working on TIAA's behalf, may have engaged in misconduct, which includes violations or potential violations of law, regulation, rule, or breaches of policy, procedure, or this Code, including threats or acts of physical violence, you must promptly escalate your concerns. Concerns can be reported through TIAA's Ethics Helpline via telephone at ***877-774-6492*** (U.S. only) or by using the Ethics Helpline website . International telephone numbers are available on the website.

TIAA also expects our Suppliers to have a process through which workers can raise workplace concerns without fear of retaliation. This grievance process should be transparent, understandable to workers and should also ensure the protection of those raising concerns.

Non-Retaliation

TIAA does not tolerate retaliation. Acts of retaliation are considered misconduct that can result in disciplinary action. We seek to provide a safe, healthy and productive workplace for our employees and our business partners who assist in our business operations and expect our Suppliers to adopt similar internal procedures.

Origin

The Supplier shall be capable to disclose all the potential sources of primary origins (country of origin) associated with goods and services. TIAA reserves the right to ask the Supplier to create, at a point of time, full supply chain mapping back to the origin to facilitate assessment of upstream supply chain compliance.

TIAA Brand Governance

Unless otherwise documented in an Agreement between Supplier and TIAA, any use or representation of names, logos, trademarks, and/or trade names of entities within the TIAA organization in publicity releases, promotional material, digital or print marketing, or advertising must be approved in writing by TIAA Brand Management or its designee, who shall have sole discretion to approve the request.

Approved uses of names, logos, trademarks, and/or trade names of entities within the TIAA organization must conform to the Brand guidelines established by TIAA Brand Management.

Requests by or on behalf of Suppliers or contractors to use names, logos, trademarks, and/or trade names of entities within the TIAA organization for business-generating efforts, including as references and case studies, are typically denied; however, requests with sufficient business justification may in limited instances be approved. Requests for approval must include a business justification and should be submitted to the Brand Management team at BrandStrategy@tiaa.org.

Use of Social Media & Public Communications

Suppliers must not communicate publicly about TIAA business unless specifically authorized to do so. Suppliers may not make public announcements on the provision of goods or services to TIAA, share information regarding TIAA assignments, or circulate pictures or descriptions of TIAA facilities or external work events. Suppliers may not share information regarding TIAA customers or employees unless it is in connection

with the services being provided as set forth in the Supplier's agreement. Suppliers must not post, share or like anything that could be viewed as a violation of the Supplier Code, including items that are malicious, disparaging, bullying, or that could jeopardize the safety of another individual including but not limited to TIAA employees, clients, or other Suppliers.

Training

If a Supplier has personnel who are onboarded with TIAA, Suppliers must inform workers of the expectations contained in this Code. This includes either a) posting the Code in the workplace in an area accessible to workers;b) conducting group or individual meetings to review and explain the Code; c) physically or electronically distributing explanatory pamphlets to workers.

Gifts and entertainment

Employees of TIAA are subject to a $100 limit on gifts in aggregate over the course of the calendar year. Supplier shall ensure that any gifts, travel, and entertainment provided to any employee or official of TIAA, its authorized personnel and representatives, or to family members of any of the aforementioned individuals are permitted by TIAA policies and compliant with all applicable laws and regulations. Gifts, travel, and entertainment should always be modest, infrequent, reasonable, properly recorded, and for a legitimate purpose.

If Supplier believes there may have been a violation of this obligation, Supplier shall notify TIAA of the possible violation. TIAA is entitled to request a representation letter from the Supplier or its subcontractors at any time to disclose all things of value passing from the Supplier or its subcontractors to TIAA's personnel or its authorized representatives.

Non-Solicitation

Unless otherwise documented in an Agreement between Supplier and TIAA, Suppliers are expected to maintain professional and respectful relationships with TIAA's employees. Suppliers should not conduct fundraising activities in the workplace or solicit charitable or non-charitable sales from employees unless specifically authorized by TIAA in advance.

Business Continuity

Unless otherwise documented in an Agreement between Supplier and TIAA, TIAA expects Suppliers to manage risk related to business continuity and ensure no business disruption due to unavailability of services. The Supplier should have a comprehensive business continuity program including procedures that address natural disasters, terrorist/security related events, epidemics / pandemics, and other emergency or crisis situations. TIAA expects the Supplier to have plans in place and to inform TIAA immediately upon becoming aware that a business disruption event has occurred or is likely to occur. Following the occurrence or knowledge of the

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likely occurrence of a disruption event, the Supplier shall immediately implement its business continuity plan(s) while fully communicating the status to TIAA throughout execution of the plan. Supplier is expected to share these plans as requested by TIAA.

Termination and Indemnification

Unless otherwise documented in an Agreement between Supplier and TIAA, TIAA may take all necessary actions to enforce the Supplier Code, including the termination of the Supplier relationship and applicable agreements. Violations of this code may also constitute violations of law, which may expose TIAA to criminal or civil penalties. TIAA may require reimbursement for any costs associated with a violation of the Supplier Code.

Acceptance of the TIAA Supplier Code of Conduct

By its acceptance of any purchase order or contract from TIAA or its affiliates, Supplier acknowledges acceptance of this Code and agrees to comply with all requirements within. If you have questions on any of its requirements, please contact a Global Supplier Services representative or email GlobalSupplierServices@tiaa.org.

In some countries, international regulators provide confidential hotlines of which staff must be made aware at their workplace. Telephone instructions for the Ethics Helpline for international associates can be found in the TIAA Code of Business Conduct on pages 14.

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