

# Supplier Code of Conduct & Ethics

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## Our Code

The purpose of this Supplier Code of Conduct & Ethics (“Code”) is to articulate our expectations and requirements for all our Suppliers providing goods, data, content, technology and/or services to T. Rowe Price (“we”, “us”, “our”).

All Suppliers have a responsibility to monitor compliance with this Code, notify us of any breaches, and take reasonable steps to address, remedy, and prevent repetition of any breach of this Code or possible breaches of this Code.

We reserve the right to undertake due diligence and risk assessments to verify compliance with our Code and expect our Suppliers to cooperate and provide supporting evidence as we may reasonably require monitoring and review their compliance.

## Commitment

T. Rowe Price is guided by a set of organizational values. We are committed to ensure alignment with Suppliers that have the highest levels of integrity and ethics and promoting a culture of diversity, equity, and inclusion, and a commitment to providing safe working conditions.

Our Organizational Values:

**Put Clients First**  
**Act with Integrity and Accountability**  
**Cultivate Intellectual Curiosity and Innovation**  
**Embrace Diversity and Collaboration**  
**Be Disciplined and Risk Aware**  
**Pursue Excellence with Passion and Humility**

In addition to these organizational values, we are committed to reducing our corporate environmental footprint, strengthening our environmental, social and governance (ESG) disclosures from a corporate standpoint, and advocating for increased ESG disclosures within our portfolio companies and Suppliers.

## Supplier Conduct

We seek to work with businesses whose values align with our own. As such, T. Rowe Price requires our Suppliers and their employees, agents, and contractors (together referred to as “Suppliers”) to comply with all applicable laws and, in all cases, to adhere to standards and principles set out in this Code across all areas of their business. Compliance with laws and the standards and principles set out in this Code is a material consideration for us in assessing every aspect of our Supplier relationships.

## Health & Safety

T. Rowe Price strives to provide a safe work environment and ensure the safety and wellbeing of all our employees.

Our Suppliers must comply with all applicable health and safety laws that aim to create a safe working environment for its employees and anyone else affected by their businesses. Suppliers must provide

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workers with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage and eating facilities.

## Labor

Our Suppliers must:

- not use or permit any form of forced, bonded, or indentured labor;
- not unreasonably restrict workers' freedom to move into, out of, or at working facilities;
- not use child labor, and ensure that permitted workers under the age of 18 do not perform work that is likely to jeopardize their health or safety, including night shifts and overtime;
- not permit harassment, abuse, corporal punishment, or inhumane treatment;
- comply with all applicable employment and wage laws, including applicable minimum wage laws and anti-wage-theft laws;
- not require employees to work excessive overtime; and
- permit their workers to associate freely and engage in protected concerted activity, bargain collectively and seek representation in accordance with local laws.

## Human Rights

T. Rowe Price is opposed to, and will oppose, all forms of human rights breaches, including forms of modern enslavement such as forced or compulsory labor, servitude, prison, trafficking in persons, debt bondage, forced marriage, prison labor, and child labor, both within its operations and its supply chain.

To that end, our Suppliers must:

- comply with all applicable human rights laws and regulations in the locations where they conduct business, and internationally recognized human rights standards; and
- have in place adequate procedures to identify, prevent, mitigate, and account for modern enslavement and other human rights impacts in their operations and supply chains.

## Integrity & Ethics

Acting with integrity and accountability is one of T. Rowe Price's core values. T. Rowe Price expects its Suppliers to act and conduct themselves in the highest ethical manner in all business dealings and interactions. In this context, T. Rowe Price requires all Suppliers to:

- disclose to T. Rowe Price any potential direct or indirect, actual, or implied conflicts of interest, be it competing personal or professional interest;
- comply with all applicable laws and regulations in relation to the prevention of bribery, corruption, and any other prohibited or improper business practices, including but not limited to the U.S. Foreign Corrupt Practices Act and the UK Bribery Act 2010;
- in all dealings with us, not engage directly or indirectly in trade activities or include in the supply chain any goods or services sourced from sanctioned persons, countries, or organizations; in accordance with all sanctions laws with which we must comply, including local or regional sanctions as mandated by the government for the relevant jurisdiction applicable to us.

## Protecting Information & Data

T. Rowe Price expects that all its suppliers respect intellectual property rights, protect confidential information, and comply with relevant privacy laws and regulations.

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Without limitation, our Suppliers must:

- protect the confidentiality of all confidential information and assets that it has access to including such information and assets disclosed by T. Rowe Price, its affiliates, and their respective employees, contractors, customers, partners;
- respect intellectual property rights, and use IP-protected assets in a manner that protects and preserves the intellectual property rights therein;
- protect the privacy of personal information of everyone with whom they do business in compliance with all applicable laws and regulations; and
- establish and maintain processes and practices that ensure adequate safeguards for such assets, data, and information.

## Diversity, Equity & Inclusion

At T. Rowe Price, we believe having a diverse and inclusive workforce and supply chain is a business and cultural imperative. An inclusive culture allows us to benefit from different perspectives, experiences, and backgrounds – to create value for our clients.

T. Rowe Price is committed to supporting diversity, equal opportunity, and inclusion and strives to achieve and maintain diversity and equal opportunity in its workplace. We expect our Suppliers to do the same. Suppliers shall co-operate with T. Rowe Price's commitment to a workplace free of harassment and unlawful discrimination. Suppliers must not discriminate based on race (including color, nationality, or ethnic origin), religion, religious belief or activity, sex, marital/domestic status, family responsibility or parental status, age, disability, medical record, physical features, personal association, trade union or industrial activity, lawful sexual activity, sexual orientation, gender identity, intersex status, or any other protected class. T. Rowe Price will not tolerate such discrimination.

T. Rowe Price is committed to supply chain diversity, equity, and inclusion practices by providing business opportunities to historically underrepresented groups. These groups include small businesses, women, ethnic minorities, veterans, service-disabled veterans, disabled, and LGBTQ+ owned business enterprises. Suppliers are expected to strive for a diverse and inclusive [direct and indirect] supply chain and agree to make every effort to utilize diverse Suppliers and provide evidence to T. Rowe Price upon request. Suppliers are encouraged to achieve an under-represented slate of sub-contractors that reflects all the markets, clients, and communities we serve. T. Rowe Price does not promote set-asides, preferences, or quotas in administering its Supplier Diversity initiatives.

## Digital Property Accessibility

T. Rowe Price is fully committed to digital accessibility for our clients, prospects, and associates. We recognize the importance of creating digital experiences that are inclusive and accessible to all individuals, with the belief that everyone should have equal access to information, services, and opportunities.

Our commitment to digital accessibility is not only a legal obligation but also an integral part of delivering exceptional client experiences. Our requirement is to ensure all “digital properties” meet “Web Content Accessibility Guidelines (WCAG) 2.1 AA” compliance. Please keep in mind, when updated WCAG standards are published T. Rowe Price may choose to adopt new requirements. This includes static documents on our websites.

Web Content Accessibility Guidelines (WCAG) defines how to make Web content more accessible to people with disabilities. Accessibility involves a wide range of disabilities, including visual, auditory, physical, speech, cognitive, language, learning, and neurological disabilities. Although these guidelines cover a wide range of issues, they are not able to address the needs of people with all types, degrees,

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and combinations of disability. These guidelines also make Web content more usable by older individuals with changing abilities due to aging and often improve usability for users in general.

Scope for this work includes:

- Suppliers who create any external and internal facing websites, web applications, digital assets, videos, event platforms, and PDFs.
- Without limitation, our Suppliers who are responsible for assisting us in developing or providing digital content, whether it be web-based content in the form of websites, web applications, digital assets, videos, event platforms and PDFs or other static documents or content shall comply with the WCAG 2.1 AA (or its replacement) standard, as such standard is applicable to the digital content being provided.

## Environmental Sustainability

T. Rowe Price is committed to minimizing our impact on the environment and engaging in ethical business practices. We consistently seek to improve our environmental management capabilities and measure our progress. As a result, we have made great strides in finding innovative ways to reduce waste, expand recycling, and create a more sustainable workplace. T. Rowe Price expects that our Suppliers share this commitment to environmental sustainability.

Our Suppliers must:

- comply with all applicable environmental laws and regulations;
- continually strive to improve their sustainability performance, focusing on reduction of waste and greenhouse gas emissions, and implementing energy efficiency measures; and
- make the best attempt to track and monitor the consumption of natural resources, incentivizing decisions that align with a low-carbon economy.

## Use of This Code

All new and existing Suppliers are required to comply with our Code and demonstrate their commitment to doing so upon request. Demonstration of commitment can include evidence of the Supplier's corporate code of conduct or Supplier specific code of conduct showing alignment with our Code. Suppliers who engage sub-contractors when providing goods or services to T. Rowe Price must make them aware of our Code.

Compliance with our Code will be used as part of our Supplier evaluation, selection, and contract management process. When a Supplier does not meet our requirements or does not agree to the comply with the Code, T. Rowe Price reserves the right to establish corrective actions, with ongoing monitoring for progress. T. Rowe Price will assess the Supplier's suitability for future consideration or engagement if a Supplier repeatedly and/or knowingly violates the Code.

## Questions & Concerns

Suppliers are encouraged to raise questions or concerns about safety, compliance or ethics while working for or on behalf of T. Rowe Price with their business unit point of contact. Suppliers may also contact the Compliance and Ethics Helpline **888-651-6223** to report activities that they believe may be illegal or unethical, or questionable matters. If you have questions or concerns about proper conduct or the content of this Code, you should immediately raise the issue with us at:

[supplier.diversity@troweprice.com](mailto:supplier.diversity@troweprice.com).