



# **VENDOR CODE OF CONDUCT**

November 2024



**A MESSAGE FROM THE  
Chief Legal and Sustainability Officer & Corporate Secretary  
and  
Vice President, Third Party Relationships**

At ATB Financial, we exist to make it possible. To turn what-if into when. To find a better way, in more than just banking. To wrap our talent, tech and wisdom around the obsessive belief that anything is possible. In Alberta, and far beyond. With each day a chance to uplift legacies and livelihoods, in ways not yet imagined. By listening and learning, advising and creating. Because remarkable things happen when we ask “what if?”

This belief, ingrained within each and every ATB Team Member, is deeply rooted in our client obsession through which we earn and maintain our clients’ trust. We do not take that trust for granted and ATB is committed to observing the high standards of ethics, fairness and prudent business management. We seek to engage vendors who share our values and are equally committed to such standards.

To that extent, the ATB Financial Vendor Code of Conduct sets out our principles and expectations for vendors with a view to ensuring that their behavior aligns with ATB standards. By engaging vendors who share our values, we strive to not only support our business goals but also contribute to the well-being of our communities and honour the trust placed in us by our clients.

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**Stuart McKellar**  
**Chief Legal and Sustainability Officer &**  
**Corporate Secretary**



## 1. INTRODUCTION

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The *ATB Financial Vendor Code of Conduct* ("**Code**") outlines the principles and standards of ethical and responsible business practices and behaviors that ATB expects from vendors who supply goods and services to ATB Financial and its subsidiaries ("**we**" or "**ATB**"). This Code captures all such vendors including their representatives, employees and subcontractors (together "**you**" or "**Vendors**"). The Code applies at all times and regardless of whether goods or services are being delivered remotely or on-site at ATB premises. ATB Vendors are expected to share ATB's commitment to ethics and integrity by adopting comparable principles and standards.

As a Vendor, ATB expects you to understand the principles and values that ATB upholds, and to have in place written policies and governance mechanisms designed to ensure adherence to these principles and values. Non-compliance with these expectations may lead to additional reviews of a Vendor's business practices and/or a re-evaluation of the suitability of the Vendor as a partner of ATB.

## 2. RESPONSIBLE PRACTICES AND BUSINESS INTEGRITY

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### Compliance with Laws and Regulations

Vendors must, in all of their activities, comply with applicable laws, rules and regulations in the jurisdictions in which they operate. This includes both the letter and the spirit of those laws, rules and regulations.

Vendors should also avoid any conduct that might create a perception of non-compliance with applicable laws or generally accepted standards of honesty, fairness and integrity.

### Conflict of Interest

Vendors must NOT:

- attempt to gain improper advantage or preferential treatment through relationships they have with ATB or our employees
- attempt to improperly impair or influence an ATB employee's ability to make sound, impartial, objective decisions on behalf of ATB

Vendors must:

- have measures in place to mitigate potential conflicts of interest
- promptly disclose any perceived, potential or actual conflicts of interest to, including situations where a Vendor's employees or contractors may have competing personal or business interests that could compromise or bias their professional judgment, bestow unfair benefit, negatively impact ATB's reputation, or impair the Vendor's ability to fulfill their obligations to ATB



## Gifts and Entertainment

Vendors must be aware of ATB's policies on gifts and entertainment, including prescribed limits, as outlined in ATB's [Team Member Code of Conduct](#). Vendors are to inform their employees and contractors of these requirements, take reasonable steps to ensure compliance with such requirements, and maintain records of exchanges of gifts and/or entertainment with ATB team members.

## Anti-Bribery

Vendors should be committed to ensuring a level playing field in all business activities. Vendors must never engage directly or indirectly in any conduct that would put themselves, or ATB, at risk of violating anti-bribery and anti-corruption laws.

### 3. PROTECTING ATB'S INFORMATION

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#### Respect Confidentiality and Privacy

It is expected that both ATB's and our Clients' financial, business and personal information ("**Confidential Information**") be protected at all times. Vendors must ensure that Confidential Information is appropriately safeguarded when under the care and control of the Vendor. Our Vendors must maintain a duty of confidentiality and protect the privacy of all Confidential Information in accordance with applicable laws, best industry practices, and applicable contractual terms.

Vendors must implement appropriate privacy and information security policies which are, at a minimum, designed to provide a level of security and protection consistent with ATB's then current privacy and information security policies. Such policies must include restrictions on access to Confidential Information by the Vendor's representatives, employees and subcontractors to a "need to know" basis and should ensure Confidential Information is used solely for the purposes agreed upon in the contract and not for any unauthorized activities

#### Cyber Security Monitoring, Incident Response, and Notifications

Our Vendors must have robust cyber security monitoring and incident response capabilities in place, including logging, real-time detection, response plans, and notification plans for vendors and customers, commensurate with the services provided to ATB.

Any actual or suspected security breaches which have or may result in any unauthorized access to or loss of Client or Confidential Information must be reported in writing to ATB as soon as possible, or as otherwise required under applicable contractual terms.

Any notification given by the Vendor to ATB of a suspected or actual data incident shall be provided in writing to [infosecurity@atb.com](mailto:infosecurity@atb.com) with copies to [VSAP@atb.com](mailto:VSAP@atb.com), and [privacyofficer@atb.com](mailto:privacyofficer@atb.com), or as otherwise documented through contractual terms.



## Data Security, Retention, and Destruction

Vendors must implement and maintain robust security measures to protect Confidential Information against unauthorized access, disclosure, alteration, and destruction commensurate with the services to be provided to ATB. These measures should include, but are not limited to, encryption, firewalls, antivirus software, patch management, and regular security audits. Vendors must ensure that Client Information is kept secure (both in transit and at rest) and destroyed in accordance with applicable laws and contractual terms. Confidential Information must be retained only for as long as is required to provide the services for which the information was obtained. Vendors must provide confirmation and/or evidence to ATB of the return or destruction of Confidential Information upon request.

Vendors are responsible for maintaining and managing policies and procedures to approve, grant, remove, deactivate, and periodically review access to Client Information. These policies and procedures must ensure that the level of access is appropriate, implement principles of least privilege, and that there is no undue delay in removing unnecessary access.

## 4. ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG)

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### Transparency in Governance

ATB believes that transparent governance practices and clear accountabilities are key to maintaining and growing stakeholder trust. ATB expects our Vendors to share this belief and adopt a similar approach. Transparent governance means being open about the people and processes that run your company, and can include, for example, being open about who your senior leaders are and publicly sharing key documents such as your code of conduct.

### Environmental Stewardship

ATB is committed to advancing environmental stewardship today and for generations to come. Our Vendors are expected to take reasonable care to ensure that their business activities are conducted in an environmentally prudent manner and at minimum comply with all applicable environmental protection laws. Vendors should strive to integrate environmental sustainability into company policies and business practices, such as addressing GHG emissions, climate resilience and waste.

### Diversity in our Vendor Base

ATB believes that a diverse supply chain is important to championing a thriving, resilient and equitable society for current and future generations. ATB expects Vendors to advance equitable opportunities for diverse businesses by adopting inclusive procurement and supply chain practices.



## Advancing Indigenous Reconciliation

ATB encourages Vendors, that are doing business within Canada, to honor and implement the recommendations from the Truth & Reconciliation's Commissions Calls to Action, specifically Call to Action #92 by actively building reciprocal and respectful relationships with Indigenous Peoples, communities and organizations. ATB is a proud member of the Canadian Council for Indigenous Business (CCIB) and we are committed to providing a high level of assurance to Indigenous Peoples through the Partnership Accreditation in Indigenous Relations (PAIR) program by advancing measurable outcomes and initiatives in 4 key areas: leadership, community relationships, business development and employment. ATB works to create reciprocal relationships and meaningful relationships with Indigenous Peoples as outlined in the United Declaration on the Rights of Indigenous Peoples (UNDRIP), the Truth & Reconciliation Commission's (TRC) 94 Calls to Actions and the Final Report into the National Inquiry into Missing and Murdered Indigenous Women and Girls.

## Community Engagement

ATB encourages Vendors to evaluate all aspects of their supply chains and to recognize the importance of uplifting Alberta based businesses and our communities. Vendors are encouraged to help foster social and economic prosperity and to contribute to the sustainability of the communities in which they operate and/or provide services to ATB. Vendors should explore opportunities and participate in providing benefits to local communities through community investment, sub-contracting or employment opportunities where reasonably practical.

## 5. BE THE BEST TO YOUR EMPLOYEES

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### Workplace Inclusivity

Vendors should have policies addressing an inclusive workforce and encourage thoughts and ideas from a broad range of perspectives.

### Employment Laws

Vendors must follow all applicable employment laws within their jurisdiction, including those pertaining to employment standards, labour, human rights and non-discrimination, workplace health and safety, human trafficking, and child labour. Vendors must promote and respect the exercise of individual rights under applicable employment laws without reprisals of any kind.

Vendors must not tolerate slavery, servitude, forced or compulsory labour, human trafficking or child labour in their business or supply chain.

### Working Conditions

Vendors are required to provide safe and healthy working environments, recognizing the specific hazards relevant to their operations, and ensuring the structural integrity of their premises. Vendors must also take reasonable steps to prevent workplace accidents and injuries, including providing access to information on health and safety and hazard prevention.

Vendors must not tolerate any form of harassment in their workplaces.



## 6. REPORTING

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ATB expects Vendors to proactively disclose any situation where you may have failed to live up to the Principles in this Code. Subject to specific timelines provided elsewhere in this Code or in any applicable contractual terms, we expect such disclosure to be forthright and provided as soon as is reasonably possible, and for you to work collaboratively with us so we can fully understand the situation. That disclosure should be provided to [tprm@atb.com](mailto:tprm@atb.com) or confidentially via ATB's third party [safe disclosure program](#).