



Supplier Code of Conduct

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Purpose

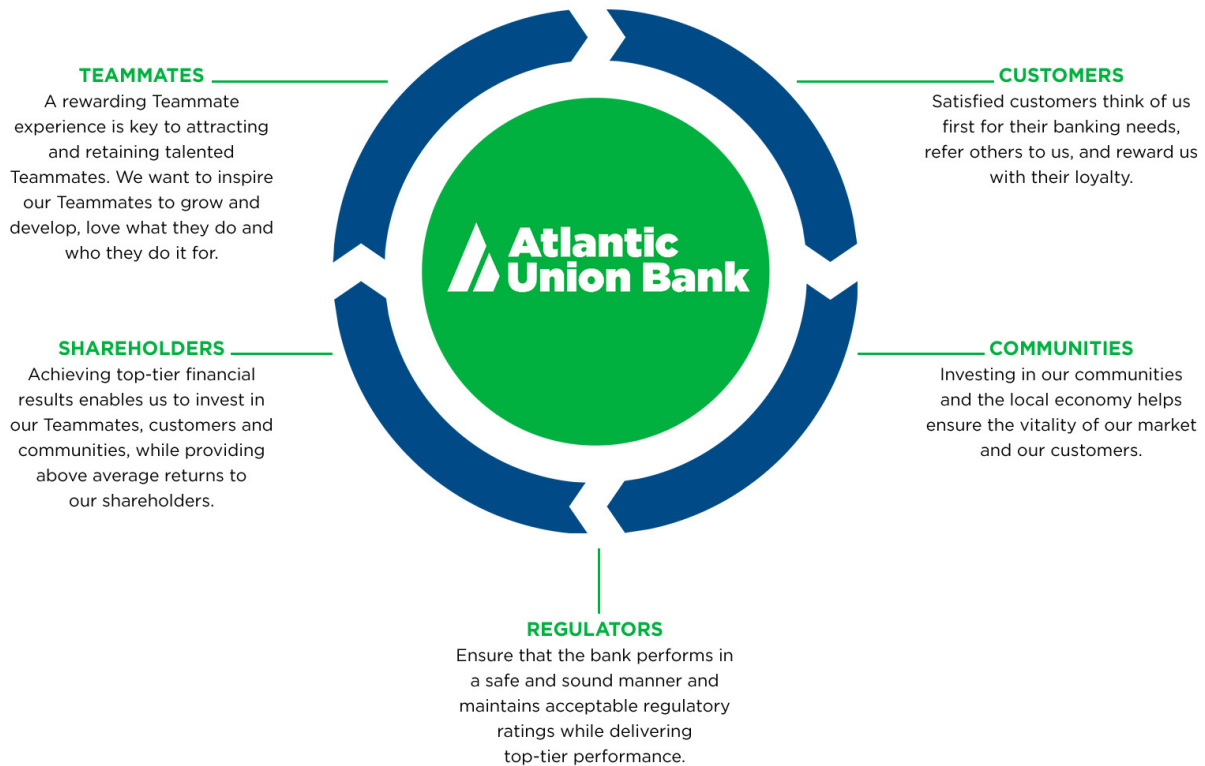
This Supplier Code of Conduct establishes ethical guidelines for suppliers working with Atlantic Union Bank. Atlantic Union Bank expects suppliers providing goods and services to the bank to comply with this Supplier Code of Conduct. Suppliers are also responsible for ensuring that their employees and subcontractors are made aware of, understand, and agree to comply with the Supplier Code of Conduct.

Overview

Atlantic Union Bank offers superior financial services and solutions along with a best-in-class customer experience to make banking easier for our customers. In addition to our customer focus, our core values of integrity and trust, teamwork, commitment, knowledge, and respect provide the foundation on which we build our relationships – with our customers, our teammates, and our suppliers.



Atlantic Union Bank must also balance commitments to our key stakeholders.



Atlantic Union Bank teammates are held to the highest standards of professional and ethical behaviors. We are accountable for our actions, treat others with respect and dignity, and strive for continuous improvement, and no less is expected of our suppliers.

Applicability

This Code of Conduct governs interactions between Atlantic Union Bank teammates and suppliers and sets out business conduct expectations of our suppliers. While many of our suppliers have their own codes of conduct or business ethics requirements, some of which may include more stringent standards than those found here, each supplier must review the contents of this document with its employees and contractors who are involved in providing goods or services to Atlantic Union Bank. Atlantic Union Bank reserves the right to monitor adherence with this requirement and request an annual attestation from suppliers.

Expectations of Suppliers

Atlantic Union Bank suppliers should offer the greatest value in goods and services and

- Foster open and honest communication
- Provide grounded feedback
- Bring innovative ideas and solutions
- Stay abreast of and share industry trends

- Monitor the regulatory environment applicable to Atlantic Union Bank's use of supplier's goods and services
- Be responsive to customer questions and concerns
- Create an environment of learning and continuous improvement
- Minimize the total cost of ownership

Employment Practices

Culture and Inclusion

Atlantic Union Bank is committed to establishing and maintaining superior supplier relationships. Our strategic sourcing and supplier management practices are designed to identify and partner with a variety of businesses that deliver the highest level of service, quality and value.

We believe that Atlantic Union Bank's success is tied to the success of the communities we serve. By doing business with the best suppliers, we are building relationships within the community and contributing to the growth of companies who are invested in the success of the communities in which we operate.

Equal Employment Opportunity

Atlantic Union Bank is committed to providing equal opportunity in employment to all teammates and applicants for employment. No person will be discriminated against in employment because of race, religion, color, creed, gender, age, national origin, disability, marital status, pregnancy, sexual orientation, military status, veteran status, genetic information, or any other protected class under the applicable law. In addition, Atlantic Union Bank will make a concerted effort to employ and advance qualified veterans and individuals with disabilities.

Suppliers are expected to adhere to these principles when making decisions regarding hiring, developing, promoting, and providing other terms and conditions of employment.

Discrimination and Harassment

Atlantic Union Bank strives to promote a productive work environment and does not tolerate discrimination and harassment, including, but not limited to, verbal or physical conduct by any teammate, customer or supplier that harasses, disrupts, or interferes with another's work performance or that creates an intimidating, offensive, or hostile work environment.

Health and Safety

Suppliers are required to abide by all local laws and regulations relating to health and safety in the workplace when on-site at Atlantic Union Bank, in their own facilities and in any other location where work is being performed for Atlantic Union Bank.

Workplace violence prevention is critical to Atlantic Union Bank's operations and philosophy. Atlantic Union Bank does not condone and does not tolerate any aggressive, violent, physical, verbal, or nonverbal intimidating behavior, including threats to engage in such behavior.

Community

At Atlantic Union Bank, we value the opportunity to be an integral part of each community we serve. We're proud of the contributions we make to our communities, and the products and services we provide to customers of all income levels. Atlantic Union Bank teammates give back to the communities we live and work in every day, sharing our time and talents to support numerous non-profit organizations. Likewise, our suppliers are expected and encouraged to support their communities and non-profit organizations.

Fair Competition and Anti-Trust

Suppliers must conduct business in full compliance with anti-trust and fair competition laws that govern the jurisdictions in which they conduct business. Suppliers should not offer confidential or proprietary information of its other clients to Atlantic Union Bank, in particular those clients who are competitors of Atlantic Union Bank. Additionally, suppliers should treat their own competitors with fairness and respect.

Forced or Child Labor

Suppliers will not use any form of forced labor, including bonded labor, forced prison labor, slavery, involuntary servitude, or human trafficking.

Suppliers will not use child labor. Suppliers are required to comply with applicable child labor laws and employ only workers who meet the applicable minimum legal age requirements in their countries of operation.

Our Environment

Suppliers must operate in an environmentally responsible and efficient manner, striving to minimize adverse impacts to the environment. Suppliers are expected to conserve natural resources, avoid using hazardous materials, and promote reuse and recycling.

Conflicts of Interest and Regulatory Compliance

Suppliers must conduct their business activities in full compliance with all applicable laws and regulations while conducting business with or on behalf of Atlantic Union Bank. Avoid actual improprieties and conflicts of interest or the appearance of either.

Gifts or Bequests

The Bank Bribery Act makes it a criminal offense for teammates (a) to solicit for themselves or for a third party (other than Atlantic Union Bank) anything of value from anyone in return for any business, service, or confidential information about the Atlantic Union Bank, or (b) to accept anything of value (other than authorized compensation) from anyone in connection with the business of Atlantic Union Bank, either before or after a transaction is discussed or consummated. Gifts, meals, entertainment, hospitality, and trips that lack transparency or a legitimate purpose may be viewed as bribes, may create the appearance of a conflict of interest, or may be perceived as an attempt to improperly influence decision making. Never give

anything to obtain an improper business advantage. Suppliers must ensure that they follow the requirements of the Bank Bribery Act.

Foreign Corrupt Practices Act

The Foreign Corrupt Practices Act (FCPA) and the anti-corrupt practices laws of other countries prohibit bribing of government officials in exchange for any business benefit or advantage for Atlantic Union Bank. Under the FCPA, it is a criminal offense to give or offer anything of value to (1) any official of a foreign government or an instrumentality of a foreign government, (2) any foreign political party or official thereof or any candidate for foreign political office, or (3) to family members of any of the foregoing, in order to (a) influence any act or decision of a foreign official in their official capacity, (b) induce a foreign official to engage or fail to engage in any act in violation of the lawful duty of the official, or (c) secure any improper advantage; or induce a foreign official to use his or her influence with a foreign government to affect or influence any act or decision of such government.

Suppliers and their employees, agents, and subcontractors must be mindful that less-than-obvious offers of value (such as favorable loan terms, debt forgiveness or cancellation, etc.) to the above-described entities are covered by the FCPA. Suppliers who engage in transactions or activities that violate the FCPA face criminal penalties, and may, by their actions, involve Atlantic Union Bank or Atlantic Union Bank teammates.

The FCPA includes all subsidiaries, affiliates, and locations of Atlantic Union Bank. Just as it includes all Atlantic Union Bank teammates, the FCPA also includes all representatives, agents, consultants, and contractors who work on behalf of Atlantic Union Bank in any country outside the U.S. If you, as a third party to Atlantic Union Bank, (1) represent Atlantic Union Bank or perform work in support of Atlantic Union Bank outside the U.S., or (2) engage companies or individuals on behalf of Atlantic Union Bank outside the U.S., you must ensure that you and any person, company or firm you engage on behalf of Atlantic Union Bank complies with the requirements of the FCPA. In addition, suppliers and their employees, agents, and subcontractors cannot avoid responsibility by acting through others or by ignoring circumstances that indicate that a violation has occurred or is likely to occur.

Corporate Opportunities

Suppliers must monitor the activities of their employees and must ensure that they do not use Atlantic Union Bank's name, property, facilities, relationships, or other assets for personal benefit or for outside work. Suppliers are admonished not to solicit or otherwise induce investments in them by Atlantic Union Bank teammates or to offer warrants, options, stock, or other securities interests.

Competing Against Atlantic Union Bank

Suppliers may not take advantage of a business opportunity that is intended for Atlantic Union Bank which arises in the course of the engagement. Suppliers may not act as a competitor by providing or attempting to provide similar products or services directly to Atlantic Union Bank customers.

Insider Trading

From time to time suppliers may be exposed to information about Atlantic Union Bank or other companies that is considered material, non-public information. This is information that a reasonable investor would consider important when deciding whether to buy or sell a security,

such as Atlantic Union Bankshares stock. Suppliers must never use such information to trade in securities. Suppliers must never pass along such information to a family member, friend or anyone else who might use it to trade in securities. Such activity is illegal and a violation of Atlantic Union Bank's policies. Insider trading can result in penalties to all involved, including the supplier and Atlantic Union Bank.

When in doubt, suppliers must assume information is material and nonpublic, and must not act upon it. Suppliers and their employees must not take part in any trading that may appear improper.

Intellectual Property, Confidentiality, and Data Privacy

Customer Information

As a result of providing services to Atlantic Union Bank, suppliers and their employees may have access to information about Atlantic Union Bank teammates or customers, including account information and personally identifiable information. Supplier employees have a responsibility to protect the confidentiality of information about customers, consumers, Atlantic Union Bank teammates or any other individuals, to which they have been granted access. They must protect against the unauthorized release or use of customer information and use it solely for the purpose of performing the services.

Confidential and Proprietary Information

All oral and written communications relating to Atlantic Union Bank, or its customers, suppliers, shareholders and teammates, which suppliers acquire or create in the performance of services, and which is not otherwise available to the general public, constitutes confidential information. This includes such information that may be of use to our competitors, or harmful to Atlantic Union Bank or its customers, if disclosed. Of special sensitivity is financial information, which should always be considered confidential unless its disclosure has been approved by Atlantic Union Bank or is required to be disclosed by law. The use of this information for any reason not specified in the written agreement(s) with Atlantic Union Bank is strictly prohibited.

Publicity

Suppliers may not use Atlantic Union Bank's name or logos in any press release or other outside communications nor shall suppliers share any details about an agreement with or services performed for Atlantic Union Bank without our prior written consent.

Intellectual Property Rights

Suppliers must respect the intellectual property rights of others. Supplier employees must not:

- Load unlicensed software on any Atlantic Union Bank computer
- Accept or use anyone else's confidential information except as authorized
- Use or copy documents or materials that are copyrighted (including software, audio, video, and internet recordings) without the approval of Atlantic Union Bank

Social Media

It is the policy of Atlantic Union Bank to:

- Foster the use of social media to communicate with customer, prospective customers, and the public at large concerning Atlantic Union Bank's financial products and services and our involvement in the communities we serve
- Minimize the business, legal and personal risks that may arise from the use by Atlantic Union Bank and by individuals of social media
- Protect the privacy of both individuals and our customers

Expectations

Suppliers are expected to follow this policy and use good judgment at all times, including when accessing or providing content on social media. We also expect that, while online, suppliers and their employees will not mention Atlantic Union Bank work or initiatives or information relating to Atlantic Union Bank or its customers.

Guidelines

We are mindful that suppliers and their employees may wish to discuss Atlantic Union Bank as consumers and otherwise, and ask that they keep the following guidelines in mind when they do so:

- Recognize that your posts will be visible by everyone
- Keep the Atlantic Union Bank core values in mind when accessing the internet or contributing to social media sites using Atlantic Union Bank equipment, or on Atlantic Union Bank's network, or in any manner through which it might appear you are representing Atlantic Union Bank
- Remember your confidentiality obligations with respect to Atlantic Union Bank's teammate, customer and other non-public information
- Clearly state in any post related to Atlantic Union Bank that you are not an Atlantic Union Bank teammate, and that the views expressed in the post are your own and are not necessarily representative of Atlantic Union Bank
- Do not use or refer to Atlantic Union Bank's brand, logos, other intellectual property, or that of other third parties with whom we do business

Atlantic Union Bank Assets

Definition

Supplier employees may be provided with Atlantic Union Bank equipment and access to network, email, and other electronic services. Use of Atlantic Union Bank equipment, networks and facilities is subject to the requirements and limitations set by Atlantic Union Bank and as outlined in the respective supplier contracts (including those regarding harassment, privacy, copyrights, trademarks, trade secrets, patents, and other intellectual property).

Right to Monitor Activity

Internet access, the network and Atlantic Union Bank's system (and all data contained therein) are the property of Atlantic Union Bank and should not be considered private by the supplier and its employees. All access should be for business purposes and is subject to monitoring by Atlantic Union Bank at any time without notice to the supplier.

Suppliers will be held responsible for the websites visited and any emails viewed, sent, and received from personal contacts, including non-work related communications that may be deemed inappropriate. Suppliers are also responsible for honoring copyrights and software

licenses, and must avoid breaches of security on their designated equipment by protecting Atlantic Union Bank's confidential and proprietary information. Downloading or transmission of offensive or illegal material that may be considered offensive or harassing is prohibited. In addition, downloading or transmission of customer data to personal devices or email addresses is prohibited.

Use and Disposition

Atlantic Union Bank equipment may never be used for any unlawful or unauthorized purpose. Suppliers must prevent damage, theft, or misuse of Atlantic Union Bank equipment and must return all Atlantic Union Bank equipment in their possession at project or engagement end or as directed by the appropriate Atlantic Union Bank supplier manager.

Contact Information

Suppliers should contact Strategic Sourcing & Supplier Management with any questions or concerns relative to this Code of Conduct.

- SupplierManagement@AtlanticUnionBank.com

Additionally, Atlantic Union Bank offers an Ethics Hotline to report potential ethics violations. The hotline is available to Atlantic Union Bank teammates, supplier employees, supplier subcontractor personnel and independent contractors to report incidents where Atlantic Union Bank or Atlantic Union Bank teammates, or third parties may be involved. Reported incidents must be made in good faith

Retaliation against anyone reporting suspected violations by supplier employees is prohibited and may result in termination of the individual supplier engagements or the supplier relationship.

Atlantic Union Bank Ethics Hotline - The Ethics Hotline is operated by an external company and is staffed 24 hours a day, seven days a week. Reports to the Ethics Hotline can be anonymous and are not recorded.

- Toll Free: **844.769.5095** in the United States, Guam, Puerto Rico and Canada
- Web: **AtlanticUnionBank.ethicspoint.com**

Corporate Security – Additional info for supplier employees working on site at an Atlantic Union Bank facility.

Report Physical Security events at an Atlantic Union Bank facility including any event related to teammate or supplier employee safety and security, to include theft, vandalism, workplace violence, threatening calls/emails, or suspicious person or package.

- From an Atlantic Union Bank desk phone dial **2030**
- Send an email to Physical.Security@atlanticunionbank.com.