



Supplier code of conduct

The mission of Capital Group is to improve people's lives through successful investing.

Building strong connections with our business partners is a cornerstone of our success. We're committed to lasting relationships with suppliers who provide high-quality and competitively priced services. This includes cultivating partnerships with, and supporting the growth of, diverse suppliers and small businesses. Doing so is good business and supports economic growth in our communities.

This supplier code of conduct (the "Code") sets forth expectations and recommended best practices for Capital Group's suppliers,¹ their personnel and anyone outside their organization engaged to provide services for or with Capital Group. Capital Group acknowledges that no code of conduct can address every situation that suppliers may encounter. As a result, this Code is not a substitute for suppliers' own accountability and responsibility to exercise good judgment and obtain guidance regarding proper business conduct.

Investments are not FDIC-insured, nor are they deposits of or guaranteed by a bank or any other entity, so they may lose value.

Our commitment to global citizenship

As a signatory of the [United Nations \(UN\) Global Compact](#), Capital Group is committed to aligning our operations with the universal principles of human rights, labor, the environment and anti-corruption and is taking actions to advance these societal goals.

We work with the following organizations to actively encourage supplier diversity and sourcing products and services in an ethical, sustainable and socially conscious way: [National LGBT Chamber of Commerce](#), [Women's Business Enterprise National Council](#) and the [National Minority Supplier Development Council](#).

Our commitment to fair labor and human rights

Capital Group has practices in place to ensure that all associates are treated with dignity and respect and expects the same from the suppliers with whom we work. We expect suppliers to support and respect internationally proclaimed human rights and to make sure they are not complicit in human rights abuses. In addition, we expect suppliers to maintain a workplace that is free from unlawful discrimination and harassment for all employees.² This includes:

- Complying with regulations that pertain to working hours, benefits and wages (such as minimum legal wages).
- Ensuring that supplier employees are provided with appropriate health and safety training, such as safe work practices and emergency preparedness in compliance with all applicable laws and regulations of the countries we serve.
- Refraining from exploitation such as slave, forced, bonded, indentured or prison labor and involvement in any human trafficking.

Our commitment to diversity, equity and inclusion

Capital Group is committed to an environment where associates can bring their best selves to work. That leads to better ideas, better business solutions and better opportunities to grow for our associates and the people we serve.

Capital Group believes in providing equal opportunity in all aspects of employment and we expect the same from our suppliers. Our policies prohibit unlawful discrimination on the basis of race, religion, color, national origin, ancestry, sex (including gender, gender expression and gender identity), pregnancy, childbirth and related medical conditions, age, physical or mental disability, medical condition, genetic information, weight, height, marital status, caregiver status, sexual orientation, hairstyle, citizenship status, AIDS/HIV status, political activities or affiliations, military or veteran status, credit history, unemployment status, status as a victim of domestic violence, assault or stalking or any other characteristic protected by federal, state or local law. We expect our suppliers to have policies in place to prohibit unlawful discrimination as outlined above.

We encourage suppliers to have in place programs and initiatives to advance diversity, equity and inclusion within their business and to provide transparency regarding workforce representation as appropriate to their business and the countries in which they operate. This could include measurement and reporting of workforce representation, setting measurable goals to advance representation and employee engagement, and seeking to provide opportunities for the advancement of underrepresented groups. Programs and initiatives to increase workforce diversity could ideally cover recruitment, development, retention and accountability metrics. Capital Group may engage with suppliers to track progress against their goals, promote best practices and advance diversity, equity and inclusion within their businesses.

Further, Capital Group is committed to identifying and developing qualified diverse suppliers from underrepresented groups, including companies owned and operated by minorities, women, military veterans, disabled veterans, people with disabilities and members of the LGBTQ+ community.

We encourage our suppliers to do business with diverse vendors, track their spend with diverse businesses and report it annually to Capital Group. Annually, certain suppliers will be asked to submit this data through a third-party platform.

Our commitment to environmental stewardship

Capital Group expects its suppliers to comply with all applicable laws and regulations in relation to environmental protection, including but not limited to maintaining all required environmental permits, regulatory approvals and registrations.

Additionally, Capital Group encourages suppliers to apply a conservation-minded approach to their business activities, including their supply chains. This includes, but is not limited to, undertaking efforts that encourage:

- Efficient use of natural resources (e.g., water).
- Minimizing waste by implementing strategies to reduce, reuse and recycle (in that order) materials prior to disposal whenever possible.
- Measuring and reporting greenhouse gas emissions (Scopes 1, 2 and 3)³ as well as the greenhouse gas emissions that are directly attributable to the products and/or services being provided to Capital Group.
- Setting greenhouse gas emissions reduction goals and demonstrating meaningful progress towards those goals, such as improving energy efficiency and/or using cleaner sources of energy.

We're proud to support the [Task Force on Climate-related Financial Disclosures](#) (TCFD), a set of climate-related disclosures by organizations that provide information to stakeholders and encourage our suppliers to consider reporting against this framework.

We have committed to carbon neutrality in our business operations, including a [25% reduction in our greenhouse gas emissions by 2025](#). This goal covers Scope 1, Scope 2 and Scope 3 (business air travel). We encourage our suppliers to consider establishing similar goals and to develop tools and products to help their customers reduce their emissions.

Capital Group may actively engage with individual suppliers to encourage these practices and may consider these practices when making procurement decisions. Annually, certain suppliers will be asked to complete a survey on their sustainability efforts.

Our commitment to ethical business practices

Capital Group expects our suppliers to act and conduct themselves in the highest ethical manner, forsaking all forms of corruption in all business dealings and interactions. We expect suppliers to:

- Disclose to Capital Group any potential or perceived conflicts of interest in relation to any bid, proposal, ongoing service or account management.
- Refrain from offering, promising, soliciting, accepting or making any payments of money, gifts or anything of value (including nonmonetary value, i.e., kickbacks, favors or other business courtesies) as an inducement for doing something illegal, unethical or designated to improperly influence business decisions. This includes a prohibition on facilitating payments, even if small, in cash or kind, to active or former government officials to perform routine governmental action.
- Comply with anti-competition and antitrust laws which prohibit price fixing, colluding, or rigging bids with competitors, allocating customers or markets with competitors, or exchanging any pricing information with our competitors.
- Exercise risk-based due diligence and monitoring to prevent and detect corruption in all business arrangements (e.g., partnerships or joint ventures).
- Establish and maintain anti-corruption training and standards for all employees.
- When requested by Capital Group, participate in our vendor risk assessment review to evaluate procedures to protect sensitive data and mitigate any information security incidents. We may also conduct initial and ongoing due diligence for various risks, including but not limited to financial viability, business continuity, disaster recovery, offshore, governance and compliance.

Acknowledgement of this Code

Capital Group expects our suppliers to comply with all laws and regulatory requirements applicable to such supplier's business activities. Unless prohibited by local laws, regulations and customs, this Code should apply globally. If the Code conflicts with local laws or ordinances, we expect our suppliers to notify Capital Group of any such conflict in a timely manner through the appropriate channels at Capital Group, as noted below. Capital Group will review reported concerns and escalate as appropriate.

Capital Group encourages suppliers to have policies, procedures and trainings that are similar to the Code. Capital Group encourages suppliers to notify Capital Group of any of its personnel's material deviation from its policies and procedures and, if requested by Capital Group, to use best efforts to provide corrective actions that are being taken to address such deviations. We define a material deviation as conduct that deviates from suppliers' policies and procedures that are similar to the Code and that could affect the ability of the supplier to provide the products or services to Capital Group and lead to regulatory, legal or ethical violations and reputational risks of Capital Group.

For notifications to the Code, please contact: suppliercode@capgroup.com

¹ Capital Group considers all suppliers to be vendors of any Capital Group affiliated company under this Supplier Code. "Suppliers" refer to entities from whom Capital Group procures the goods, services, and equipment needed to run our corporate operations.

² Capital Group considers all workers, including temporary, migrant, student, contract, direct employees and any other type of worker, as "employees" of Capital's suppliers under this Code.

³ Please see The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard, available at <https://ghgprotocol.org/corporate-standard>, for more information on how to report greenhouse gas emissions. There are also many third parties and technology platforms that help companies measure and report their emissions.

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