

## Supplier Code of Conduct

### Purpose

This Supplier Code of Conduct establishes ethical guidelines for suppliers providing goods and services to First Commonwealth Bank (FCB). FCB expects that its suppliers will comply with this Supplier Code of Conduct and will ensure that their employees and subcontractors are made aware of, understand, and comply with the Supplier Code of Conduct.

### Applicability

This Code of Conduct governs interactions between First Commonwealth Bank teammates and suppliers and sets out business conduct expectations of our suppliers. Each supplier must review the contents of this document with its employees and contractors who are involved in providing goods or services to FCB. FCB reserves the right to monitor adherence with this requirement and request an attestation from suppliers.

## Human Capital

### Employment Verification

Suppliers and their subcontractors must only employ workers who are legally authorized to work in their location and validate the employment eligibility of each employee.

### Freely Chosen Employment

Suppliers must not engage in any practice that could reasonably be considered as employing or encouraging any form of modern slavery, including forced labor and human trafficking. This includes practices such as withholding wages or security payments, confiscating identity documents, the payment of recruitment fees by workers and/or restricting movement of workers. Any written contract involving workers must be provided in a language that the worker can easily understand and must be entered into voluntarily. No involuntary work of any type is permitted, including: forced or compulsory labor, trafficked labor, indentured labor, bonded labor, involuntary prison labor, or forced overtime. ILO Conventions 29 and 105 provide further detail. First Commonwealth expects its suppliers and their subcontractors to abide by the United Nations Universal Declaration of Human Rights.

### Child labor

Suppliers must take all necessary steps to ensure that there is no child labor within their organizations or supply chains. A “child” is any person under the age of 15 (or 14 where the law of the country permits), or under the local legal minimum age for work or mandatory schooling, whichever is greatest. ILO Conventions 138 and 182 provide further detail. First Commonwealth expects its suppliers and their subcontractors to abide by the United Nations Universal Declaration of Human Rights.

### Harassment/antidiscrimination

First Commonwealth expects its suppliers to offer equal employment to all, to treat all workers with dignity and respect and to maintain a work environment that is free from intimidation, violence and abuse. Discrimination or harassment on any grounds, including but not limited to race, color, creed (including religious creed), religion, sex (including pregnancy, childbirth or related medical conditions), genetic information, gender, gender identity, gender expression, sexual orientation, national origin, citizenship status, age, ancestry, marital status, medical conditions, disability (including physical or

mental disability), military and veteran status or any other factors prohibited by applicable law is prohibited.

#### Drug and alcohol-free workplace

First Commonwealth expects suppliers to comply with the requirements of the Drug Free Workplace Act and other similar local applicable laws and regulations and to maintain a drug-free workplace. Suppliers must prohibit the illegal use, possession, solicitation, manufacture, distribution, dispensation, transfer or sale of controlled substances (illegal drugs, including marijuana), as well as the unauthorized consumption or possession of alcoholic beverages and abuse of prescription drugs on FCB premises or while working on FCB business. No employee is to report to work or conduct FCB business while impaired or under the influence of controlled substances or alcohol, or are otherwise impaired or intoxicated, whether from legal or illegal substances

#### Diversity and inclusion

First Commonwealth's commitment to diversity and inclusion is at the core of who we are as a company. In addition to our focus on workplace diversity, we recognize the value of having and promoting diversity in our supply chain, and actively seek to do business with certified diverse businesses either directly or indirectly through our Supplier Diversity Program. Examples of diverse suppliers include companies owned by minorities, individuals with disabilities, veterans, women and lesbian, gay, bi-sexual or transgender individuals. We also encourage supplier diversity by mentoring and developing certified diverse-owned businesses so that they can become qualified to provide products and services that meet our requirements. We are committed to investing in diverse businesses to drive sustainable growth and create shared success in the communities we serve.

#### Community

At First Commonwealth, we value the opportunity to be an integral part of each community we serve. Our suppliers are expected and encouraged to support their communities and non-profit organizations.

#### Business Ethics

##### Payments, Gifts and Entertainment

Suppliers are prohibited from making payments to our employees or representatives in an effort to influence actions or gain an advantage with the company. Suppliers are also prohibited from improperly providing or offering gifts, entertainment, or anything of value to employees, government officials, or other corporate representatives in an effort to obtain or retain business. Political contributions must not be made on behalf of, or as a representative of FCB, in an effort to influence a business relationship, or to request influence of a political figure in favor of the company.

#### Compliance with laws

First Commonwealth expects its suppliers to comply with all applicable laws, rules and regulations (including federal, national, state, provincial and municipal), including, but not limited to: all anti-trust and fair trade policies, all anti-money laundering and anti-terrorist financing laws, all anti-bribery and anti-corruption laws, all tax laws, all wage and hour laws, all privacy and information security laws, all environmental laws and all laws that address child labor, forced labor, slavery, human trafficking, equal pay and nondiscrimination, and occupational safety and health.

### Conflicts of interest

First Commonwealth expects its suppliers to disclose any potential conflicts of interest prior to initiating their relationship with us, or as soon as a supplier becomes aware of a conflict after initiating a relationship; and we expect fair, non-collusive competition among our potential suppliers, contractors and subcontractors.

### Anti-Bribery, anti-corruption, anti-money laundering

First Commonwealth has zero tolerance for bribery, corruption and money laundering. Suppliers are prohibited from engaging in any activity that would constitute, or be perceived to constitute, bribery and/or corruption, including tolerating or facilitating bribery and/or corruption. Suppliers must not engage in illicit activities, including doing business with those engaged in illicit activities, including, without limitation, money laundering, terrorism financing, human trafficking, slavery or the proliferation of weapons of mass destruction.

### Sustainability

At First Commonwealth, corporate sustainability is focused on reducing energy and resource consumption, reducing greenhouse gas emissions, and managing our waste responsibly. FCB expects its suppliers to support the sustainability efforts of FCB through the services they perform as well as through their own corporate initiatives.

### Intellectual Property, Confidentiality, and Data Privacy

#### Customer Information

As a result of providing services to First Commonwealth Bank, suppliers and their employees may have access to information about FCB teammates or customers, including account information and personally identifiable information. Supplier employees have a responsibility to protect the confidentiality of information about customers, consumers, FCB 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

Suppliers may have access to information that is confidential or proprietary to First Commonwealth. This includes such information that may be of use to our competitors, or harmful to FCB or its customers, if disclosed. Of special sensitivity is financial information, which should always be considered confidential unless its disclosure has been approved by FCB or is required to be disclosed by law. Suppliers must not use or disclose this information for any reason except as permitted in the written agreement(s) between the supplier and FCB.

#### Publicity

Suppliers may not use First Commonwealth'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 FCB 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 FCB 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 FCB.

### Regulated Entity

FCB is a regulated financial institution. As such, First Commonwealth, its directors, officers, employees, and suppliers are subject to extensive rules and regulations governing, among other things, privacy, information security, product terms and disclosures, consumer protection, and anti-money laundering. FCB is required to perform due diligence and regular monitoring of its suppliers through its vendor management program. Therefore, suppliers and their subcontractors are expected to cooperate with all requests from FCB or its regulatory agencies related to the goods or services that are provided. Please refer to the following guide from the FDIC for additional information about doing business with a regulated financial institution: <https://www.fdic.gov/fditech/guide.pdf>.

### Compliance assurance

Suppliers are expected to self-monitor their compliance with this code while conducting business with or on behalf of First Commonwealth, and to inform us in a timely manner of any non-compliance. We reserve the right to monitor compliance with this code using a reasonable and risk-based approach and framework that is suitable for small and diverse-owned businesses as well as larger businesses with more mature compliance programs. This may include verification through self-assessments or questionnaires, on-site audits, or other means of due diligence. We recognize that small and diverse-owned businesses may be challenged to meet some of the expectations we have set forth. We are committed to working with these businesses to achieve a reasonable level of compliance given their unique circumstances. If requested, suppliers are expected to provide written information, including, policies, procedures and data regarding the topics included in this code. Any supplier that does not comply fully with this code, is expected to remediate any lapses to FCB's satisfaction in a timely manner. Failure to agree upon a remediation plan, or failure to implement it, could adversely affect ability to be awarded additional work and/or result in termination.

### Reporting Concerns and Inquiries

All First Commonwealth Suppliers are required to report any suspected or known violations of this Code to FCB using the contact information below. Any inquiries regarding this Supplier Code of Conduct can also be made to the same contact.

Contact Information: Michael Papcunik, Third Party and Business Continuity Supervisor, 724-463-4013, MPapcunik@fcbanking.com