



BNY

HUMAN RIGHTS STATEMENT

October 2023



BNY Human Rights Statement

At BNY and within our subsidiaries, we consider human dignity paramount, and we work to preserve human rights throughout our company and our supply chain. Our actions are guided by our human rights statement, and we apply these principles to all the entities with which we do business, inclusive of our employees, suppliers, clients, communities, and other stakeholders.

Beyond our own workplace and our supply chain, we also look for ways to contribute to human rights solutions throughout the world, serving as a positive influence for the protection of human rights.

BNY is committed to the protection and preservation of fundamental human rights around the world. We are guided by international standards such as the United Nations Universal Declaration of Human Rights and International Labor Organization (ILO) Core Conventions, United Nations Guiding Principles on Business and Human Rights and by our participation as a signatory to the United Nations Global Compact.

We are committed to an inclusive, safe, and ethical workplace as demonstrated within our Code of Conduct, Equal Employment Opportunity Statements, and our other human resources policies. Our human resources policies comply with local laws concerning employment and individuals' rights in every country in which we operate. We work with our communities and our suppliers to encourage cultural, economic, and social development. We believe that, through our actions, we can be a constructive influence for human rights, especially in communities where others' actions are not aligned with our commitments. Our commitment to human rights is embedded in the culture and values that define our company and is reflected in our policies and actions toward our employees, suppliers, clients and the communities and countries where we do business and throughout our value chain.

At BNY, we strive to create an environment of respect for all individuals. We do not tolerate corruption, discrimination, harassment, child labor, prison labor, forced labor or slavery in any form.

We support the protection of the rights of individuals who have been historically disadvantaged in the workplace and in society, including the rights of women, individuals from underrepresented ethnic/racial/religious backgrounds, indigenous peoples, migrants and refugees, people with disabilities and LGBT+ individuals. We are committed to providing equal pay for equal work, and we periodically review our pay practices and processes to ensure compliance.

Engaged, healthy employees are critical to our success; we support employee's total wellbeing through inclusive programs that enable our employees to thrive. Our Life Balance framework supports both employee resiliency and connectedness, focusing on physical health, emotional resilience, and financial wellbeing. We support early identification of health risks through education and access to risk reduction tools, for example, by providing opportunities to access physical screenings and vaccinations.

We believe that, through our actions, we can be a constructive influence for human rights.

Modern Slavery Act Statements

Modern slavery takes various forms, such as slavery, servitude, forced, bonded and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty in order to exploit them for personal or commercial gain. BNY does not tolerate any form of modern slavery and human trafficking and we expect our employees and suppliers to commit to acting ethically and with integrity in all their business dealings and relationships. We fully comply with all applicable slavery, forced labor and human trafficking laws, including without limitation, the UK Modern Slavery Act 2015 and Australia Modern Slavery Act 2018.

BNY expects employees to adhere to the principles and values set out in our Modern Slavery Transparency Statement and expects suppliers to promote and respect human rights by working to prevent acts of modern slavery and human trafficking in their supply chains.

Additionally, we expect our suppliers to implement due diligence measures to ensure that no modern slavery or human trafficking exists within their supply chains and to have policies and practices that foster these values and rights. Examples of such rights are articulated in the Internal Labor Organization Convention and Ethical Trading Initiative Base Code. At a minimum, suppliers are expected to comply with all applicable laws, rules and regulations and have policies and practices that address employment (freedom from forced labor, paid wages), working conditions (health, safety, and security), child labor, harassment, and non-discrimination. For details on our expectations for suppliers with regards to the Modern Slavery Act, please refer to BNY's Supplier Code of Conduct.

Governance

This statement is periodically reviewed and updated and is approved by senior management. As per the committee charter, the Corporate Governance, Nominating and Social Responsibility Committee of the Board of Directors shall review this statement when updated. Future updates to this policy will include details on monitoring and escalation processes related to the implementation of this Statement. An outline of the execution of activities surrounding this policy will be made available in future BNY Sustainability Reports.