

## First Horizon Code of Business Conduct for Suppliers

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First Horizon seeks to outperform the competition fairly and honestly and has a history of succeeding through honest business competition. First Horizon seeks competitive advantages through superior performance, not through illegal or unethical business practices. This Code establishes the business conduct expectations for the Company's suppliers (i.e., third parties that provide goods or services to First Horizon).

First Horizon expects its suppliers to comply with applicable laws and regulations and act ethically in all matters related to doing business with the Company. The terms "First Horizon" and "the Company" in this document refer to First Horizon National Corporation or one or more of its subsidiaries, whichever is relevant to the particular supplier relationship.

**Bribery:** First Horizon operates in compliance with all applicable regulations and applicable laws, which include the Bank Bribery Act, the Foreign Corrupt Practices Act and similar laws that prohibit improper payments. First Horizon is committed to conducting business ethically and expects its suppliers to refrain from offering bribes and accepting improper kickbacks or payments.

**Compliance with Law:** First Horizon expects its suppliers to comply with all applicable laws, rules and regulations.

**Confidentiality:** First Horizon expects suppliers to maintain the confidentiality of all information so entrusted to them, except when disclosure is authorized or legally permitted, and must use such information only for legitimate business purposes of the Company.

**Corporate Gifts, Meals, Trips and Entertainment:** Employees of First Horizon are prohibited from accepting anything more than modest gifts, meals and entertainment from suppliers. Acceptance of meals, refreshments, trips and entertainment from a supplier is subject to certain requirements and must be approved per First Horizon policy.

**Fair Dealing:** First Horizon expects that its suppliers will deal fairly with First Horizon and its customers. First Horizon expects that its suppliers will not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information or misrepresentation of material facts or participate in unfair dealing practices.

**Human Rights:** First Horizon conducts its business in a manner that is consistent with the fundamental human rights principles described in the United Nations Universal Declaration of Human Rights. The Company is committed to operating in an environment where everyone is

treated with dignity and respect. First Horizon expects its suppliers to respect human rights within the suppliers' workplace environment and in its business dealings with the Company.

**Non-Discrimination:** First Horizon is firmly committed to non-discrimination and equal opportunity for employees, customers and suppliers. In accordance with all applicable laws and regulations, First Horizon expects its suppliers to treat everyone without discrimination or harassment based on race, color, religion, sex, sexual orientation, gender identity, national origin, age, veteran status or disability.

**Recordkeeping:** First Horizon requires honest and accurate recording of information in order to provide accurate reports and make responsible business decisions. First Horizon expects that all of its suppliers' books, records, accounts and financial statements will be maintained in reasonable detail, will appropriately reflect the supplier's transactions with First Horizon, and will conform to both applicable legal requirements and to the supplier's system of internal controls. Unrecorded or "off the book" funds or assets should not be maintained unless permitted by law and not prohibited by First Horizon policy.

**Reporting Potential Misconduct:** First Horizon's policies protect anyone who reports potential misconduct or illegal activities from retaliation. Suppliers who believe that an employee of First Horizon, or anyone acting on behalf of First Horizon, has engaged in illegal or otherwise improper conduct, should report the matter to the Company. The supplier can contact the First Horizon anonymous Ethics Hotline at (800) 217-3031 or [www.lighthouse-services.com/firsthorizon](http://www.lighthouse-services.com/firsthorizon).