



Human Rights Statement

November 2024

Introduction

Wells Fargo is committed to respecting human rights. Our efforts are informed by the United Nations Universal Declaration of Human Rights¹ and the United Nations Guiding Principles on Business and Human Rights², which set forth a responsibility for corporations to respect human rights in their operations and through their business relationships. Our Human Rights Statement provides an overview of our approach and how it is reflected within our policies, procedures, and business practices.

Ethical business conduct

We are committed to ethical business conduct and anti-bribery and corruption practices, and we expect our employees to speak up if they have a concern. Our Code of Conduct, supported by related policies and required training, provides employees with guidance on doing what's right and in the right way. The Code of Conduct encourages employees to report any suspicion or instance of human rights abuses in our operations or related to any specific customer, investment activity, or the operations of our suppliers. The Code of Conduct can be found on our [Goals and Reporting](#) website.

Privacy

As a global provider of financial services and products to consumers, corporate clients, small businesses, governments, and other institutions, Wells Fargo is committed to the protection and appropriate use of the personal data we collect and process.

We aim to honor our customers' privacy preferences regarding the processing of their personal data as described in our United States (U.S.) privacy policies and notices, which can be found on our [Privacy, Cookies, Security and Legal](#) website. The website is a resource for individuals to learn about the types of data we collect, how it is used, and choices available to individuals.

Employees

Our people are what set Wells Fargo apart and are critical to our success. Wells Fargo respects the human rights of our employees and contingent resources by promoting freedom from discrimination, harassment, and retaliation, as well as the rights to health and safety.

We review and refine our workplace practices and policies to support a safe, healthy, and accessible environment to employees and contingent resources. We provide eligible full- and part-time employees (and their eligible dependents, as applicable) with a comprehensive set of benefits designed to support their physical, emotional, and financial health to help them make the most of their well-being. In addition, we design and implement programs across our Company to provide accommodations to care for our employees' and contingent resources' unique needs.

We are committed to fair and equitable compensation practices. We have conducted an annual pay equity review through engagement with a third-party consultant for a number of years. The pay equity review compares the compensation of women to men globally and minorities to non-minorities in the U.S., taking into account factors such as role, level, tenure, and geography. We may make adjustments to compensation in the event the review identifies gaps.

¹ <https://www.un.org/en/about-us/universal-declaration-of-human-rights> References to publicly available websites are provided herein for your convenience. Unless otherwise noted, Wells Fargo does not control the websites and does not endorse and is not responsible for the content, links, privacy policies, or the security policies of such websites.

² <https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights> References to publicly available websites are provided herein for your convenience. Unless otherwise noted, Wells Fargo does not control the websites and does not endorse and is not responsible for the content, links, privacy policies, or the security policies of such websites.

We are committed to adhering to applicable local laws regarding the freedom of association and collective employee action. Wells Fargo supports the legal right of every employee to make a free and informed choice about whether they want union representation. We maintain policies and practices that are consistent with applicable law regarding employees' rights to freedom of association and collective bargaining. Our policies do not prohibit employees from forming or joining labor organizations or from collective bargaining, nor do they prohibit employees from discussing wages, benefits, or other terms and conditions of employment.

We have a well-developed framework designed to prevent and address harassment and discrimination, including policies and procedures, annual training, various reporting avenues, and investigation processes for conduct-related allegations. Our Code of Conduct and policies include the Anti-Harassment and Discrimination Policy, the Affirmative Action, Equal Employment Opportunity Policy, and the Speak Up and Nonretaliation Policy.

Customers and clients

Wells Fargo has policies and procedures to provide fair access to products and services for our customers and treat them with dignity and respect.

Wells Fargo plays a vital role in the financial future of many individuals and small businesses, delivering convenient, reliable, and secure financial services for our customers. We periodically review and refine our business practices to help all employees behave ethically and with integrity.

Responsible lending and consumer practices

Wells Fargo has implemented several measures to promote responsible lending and banking, including:

- The Office of Consumer Practices — a company-wide, consumer-focused advisory group within the Chief Operating Office. It is designed to help ensure our products, services, and business practices are fair and transparent and reinforce a customer-centric culture.
- The [Treating Consumers Fairly Principles](#) — a set of five clear standards to help guide customer interactions and confirm fairness considerations are incorporated in decision-making about products and services.

Additionally, we were an original participant in the United Nations Finance Against Slavery and Trafficking Survivor Inclusion Initiative, which provides checking and savings accounts to survivors of human trafficking.

As a large financial institution serving commercial clients in many sectors, including some that may be associated with elevated social impacts, we recognize the importance of understanding the social implications of our business decisions.

Our global Financial Crimes Risk Management Program is designed to facilitate compliance with applicable legal requirements and report activity that may be indicative of financial crimes to appropriate authorities. Clients or transactions are referred to appropriate teams working on financial crimes risk management or environmental or social impact if potential ties to certain human rights abuses are identified, including modern slavery, servitude, forced or compulsory labor (including child labor), and/or human trafficking. More information about our efforts related to the prevention and detection of modern slavery can be found in our annual United Kingdom Modern Slavery Act Statement, which can be found on our [Europe, Middle East and Africa website](#).

Environmental and social impact management

Our approach to managing environmental and social impacts associated with our client relationships is informed by globally recognized standards. Wells Fargo conducts additional due diligence on certain corporate clients and transactions that present elevated risk. More information about our approach to addressing environmental and social impacts is available in our Environmental and Social Impact Management Framework, which can be found on our [Goals and Reporting](#) website.

Indigenous peoples

Wells Fargo also recognizes its responsibility to respect the rights of Indigenous Peoples, which include the right to determine their own way of life on their own lands, according to their time-honored cultures, traditions, and beliefs. We take that responsibility into account in conducting our business activities. We have existing policies and procedures to evaluate potential risks to Indigenous communities, and we periodically review and evaluate those policies and procedures, consistent with our standard policy management process and our enterprise risk and control programs.

Procurement

Wells Fargo strives to engage with suppliers whose values and business principles reflect respect for the human rights of the people with whom, and the communities in which, they do business. Our supply chain management team has enhanced its modern slavery evaluation capabilities by further improving tools and practices within third-party diligence, sourcing, and lifecycle management. While we recognize that each supplier has varying policies and approaches to human rights, we expect our suppliers to adhere to the standards and values expressed in our Supplier Code of Conduct, which can be found on our [Goals and Reporting](#) website.

Diversity, equity, and inclusion

Wells Fargo also respects human rights through our efforts to advance diversity, equity, and inclusion. Examples of our efforts include:

- Proactively seeking qualified suppliers who are minority, women, LGBTQ+, veteran, disability-owned, and small businesses.
- Supporting accessibility to Wells Fargo's facilities (both physical and digital), products, services, and communications for customers, employees, and job applicants.
- Supporting equal employment opportunities through programs such as our Neurodiversity Program; programs for military veterans; and Glide, our return-to-work program.
- Advancing efforts to support fair and equitable access to housing through focused outreach efforts and industry initiatives.

Our Diversity, Equity, and Inclusion Report, which can be found on our [Goals and Reporting](#) website, provides additional details on our diversity, equity, and inclusion efforts.

Addressing concerns

Wells Fargo has channels for receiving feedback, including engagement with investors and customers, employee resources, and publicly-available mechanisms. Examples of some of these channels and resources are provided below.

Employee concerns

Employees are encouraged, and in some cases expected, to raise concerns. We provide a number of forums for employees to do so in a public or private manner, examples of which include:

- Directly to their managers or any manager with whom they feel comfortable.
- Our EthicsLine, which is a third-party resource available by phone or online 24 hours a day, 7 days a week. To the extent permitted by local or applicable laws and regulations, employees may choose to remain anonymous.
- Through Employee Relations, a team within Human Resources that specializes in helping employees and managers resolve workplace conflicts.

Our reporting channels, resources, and policies are designed to allow employees to raise concerns without fear of retaliation or reprisal. We endeavor to manage these concerns in an objective, thorough, and timely manner. These reporting channels are also available to contingent resources.

Customer concerns

Wells Fargo's Enterprise Complaints and Remediations organization brings together functions from across the Company to care for customers who have expressed a concern or been adversely affected by the Company. Our Complaints team listens to our customers and works to capture, understand, and address their concerns. Additionally, the insights shared by the Complaints team are used to support the continuous improvement of frontline operations. Our Remediations team works to make customers whole, when appropriate, by providing remediation in a consistent and timely manner.

Training

We promote the understanding of and compliance with our human rights related policies and procedures by developing and making available relevant training courses. Examples include training on financial crimes, Code of Conduct, risk fundamentals, anti-harassment and discrimination, diversity, equity, and inclusion, privacy, ethics, and supply chain. We have also incorporated a voluntary human rights training section on our employee Learning and Development platform.

Ongoing efforts

Wells Fargo acknowledges that accountability is important. Wells Fargo's Human Rights Statement is approved at senior levels of our Company. The Wells Fargo Board of Directors' Corporate Responsibility Committee oversees, and management executes and maintains, the Company's significant strategies, policies, and programs on social and public responsibility matters, which include human rights.

Wells Fargo promotes transparency around our approach to respecting human rights and our dedication to improving our overall human rights performance through our public reporting and disclosures. We value active and ongoing engagement with our stakeholders. Updates on our human rights approach will be communicated on our [Goals and Reporting](#) website and our [Europe, Middle East and Africa website](#).

Disclaimer and forward-looking statements

This document is provided for information purposes only. The information provided in this document reflects Wells Fargo & Company's (the "Company") approach to the topics herein as of the publication date. The approach is subject to change in the Company's sole discretion without notice. The Company does not undertake to update this document, or any information contained in this document, to reflect changes or events that occur after that date. The information discussed in this document is not a guarantee of future results, occurrences, performance, or conditions.

This document contains forward-looking statements about our business and operations, including discussion of the Company's efforts related to human rights and the Company's role and efforts in addressing human rights issues. Because forward-looking statements are based on our current expectations and assumptions regarding the future, they are subject to inherent risks and uncertainties. Do not unduly rely on forward-looking statements as actual results could differ materially from expectations. Forward-looking statements speak only as of the date made, and we do not undertake to update them to reflect changes or events that occur after that date. Factors that could cause actual results to differ materially from those forward-looking statements described in this document include the precautionary statements and disclaimers included in this report as well as the following factors: changes in laws and regulations; changes in our business relationships, practices, and approaches; changes in global policies, practices, and expectations; changes in management's strategy for our aspirational targets, goals, strategies, and commitments; and other unforeseen events or conditions. For additional information about factors that could cause actual results to differ materially from our expectations, refer to our reports filed with the Securities and Exchange Commission, including the discussion under "Risk Factors" in our Annual Report on Form 10-K for the year ended December 31, 2023, and in our subsequent quarterly reports, as filed with the Securities and Exchange Commission and available on its website at www.sec.gov.³

While this document describes events, including potential future events, that may be of interest or significance to our stakeholders in the context of our commitment to human rights and related activities, any reference to terms such as "significant," "important," or "material" or similar terms should not be read as necessarily rising to the level of materiality of disclosures required under U.S. federal securities laws or other laws and regulations.

The Company is not providing any financial, economic, legal, accounting, tax, or investment advice or recommendations. This document should not be used as a basis for trading in the securities of the Company or for any other investment decision.

This document reflects certain positions and approaches to the Company's commitment to human rights as of the date of this document that are subject to change at any time in the Company's sole discretion without notice, and we do not undertake to update this document to reflect any such changes.

Wells Fargo's commitment to human rights does not constitute a guarantee or promise of achievement of any such goals, targets, or commitments or regarding actual or potential positive impacts or outcomes.

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³ Wells Fargo does not control this website. Wells Fargo has provided this link for your convenience but does not endorse and is not responsible for the content, links, privacy policy, or security policy of this website.

This document provides general information regarding a number of the Company's policies, procedures, and positions relating to human rights issues. The description of such policies, procedures, and positions herein does not purport to be complete and such policies, procedures, and positions may contain certain exceptions. Further, there can be no assurance that the Company's policies, procedures, and positions relating to human rights issues will continue; such policies, procedures, and positions, could change, even materially. The Company may determine in its sole discretion that it is not feasible or practical to implement, comply with, or achieve certain of its policies, procedures, positions or commitments relating to human rights issues based on various considerations.

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