M&T Bank

STATEMENT ON HUMAN RIGHTS

At M&T, we have a responsibility to do the right thing, in everything we do. Treating every individual with dignity and respect is not just essential to our success. **It's the right thing to do.**

While we recognize that national governments bear responsibility for implementing legal frameworks designed to protect and preserve human rights, we know that the private sector can and should play a constructive role in championing the rights of every individual. Accordingly, M&T is committed to respecting human rights and is guided by the International Bill of Human Rights, including the Universal Declaration of Human Rights (UDHR), as well as the standards established in the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

This commitment is ingrained throughout our organization: From our people, to our communities, to our suppliers.

OUR PEOPLE.

We respect the fundamental rights of our employees.

M&T is dedicated to maintaining a workplace where all employees are treated with dignity and respect. At its most basic level, this commitment includes the right to not be subject to modern slavery, forced labor, prison labor, human trafficking, child labor, or other similar exploitative practices. Accordingly, M&T rejects such exploitative practices in its business operations and acts in accordance with laws designed to combat modern slavery and human trafficking. This commitment also includes the right to equal pay for equal work and a living wage that meets or exceeds all applicable laws, including those relating to minimum wages, overtime hours, and benefits. Further, we are committed to protecting our employees' right to time away from work by limiting working hours in compliance with all applicable local laws, including those pertaining to overtime. We also respect the right of our employees to freely associate and to bargain collectively without suffering any kind of discrimination, harassment, intimidation, or retaliation.

We provide opportunity for all.

M&T is unwavering in providing equal opportunities throughout the entire lifecycle of each person's employment, without regard to a person's race, ethnicity, color, national origin, sex, gender identity, sexual orientation, age, disability, citizenship, religion, veteran status, military status, marital status, pregnancy status, genetic information, or any other characteristic protected under applicable laws.

We prioritize ethical conduct and worker health, safety, and quality of life.

We are committed to fostering a safe, healthy, and respectful environment. Our Code of Business Conduct and Ethics plays a major role in ensuring that respect for human rights is woven into the fabric of our organization. Accordingly, M&T does not tolerate discrimination, harassment, violence, retaliation, or any other threatening behavior.

Our support framework is built on the foundation that all our people deserve a standard of living adequate for the health and well-being of themselves and their families. We are committed to offering a medical plan that enables our employees to receive and pay for treatment, manage their health with free preventive services, and, most importantly, stay healthy and take care of their families. We offer up to 12 weeks of parental leave that pays 100 percent of base salary (or average commissions for commissioned employees), with job reinstatement protection as employees return from leave. Upon return, break times and private nursing rooms are offered to nursing mothers. We offer other leave varieties, including personal, medical, and military service. Furthermore, we recognize the importance of mental and emotional health to how we think, feel, and function. Our annual allowance of paid time off is structured to enable our employees to maintain a healthy work-life balance. We also offer wellness programs that provide 24/7 confidential support to employees and their dependents on a range of issues, including counseling, financial resources, and legal support, and work-life solutions.[1]

[1] The benefits described apply to employees based in the United States. We provide comprehensive programs to our international workforce, which accounts for less than 1 percent of employees.

OUR COMMUNITIES.

We are committed to fair and responsible banking.

We foster an enterprise-wide culture of fair and responsible banking. This requires treating our customers consistently and equitably, in compliance with consumer protection laws and regulations, and without regard to any characteristics or bases prohibited by law. Our Fair and Responsible Banking Policy and Program reflect the core principle that fair and responsible banking applies throughout a product or service life cycle. All personnel are expected to deliver products and services in a fair and transparent manner, and to provide customers with the information necessary to make an informed choice regarding the product and service that meets the customer's financial needs. Fair and responsible banking compliance is an essential part of M&T's business strategy.

We support our communities through access to finance and housing.

We are committed to expanding access to financial products and services and supporting economic opportunity in the communities we serve. These products and services include safe and affordable bank accounts, mortgages to low- and moderate-income (LMI) homeowners and customers living in LMI areas, low-income housing tax credits, small business lending, and financial education and financial wellness tools.

We also recognize the importance of safe, high-quality, affordable housing to strong communities. M&T is committed to supporting the creation and preservation of affordable housing through lending and investment activities, including construction and bridge loans, mortgages, and low-income housing tax credits.

We help prevent illicit and corrupt behavior that can degrade human rights.

We understand the importance of implementing safeguards designed to prevent our products and services from being used for improper purposes, including purposes that could perpetuate conflict and deprive individuals of fundamental human rights. Accordingly, our Bank Secrecy Act/Anti-Money Laundering (BSA/AML) and Sanctions Compliance Program affirms our commitment to combating money laundering, terrorist financing, and other illegal activities. The Program includes detailed guidance for "Knowing Our Customer" and detecting and reporting suspicious customer activity. It also includes screening, transaction monitoring, and targeted analytics initiatives that help us identify human rights violations, as well as corporate fraud, corruption, domestic terrorism, and other illicit activities.

Further, we recognize that misappropriation of public assets, bribery, and other forms of corruption not only undermine the trustworthiness of M&T, but also degrade the rule of law and ultimately affect the rights of individuals and communities. Accordingly, we maintain a robust Anti-bribery and Anti-corruption (ABAC) Policy designed to help ensure compliance with federal and applicable state and international anti-bribery and anti-corruption laws.

We respect privacy and responsibly manage data.

We recognize that respecting the privacy rights of individuals is essential to building trust within our communities. Our Enterprise Privacy Policy and Program reflect our commitment to the fair and responsible handling of customer, employee, and other personal data. Specific information about the personal information we collect, what information is shared with affiliates and non-affiliates, and when and how customers may limit that sharing can be found in our Privacy Notice, which is provided to all customers when they establish a relationship with M&T.

We also take the protection of every individual's personal and financial information seriously. Our programs and policies related to information security, cybersecurity and business continuity assist us in our efforts to meet our commitment to the protection, confidentiality, integrity, and availability of information assets, including personal information.

OUR SUPPLIERS.

We expect our suppliers to respect human rights.

While M&T's commitment to respecting the inherent dignity and inalienable rights of every individual starts from within, we recognize that this commitment does not stop with us. Accordingly, we expect our suppliers and business partners to demonstrate at least the same level of commitment to operating an ethical and responsible business as M&T.

To reinforce this, we have set clear, minimum expectations regarding human rights, labor rights, and equal employment opportunities in our Supplier Code of Conduct (the "Supplier Code"). These base-level standards include compliance with all applicable laws and regulations relating to human rights, including those intended to eliminate modern slavery, forced labor, and human trafficking and those regarding child labor, wages, working hours, health and safety, and discrimination in hiring and employment practices. The Supplier Code also includes proscriptions against activities that violate applicable anti-bribery and anti-corruption laws and that involve other illicit activities, including money laundering, terrorism financing, human trafficking, and international narcotics trafficking.

To hold our suppliers accountable, we have incorporated the Supplier Code into our purchase order terms and conditions and our standard master supply agreement.

OVERSIGHT AND ACCOUNTABILITY.

We recognize that respecting and supporting the promotion of human rights across our business is an ongoing process requiring continuous learning and adaptation. Accordingly, this Statement on Human Rights is periodically reviewed and approved by senior management.

In addition, we educate personnel on several of the areas covered in this statement through trainings required at the time of hire and annually thereafter. These trainings include the following topics: the Code of Business Conduct and Ethics, workplace harassment, physical security, fair and responsible banking, the Community Reinvestment Act, BSA/AML and sanctions compliance, ABAC, privacy, and information security and cybersecurity.

Further details and updates on M&T's execution of activities related to its human rights efforts are made available annually in M&T's Sustainability Report.

The information included in this statement is current as of the date of publication and is subject to change without notice. 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.