

City Holding Company Vendor & Supplier Code of Conduct

City Holding Company and its affiliates (City) prides itself on maintaining the highest ethical standards and commitment to our core values which include integrity, teamwork and collaboration, respect and inclusion, and accountability.

We rely on vendors and suppliers for a variety of products and services to support our company and the successful delivery of products and services to our customers. Developing sound vendor and supplier relationships helps us to continue to improve our performance and market position, and to uphold our responsibilities to our customers, employees, and communities.

City's Vendor and Supplier Code of Conduct ("Code") sets forth City's expectations for ethical, human rights, labor, and environmental standards throughout our vendor and supplier network. It is expected that City's vendors and suppliers demonstrate the same level of commitment to ethical business practices. To avoid any ethical conflict, we ask for our vendors and suppliers full adherence to this code and assurance that it is communicated to the appropriate officers and employees within your organization.

Our vendors and suppliers are required to uphold these responsible business practices throughout the supply chain by encouraging the same of their next level suppliers. Vendors and suppliers are expected to comply with the content of this Code, along with all applicable laws, regulations, and standards of the States and Countries both in which they are headquartered, and in which business is conducted. Vendors and suppliers may be asked to provide a written attestation agreeing that they have read, understand, and will abide by the terms of this Code.

If this Code is incorporated by reference into any Vendor or Supplier agreement, then that agreement will be self-supporting as evidence of attestation. This Code covers the following areas: Being a City Partner, Business Ethics, Risk Management, Labor, Human Rights, and Social Responsibility and Environmental Management and Sustainability.

Being a City Partner

At City, we believe that strong vendor and supplier relationships are key to our ability to deliver value to our customers. Vendors and suppliers play a critical role in helping City achieve its business objectives by supplying the quality products and services that allow us to remain efficient and innovative.

We are interested in the value vendors and suppliers can bring to our company. We not only want to know what products and services they offer, but we also want to be sure our relationship will be a good fit for their business and ours.

Business Ethics

We expect our vendors and suppliers to aspire to the highest standards of integrity in their business dealings. A fundamental part of our commitment to integrity is adhering to the letter and the spirit of applicable laws, regulations, and policies. In no case, shall a vendor or supplier use illegal or unethical means or methods when acting on behalf of City. We expect our vendors and suppliers to adhere to the following expectations:

- **Fair and Honest Dealings:** Vendors and suppliers should disclose any potential conflicts of interest before initiating their relationship with City, or as soon as the vendor or supplier becomes aware of a conflict after initiating a relationship, and we expect fair competition among our potential vendors, suppliers, contractors, and subcontractors.
- **Gifts and Entertainment:** Vendors and suppliers may not offer or provide gifts or entertainment to City employees while an RFP is pending or in such an amount or frequency that could give the appearance of a conflict of interest.
- **Raising Concerns:** We expect our vendors and suppliers to provide a healthy working environment where their employees can report concerns or misconduct in good faith without fear of retaliation.
- **Reporting:** Vendors or suppliers must report, in writing, any information regarding conduct that is inconsistent with City's Vendor and Supplier Code of Conduct. All written reporting should be sent directly to: City Holding Company – General Counsel, 25 Gatewater Road, Cross Lanes, West Virginia 25313.
- **Complying with Laws, Regulations, and Policies:** City is committed to full adherence with all laws, regulations, and policies, as such we expect all vendors and suppliers to comply with all applicable laws, regulations, and policies.
- **Anti-Money Laundering:** Vendors and suppliers must not finance terrorists or those engaged in illicit activities, including: money launderers, international narcotics traffickers, and those engaged in activities related to the proliferation of weapons of mass destruction. Vendors and suppliers must comply with anti-money laundering and anti-terrorist financing laws, rules, and regulations.
- **Bribery, Fraud, Embezzlement:** Vendors and suppliers must refrain from bribery, fraud, embezzlement, extortion, or similar action as well as unfair or deceptive acts or practices.
- **Unfair, Deceptive, or Abusive Acts or Practices:** Vendors and suppliers must treat our customers fairly and lawfully and refrain from engaging in any unfair, deceptive, or abusive act or practice.

Risk Management

City is committed to remaining financially strong and resilient as well as protecting our clients and reputation. In the normal course of business, City may incorporate vendors and supplier solutions into our processes. Both customers and regulators expect us to manage these outsourcing arrangements so that services are delivered seamlessly. Ineffective or misaligned vendor or supplier practices can lead to negative consequences for our customers, our company, and our communities. Risk management is a core component of City's onboarding process and our ongoing relationships. As good stewards of City's assets, and responsible business people, we require potential vendors and suppliers to fulfill their obligations with the same level of care and diligence that we would. We seek to maintain appropriate controls related to outsourced arrangements through a pre-execution structured due diligence process, as well as, post-execution ongoing monitoring, including business continuity and financial health testing where appropriate.

- **Operational Risk:** Vendors and suppliers are expected to maintain an operational risk management framework corresponding with their risk profile, including the identification of processes and risk, design and execution of controls, and ongoing monitoring and reporting. As such, City may require its vendors or suppliers to provide information about operational risk management. In addition, vendors and suppliers are required to escalate timely material operational risks that may impact City or our customers.
- **Business Continuity:** Vendors and suppliers must maintain a comprehensive business continuity program that addresses the loss of the facilities, technology, or human capital necessary to support City.
- **Privacy and Data Protection:** City expects its vendors and suppliers to protect all of its data, including customer information, under applicable privacy, information security, and data protection laws, regulations, and industry standards.

Labor, Human Rights, & Social Responsibility

At City, we consider human rights paramount, and we work to preserve human rights throughout our company and our vendor and supplier population. We apply these principles to our employees, vendors, suppliers, clients, communities, and other stakeholders.

City does not tolerate corruption, discrimination, harassment, intimidation for any reason, or forced or child labor or slavery in any form. We expect our vendors and suppliers to take all necessary measures to address human rights issues within their operations. These measures may include:

- **Occupational Health and Safety:** Provision of a safe and hygienic working environment through proactive management and controls that minimize health and safety risks and support accident prevention for all personnel, bearing in mind the prevailing knowledge of the industry, the requirements of local health and safety laws, and any specific hazards, wherever personnel performs duties, such as, factories, warehouses, workshops, offices, vehicles, external facilities or other work, dining, and recreational spaces. Additionally, vendors and suppliers will provide and maintain for all personnel and stakeholders a work environment that meets or exceeds applicable federal, country, state, provincial and municipal laws regulating occupational safety and health.
- **Freely Chosen Employment:** Ensuring that all work is completed voluntarily and without slavery, servitude, forced or compulsory labor, and human trafficking.
- **Avoidance of Child Labor:** Child labor should not be employed. The term 'child' refers to any person less than 15 years of age unless the minimum age for work or mandatory schooling is stipulated as being higher by local law, in which case the stipulated higher age applies in that locality.
- **Working Hours:** Working hours must be limited according to national or local law, including breaks.
- **Wages and Benefits:** Being responsible for employee compensation and payment of fair wages. All employees should be paid a fair wage commensurate with prevailing industry conditions or the minimum wage, whichever is higher. Any overtime should be compensated appropriately.
- **Avoidance of Discrimination and Harassment:** Promoting a workplace free from discrimination, harassment (sexual, physical, mental), victimization, or any other form of inappropriate behavior or abuse on any grounds (including, but not limited to: age, disability, ethnic origin, gender, gender identity, nationality, marital status, parental status, physical appearance, political convictions, pregnancy, race, religious beliefs, sexual orientation, social origin or status, economic status, union affiliation or employment status—salaried or hourly, full-time, part-time, seasonal, intern).
- **Grievance:** Demonstration of formal mechanisms allowing employee grievances regarding human and labor rights violations to be properly filed addressed and resolved without fear of perceived or actual retaliation.
- **Whistle-blowing and Anti-Retaliation:** Demonstration of formal mechanisms allowing employees to raise concerns of operational or business practices that violate laws, regulations, or company values and for the concerns to be properly filed addressed and resolved without the fear of retaliation.
- **Diversity:** City views diversity and inclusion as a goal of our business.

Environmental Management & Sustainability

At City, our Core Value of Taking Accountability requires that we recognize and hold ourselves accountable for the potential impact that our operations, lending, and investment decisions have on communities and the environment.

Environmental sustainability is essential to the success of our business and to the health of the communities where we live and serve. We expect our vendors and suppliers to operate with this principle in mind, and to make every effort to measure, reduce and mitigate the environmental impacts of their operations, especially in the areas of: energy, water, paper usage, greenhouse gas emissions and waste generation. Vendors and suppliers should conduct their operations and business in a way that protects the environment. We expect vendors and suppliers to understand their environmental impact and pursue actions that will allow City and our communities to thrive in the future. Vendors and suppliers must also comply with all applicable environmental laws and regulations.

Vendor and Supplier Monitoring

City may conduct annual compliance surveys or ad hoc requests to confirm compliance with this Vendor and Supplier Code of Conduct. However, City

expects that vendors and suppliers will actively audit and monitor their own day-to-day management processes concerning the Code of Conduct and provide evidence upon request.