

Ally Financial Inc. Supplier Code of Conduct

Issued: October 7, 2025

Purpose

As a digital financial services company, Ally Financial Inc. (together with its subsidiaries, “Ally,” “we,” “us,” or “our”) is driven by a mission to “Do It Right” and be a relentless ally for our customers and communities. To help execute this mission, we strive to operate with integrity and honesty. Our **LEAD core values** drive our commitment to our stakeholders to **Look** externally, **Execute** with excellence, **Act** with professionalism, and **Deliver** results. This Supplier Code of Conduct (“Supplier Code”), based on Ally’s LEAD core values, sets our minimum expectations for Supplier conduct.

While not every potential situation can be covered in a code of conduct, we expect all Suppliers to take responsibility for maintaining high standards of honesty, trustworthiness, and integrity, and to operate in compliance with all applicable laws, rules and regulations. We recognize that maintaining high standards of ethical conduct requires ongoing leadership and effort, so we strive to partner with Suppliers to promote best practices within our supply chain.

Our Supplier Code applies to anyone who provides services or products to or represents Ally - including, but not limited to service providers, contractors, consultants and their employees, agents, subcontractors and sub-tier suppliers (collectively “Suppliers”). We expect our Suppliers to understand and adhere to all elements of this Supplier Code and to communicate and monitor compliance with the Supplier Code within their organization and throughout their own supply chains. The most recent version of the Supplier Code is available online and may be updated from time to time. In addition to complying with all applicable laws and regulations where they conduct business, Suppliers are expected to satisfy the expectations outlined in the Supplier Code.

The expectations provided in the Supplier Code are in addition to, and should not be construed as, amending, replacing, or superseding the provisions of any applicable written agreement between the Supplier and Ally.

This Supplier Code covers the following areas: Ethical Business Practices, Labor & Human Rights, and Environmental Sustainability.

Ethical Business Practices

At Ally, we strive to do what is right. We expect all employees to take personal responsibility for maintaining high standards of honesty, trustworthiness, and ethical conduct. All Ally employees should understand and adhere to the [Ally Financial Inc. Code of Conduct and Ethics](#) (“Code of Conduct”), and to apply such Code of Conduct in their individual areas of responsibility.

Ally Suppliers should maintain high standards of integrity in their business dealings while monitoring and quickly addressing any unethical business practices and illegal or improper activities.

Specifically, we expect Suppliers to adhere to the following:

- **Conflicts of Interest:** Suppliers should immediately report to Ally any apparent or actual conflicts of interest involving Ally. Additionally, Ally requires Suppliers to have a documented and communicated method for detecting and managing any situations in which an employee has competing interests or loyalties because of duties to one or more organizations.
- **Anti-Corruption:** Suppliers should demonstrate integrity at all times and comply with the requirements of the US Foreign Corrupt Practices Act and all other applicable anti-corruption and anti-money laundering laws.
- **Insider Trading:** Under Federal Securities laws, Suppliers are prohibited from buying or selling securities of Ally and any other public company when in possession of Ally or another company's information that is (1) not accessible to the investing public and (2) could affect an investor's decision to buy or sell the security.
- **Gifts and Entertainment:** Suppliers should not give gifts, meals, entertainment or hospitality benefiting Ally or Ally employees to influence business decisions. Ally employees may not accept a gift from anyone doing or seeking to do business with Ally if the gift is designed to influence or reward Ally's business decision or could reasonably be perceived as attempting to influence or reward such a decision. Suppliers should consult the [Ally Code of Conduct](#) for more for more details, guidance and examples of gifts and entertainment that generally may be acceptable, absent other circumstances giving rise to a concern. Suppliers are prohibited from paying expenses for travel, lodging, gifts, charitable contributions, or entertainment to government officials on Ally's behalf.
- **Political Activity:** Suppliers should never make payments or donations to political campaigns to gain favor or influence Ally business decisions, or benefit Ally, or to increase the likelihood of working with Ally.
- **Self-Dealing:** Suppliers should not seek to benefit themselves personally when acting on behalf of Ally in a transaction or other business dealing. Suppliers also may not take for themselves or direct someone else to any business opportunity that they discover through an engagement with Ally, unless Ally has already been offered the opportunity and rejected it.
- **Fair Competition/Antitrust:** Suppliers should be committed to competing within applicable law. Suppliers should not take unfair advantage of anyone through manipulation, concealment, misrepresentation, or any other unfair, deceptive or abusive acts or practices. Suppliers should never engage in collusive or anti-competitive behavior; instead, Suppliers should conduct business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which they conduct business.
- **Protection and Use of Ally Assets:** Suppliers should protect Ally's assets (including, but not limited to physical assets, financial assets, intellectual property and information technology, etc.) and use them properly and efficiently in the conduct of Ally's business. Ally assets must be used only for Ally's business, except to the extent permitted by the Supplier Code or a policy, and in accordance with applicable law and policies.
- **Reporting Mechanism & Protection:** Suppliers should provide Supplier employees and subcontractors with an anonymous method of reporting unethical behavior. Additionally, Ally requires Suppliers to document their whistleblower and/or anti-retaliation protections for individuals who, in good faith, report instances of unethical behavior

Labor & Human Rights

At Ally, our people-first approach enables a winning, customer-centric philosophy focused on resiliency, adaptability, and a growth-mindset-oriented drive to “Be (Even) Better”. Ally is committed to fostering a culture of belonging for all employees and we believe the best ideas come from a collective mixture of different voices and perspectives. We emphasize a **One Ally culture**, grounded in our LEAD core values, where employees are engaged and feel cared for as individuals. Ally is committed to offering equal employment opportunities, treating our employees fairly and creating an inclusive and nondiscriminatory workplace in which all employees are valued and empowered to succeed. Additionally, Ally respects the fundamental principles of human rights across all our business activities. Ally’s risk culture emphasizes the importance of prudent risk-taking behaviors.

Ally suppliers should maintain fair labor practices and respect the fundamental rights and freedoms that are inherent to all human beings.

Specifically, we expect Suppliers to adhere to the following:

- **Respect Human Rights:** Suppliers should respect individual human rights and conduct their business operations free from abuses such as human trafficking, child labor and all forms of slavery.
- **Non-discrimination:** Suppliers should provide a nondiscriminatory work environment for Supplier employees. This includes all Supplier locations where Ally business is conducted and other non-company locations if the conduct affects the work relationship.
- **Fair Wages, Benefits & Working Hours:** Suppliers should provide fair compensation and benefits commensurate with prevailing industry conditions. Working hours and any overtime should be voluntary and compensated appropriately.
- **Workplace Health & Safety:** Suppliers should commit to protecting the health and safety of each employee.

Environmental Sustainability

Ally’s commitment to “Do It Right” extends to the conservation of environmental resources to promote a sustainable future for our stakeholders. We are committed to operating our business responsibly, because we believe doing so will help us create long-term sustainable value for our customers, employees, stockholders, and the communities we serve.

Ally suppliers should maintain their business in an environmentally responsible way to create long-term sustainable value for their stakeholders.

Specifically, we expect suppliers to adhere to the following:

- **Environmentally Responsible Practices:** Suppliers should strive to operate their business in a way that is environmentally responsible and are encouraged to monitor and address their environmental impacts, as well as the impacts of their own supply chains

Compliance Concerns and Reporting

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Suppliers should actively self-monitor their compliance with the Supplier Code. Suppliers must report to Ally, within 24 hours of discovery, any illegal, unethical, or improper behavior or incidents they observe or which they become aware of that pertains to Ally that violates this Supplier Code. To raise a concern or report a violation, you can visit www.allyethics.com or call the Ally Ethics Hotline (U.S. and Canada) at 800-971-6037. Ally prohibits intimidation or retaliation against anyone who raises an honest concern.

Ally may request information from Suppliers to confirm compliance with the Supplier Code. In recognition of the unique circumstances of small businesses, we will work with these organizations to achieve reasonable compliance with the goal of continuous improvement.

Please contact your Ally Supplier Manager if you have any questions about the Supplier Code.