



Third Party Code of Conduct

Updated September 2022





OVERVIEW

U.S. Bancorp and its wholly-owned subsidiaries and affiliates (collectively, “us”, “our”, “we”, or the “Company”), are committed to serving our clients and customers with outstanding products and services. Our commitment to high ethical standards is the foundation for our core values and guides every decision we make. The success of our longstanding focus on transparency, simplicity, and uncompromising honesty and integrity depends not only on our employees, but also on our external business partners. As our third party service provider, supplier, or vendor (hereinafter, “you”, “your” or “Company Third Party”), we expect you to adhere to the same standards that guide our operations.

PURPOSE

This Third Party Code of Conduct (the “Code”) sets forth our minimum expectations for Company Third Parties when interacting with our customers or when otherwise acting on our behalf. These expectations

information or Company physical facility controls.

- Workplace and Vehicle Safety – do not tolerate threatening, intimidating, or physically harmful behavior by employees, customers, contractors, third parties, suppliers, partners, or anyone else. Do not permit any type of weapon on workplace property, at work-related functions or while performing business (excepting law enforcement officials and designated security personnel). Practice good safety habits, including ensuring that only authorized individuals are allowed in secured areas and checking the credentials of delivery agents or service providers. In accordance with applicable laws and regulations, ensure personnel with access to Company information, resources, assets, and customers are subjected to appropriate pre-employment screening. Follow company safety standards to prevent the transmission of illness, including staying hom

network access to Company systems, must timely and sufficiently complete any required Company training annually.

- Promptly report information security weaknesses, violations, or related concerns that impact the Company, our clients, customers, or business partners to the Company. Identified concerns or violations are subject to the requirements and other matters governed by your agreement with the Company.

The above requirements are in addition to any other confidentiality obligations that you have pursuant to a contract or other agreement with the Company. Comply with all applicable laws and regulations governing the protection, use, and disclosure of Company proprietary and confidential information,

available to the public. This information may be about the Company and all related entities, employees, customers, prospective customers, and other third parties. This type of information is known as intellectual property, and it is the Company

directly or indirectly offer, give or authorize anything of value to any domestic or foreign government official to facilitate or expedite government action or approvals. You must promptly notify the Company if you become aware of any violation by your personnel of this section of the Code or any anti-bribery and anti-corruption laws.

- Anti-Criminal Facilitation of Tax Evasion Law - The Company is committed to compliance with Part 3 of the UK Criminal Finances Act 2017 and expects you to comply with its requirements. The Company has zero tolerance towards the criminal facilitation of tax evasion and does not tolerate the facilitation of tax evasion.

Corruption laws, above.

- Insider Trading – insider trading laws and regulations prohibiting the trading in any securities of the Company or other companies or entities to which insider information pertains or otherwise passing along inside information to anyone regardless of whether they might use it to trade in securities. Do not use Company information for the benefit of your personal investments.
- Political Activities/Lobbying – comply with all laws that govern interactions with public officials, political contributions, and lobbying activities. Do not use Company resources for any political activities. Do not make any political contributions or present any gifts in the name of, or on behalf of, the Company to any candidate for public office or elected officials. Ensure that any recipient of your own political contributions (including any affiliated political action committees) does not represent or appear to represent an endorsement from the Company. Do not engage in lobbying activities on behalf of the Company without approval from relevant Company authorities. Do not seek or hold public office if it could be reasonably construed as primarily serving to benefit the Company. The term “lobbying activities” generally includes attempts to influence, including interactions aimed at obtaining business (procurement lobbying) or shaping legislation and executive rules and regulations.

Ensure appropriate and responsible development, design, implementation, and use of technologies, platforms, systems, and tools that support your relationship with us (including, but not limited to, new and emerging or emerged technologies, such as artificial intelligence, machine learning, and intelligent automation) so as to align with and conform to ethical standards (including, but not limited to, fairness, transparency, collaboration, trust, accountability, and morality) as well as all applicable legal, regulatory, and industry requirements and standards of good practice (including consumer protection laws and regulations).

MAINTAIN ACCURACY OF RECORDS AND FILINGS

As a publicly traded company and a national bank, the Company makes filings with the Securities and Exchange Commission, the Federal Reserve, and other primary regulators of the Company and its affiliates. This information may include accounting and audit records, loan documents, phone records, transaction records, ATM and teller balancing, expense reports, and other records that are part of our day-to-day business. These disclosures must be full, fair, accurate, timely, and understandable. The

opinions and activities are not viewed as those of the Company. Monitor the activities of your personnel to ensure they avoid conflicts of interest and do not use the Company's name, property, facilities, relationships, or other assets for personal benefit. Many conflicts of interest may be mitigated especially when disclosed to the Company early on. The Company also maintains policies relating to conflicts which can provide guidance on identifying and addressing conflicts of interest.

PROTECT THE ENVIRONMENT

Comply with all applicable environmental laws and implement sustainability policies and strategies. Commit to continuously monitoring and