



# Third Party Code of Conduct

Updated September 2022



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**Concerns regarding potential or actual violations of this Code, or other illegal, unethical, or dishonest acts, whether by personnel of the Company or Company Third Parties, should be reported [online](#).**  
Reporters in European Union member states can learn more about reporting under the EU Whistleblower Protection Directive [here](#).

## 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 also extend to your relationships with your employees, business partners, customers, and the general public. We recognize many Company Third Parties maintain their own codes of business conduct or business ethics requirements, which may be more stringent than the standards provided herein. Certain Company Third Parties are subject to additional or more restrictive rules regarding matters covered by this Code, as well as other applicable laws, regulations, policies, or procedures in relevant jurisdictions. Since no code of conduct can address every conceivable circumstance or situation, any omission from this Code (or your own code of conduct) does not relieve you of your obligations to maintain high ethical standards, as well as to comply with applicable laws, regulations, rules, and all provisions of your contract(s) with the Company. In the course of your activities as a Company Third Party, **promptly inform the Company if your personnel may be or are in violation of this Code or have committed illegal or dishonest acts or acts that cause, or are substantially likely to cause, harm to the Company, customers, or others.**

## GENERAL PRINCIPLES

### A. DO THE RIGHT THING

- Follow the letter and spirit of all laws, regulations, and applicable Company policies and procedures.
- Treat clients, customers, and business partners consistently, and with respect and dignity.
- Be clear, truthful, fair, transparent, responsible, and accurate with clients, customers, employees, regulators, suppliers, business partners, and others.
- Protect customers from harm (including protection of their information and privacy, as well their protection from unlawful discrimination and/or unfair, deceptive, or abusive acts or practices, or fraud).
- Protect the Company’s reputation as a safe and trusted financial institution.
- Report to the Company all complaints, disputes, concerns, fraud, or violations that impact our clients, customers, or business partners.
- Cooperate with investigations and notify the Company of requests for Company consumer financial information from local law enforcement or federal agencies.

## B. LEAD WITH INTEGRITY

- Model ethical behavior and adhere to human rights and labor standards in the workplace.
- Promote a culture of integrity.
- Foster open and honest communication.
- Recognize ethical behavior that exemplifies high ethical standards.
- Promptly and appropriately respond to misconduct and report violations.
- Do not tolerate retaliation against anyone in connection with a good faith report of an ethics violation, illegal conduct, sexual or other forms of harassment, discrimination, inappropriate workplace behavior, or other serious issues. Investigate all retaliation allegations and ensure appropriate disciplinary action for those who engage in retaliation.
- Promptly inform us if you believe your personnel or Company personnel appear to be, or are, engaging in illegal, dishonest, deceptive, unfair, abusive, or unethical acts, or acts that cause or are likely to cause harm to the Company or our customers.
- Ask for clarifications when necessary.

## GENERAL EXPECTATIONS

### A. MAINTAIN AN APPROPRIATE WORK ENVIRONMENT

- Diversity and Inclusion – intentionally engage and respect talent, perspective, and uniqueness by viewing everything through a diversity and inclusion lens. Celebrate individual diversity and diversity of thought, acknowledging diverse individual and business customer needs. Engage the talents and services of diverse suppliers and make a meaningful impact in our communities. Commit to, and embrace, Equal Employment Opportunity (EEO) and Affirmative Action (AA), and comply with all immigration laws, ensuring only those who are lawfully authorized to work are employed. Provide reasonable accommodations so that current and prospective employees with disabilities may fully participate in employment opportunities.
- Drug Free and Alcohol Free Workplace – do not permit the use, possession, distribution, manufacture, sale, attempted sale, or being under the influence of alcohol or illegal drugs and legal drugs that may cause impairment (including medical or recreational marijuana) while conducting business for or on behalf of the Company.
- Harassment and Discrimination – do not tolerate harassment or discrimination based on race, religion, color, creed, age, sex, national origin or ancestry, sexual orientation (including gender expression or identity), pregnancy, genetic information, disability, veteran status, citizenship status, marital status, or other factors that are protected by law. Comply with all applicable laws and regulations concerning discrimination in hiring and employment practices. Comply with employee rights as enumerated under Section 7 of the National Labor Relations Act or in other applicable laws or regulations in relevant jurisdictions.
- Unauthorized Photography and Recordings – in order to ensure the safety, security, and privacy of employees, customers, suppliers, and others with whom you interact on behalf of the Company, as well as to protect trade secrets, promote harassment-free and distraction-free workplaces, do not make unauthorized audio, video, or photographic recordings of confidential

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 home when you're sick, adhering to hygiene protocols, keeping the workspace and shared spaces clean, and following any additional requirements or safety standards issued during a health crisis or pandemic.
- Fair wages – comply with all applicable minimum wage and prevailing wage laws.

#### B. TREAT CLIENTS AND CUSTOMERS APPROPRIATELY AND WITH RESPECT

- Accommodations – remove architectural and communication barriers in accordance with applicable laws and regulations to ensure that all customers have access to Company products and services. Regardless of whether personnel work with customers in person or over the phone, pay attention to any physical or communication barriers and offer assistance when it is needed.
- Complaints – address complaints about you or your business promptly and professionally by: investigating surrounding circumstances, understanding and addressing customer issues and concerns as quickly as possible, taking appropriate action based on investigation results, and using said results to improve customer experience, modify procedures, and monitor service support. Complaints from Company customers should be promptly communicated to the Company according to Company requirements. Key complaint stakeholders who have a role in the Complaint Management process should work with their USB contact or take the USB [Third Party Complaint Training](#) at least annually
- Communications – all client and customer communications, including marketing materials and website content, must be accurate and clear, and must also comply with applicable laws, regulations, and Company requirements.
- Sales Practices – incentive gaming and aggressive, deceptive, unfair, or abusive sales practices are strictly prohibited. Do not manipulate records, open bogus accounts, sell products and/or open accounts without a customer's affirmative consent, falsify applications or skew results in any way for the benefit of yourself or others. Vendors and third parties are prohibited from doing this in support of the Company, Company customers, or potential Company customers.
- Responsible Marketing, Sales, and Servicing Activities – sales to potential or current Company customers must be based on client and customer needs or requests rather than efforts to promote products or services to meet sales goals, incentives, or recognition goals. Products and services must not be offered in a manner that is unfair, deceptive, or abusive—current and prospective customers must be informed about options appropriate for them, and must receive

an explanation of terms and features in a fair and balanced way so that they may make informed decisions. Be clear about products and services that are optional from core product offerings ensuring instructions for cancellation of optional products and services are communicated. Listen to customer feedback and monitor serving efforts (e.g., handling inquiries and complaints, ensuring timely and accurate transactions, processing fees or payments, and managing fee practices, collection activities, account resolution, and property disposition, as applicable).

### C. PROTECT COMPANY AND COMPANY CUSTOMER CONFIDENTIAL INFORMATION

Information that is gathered, processed, stored, or transmitted about the Company, Company customers, Company employees, the Company's business partners, etc., is considered to be confidential Company property. Handle Company information in compliance with applicable Company requirements:

- Understand and apply Company information classifications as necessary to ensure the protection of confidential information.
- Access only the information that is needed to do your job, as allowed per contract or other Company requirements, laws, or regulations.
- Protect user IDs and passwords, and take responsibility for personnel action taken under their user ID and for following Company and Company Third Party information security requirements to prevent user ID misuse. Change passwords frequently, and apply password requirements to sensitive or confidential information in accordance with Company requirements and best practices.
- Use all required security controls on systems or other applicable devices (including, among other things, internally or externally hosted cloud-based technology) containing Company data and when conducting Company business or related business communication. Do not alter or circumvent these controls.
- Comply with Payment Card Industry (PCI) standards, as applicable.
- Take extra care to protect laptops, smartphones, and other electronic devices from theft, regardless of whether they contain confidential information. Equipment should be owned by your company, or be subject to reasonable security precautions to protect Company information on personally-owned devices.
- Properly encrypt all sensitive data you send electronically.
- Do not forward confidential information to personal email accounts.
- Do not share customer information with anyone inside or outside the Company unless there is a business need for doing so or unless it is required by law.
- Securely transport (as authorized) physical documents or any media containing confidential information.
- Complete information security awareness training as provided or assigned, no less than once per calendar year.
- Third Party contractors, as part of Company review and approval processes for the grant of

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, including customer or consumer personal or confidential information.

#### D. PROTECT COMPANY ASSETS

Company Third Party personnel may, as authorized, have access to and use many types of Company resources, including a wide range of Company property, from equipment to intellectual property and the Company's brand identify. Company Third Parties may use these resources only as authorized and only for legitimate business purposes, and must protect them from theft, loss, damage, waste, or abuse.

- Company Resources – equipment, facilities, information technology, financial assets, intellectual property, and other resources belonging to the Company may only be used for Company business as authorized. Do not use Company resources to conduct outside business activities, engage in unethical or illegal activities such as gambling or stalking, or to access, transmit, or store material that is offensive or violates this Code (or other applicable requirements) for maintaining a respectful, harassment-free work environment. If you are authorized to use personal devices to conduct Company business, such business use must comply with this Code and other applicable Company requirements, including applicable Information Security policies.
- Business Communications and Records – your verbal and written communications must comply with applicable ethical standards and requirements. What you say, write, and do should be professional, reflect a clear understanding of ethical values and expectations, demonstrate sound judgment, and be clear, truthful, accurate, and respectful. This expectation extends to internal and external business communications, including, among other things, informal notes and memos, email, telephone conversations, and internal social networking and collaboration tools. Media inquiries regarding the Company must be forwarded to the Company's Public Affairs and Communications division; only authorized spokespersons may communicate on behalf of the Company (including, among other things, online forums, blogs, and other Internet channels). Do not use social media to post internal reports, policies, procedures or other internal business-related confidential communications, or confidential information about the Company, our clients or customers. Do not post any photographs, logos or images, including videos, of non-public Company premises, or of our processes, without our permission, or of employees, clients, or customers without their permission. Adhere to all contractual agreements with the Company, including non-disclosure, non-solicitation, or other legal obligations.
- Intellectual Property – while working on Company business, you may, as authorized, produce, develop, and have access to intellectual property and other information that generally is not

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's property. Protect it from unauthorized use and disclosure, and do not use it for personal gain. Respect others' intellectual property and information. Comply with any confidentiality obligations that you may have to others. It is illegal to share or modify third-party copyrighted materials without written permission from the copyright holder. Do not make use of Company trademarks or logos in a manner that, under applicable law, infringes upon the Company's trademark (including registering a domain name). Ensure use of the Company and other registered Company names, branding, and intellectual property aligns with Company requirements and is approved by the Company prior to use.

- Monitoring Use of Company Resources – the Company reserves the right to monitor the use of Company resources, including information resources such as email and the Internet, for any reason, at any time, subject to applicable law. The use of personal equipment for business purposes results in consent to search of the device for business-related purposes and agreement to disclose electronic communications stored at third party service providers.
- Solicitation – do not solicit customers, third parties or vendors, as part of charitable fundraising activities or other business-related events on behalf of the Company. Do not post, advertise, or otherwise solicit for business or other activities at any Company site, except as part of a Company- approved monitoring program. Any community involvement and fundraising activities performed on behalf of the Company must align with applicable policies and procedures, as well as any applicable laws and regulations.

## **COMPLY WITH ALL APPLICABLE LAWS, REGULATIONS, AND RULES**

Compliance with all applicable laws, regulations, and rules for all relevant jurisdictions, which govern our business and/or yours, is critical. Your personnel are expected to understand and adhere to all applicable laws, regulations, and rules including, but not limited to, the following (including as noted elsewhere in this Code):

- Anti-Bribery and Anti-Corruption Laws – The Company is committed to compliance with anti-bribery and anti-corruption laws and does not tolerate bribery, corruption, or improper payments of any kind in any business dealings anywhere in the world. The Company expects you to comply with the Foreign Corrupt Practices Act, the Irish Criminal Justice (Corruption Offences) Act, the U.K. Bribery Act, the Organization for Economic Cooperation and Development Anti-Bribery Convention, and all other applicable anti-bribery and anti-corruption laws. Your personnel, including any principals, owners, directors, officers, employees, consultants, suppliers, and subcontractors may not directly or indirectly offer, give, solicit or accept anything of value to/from any third party, customer, domestic or foreign government official or any other person to influence a decision, avoid a disadvantage or secure an improper commercial, contractual or regulatory benefit on behalf of the Company. Anything of value includes, but is not limited to, cash, cash equivalents, gifts, travel, meals, accommodations, entertainment, loans, vouchers, discounts, offers of a business advantage, contract or employment (including unpaid internships), and charitable and political contributions. Your personnel may not directly or indirectly offer, give or authorize any gift, gratuity, service, favor or anything of value to influence a Company employee or obtain or retain Company business. Your personnel may not also



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 in any business dealings anywhere in the world. Your personnel, including any principals, owners, directors, officers, employees, consultants, suppliers, and subcontractors may not directly or indirectly facilitate tax evasion. You must promptly notify the Company if you become aware of any violation by your personnel of this section of the Code.
- Anti-Money Laundering Laws – Bank Secrecy Act (BSA) and related anti-money laundering (AML) laws and regulations in relevant jurisdictions, including economic sanctions regulations that prohibit U.S. citizens and the Company from doing business with certain countries, businesses, and individuals.
- Anti-Trust Laws e.g., laws prohibiting working with competitors to set or control prices, rates, trade practices, or marketing policies to allocate markets or customers—including any actions that could give the appearance of the same, as well as laws prohibiting a requirement that customers engage in “tied” or reciprocal transactions.
- Consumer Financial Laws, Regulations, and Rules – Fair Lending (e.g., Fair Housing Act, Equal Credit Opportunity Act, Home Mortgage Disclosure Act), Servicemembers Civil Relief Act, Fair Debt Collection Practices Act (FDCPA), Unfair, Deceptive, or Abusive Acts or Practices (UDAAP), other privacy laws, etc.
- Fair and Responsible Banking Laws and Regulations e.g., laws prohibiting unlawful, discriminatory lending practices, as well as harm to customers, or unfair, deceptive, or abusive acts or practices.
- Gift and Entertainment Laws and Regulations – while gift giving and entertainment on a reasonable basis that can help strengthen relationships, the Company and Company Third Parties are both responsible for ensuring that such practices do not violate the law, appear improper, or create an actual or perceived conflict of interest. The Company does business based solely on customer need and the quality and price of our products and services. Before offering or providing anything of value to a Company employee, Company Third Parties should be certain that they are permitted to do so. Company Third Parties must not solicit or accept gifts or entertainment in exchange for favorable business treatment, or provide gifts or entertainment to secure business or influence a decision. Accepting or soliciting anything of value for the benefit of a third person or party is also prohibited. Gifts and entertainment should be related to a legitimate business purpose, reasonable and proportionate in value and frequency, appropriate in timing and customary for the circumstances, and transparent and compliant with local law. Company Third Parties must never give gifts of cash or cash equivalents such as Visa, Mastercard, or American Express gift cards). See the section on Anti-Bribery and Anti-

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 (legislative lobbying). The federal government and many states have extended this to cover efforts to influence rulemaking by executive branch agencies and other actions taken by government agencies. This includes an agency’s decision to enter into a contract or other financial arrangement. Even if you do not directly contact a government official, the assistance given to an individual who does lobby a government official, under certain circumstances, may be considered lobbying.
- Privacy/Data Protection Laws and Regulations – comply with all applicable privacy/data protection laws and regulations that govern the collection, use, disclosure, storage and destruction of personally identifiable information, including but not limited to the Gramm-Leach-Bliley Act (GLBA), the Health Insurance Portability and Accountability Act (HIPAA), the Children’s Online Privacy Protection Act (COPPA), the California Consumer Privacy Act (CCPA), the Personal Information Protection and Electronic Documents Act (PIPEDA), the General Data Protection Regulation (GDPR) and other privacy laws, etc.

Maintain an appropriately robust program designed to ensure compliance with regard to the product or service provided to or on behalf of the Company, regardless of whether some or all of the provision is performed by you or a sub-contractor (Company Fourth Party), such as processes for, among other things, identifying and communicating applicable legal and regulatory requirements, personnel training, ongoing monitoring for compliance, and promptly reporting and remediating any identified deficiencies.

## **COMPLY WITH CONTRACTUAL OBLIGATIONS AND AGREEMENTS**

Compliance with each of your contractual obligations and agreements with us is required, regardless of whether your product or service is performed by you or a sub-contractor (Company Fourth Party). Maintain an appropriately robust program designed to ensure compliance with your contractual obligations to us, including, among other things, compliance with any continuing obligations to us if our relationship ends.

## **USE TECHNOLOGY RESPONSIBLY**

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 Company has strict disclosure controls and procedures and stringent internal controls over financial reporting.

Company Third Parties preparing or contributing information to our public and other disclosures have a special responsibility to help us ensure that such information is, among other things, complete, accurate, and recorded in a timely manner, handled according to applicable accounting standards, legal requirements, and internal controls, and corrected immediately if errors occur. The falsification of any books, records, documents, or accounts relating to the business of the Company is prohibited. Follow any applicable affidavit, notary, certification, and attestation requirements.

## **AVOID CONFLICTS OF INTEREST**

Conflicts of interest can take many forms, and it is impractical to list every situation or circumstance that might lead to a conflict of interest. For this reason, there is no substitute for common sense and good judgment. Conflicts of interest may arise from personal circumstances when one's financial interests, outside activities, or close personal relationships could create or may appear to create a conflict with one's responsibilities at the Company or compromise the interests of the Company. In addition, conflicts may arise on an organizational level when a Company Third Party's interests could interfere with its ability to provide objective, unbiased and fair treatment to the Company, customers or other stakeholders.

The Company and Company Third Parties must avoid conflicts of interest, the appearance of conflicts, and other activities that could reflect negatively on the Company. Common situations that may present either the potential for conflicts of interest or the appearance of conflicts of interest include, among other things: outside employment, outside business activities—including partial ownership of properties or enterprises, personal relationships, self-dealing, political activity or appointment and other situations involving access to or disclosure of Company or customer confidential information. Financial relationships, such as consulting contracts with Company employees or employment of friends and relatives may also give rise to conflicts. If a potential conflict exists, you must disclose it to the Company. Not every situation may present a conflict or appearance of a conflict of interest that is counter to the spirit of this Code; Third Parties should exercise sound and reasonable judgment to identify conflicts that are or otherwise appear to be at odds with the best interests of the Company. Be sure that your personal political

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 improving business practices to reduce adverse environmental and climate impact and to create opportunities for employees, customers, providers, suppliers, and communities to do the same, by: developing less resource-intensive practices, investing in projects that help the environment, developing products and services that are good for the environment or otherwise benefit environmentally-friendly activities, seeking to partner, and partnering, with providers or suppliers that have appropriate and relevant environmental policies and processes, and educating employees and customers about the ways in which they can help the environment.

## **RESPECT GLOBAL HUMAN RIGHTS AND COMMUNITIES**

Do not in any way engage, nor support or work with organizations that engage, in human trafficking or child labor activities, organizations, or persons. Ensure compliance with all applicable human rights laws and adhere to international human rights standards, including, among others, the Universal Declaration of Human Rights, the United Nations Global Compact principles, and the Modern Slavery Act (2015), which include prohibitions against the employment of underage children, forced or compulsory labor, workplace exploitation, slavery and human trafficking, and any form of physical punishment or abuse.