

VENDOR CODE OF CONDUCT

The American Bankers Association (ABA) expects all its employees, consultants, agents, vendors, exhibitors, sponsors, members and other participants to conduct themselves with integrity and in full compliance with all federal, state, and local laws and regulations governing business activities in the United States and internationally. This document contains ABA's established business practice and regulatory compliance standards for all vendors and business associates.

ABA's policy is to conduct business, whether in advocacy, education, or business solutions, with vendors who share and embrace the letter and spirit of our commitment to integrity. ABA defines a vendor as any firm or individual providing products or services, directly or indirectly, to ABA or any of its subsidiaries or affiliates. We understand vendors are independent entities, but the vendor's business practices and actions may significantly impact and/or reflect upon ABA's reputation and brand, an asset ABA prides itself on and consistently works to improve. Because of this, ABA expects all vendors and their employees, agents and subcontractors (their "Representatives") to adhere to this Vendor Code of Conduct while conducting business with, or on behalf of, ABA. All vendors need to educate their Representatives to ensure they understand and comply with this Vendor Code of Conduct and compliance with all applicable laws and requirements in the delivery of products or services for or on behalf of ABA. These include, and are not limited to, antitrust and fair competition laws, anti-bribery, anti-corruption laws, intellectual property rights, anti-slavery, anti-harassment or discrimination policies. Further, all Vendors shall comply with all applicable tax laws and regulatory requirements and assist ABA with meeting all of its such requirements, without hesitation or delay.

This Code of Conduct is maintained on the ABA website and may be updated periodically to clarify the behavior expected from ABA vendors and their Representatives.

ABA's expectation is ABA vendors and their Representatives share ABA's commitment to human rights, diversity, and equal opportunity in the workplace. Vendors and their Representatives shall without limitation:

- Cooperate and support ABA's commitment to a workforce and workplace based on respect and free of harassment and unlawful discrimination.
- Recognize ABA embraces and encourages differences and other characteristics which make our employees, customers, members, participants, vendors and their Representatives unique. ABA will not tolerate discrimination or harassment based on sex, age, religion, national origin, race, color, ancestry, disability, sexual orientation, genetic information, personal appearance, gender identity or expression, marital status, veteran status, citizenship, family responsibilities, matriculation, political affiliation, service in the uniformed services or any other basis protected by federal, state or local law by ABA employees or Representatives.
- Not engage in verbal or physical abuse. ABA's Policy is to treat employees, customers, members, vendors, and the many participants in its conferences, schools, meetings, and other activities with respect and not subject anyone to abuse whether physical or verbal or other forms of harassment or intimidation.

It is the vendor's responsibility to ensure its Representatives understand, comply and continuously monitor its compliance with this Vendor Code of Conduct and to inform its ABA contact if there are any violations of this Code. Conduct in violation of the Code may subject the Representative to written reprimand, removal from an event immediately and without refund, disqualification for further business with ABA, and reporting to the employer, security and law enforcement.

This Code of Conduct does not confer, nor shall it be deemed to confer, any rights on the part of third parties, including any third-party beneficiary rights. For avoidance of doubt, no Representative of any vendor shall have any rights against ABA by virtue of this Code of Conduct, nor shall such Representative have any rights to cause ABA to enforce any provision of this Code. ABA reserves, and has the sole right, to enforce this Code in its discretion.

Any questions or concerns may be directed to the vendor's ABA contact or through ABA's Ethics and Compliance Hotline at 800-732-6190 or www.lighthouse-services.com/aba.

ABA vendors may also, on a confidential basis, report concerns to any member of the ABA executive staff. A record of such complaints and concerns, along with the results of the investigation, will be maintained on a confidential basis in the files of the Office of the General Counsel.

ABA will not tolerate, or engage in, retribution or retaliation against any vendor or Representative who in good faith sought advice, reported questionable behavior or a possible violation.

Thank you for your compliance with this Vendor Code of Conduct and ABA looks forward to a mutually beneficial relationship with all of our vendors and their Representatives based on the highest levels of ethical behavior.

American Bankers Association Vendor Code of Conduct. Effective, March 20, 2024