

VENDOR CODE OF CONDUCT

The American Bankers Association (ABA) expects each company and individual providing products or services, directly or indirectly, to ABA or any of its subsidiaries or affiliates (“Vendor”) to conduct themselves in compliance with this Vendor Code of Conduct (“Code”).

ABA conducts business, whether in advocacy, education, or business solutions, with vendors who share and embrace the letter and spirit of our commitment to integrity.

ABA expects each Vendor and its employees, agents, and subcontractors (“Representatives”) to

- adhere to this Code while conducting business with, or on behalf of, ABA.
- comply with laws, including, but not limited to, antitrust and fair competition laws, anti-bribery, anti-corruption laws, intellectual property rights, anti-slavery, anti-harassment or discrimination policies, applicable tax laws and regulatory requirements and assist ABA with meeting all its such requirements, without hesitation or delay.
- cooperate and support ABA’s commitment to a workforce and workplace based on respect and free of harassment and unlawful discrimination on the basis of sex, age, gender, 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
- treat employees, customers, members, vendors, and participants in all ABA sponsored and affiliated 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 educate its Representatives about this Code, understand and comply with the Code, continuously monitor compliance with this Code, and inform its ABA contact of any violation. Violations may subject the Vendor or Representative to written reprimand, immediate removal from an event and without refund, disqualification for further business with ABA, and reporting to security and law enforcement.

No Representative or Vendor shall have any rights against ABA by virtue of this Code. ABA reserves, and has the sole right, to enforce this Code in its discretion.

Vendors or Representatives may direct questions to the Vendor’s ABA contact, through ABA’s Ethics and Compliance Hotline at 800-732-6190 or www.lighthouse-services.com/aba.com or report concerns to any member of the ABA executive staff.

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.

The Office of the General Counsel will maintain a confidential record of such complaints and concerns made to ABA executive staff, along with the results of the investigation, if any.

Effective January 8, 2025

This Code is maintained on the ABA website and is subject to periodic updates.