

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 the laws and regulations that govern our business activities both in the United States and globally. To that end, ABA established standards for business practice and regulatory compliance in its Employee Code of Conduct for all ABA employees and associates and also established this policy for vendors.

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. By "vendor" we mean any firm or individual who provides a product or service, directly or indirectly, to ABA or any of its subsidiaries or affiliates. We understand that 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 that 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 they are 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 agree to comply 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, intellectual property rights, and compliance with anti-harassment or discrimination policies.

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 that 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 that ABA embraces and encourages differences and other characteristics that 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 that its Representatives understand and comply with this Vendor Code of Conduct and to inform its ABA contact if any situation develops that causes the vendor to operate in violation of this Code. ABA vendors are expected to monitor their compliance with 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 Representative's 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.

If you have questions about this Vendor Code of Conduct, including questions regarding a possible violation of the Code, ABA has a variety of resources available to assist including your primary ABA contact who will work with you to resolve a business practice or compliance concern. There may be times when working with your primary contact may not be feasible. In such instances, please contact our Chief Member Engagement Officer, Jim Edrington (jedringt@aba.com), Chief Human Resources Officer, Alethia Baggett (abaggett@aba.com) or our General Counsel, Dawn Causey (dcausey@aba.com). Alternatively, please report any violations to the ABA Ethics and Compliance Hotline at 800-732-6190.

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

Thank you for your compliance with this important 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.