

2024 Code of Conduct – For Contingent Workers

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“OUR CODE OF CONDUCT REINFORCES OUR COMMITMENT TO CONDUCT OURSELVES AND OUR BUSINESS WITH THE HIGHEST INTEGRITY.”

A MESSAGE FROM PRESIDENT & CEO FRANK LA SALLA

DTCC plays a unique and critical role in protecting the safety and stability of the global financial system. As we look to the future, our vision is to lead the advancement of the global financial markets as the most influential, strategic, and tech-focused partner, making our commitment to uphold the highest standards of ethical behavior of paramount importance.

Our five core values – Unwavering Integrity, a Passion for Excellence, Steadfast Partnership, Respect for Individuals and Responsible Citizenship – serve as our north star for how we operate, and they guide us in how we engage with stakeholders and each other.

To ensure we maintain the highest standards of ethical behavior, each year, we require all contingent workers to read and confirm their understanding of DTCC’s Code of Conduct which defines the behaviors we must demonstrate in our roles at the firm. This annual acknowledgment ensures that our company’s business principles, which are embedded within our culture and integral to preserving the longstanding trust and confidence with our stakeholders.

Due to the highly regulated nature of our businesses that are overseen by more than 20 different supervisory agencies around the world, and the critical work we perform for the industry each day, all contingent workers must follow strict ethical and business standards at all times.

Adhering to these standards is essential in safeguarding the global financial markets.

The Code of Conduct serves as the foundation of our business culture, reinforces our commitment to always “doing the right thing,” and helps all of us to maintain the firm’s reputation as the premier global financial market infrastructure.

Thank you for your compliance with to our Code of Conduct, and for your continued efforts to uphold our integrity, corporate values and standards of behavior.

Sincerely,

Frank La Salla

President and Chief Executive Officer

INTRODUCTION

As a global financial services leader, DTCC's Code of Conduct (the "Code") represents our commitment to integrity and high ethical standards. Adhering to the letter and the spirit of this Code and applying sound judgment is integral to the success of DTCC.

The Code should guide your actions and decisions at DTCC, providing an ethical standard for you to follow when dealing with DTCC's clients, regulators, employees, and the community.

As a contingent worker at DTCC, you are required to read and understand each section of the Code, as well as to participate in supplemental Code of Conduct training. You are expected to follow this Code, other policies referred to in the Code, additional policies that apply to your specific responsibilities and the spirit and letter of all applicable laws and regulations.

This Code is applicable to DTCC and all of its subsidiaries, including but not limited to the DTCC Clearing Agencies' businesses (National Securities Clearing Corporation (NSCC), Fixed Income Clearing Corporation (FICC), and The Depository Trust Company (DTC)), as well as their support areas.

All requirements and expectations set forth in the Code apply to contingent workers while working physically in one of DTCC's offices or in a remote capacity.

MANDATORY AND REQUIRED TRAINING

All contingent workers are required to complete mandatory and required training within the allotted timelines. This is a formal requirement under the *DTCC Mandatory and Required Training Policy*.

YOUR CODE OF CONDUCT OBLIGATIONS

All contingent workers must adhere to the Code. Failure to comply with any requirements of the Code will be escalated to DTCC Management, Compliance, Human Resources and to your hiring agency, and may result in disciplinary action up to and including termination of your engagement with DTCC.

If you do not understand your obligations, it is your responsibility to seek clarity

All contingent workers are also responsible for promptly reporting any knowledge or information about conduct by anyone in the company that you reasonably believe to be:

- A criminal or illegal act.
- A violation of regulatory or policy requirements, including this Code of Conduct and the policies referenced herein.
- Unethical conduct or a dishonest act, including inappropriate actions with financial implications, violation of the standards defined in this Code of Conduct, or other behavior that would reasonably be considered unethical.

If you witness the above behavior at DTCC, you must report it to your manager, Compliance, Legal, Human Resources, or the Global Ethics Hotline.

COMPLY WITH THE LAW



If you come across unusual or potential suspicious activity through your role at DTCC, you must immediately report it to DTCC management.

ETHICAL BUSINESS PRACTICES

FAIR COMPETITION

We compete fairly for business by providing excellent service at fair and reasonable prices.

DTCC is prohibited from participating in price fixing arrangements with competitors or potential competitors and may not collude with anyone in dividing up markets or denying a party access to services. Furthermore, laws and regulations may prohibit conditioning the availability or price of one product on the purchase of another.

In addition, offering special pricing or discounts may also be prohibited and must be reviewed by Finance.

Please refer to the *Clearing Agency and DTCC Non-Clearing Agency Pricing Policies* for more information.

FRAUD

DTCC does not tolerate fraud, which is a false representation, including concealment of fact by words or conduct, or in business records. DTCC contingent workers are expected to behave ethically and honestly including but not limited to when conducting business, submitting time sheets or billing, identifying and disclosing conflicts of interest, disclosing background information, and during contract negotiations. Failure to do so may result in disciplinary action, up to and including ending your engagement with DTCC.

If you witness or suspect fraudulent behavior at DTCC, you must report it to DTCC Management, DTCC Compliance, DTCC Legal, DTCC Human Resources, or via the DTCC Global Ethics Hotline.

BRIBERY AND FACILITATION PAYMENTS

Contingent workers must not directly or indirectly bribe others or accept bribes in connection with any dealings in any country. This includes persons in the private sector and government or foreign or domestic public officials.

BRIBERY

Provisioning anything of value with the intent to improperly persuade someone to give a business advantage is considered bribery.

THIS CAN INCLUDE THE FOLLOWING:

- Merchandise, gifts, cash and cash equivalents, favors, loans, entertainment, or charitable donations
- Political contributions
- Hiring in exchange for business or a favor

FACILITATION PAYMENTS

Payments to speed up or expedite routine governmental action are illegal under the law of some jurisdictions.

THIS CAN INCLUDE THE FOLLOWING:

Payments to further routine government action, for example to expedite passports, visas, supplying utilities, registrations, or building permits.

All employees must obtain pre-approval from Compliance or Legal prior to making any facilitation payments, except in the event of risk to life or limb.

If you are unsure whether something rises to the level of being a bribe or if it could be considered a facilitation payment, please contact the Compliance or Legal departments for guidance.

GIFTS AND ENTERTAINMENT

DTCC permits the giving or receiving of business-related gifts and entertainment that are reasonable and customary in the course of maintaining business relationships and that conform to this Code of Conduct and the *DTCC Gifts, Entertainment, and Conflicts of Interest Policy*.

Contingent workers are prohibited from giving or receiving gifts and entertainment that are contrary to DTCC's policies, are in violation of applicable laws or regulations, intended to obtain special favors or impair the impartiality or professionalism of the recipient, may be construed as bribery, would be considered lavish, or inappropriate under the circumstances, or may create the appearance of impropriety or a conflict of interest.

Please refer to the *DTCC Gifts, Entertainment, and Conflicts of Interest Policy* for more information. Failure to adhere to the *DTCC Gifts, Entertainment, and Conflicts of Interest Policy* may result in disciplinary action, up to and including ending your engagement with DTCC.

REIMBURSABLE TRAVEL EXPENSES

DTCC may reimburse contingent workers for reasonable travel expenses. You are responsible for seeking the most cost-effective rates and complying with DTCC's Travel and Expense Reimbursement Policy.

All anticipated travel for each contingent worker must be agreed upon and included in the Statement of Work (SOW). For Contingent Workers, the Supplier must timely submit all compensable time, events, and expenses through Fieldglass and/or Project Portfolio Management (PPM) system.

From either tool, the SOW Owner can approve or reject the hours. Upon approval of the hours, the Fieldglass SOW Module generates an approved invoice and routes it to DTCC's Accounts Payable Department for payment pursuant to the net payment terms in the Agreement. You should not submit your expenses through Concur.

You should substantively review the supporting documentation and verify the expenses conform to the negotiated terms in the SOW.

Certain expenses, such as personal items, lost property, travel



products, personal insurance, childcare, corporate card fees, airline upgrades, hotel upgrades, and spousal entertainment, are not reimbursable. Please refer to the DTCC Travel and Expense Reimbursement Policy for a full list of items that are non-reimbursable.

CONFLICTS OF INTEREST

Contingent workers may support multiple entities and business areas. As a result, contingent workers may experience potential or actual internal conflicts due to competing demands. If this occurs, and you are in doubt as to whether a potential or actual conflict exists on your competing deliverables, raise the question with DTCC Management.

During your engagement with DTCC, conflicts of interest may also arise from outside business activities (e.g., obtaining outside employment with a DTCC client or vendor, or by providing services, such as consulting services, to DTCC clients and vendors).

Contingent workers are prohibited from entering into such relationships without prior notification to DTCC Management and must promptly report potential or actual conflicts of interest to DTCC Management.

Please refer to the *DTCC Gifts, Entertainment, and Conflicts of Interest Policy* and the *Conflict of Interest Policy*.

ANTI-MONEY LAUNDERING

We are committed to protecting DTCC from being used to facilitate money laundering, terrorist financing, financial crimes, and any other illegal operations. Compliance with DTCC's Anti-Money Laundering (AML) and Global Sanctions programs are essential to promoting the safety and soundness of DTCC's operations.

Each year, Compliance trains contingent workers to identify unusual and suspicious activity. DTCC has defined AML Red Flags that identify activities that may indicate attempts by individuals or entities to launder money through DTCC's products or services. All contingent workers are trained on general corporate red flags and some departments are provided additional training on specialized red flags, specific to their roles.

Please refer to the *DTCC AML Policy and DTC AML Program* for additional details.

SANCTIONS

DTCC has a comprehensive Global Sanctions program to ensure ongoing compliance with all applicable global

sanctions regulations (e.g., those regulations enforced by the U.S. Treasury Department's Office of Foreign Assets Control ("OFAC"), HM Treasury, European Union, etc.). The various global sanctions regulations prohibit persons from directly or indirectly engaging in activities or transactions with targeted foreign countries and with persons and entities named on the global sanctions lists.

You must follow the *DTCC OFAC/Global Sanctions Policy* to comply with all applicable OFAC and Global Sanctions obligations. Failure to comply with sanctions laws and regulations can result in significant penalties against both yourself and DTCC.

ANTI-BOYCOTT LAW

The United States enacted anti-boycott laws in the 1970s to ensure that U.S. firms do not participate in, comply with, or support foreign boycotts that the United States does not sanction. These laws are intended to prevent U.S. firms from being used to implement foreign policies of other nations that run counter to U.S. policy.

Violations of U.S. anti-boycott laws can have severe consequences, including civil fines, loss of U.S. foreign tax credits, and reputational harm

The anti-boycott laws apply to DTCC and its U.S. subsidiaries/affiliates.

If you believe that DTCC has been requested to participate in, comply with, or support a boycott, you are to contact the Regulatory Change Management (RCM) group at RegChangeMgmt@dtcc.com immediately. RCM will then work with you, GCO, and any other relevant stakeholders, to determine appropriate actions, if any.

PROTECT CONFIDENTIAL INFORMATION



CLIENT CONFIDENTIAL INFORMATION

DTCC is entrusted with non-public information from and about its clients that is confidential and that must be protected from public disclosure (Client Confidential Information). Access to such information must be limited based on a need-to-know basis and appropriate measures must be taken to safeguard such information.

Certain confidential information may be considered “material non-public information” (MNPI). Information is deemed “material” if there is substantial likelihood that a reasonable investor would consider the information important in making an investment decision or is reasonably certain to have an effect on the price of a security. Information is deemed “non-public” if it has not been made available to the public, has not been disseminated broadly to the marketplace, or has not had sufficient time post-dissemination for the marketplace to react to the information. For example, non-public information about the announcement of a tender offer, a pending merger, or a positive earnings report are among things considered to be MNPI.

PROHIBITION ON INSIDER TRADING

Your role at DTCC may allow you to have access to MNPI. You may not trade, share, nor allow others to trade on the basis of this MNPI, or any other MNPI you may acquire in your role.. All trading activity must be conducted in accordance with the *DTCC Personal Securities Investment Policy*. You may be required to disclose personal investment accounts held solely or with another individual, as well as those that are held by members of your household. DTCC may place certain trading restrictions and monitor your trading activity in these accounts. Failure to adhere to the *DTCC Personal Securities Investment Policy* may result in disciplinary action, up to and including ending your engagement with DTCC.

DTCC CONFIDENTIAL INFORMATION

Contingent workers may have access to information about DTCC that must not be shared without proper authorization and/or without going through an authorized contingent worker gatekeeper. Such information includes, but is not limited to, pre-announced Material Non-Public Information ‘MNPI’ (e.g., pre-announced corporate actions, Member Financial Health, Closeout Related Information, and AML Investigations); documents detailing DTCC's network (e.g., Visio diagrams with server names, IP addresses and network locations detailed; username and passwords to DTCC systems; detailed job aids and runbooks on DTCC

business processes and technology; and legal agreements/Statements of work (‘SOW’) between DTCC and participants, Vendors and other third parties (“Confidential and Restricted Information”). Access to such information must be limited on a need-to-know basis and appropriate measures must be taken to safeguard it in accordance with DTCC’s policies and control standards.

The obligation to safeguard and maintain Confidential and Restricted information in confidence is continuous, while assigned to DTCC, and after the assignment ends. The unauthorized use or disclosure of Confidential and Restricted Information may cause irreparable harm, both financially and reputationally to DTCC and its business.

PERSONALLY IDENTIFIABLE INFORMATION

In the course of providing services to clients and managing our employment relationships, DTCC may collect, store and process Personally Identifiable Information (PII). PII, as used within DTCC, refers to information that can be used on its own or be combined with other information to identify an individual.

You must take appropriate measures to use and safeguard PII in accordance with applicable laws, rules, and regulations. In addition, you must comply with *DTCC’s Global Privacy Policy*, which is designed to address the appropriate collection, use, distribution, and storage of PII.

You may only use or share PII for a legitimate business purpose and may not access, use, or otherwise misappropriate PII for personal benefit, or for the benefit of anyone else other than as part of DTCC business operations. This includes the use of PII to solicit any of DTCC’s former, current, or prospective clients or employees, or in any other manner adverse to the interests of DTCC or its clients.

COMMUNICATION WITH OUR REGULATORS AND GOVERNMENT OFFICIALS

DTCC has regulated subsidiaries globally, including three that are designated as Systemically Important Financial Market Utilities in the United States (i.e., DTC, FICC and NSCC). DTCC has established centralized points of contact to facilitate responses to requests, communications, and contacts from regulators.

As a DTCC contingent worker, you may be contacted by a regulator or other government official that requests information or documents regarding DTCC or its subsidiaries. If you are contacted directly by a regulator or government official, promptly advise Regulatory Relations so that they can coordinate a response. In non-U.S. jurisdictions, advise your local Compliance Officer as well as Regulatory Relations.

Please keep in mind that when interacting with regulators, you should demonstrate respect for their mission and role. When responding to regulatory requests, you are expected to provide timely, accurate, and complete responses.

You are expected to treat regulatory requests and DTCC's responses as strictly confidential.

DTCC contingent workers are subject to strict disclosure rules with respect to Federal Reserve (Fed) and New York State Department of Financial Services (NYDFS) supervisory activities, which includes information about their examinations, continuous monitoring and ad hoc requests for information.

DTCC contingent workers may not have access to information relating to Fed or NYDFS supervisory activities (known as "Confidential Supervisory Information" or "CSI") unless a written agreement is in place with the employer to protect the CSI and there is prior written authorization from the relevant supervisory agency, as applicable.

Authorized DTCC contingent workers may only share CSI with DTCC employees, officers, directors, affiliates, and other other authorized DTCC contingent workers when necessary for business purposes.

CSI may not be shared with service providers unless a written agreement is in place to protect the CSI and there is prior written authorization from the relevant supervisory agency, as applicable. "Service providers" include consultants, contractors, contingent workers, and technology providers. If you are authorized to access CSI, you are responsible for treating the CSI as strictly confidential. If you access CSI and are not authorized to do so, contact Regulatory Relations immediately.

Please refer to the *DTCC Global Confidential Supervisory Information Policy* for additional information.

CONFIDENTIAL SUPERVISORY INFORMATION (CSI)

CSI includes reports of examination and other non-public supervisory communications prepared by the Federal Reserve or New York State Department of Financial Services, and any information derived from, related to, or contained in such communications.

Any portion of a document that contains or would reveal supervisory communications is also CSI.

PROTECTION & APPROPRIATE USE OF DTCC'S ASSETS



TECHNOLOGY USAGE

In accordance with information security policies and procedures, contingent workers must diligently protect DTCC's information systems and communications facilities that they have access to, to prevent data leakage, unauthorized access, tampering, or systems infiltration. This includes prohibiting staff from using third party applications, websites, tools, and email or other electronic communications through DTCC's systems and facilities. Clients' privacy must also be secured by complying with all information security policies and procedures, including the *DTCC Technology Usage Policy*.

In addition, all technology (e.g., Artificial Intelligence applications) at DTCC should be designed, developed, deployed, and used in accordance with DTCC's corporate policies including consideration of safety, security and resiliency, transparency, privacy, fairness and accountability.

To protect DTCC's assets, contingent workers are responsible for performing various obligations, such as:

- Installing periodic updates to operating systems and software to maintain security and reduce any potential vulnerabilities from being exploited;
- Periodically recertifying that their system access is limited to systems needed to perform their respective functions;
- Reporting missing/stolen devices with DTCC data;
- Returning all DTCC technology and computer equipment when they leave the company;
- Locking all computers, laptops and other devices (e.g., mobile phones and tablets) that contain DTCC data with a password when they are not in use (e.g., an employee leaves their desk);
- Refraining from sharing devices with others or using them for personal matters;
- Maintaining all passwords to DTCC systems in accordance with DTCC's password management policies with regards to length and composition, and not disclosing them to anyone, unless authorized for regulatory submissions;
- Only using approved third-party applications, websites, tools, and credentials for conducting DTCC business (i.e., credentials issued by DTCC, as opposed to prior employment or educational institutions); and

- Avoiding uploading, downloading, saving and/or installing unauthorized materials (e.g., software and/or third-party applications), from the Internet that have not been approved or authorized by Technology Risk Management, and from copying, using and/or distributing the intellectual property of DTCC and others in violation of intellectual property laws or contractual terms.

DTCC monitors its systems and facilities to protect its legitimate business purposes, including (without limitation) to detect violations of company policy, and where required for legal and regulatory obligations. DTCC's systems and facilities and all information captured by DTCC in the course of monitoring its systems and facilities, including (without limitation) videos, photographic images, audio recorded by DTCC, internal and external messages, and information and content accessed, viewed, created, sent, downloaded, uploaded, stored, forwarded, transmitted or received on or through them, are considered the property of DTCC.

DTCC reserves the right to access, inspect, monitor, delete, disclose and record, and use such information and materials in any way it deems appropriate at its discretion. This includes, but is not limited to, your personal use of third party websites and use of your personal password-protected email account and other online accounts accessed using DTCC systems and facilities.

For additional information, please refer to the *DTCC Technology Usage Policy*, the *DTCC Bring Your Own Device Policy* and the *DTCC Corporate Liable Device Policy*.

PROTECT AGAINST CYBER ATTACKS

You can protect DTCC against cyber-attacks by being alert for suspicious messages - including email, instant message, text or voice - as well as suspicious attachments, links and web pages that may contain malware or viruses. Contingent workers have a responsibility to identify and report any suspicious emails to Technology Risk.

You should use the **“Report Phishing Cofense”** Outlook taskbar icon or email the Threat & Vulnerability Assessment mailbox at TVA@dtcc.com upon receipt of any such message.

ELECTRONIC COMMUNICATIONS

All DTCC business communications (e.g., emails, text messages, instant messages and other collaboration data) must be conducted using applications that are approved and managed by DTCC to ensure that communications are properly protected, retained and monitored in compliance with applicable corporate policies (“approved DTCC-managed applications”). This applies to both personal and DTCC corporate-issued devices (mobile phones, iPads, tablets, computers, etc.) that may be used to conduct DTCC business.

Contingent workers should avoid contributing to any business communications (e.g., chats or whiteboards) using an approved application that is managed by a non-DTCC account (e.g., joining a meeting hosted by a third party) since DTCC does not have the same controls in place.

Any business communications exchanged between a contingent worker and a colleague, client or other third party on a prohibited application must be forwarded to their DTCC email promptly.

Instances of non-compliance must be promptly reported to the DTCC Compliance Hotline or the Global Ethics Hotline, if identified.

For additional information, please refer to the *DTCC Global Records Management Policy*, and the *DTCC Standards on Collaboration Tool Usage During Internal & External Meetings*.

INFORMATION CLASSIFICATION

Contingent workers are also required to familiarize themselves with, and adhere to, DTCC’s information classification system in accordance with the confidentiality of the material, as per the *DTCC Information Security – Asset Security Policy and Control Standards*.

Contingent workers may not send confidential information from any DTCC email to any personal email, messaging application, unauthorized third party, or other Internet account that is not provided by DTCC. Information exchanged (or transferred) between DTCC contingent workers, between contingent workers and DTCC employees, and between DTCC contingent workers and external parties must be conducted in line with its data classification

Further, contingent workers may not transmit any non-DTCC confidential information, for example, from a previous employer, into DTCC from personal email or other messaging applications



SOCIAL MEDIA POLICY

Our public image is very important in maintaining industry confidence and protecting the health of our company, including when representing or referring to DTCC on social media.

As we continuously enhance DTCC's profile on X (formerly Twitter), LinkedIn, YouTube, Instagram and Facebook, contingent workers are welcome to play role in helping us promote DTCC within their own networks, as well as with DTCC's network of followers, within the boundaries of DTCC's policies.

The *DTCC Social Media Policy* allows contingent workers to create and post certain content without Marketing & Communications' approval.

However, it is important to note that, as per the *DTCC Social Media Policy*, when using DTCC Systems and Facilities, engaging in social media as an official representative of DTCC, identifying yourself as being engaged by DTCC, or using social media activities that may reference DTCC, you must be mindful not to:

- Disseminate DTCC Restricted (Red) or DTCC Confidential (Yellow) information outside of DTCC
- Violate any privacy, copyright, trademark, or confidentiality laws
- Provide any references or recommendations concerning current and former employees
- Be disrespectful towards co-workers, clients, vendors, members of the public, and other DTCC associates
- Post sexually explicit, abusive, racist, defamatory, or threatening messages or materials

Please refer to the *DTCC Social Media Policy* to learn more.

MEDIA REQUEST & PRESENTATIONS

To protect the DTCC brand:

- **Only authorized spokespeople are approved to speak with the media on DTCC's behalf.**
- **Speaking engagements:** You may not accept speaking engagements on behalf of DTCC without approval from DTCC Management.
- **Media inquiries:** All requests and inquiries from journalists and reporters must be directed to Marketing & Communications at

MarketingCommunications@dtcc.com.

INTELLECTUAL PROPERTY

Intellectual property rights are crucial to protecting the investments that DTCC makes in its businesses. You may only use intellectual property made available by DTCC for approved purposes and in accordance with DTCC guidelines, applicable licenses, terms and conditions, and laws.

Except as otherwise agreed in writing with DTCC, discoveries, developments, improvements, works of authorship, designs, know-how, concepts, ideas, processes, and data and information (collectively “Inventions”), regardless of form, that you develop alone or with others during the course of and in connection with your engagement with DTCC must be promptly disclosed and will be owned exclusively by DTCC. In addition, any intellectual property created prior to or outside of your engagement with DTCC must be disclosed if such intellectual property is incorporated into any Invention.

As a condition of your engagement with DTCC, you may be required to assign all rights, title, and interest in the Inventions exclusively to DTCC, and will provide all assistance necessary to secure intellectual property rights for DTCC for any and all Inventions.

Inventions may not be used externally or be described in any publication without express written permission from the Legal Department. Should your engagement with DTCC terminate for any reason, all rights in the Inventions remain the exclusive property of DTCC.

To report any suspected unauthorized use of DTCC’s trademarks, copyrights or other intellectual property, use the “See Something, Say Something” link on the DTCC intranet or email:

IntellectualPropertyIncidents@dtcc.com.

COMPLETE AND ACCURATE RECORDS

RECORDS MANAGEMENT

DTCC must maintain complete and accurate electronic and hard copy records (including data, information and files) in compliance with applicable legal, regulatory and business requirements outlined in the *DTCC Global Records Management Policy*.

All contingent workers are responsible for understanding and adhering to the *DTCC Global Records Management Policy*, which requires them to retain, store, retrieve and dispose of DTCC’s records in compliance with the minimum requirements outlined in the DTCC Global Records Retention Schedule, unless subject to a legal hold or needed for a legitimate business purpose. This

includes using approved designated centralized repositories and applications that support compliance with the policy, as required. Material changes to the technology used to store records (including changes to the underlying infrastructure or location stored) as well as related incidents and instances of non-compliance must be promptly escalated to Compliance.

For additional information, please refer to the *DTCC Global Records Management Policy*

DTCC POLICIES AND PROCEDURES

DTCC policies and procedures are key documents utilized by our employees and contingent workers, and assessed by regulatory examiners and auditors. All policies and procedures must be complete, accurate, and created in accordance with the *DTCC Corporate Document Management Policy*.



PROTECTION AND FAIR TREATMENT OF CONTINGENT WORKERS AND OUR COMMUNITIES



WE HARNESS THE FULL ARRAY OF TALENT, IDEAS AND ATTRIBUTES OFFERED BY OUR GLOBAL WORKFORCE TO DISCOVER INCREASINGLY BETTER WAYS TO DELIVER FOR OUR CLIENTS

PERSONAL INTEGRITY AND PROFESSIONAL CONDUCT

You are responsible for the accuracy of any personal information you provide DTCC, both during the onboarding process and throughout the course of your engagement with DTCC. This includes:

- Representations about education history
- Work experience history
- Criminal history
- Outside business activities
- Personal and household investment accounts

If you are either arrested or charged with a crime, the subject of any regulatory investigation or proceeding, receive a subpoena or other governmental inquiry, or become involved in civil litigation relating to your engagement with DTCC, you must give prompt written notice to either your DTCC Human Resources contact or DTCC Legal.

Finally, DTCC believes you have the right to expect a workplace that is free from illegal drugs and substance abuse. In this regard, the company has instituted a strict policy to eliminate the risks posed by them. DTCC's no-tolerance policy covers:

- The possession or use of alcohol, illegal drugs or controlled substances, other than in accordance with medical prescriptions, on DTCC premises.
- The sale or distribution of alcohol, illegal drugs, or controlled substances by contingent workers, on or off DTCC premises.
- The impairment of on-the-job performance or behavior as the result of the use of alcohol, illegal drugs, or controlled substances, whether the substance is used on or off DTCC premises.

Contingent workers found falsifying information, being untruthful during an investigation or violating DTCC's above-referenced alcohol and drug free workplace policy may be referred to the hiring vendor for appropriate action.

DISCRIMINATION AND ANTI-HARASSMENT

At DTCC, you have the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices.

We treat individuals fairly with respect to onboarding, terms and conditions of engagement, training, and termination of engagement, without regard to any characteristics protected by applicable law.

We require all relationships among persons in the workplace to be business-like, respectful, and free of bias, prejudice, and harassment. Reference the *DTCC Equal Employment Non-Discrimination and Anti-Harassment Policy* for more information.

DIVERSITY AND INCLUSION

DTCC is committed to employing a workforce that reflects the diversity in our markets, and one that understands and appreciates the global client base with which we do business.

At DTCC we harness the full array of talent, ideas and attributes offered by our global workforce to discover increasingly better ways to deliver for our clients. Our approach is to fully integrate diversity and inclusion into all aspects of the DTCC community by fostering an environment where everyone is valued, respected, and feels that they can play an active part in the company's success.

We recognize that diversity and inclusion is core to who we are and key to our business success. We channel the power of inclusion and embrace the similarities and differences in our global workforce to shape our ability to innovate, create and continuously evolve – all of which enable us to secure the financial services industry.

HUMAN RIGHTS

DTCC is committed to respecting human rights and demonstrating responsible employment practices in all regions where we conduct business. We are guided by standards including the Modern Slavery Act 2015, enacted by the UK Parliament to expose and combat forced labor. Millions of people around the world are trapped in some form of forced labor, the term used to describe all forms of modern slavery, including trafficking, debt bondage, and child labor.

The Modern Slavery Act includes a provision on transparency in supply chains that requires certain businesses operating in the United Kingdom (and, based on certain criteria, their UK and US affiliates or parent) to disclose the steps taken to ensure there is no modern slavery in their own business and their supply chains (e.g., companies and vendors that provide it with goods or services).

DTCC requires adherence to business standards that are pertinent to mitigating the risk of slavery and human trafficking that could occur within the company's business or in any part of its supply chains. While DTCC does not consider that it currently operates in high-risk sectors for modern slavery, we must be aware of the dangers of modern slavery, in particular with regard to our vendor engagements and report any suspected non-compliance to the DTCC Compliance Hotline. DTCC has made a global commitment that we will not offer any employment (such as internships) without compensation.

WHISTLEBLOWER PROTECTION

DTCC abides by all federal, state, and local laws, rules, and regulations applicable to it and requires that its contingent workers do the same. Every contingent worker is responsible for assisting DTCC to implement this policy.

Contingent Workers should bring forward issues of workplace practices or policies that they believe to be in violation of law, against public policy, fraudulent, unethical and/or to present a substantial and specific danger to public health or safety.

DTCC will not retaliate against a contingent worker, who makes a good faith report pursuant to this policy, even if an investigation reveals that no violation occurred. For example, DTCC will not retaliate against or tolerate any reprisal against any of the following:

- (1) Disclosing or threatening to disclose to a supervisor or member of management, an activity, policy or practice that the contingent worker reasonably believes is in violation of a law, or a rule or regulation promulgated pursuant to law, or which poses a substantial and specific danger to the public health or safety;
- (2) Providing information involving deception of, or misrepresentation to, any shareholder, investor, client, patient, customer, employee, former employee, retiree or pensioner of DTCC or any government entity;
- (3) Providing information regarding any perceived criminal or fraudulent activity, policy or practice of

deception or misrepresentation that the contingent worker reasonably believes may defraud any shareholder, investor, client, patient, customer, employee, former employee, retiree or pensioner of DTCC or any governmental entity;

- (4) Providing information to, or testifying before, any public body conducting an investigation, hearing, or inquiry into any activity, policy or practice as summarized in (1)-(3) above; or
- (5) Objecting to, or refusing to participate in, any activity, policy or practice as summarized in (1)-(3) above.

It is DTCC's responsibility to correct and prevent violations of this nature and, should such circumstances arise, employees should bring such matters forward and give DTCC a reasonable opportunity to correct them.

DTCC has designated the following Company resources to receive complaints and answer employee questions regarding this policy:

- HR Business Partners
- Employee Relations
- DTCC Chief Compliance Officer or your local Chief Compliance Officer
- Global Ethics hotline (1-844-815-4396)

SOLICITATION

Any form of solicitation during working hours is **prohibited**. This includes:

- Distributing literature for personal causes via email, in person, or on bulletin boards
- Soliciting employees to participate in sports pools, games of chance, or other similar activities; or
- Soliciting funds or other items of value for charity or any other purpose, except for charities and charitable events approved by Corporate Social Responsibility

In most circumstances, soliciting DTCC vendors, DTCC employees, and DTCC clients to provide donations for charitable causes could be viewed as solicitation of a bribe or conflict of interest and is prohibited.

PERSONAL RELATIONSHIPS

Although consensual relationships are a matter of personal choice and privacy between the individuals involved, consensual relationships between a contingent worker and DTCC employee where there is any actual or perceived conflict of interest are contrary to the best interests of DTCC and are strongly discouraged.

If a romantic relationship between a managerial employee and a contingent worker engaged by the managerial employee's team develops, or where there is any actual or perceived conflict of interest, it is the responsibility and mandatory obligation of the managerial employee to promptly disclose the existence of the relationship to the next level officer in the department. The contingent worker is also strongly encouraged to disclose the relationship to their employer (e.g., vendor) and DTCC Human Resources.

WORKPLACE SAFETY

All DTCC contingent workers should report hostile intruder situations or imminent threats of violence to local law enforcement via the quickest means possible, followed by a call to Global Security Management (77-7777 or 212-855-8200).

You are responsible for professional conduct that avoids potentially putting yourself or others at risk. This includes, but is not limited to, threatening or other hostile or violent behavior. Weapons are strictly prohibited at all DTCC facilities and sponsored events.

You should report to Global Security Management any threats or perceived threats that you have witnessed, received, or have been told that another person has witnessed or received. You should also report any behavior that you have witnessed, received, or have been told that another person has witnessed or received that could be intimidating, threatening, or violent or believe that the behavior of concern might be, or could be, carried out on a company-controlled site or is connected to company business.

Please refer to the *DTCC Workplace Safety Policy* for additional information.

WHO TO CONTACT FOR HELP

AS A CONTINGENT WORKER, YOUR COMMITMENT TO THIS CODE IS ESSENTIAL. DTCC'S COMPLIANCE WITH LAWS, REGULATIONS AND ETHICAL STANDARDS IS A SHARED RESPONSIBILITY BY ALL.

You may report any potential violation of this Code by calling the Ethics Hotline (anonymously or self-identified).

POTENTIAL CODE OF CONDUCT VIOLATIONS

24 hours a day, seven days a week

+1-844-815-4396 (U.S. & Canada)

[MyComplianceReport.com](https://mycompliancereport.com)

Access Code: DTCC

If you are located in Europe or the Asia-Pacific Region, see page 24 for phone numbers.

GENERAL COMPLIANCE QUESTIONS

+1-212-855-8030

EmployeeMonitoring@dtcc.com

GIFTS, ENTERTAINMENT, AND CONFLICTS OF INTEREST QUESTIONS OR REPORTING

+1-212-855-8030

EmployeeMonitoring@dtcc.com

[StarCompliancePortal](#)

PERSONAL TRADING QUESTIONS OR DISCLOSURES

+1-212-855-8030

EmployeeMonitoring@dtcc.com

[StarCompliancePortal](#)

ANTI-MONEY LAUNDERING ISSUES

DTCCcompliancehotline@dtcc.com

Or, report using the "[Think It's Suspicious? Report It!](#)" link on the DTCC Intranet.

SANCTIONS QUESTIONS

ofac@dtcc.com

RECORDS MANAGEMENT

RecordsManagement@dtcc.com

LEGAL RESOURCES

Please contact your [Legal Resources Business Partner](#)

GLOBAL SECURITY MANAGEMENT

24 hours a day, seven days a week

77-7777 (ON-SITE)

+1-212-855-8200 (OFF-SITE)

TECHNOLOGY RISK

TVA@dtcc.com

INSIDER RISK

InsiderRisk@dtcc.com

INTELLECTUAL PROPERTY ISSUES

IntellectualPropertyIncidents@dtcc.com

Or report using the "See Something, Say Something" link on the DTCC Intranet.

PRIVACY OFFICE

PrivacyOffice@dtcc.com

REGULATORY RELATIONS

RegulatoryRelations@dtcc.com

HUMAN RESOURCES

Please contact your [Human Resources Business Partner](#)

CORPORATE SOCIAL RESPONSIBILITY

CSR@dtcc.com

KEY POLICIES AND PROCEDURES

Note: You can find all corporate Policies and Procedures on the Policy and Document Management System (“PDMS”) within the DTCC Intranet.

POLICY MANAGEMENT

DTCC Corporate Document Management Policy

TRAINING

DTCC Mandatory and Required Training Policy

ANTI-MONEY LAUNDERING

DTCC AML Policy
DTC AML Program

PERSONAL INVESTMENTS

DTCC Personal Securities Investment Policy

GIFTS, ENTERTAINMENT, AND CONFLICTS OF INTEREST

DTCC Travel and Expense Reimbursement Policy
DTCC Gifts, Entertainment and Conflicts of Interest Policy
DDR Code of Conduct
DDR Conflict of Interest Resolution Policy
DDRJ Conflict of Interest Resolution Policy
DDRL Conflicts of Interest Policy
DDRS Conflict of Interest Resolution Policy
DDRIE Conflicts of Interest Policy

HUMAN RESOURCES

DTCC Equal Employment Non-Discrimination and Anti-Harassment Policy
Global Corporate Social Responsibility Policy
DTCC Mandatory and Required Training Policy

WORKPLACE SAFETY

DTCC Workplace Safety Policy

INFORMATION PROTECTION, PRIVACY AND CONFIDENTIAL SUPERVISORY INFORMATION

DTCC Global Privacy Policy
DTCC Global Confidential Supervisory Information Policy
DTCC Information Security Program
03 DTCC Information Security – Asset Security Policy and Control Standards

MEDIA/COMMUNICATIONS

DTCC Social Media Policy
Media Contact, Public Presentations & Endorsements Policy

RECORDS MANAGEMENT

DTCC Global Records Management Policy (including DTCC Global Records Retention Schedule)
DTCC Global Records Management Procedures
DTCC Standards on Collaboration Tool Usage During Internal & External Meetings

SANCTIONS

DTCC OFAC/Global Sanctions Policy
DTCC Global Sanctions Business Areas Consolidated Procedures

TECHNOLOGY USAGE

DTCC Technology Usage Policy
DTCC Corporate Liable Device Policy
DTCC Bring Your Own Device Policy

FINANCE

Clearing Agency Pricing Policy
DTCC Non-Clearing Agency Pricing Policy

DTCC GLOBAL ETHICS HOTLINE

ALL DTCC CONTINGENT WORKERS MAY REPORT ANONYMOUSLY OR SELF-IDENTIFY VIA COMPLIANCE LINE'S WEBSITE:

MYCOMPLIANCEREPORT.COM ACCESS CODE: DTCC

FOR USA & CANADA	
Step 1	Dial 844-815-4396
Step 2	Automated voice will state that the line is owned by ComplianceLine, Inc.

Callers outside the U.S., Canada, and countries not on the list below should use the web portal to file reports.

INTERNATIONAL		
Hong Kong	Please Dial	800-938-044
India	Please Dial	000-800-050-963
Ireland	Please Dial	1-800-851-749
Japan	Please Dial	0345-104-874
Philippines	Please Dial	1-800-1-322-0480
Singapore	Please Dial	800-852-3939
UK	Please Dial	800-092-2702