

JPMC Commitment to Anti-Corruption Compliance

JPMorgan Chase & Co.'s (the Firm or JPMC) reputation for integrity is central to the success of its business. By acting with integrity, the Firm earns the trust of its clients, shareholders, communities, and regulators. JPMC strives to maintain that trust by promoting a corporate culture that encourages ethical business practices and compliance with both the letter and the spirit of the laws of the countries in which the Firm conducts business.

With these values in mind, JPMC has zero tolerance for bribery and corruption. JPMC's global Anti-Corruption Policy (Policy) therefore prohibits offering or giving anything of value (including gifts, hospitality, travel, employment, and work experience) to—and soliciting or accepting anything of value from—anyone for a corrupt purpose, such as improper payments or benefits to government officials or private parties for a business advantage. The Policy further prohibits making facilitation payments to cause a government official to perform or expedite performance of a routine duty. Other key features of the Policy include requirements to:

- Obtain Compliance review and approval before offering or giving anything of value to government officials (subject to certain thresholds relating to gifts and business hospitality)
- Keep accurate books, records, and accounts that relate to the business of the Firm, its clients, suppliers, and other partners
- Conduct due diligence and oversight of intermediaries/agents, joint venture partners, and entities over which the Firm has or may obtain control or influence
- Report potential corruption-related issues (including through the Code Reporting Hotline), with a prohibition on retaliation against those who make good faith reports

Any violation of the Policy may result in disciplinary action up to and including dismissal.

The Firm's Anti-Corruption Compliance Program (Program) is reasonably designed to implement the Policy's requirements, as well as identify, manage, and mitigate the risk of non-compliance with those requirements. Key components of the Program include:

- A governance structure managed by anti-corruption professionals with senior management oversight
- Training and awareness activities
- Monitoring and testing for compliance
- Periodic assessment of corruption risks and control effectiveness
- Protocols for managing and reporting material issues

The Firm regularly participates in anti-corruption professional forums such as the Wolfsberg Anti-Corruption Working Group to enhance ethical standards and practices both at the Firm and across the financial services industry.