

Fifth Third Bancorp

Code of Business Conduct and Ethics

Issued September 2023

Foreword

Since 1858, Fifth Third Bank has been committed to upholding the highest standards of integrity. In an industry crowded with choices of where to work and where to bank, this record of integrity and a strong ethical culture defines and differentiates Fifth Third.

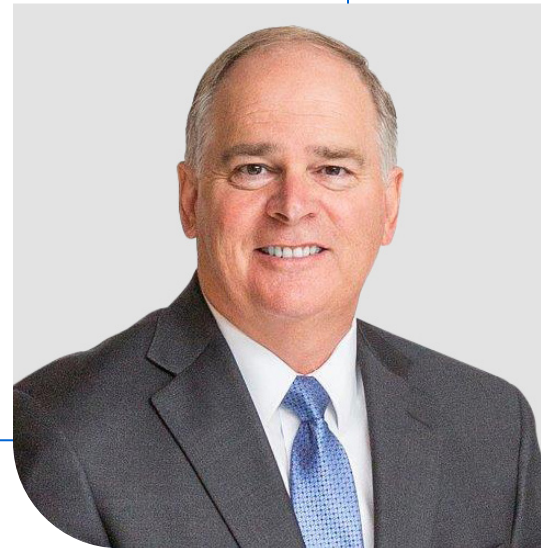
Fifth Third's ambition to be the One Bank people most value and trust guides how we work together to serve our clients and communities. Put simply, our ethical culture is a competitive advantage. It earns the trust of employees, clients and shareholders.

The Fifth Third Bank Code of Business Conduct and Ethics represents a responsibility, shared by all, to uphold this legacy of integrity. Thank you for taking this responsibility seriously. Thank you for your ongoing commitment to doing the right thing, acting with integrity, speaking up and living our core values, every day.



Nicholas K. Akins

Board Chairman
Fifth Third Bancorp



Living Our Core Values

Leading an organization that has been recognized multiple times as one of Ethisphere's World's Most Ethical Companies gives me a great sense of pride, and I hope you feel that pride, too. **Strong ethics don't happen by accident.** They're an outcome of doing the right thing, even when no one is watching. They're the result of conscious decisions, every hour of every day, by every one of us.

Fifth Third Bancorp's Code of Business Conduct and Ethics helps guide those decisions. Our commitment to do the right thing starts with each individual employee. It starts with you.

This important document will help you understand how to apply our Core Values to the decisions you make at work. It provides information on how to live our values by following both the letter and the spirit of laws, regulations and policies.

Please take the time to review the Code in detail and refer to it regularly. If you ever are uncertain about what to do, or what doing the right thing looks like in a certain situation, and you can't find the answer here, talk with your manager or access any of the resources listed in the Code.

When we work together to do the right thing for all our stakeholders, we ensure that Fifth Third Bank remains a company deserving of its accolades and deserving of our pride.

Thank you for all you do to maintain and build a legacy of integrity.

Sincerely,



Tim Spence

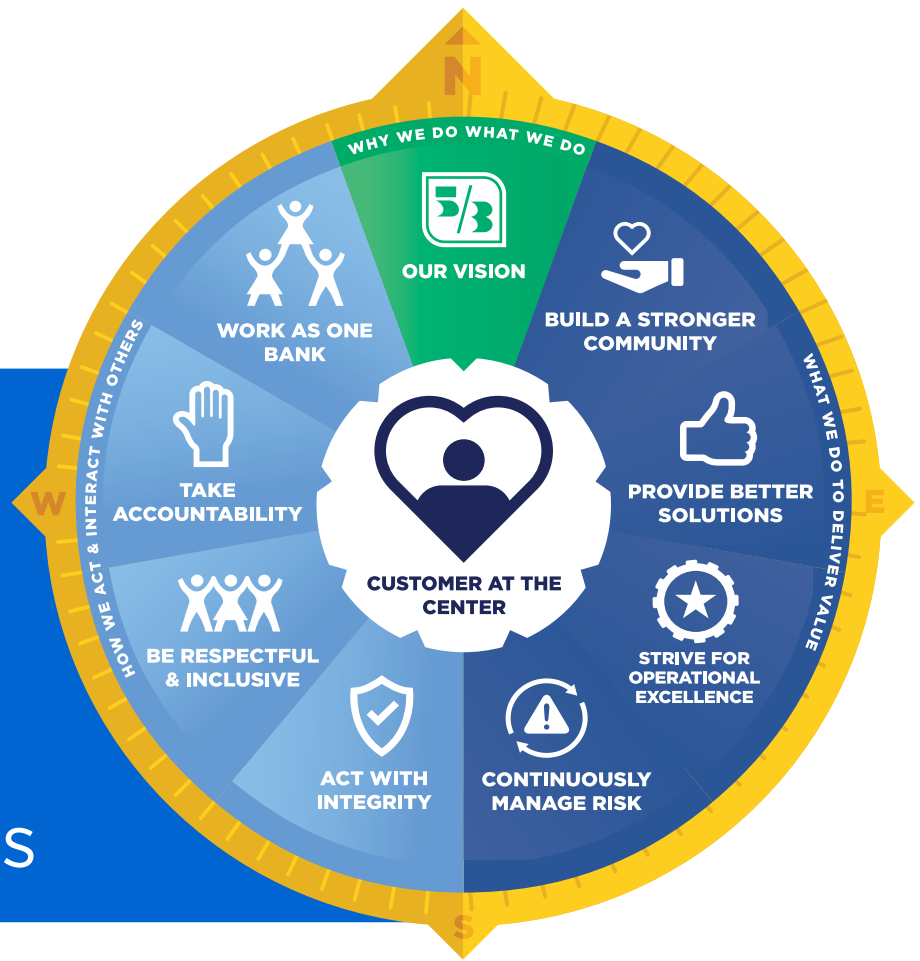
President and CEO
Fifth Third Bancorp



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Making Ethical Decisions – Following the Compass



Our Fifth Third Compass communicates who we are, what we believe and how we define success. It informs everything we do, from how we navigate our daily work and recognize each other's efforts to the way we behave with customers and each other. The Compass also guides our strategic directions and actions as we work toward achieving our Vision to be the One Bank people most value and trust.

Within the Compass, you will find the principles that we highly value at Fifth Third Bancorp, namely:

- **Our Vision** is to be the One Bank people most value and trust. Our Vision guides our actions; it is why we do what we do. It sits at the top of our Compass and points to the north.
- **Our Core Values** direct us on how we act and interact with others. Our Values incorporate our One Bank philosophy, our focus on inclusion and diversity and our ongoing commitment to accountability and doing the right thing.
- **Our Strategic Actions** drive our business. These Actions inform our decision making. Our commitment to community, our drive to offer innovative products and services, our focus on operational excellence and our dedication to proactive risk management are the four key elements of our Strategic Actions.
- **Keep the Customer at the Center.** Keeping the customer at the center of everything we do and delivering a world-class customer experience every time are paramount to our success.

Fifth Third Core Values Test

In situations where you are uncertain what to do, ask yourself these questions:

- 1 Is the action legal?
- 2 Does it comply with our Code of Business Conduct and Ethics and related policies?
- 3 Does it reflect our Core Values?
- 4 Would I be comfortable if my friends and family knew about it?
- 5 Would it be OK if other employees did it?
- 6 Would it keep Fifth Third and our shareholders from experiencing loss, harm, or unnecessary risk?
- 7 Does it feel like the right thing to do?

If you answered “no” to any of these questions, **don’t do it**. Use the resources on Page 8 for additional guidance.

Each of your decisions and actions shape our reputation. That is why we must commit to act with integrity. The general rule of thumb to follow is: If you know it’s wrong, don’t do it. If you’re not sure, ask yourself the questions above. If you still are unsure on what to do, use the resources on Page 8 to determine whom to contact. Keep asking until you have clarity on following the right path. The Code is an excellent guide to doing the right thing, but it’s not a substitute for good judgment, nor can it cover every issue or scenario. So where there is no written rule or precedent, decisions need to be consistent with our Core Values.

Anyone who works for, with or on behalf of Fifth Third Bancorp has the responsibility to demonstrate the highest standards of business conduct. The Code of Business Conduct and Ethics applies to all officers, directors, employees and contractors of Fifth Third Bancorp, our subsidiaries and our affiliates. Anyone who violates the spirit or letter of the Code may face disciplinary action, up to and including termination. Additionally, third parties are also expected to comply with the [Third Party Code of Conduct](#).



“Our commitment to our community, our drive to offer innovative products and services to our customers, our focus on operational excellence, and our dedication to proactive risk management are key strategic elements to our success.”

Jamie Leonard
Chief Financial Officer

Employee Responsibilities

Every employee plays a part in building and maintaining a strong culture at Fifth Third, a culture in which ethics and compliance are the standard.

Each of us is accountable for:

- Obeying, both in form and spirit, all laws, regulations and Fifth Third Bancorp policies and procedures, including the Code.
- Protecting our reputation by conducting our work and professional activities ethically.
- Keeping the customer at the center.
- Being honest, accurate, respectful and responsible with customers, examiners, suppliers, business partners, shareholders and other employees.
- Reporting any potential violations or ethical concerns promptly and in an appropriate manner.
- Immediately disclosing any conviction of a criminal offense other than a minor traffic violation.
- Protecting confidential and proprietary information and Fifth Third assets and property.
- Cooperating with (and maintaining the confidentiality of) internal and external investigations or examinations.
- Completing all required training, including the Code of Business Conduct and Ethics Training, within the required time frame.

The Code reflects our Core Values.

While there is no way we can write a scenario for every situation you may face, the Code sets the expectation that you act with integrity and use good judgment. There also are policies throughout the Code under “Policies to Reference” sections to which you can refer for more detail. If you still are in an ethical dilemma, use the [Core Values Test](#) to help you make the best choice, or use the list of resources in [Speak Up: Reporting Concerns](#).

“This Code reflects our Core Values. It outlines responsibilities for our board, our executive staff, our managers and all employees. Together, working as One Bank, we can achieve our Vision to be the One Bank people most value and trust.”

Kevin P. Lavender
Head of Commercial Banking



Manager Responsibilities

If you are a manager, you have a responsibility to lead by example. All managers must show a commitment to Fifth Third's Core Values, and conduct business according to the highest standards of ethics and professional behavior.

Managers who fail to take action or who retaliate against employees who report misconduct may be held responsible for their conduct.

You are responsible for:

- Making sure you know and understand the Code and related policies.
- Reinforcing the importance of conducting business with the highest level of integrity with your employees.
- Ensuring your employees complete all required trainings in a timely manner.
- Supervising activities and conduct of employees in your reporting chain.
- Responding to misconduct and report violations as soon as you witness them or are made aware of them and use the resources listed below to make a report.
- Promoting a positive and ethical work environment in which employees feel comfortable raising concerns and communicating bad news.
- Addressing issues raised by employees by listening and taking action when appropriate.

Speak Up: Reporting Concerns

Every employee has a responsibility not only to adhere to the Code of Business Conduct and Ethics, but also to raise issues when you become aware of misconduct or other violations of our Code.

Whenever possible, you are encouraged to raise questions and concerns directly with your manager, or someone in your division's reporting line with whom you feel comfortable talking. In many cases, your manager can resolve issues, or help guide you through the appropriate process. If you are not comfortable doing so, the following resources are also available to you:

- Your HR business partner
- The Employee Relations Resource Group
 - Email: HR.ERRG@53.com
 - Phone: 513-358-7191
- The Ethics Office directly at EthicsOffice@53.com
- The Bancorp Security Operations Center at 800-436-4400
- The Fifth Third EthicsLine — you can make a report 24 hours a day, seven days a week, and you may choose to remain anonymous
 - Mobile: 53mobile.ethicspoint.com or QR code:
 - Online: 53.ethicspoint.com
 - Phone: 877-FOR-5353
- The Security and Risk Awareness inbox for reporting suspicious emails at SecurityandRiskAwareness@53.com
- Reporting fraud at 844-STOPFRD (844-786-7373) or the [Fraud and AML Referral Form](#) ([The Landing > Security & Risk](#))



Investigations

The Bancorp investigates every concern that employees report through any channel. Every report of a violation is taken seriously and we will protect confidentiality to the fullest extent possible. You are required to cooperate fully with any authorized internal or external investigation, including, but not limited to, those involving ethical issues, legal or regulatory issues, or policy violations. You should never withhold, tamper with or fail to communicate relevant information in connection with any investigation. Making false statements and/or failing to participate in an investigation may be grounds for immediate termination. If the investigation determines a violation has occurred, prompt corrective action will be taken, up to and including termination.

EthicsLine Investigative Process



Every employee has a responsibility to raise issues when they become aware of misconduct or other violations of the Code. The EthicsLine is one of several ways that employees can report suspected misconduct.



You can make a report 24 hours a day, seven days a week, and you may choose to remain anonymous.

Online:
53.ethicspoint.com

Mobile: 53mobile.ethicspoint.com

Phone:
877-FOR-5353



Be specific about the activity you are reporting. Important information includes:

- Who are the parties involved and what are their titles?
- What is your location?
- What are the details surrounding your report?
- Documents (emails, screenshots) can be attached to the report.



The Ethics Office reviews **EVERY** incoming case and assigns an investigator. The Ethics Office will also request additional information, if needed. **ALL** cases are investigated.



You can follow-up on your report by using your assigned report key. Your case will be noted with a case closure when it has been fully investigated.

Due to the privacy considerations of any investigation, specific findings may not be shared. Even after case closure, you may still follow up on your report with additional information.

“As stewards of Fifth Third, each of us have the responsibility to contribute to our strong culture of ethics and compliance. We do this by upholding the Code of Business Conduct and Ethics in our daily work, leading by example, and raising good-faith reports of misconduct without fear of retaliation. If you have a concern, please raise your hand: We’re listening.”

Stefan Hayek
Chief Ethics Officer



Non-Retaliation and Whistleblowers

Fifth Third prohibits intimidation of or retaliation against individuals who make good-faith reports of known or suspected violations of the Code of Business Conduct and Ethics, any Fifth Third policy or procedure, or any law or regulation. Further, Fifth Third prohibits retaliation against anyone cooperating with an investigation. Retaliation can also be against the law leading to potential civil liability and criminal penalties. Retaliation is taken very seriously, and if it occurs it will result in discipline, up to and including termination.

Policies to Reference:

- [Non-Retaliation Policy for Employees who Report Potential Violations](#)

Self-Reporting: Criminal Matters

We expect you to notify the Company about certain matters that may affect your ability to continue doing your job. Fifth Third must know about these matters in order to make informed decisions about your continued employment.

In addition to reporting problems or issues to your supervisor, Employee Relations or any of the ethics resources listed in [Speak Up: Reporting Concerns](#), you have an obligation to notify the Company of certain criminal convictions other than a minor traffic violation.

Your obligation to report includes the following:

- There has been a finding of guilt against you.
- A court's acceptance of a plea of guilty or nolo contendere (no contest) from you.
- You have entered into a First Offender, deferred adjudication, pardon program, diversion program, or other similar pre-trial arrangement or program as part of which a judgment of conviction has been withheld.

The term "conviction" does not include any of the following:

- Arrests or charges that did not result in conviction.
- Convictions that have been judicially dismissed, expunged, erased or sealed.
- Convictions that state law does not permit an employer to consider, except that any conviction involving controlled substances, a felony, dishonesty, breach of trust or money laundering, as well as convictions that could result in exclusion from federal programs, revocation of your license or ability to perform services on behalf of Fifth Third must always be reported. Examples of dishonesty may include, but are not limited to, theft, larceny, robbery, forgery, criminal fraud, perjury or embezzlement.

Supervisors who become aware of an employee who has been convicted of a criminal offense other than a minor traffic violation, must immediately report the situation to Employee Relations.

Interpretations & Waivers

Any waivers of the Code for executive officers or directors of Fifth Third Bancorp may be made only by the Board of Directors of Fifth Third upon the recommendation of the Audit Committee; waivers will be publicly disclosed as required by SEC or NASDAQ rules. Any waivers of the Code for other employees may be made by the Conflicts Council as outlined in the Code.



1.0 Living Our Core Values for Our Employees



1.1 Inclusion & Diversity

Fostering an inclusive culture and creating products and experiences that reflect the diversity of our employees, customers and communities has long been a priority for Fifth Third. As we consider the changing demographics of our nation there is an ongoing need to continue progressing our inclusion and diversity efforts. We fully understand that our company thrives based on the diverse perspectives our employees bring to Fifth Third every day. Additionally, research has proven that teams make better decisions than individuals and that more diverse teams make better decisions than less diverse teams. Having diverse perspectives leads to greater innovation, more robust bottom line and better positions our company to achieve our strategic goals and objectives.

The U.S. Census Bureau predicts that by 2045, no single race will have a majority, which means that our employees, customers, suppliers and communities will be even more diverse. These trends highlight the importance of living our Core Values.

As Fifth Third employees, we should continue to hold ourselves and each other accountable for being respectful of our colleagues, customers and our communities. These actions are directly aligned to our Core Value to Be Respectful & Inclusive and is supportive of the important principle, that we should treat everyone with whom we interact in the manner that they would like to be treated. Our position is to listen and seek to understand and to be understood.

We firmly believe that Inclusion and Diversity are a strategic differentiator for our company, and we will continue integrating this approach into our business interactions; including building an engaged workplace, a strong third party supplier base and vibrant, thriving communities.

The Bank's Business Resource Groups (BRGs) support the rich cultural identities of our employees and provides them opportunities to make connections, engage in personal development, community volunteerism and business innovation.

Policies to Reference:

- Discrimination and Harassment Policy in the [Employee Policy Manual](#)
- [Equal Employment Opportunity Policy](#)
- [Affirmative Action Policy](#)

”Our purpose-driven commitment to inclusion and diversity grows stronger each year. While we are progressing, our journey is never-ending. Understanding the past with clarity, building the future with hope and filling the present with opportunity will light the path to a more inclusive world that will benefit us all—one where we are all doing everything we can to bridge the gaps in equality, equity and inclusion.”

Stephanie A. Smith

Chief Inclusion & Diversity Officer



1.2 Discrimination & Harassment

Fifth Third promotes and is committed to maintaining a workplace where everyone can participate in an inclusive, respectful and safe environment. Fifth Third does not tolerate discrimination, harassment or intimidation for any reason, including on the basis of an individual's race, ethnicity color, national origin, ancestry, citizenship status, religion, religious affiliation, creed, physical or mental disability, sex/gender, marital status, civil partnership, sexual orientation, gender identity or expression, transgender status, age, pregnancy, parental status or caregiving responsibilities, genetic information, physical or intellectual disability or protected condition, medical condition, military or veteran status, an individual having been a victim of domestic violence, sexual assault or abuse, or any other characteristic protected under applicable federal, state or local law (collectively referred to hereafter as "Prohibited Actions").

Sexual harassment is a specific type of prohibited conduct. Sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature. In particular, sexual harassment refers to situations where either submission to or rejection of such conduct has an effect on the terms and conditions of an individual's employment or where such conduct creates an intimidating, hostile or offensive work environment that unreasonably interferes with an employee's work performance. Sexual harassment may involve persons of the same or different genders.

Q&A

I overheard one of my co-workers making fun of someone else in our department, making rude comments about her accent and some religious attire she wears. Should I say something?

Fifth Third is committed to maintaining a professional work environment, and does not tolerate discrimination, harassment or intimidation for any reason. Every employee has an obligation to treat others with dignity and respect. If you are comfortable speaking directly to the employee who made the comments, you can do so. In any case, you must share your concern with your manager, Employee Relations (HR.ERRG@53.com or 513-358-7191), or the EthicsLine (877-FOR-5353) or 53.ethicspoint.com).

Some examples of Prohibited Actions include, but are not limited to, the following:

- Making or using derogatory comments, epithets, slurs, slang, phrases, nicknames or jokes, in verbal, written or electronic communications about any individual, group or employee that are offensive or stereotypical based upon age, religion, gender, gender identity or expression, race, color, sexual orientation, national origin, disability, military or veteran status and other protected categories or personal characteristics.
- Denying, directly or indirectly, an employment-related opportunity based upon refusal to comply with a sexually oriented request or advance.
- Leering, making sexual gestures, or displaying derogatory, vulgar, sexually suggestive objects or pictures, drawings, cartoons, emails or posters.
- Inappropriate physical contact and any other unwelcome verbal or physical conduct of a sexual nature.
- Retaliation for reporting or threatening to report acts of misconduct or for reporting work related injuries or illnesses.
- Verbal or physical conduct that has the purpose or effect of creating an intimidating, hostile or offensive work environment.
- Verbal abuse or the use of degrading words to describe an individual, or notes, emails or invitations that use degrading or humiliating words.
- Threats, stalking, acts of violence, suggestions of violence, inappropriate or proactive language.

Policies to Reference:

- Discrimination and Harassment Policy in the [Employee Policy Manual](#)

How to Use the Employee Assistance Program

The employee assistance program (EAP) is a service provided by Fifth Third that offers help with personal and work-related issues. Professionally trained consultants are available to help with family problems, marital concerns, financial and legal matters, stress, depression, and other issues affecting your personal or work life. The EAP is free and confidential. Consultants are available to help 24 hours a day, 7 days a week, 365 days a year.

EAP contact info: HR Hub > Benefits > EAP

Policies to Reference:

- [Corporate Safety & Security Policy and Guidelines](#)
- Discrimination and Harassment Policy in the [Employee Policy Manual](#)
- Workplace Non-Violence Policy in the [Employee Policy Manual](#)

1.3 A Safe and Healthy Work Environment

Fifth Third is committed to providing a workplace where employees and visitors feel safe. Unsafe practices can lead to serious consequences such as personal injury, injury to employees and Fifth Third, or other serious outcomes. It is the responsibility of our managers and all our employees to maintain a workplace free from threats and acts of violence. Fifth Third prohibits the use of violence or threats of violence in the workplace and takes such actions very seriously. We do not tolerate threatening, intimidating or physically harmful behavior by employees, customers, contractors, vendors, suppliers, partners, or anyone else. Any person who makes threats, exhibits threatening behavior, or engages in violent acts on Fifth Third premises shall be removed from the property. Violations will lead to disciplinary action, up to and including termination of employment, and the involvement of appropriate law enforcement authorities, as needed. You may not possess any type of weapon in Fifth Third's facilities, at work-related functions or while performing Bancorp business of any kind. This does not apply to law enforcement officials and designated security personnel, or where preempted by applicable law.

“The well-being of our employees, customers and communities is of the utmost importance. Through regularly reviewed and updated policies, procedures and guidelines, we work to maintain an environment where everyone feels secure and included.”

Nancy Pinckney
Chief Human Resources Officer



To maintain a safe and secure work environment, employees always should adhere to the Bank's safety policies and guidelines, such as displaying your employee identification badge and following approved physical access procedures. Maintain an awareness of your surroundings, and report any suspicious or unusual situations. Always follow facility safety rules, regulations, procedures and warnings, particularly those that cover dangerous equipment and materials.

If you feel a threat or an act of violence has been made against you, or others, report the details immediately to any of the following:

- In an emergency, call 9-1-1.
- Bancorp Security Operations Center at 800-436-4400.
- Employee Relations Resource Group at 513-358-7191.
- Your manager.

If you witness or suffer an accident, or see unsafe conditions, report the situation immediately. You have the right to report any work related injury or illness to Fifth Third without retaliatory action for doing so. Contact your manager about any illness or work-related injuries.

Policies to Reference:

- [Corporate Safety & Security Policy and Guidelines](#)
- Discrimination and Harassment Policy in the [Employee Policy Manual](#)
- Workplace Non-Violence Policy in the [Employee Policy Manual](#)

1.4 Substance Abuse

Fifth Third is committed to providing an alcohol free and drug free work environment. We expect you to report for work as scheduled and to be able to perform assigned duties free from the effects of alcohol and drugs. We prohibit alcohol or drug use that could have an adverse effect on your job performance or that could jeopardize customer service, public relations, and the safety of other employees or Fifth Third equipment. We also will not tolerate the unlawful use, manufacture, possession, sale or transfer of drugs or narcotics on our property. You should never come to work under the influence of alcohol, drugs (including lawfully prescribed drugs) or any other substance that could impair your ability to perform your job or jeopardize the safety of others.

Policies to Reference:

- Substance Abuse Policy in the [Employee Policy Manual](#)

1.5 Gambling

As part of our commitment to comply with all federal and state laws, Fifth Third strictly prohibits illegal gambling, raffles, or other games of chance using Company resources or in Company facilities. This includes sports betting pools, brackets, and all other forms of gambling.

Policies to Reference:

- Contribution, Solicitation, Canvassing, & Distribution of Literature Policy in the [Employee Policy Manual](#)

STRENGTHENING COMMUNITIES

WORKED TO IMPROVE COMMUNITIES THROUGH INCLUSIVE LENDING, INVESTMENTS THROUGH OUR LEGACY OF COMMUNITY COMMITMENT, WE PAVE THE WAY FOR

ATION - PERSON BY PERSON NEIGHBORHOOD BY NEIGHBORHOOD, CITY BY CITY

FIFTH THIRD STRIVES TO HELP COMMUNITIES OF TODAY SO THEY CAN

2.0 Living Our Core Values for Our Customers and Communities

2.1 Fair and Honest Business Practices

Fifth Third believes that fair and honest business practices are essential to keeping our customer at the center of everything we do. We should always act in the best interest of our customers.

Unethical business practices are strictly prohibited.

Examples of such activities include, but are not limited to:

- Incentive gaming.
- Falsifying documents or inflating performance results.
- Manipulating records.
- Tax evasion.
- Opening bogus or fake accounts.
- Opening accounts or selling products without customer authorization.
- Offering customers unnecessary product.
- Falsifying records or applications in order to benefit yourself or other Fifth Third employees.

Fifth Third is fully committed to maintaining non-abusive and anti-predatory lending practices and to the principle that all credit-related decisions will be made without regard to any prohibited basis, such as:

- Race
- Ethnicity
- Color
- Religion
- National origin
- Sex
- Age
- Marital status
- Sexual orientation
- Gender identification or assignment
- Military status
- Disability
- Receipt of public assistance
- Familial status
- A consumer's exercise of credit protection rights

“Relationships are at the heart of our business. Customers choose us because they trust our brand and our people. We earn that trust by always acting in their best interest and conducting our business ethically and with integrity.”

Howard Hammond
Head of the Consumer Bank

Q&A

I sometimes work with customers who aren't knowledgeable about financial products. Is it acceptable to steer customers toward a product for which I receive more credit, so long as the product will still be of at least some benefit to them?

Fifth Third's Vision is to be the One Bank people most value and trust. Our customers must be able to trust that we have their best interests in mind. Employees must not engage in deceptive or dishonest business practices, such as misrepresenting products or offering customers inaccurate or insufficient information about products, in order to benefit personally.



Other laws and regulations, including those at the state or local level, may contain other prohibited bases. This commitment will be fulfilled while maintaining prudent credit discipline and sound business practices. Fifth Third is committed to providing customers with financial products and services in ways that avoid any practices that could be deemed predatory, unfair, deceptive or abusive.

Fair Lending and Responsible Banking compliance is the responsibility of all employees.

Policies to Reference:

- [Consumer and Business Practices Compliance Policy](#)

2.2 Customer Complaints

Fifth Third defines a complaint as “any written or escalated verbal communication stating that something is unfair, unsatisfactory, or unacceptable, or that the consumer is dissatisfied in regard to a product, service, location or personnel.”

Fifth Third has a comprehensive Customer Complaint Management program to ensure customer complaints are handled properly and in a timely manner. You are expected to report customer complaints completely and accurately through our defined Complaint Management process.

Policies to Reference:

- [Bancorp Complaint Management Policy](#)

2.3 Preventing Fraud

Fifth Third Bancorp is committed to minimizing the impact of internal and external fraud to both Fifth Third and our customers. Every employee at every level of the Bancorp is accountable and expected to do his or her part to protect Fifth Third and our customers from fraudulent activity. There is zero tolerance for internal fraud within Fifth Third’s organization and internal fraudulent activity must be referred to Financial Crimes when suspected. Failure to report fraudulent activity exposes Fifth Third to regulatory and compliance violations and could lead to significant financial penalties and additional fraud losses.

It is the responsibility of every employee - manager and non-manager alike - to refer all cases of suspected fraud through the appropriate channels:

- Fifth Third’s Fraud Hotline: 844-STOPFRD or 844-786-7373
- Fifth Third’s [Fraud and AML Referral Form](#) located on [The Landing > Security & Risk](#)
- Fifth Third EthicsLine:
 - Online: 53.ethicspoint.com
 - By phone: 877-FOR-5353

Policies to Reference:

- [Enterprise Fraud Prevention Policy](#)

Q&A

I noticed a co-worker accessing an account without the customer being present and then transferring some of the funds into a dormant account. This seemed odd to me, but I don’t have all the facts. Should I report this?

Every Fifth Third employee has a responsibility to communicate situations that could cause risk or harm to the Bancorp or our customers. While you may not have all the information in this situation, it is important to share your concerns. You can report the information using the Fraud Hotline (**844-STOPFRD**), by submitting a [Fraud and AML Referral Form](#), or by calling the EthicsLine (**877-FOR-5353**) or 53.ethicspoint.com.

2.4 Strengthening Communities

Building strong and vibrant communities across our footprint and beyond is at the heart of Fifth Third's Corporate Social Responsibility and Community and Economic Development programs. With the customer at the center, our commitment to improve the lives of our customers, our communities and our employees is realized. We are committed to providing better financial solutions with every business decision and customer interaction for all the people we serve. When we do this, we effect positive change, empower the underserved, and engage our neighbors where we live, work and contribute.

Each year the Bancorp invests millions of dollars through corporate citizenship, philanthropic investments, and Community Reinvestment Act activities. Employees supplement these efforts by volunteering their time and talents to support various causes.

Employees are expected to demonstrate our Core Values when engaging and supporting our communities and to avoid situations that might lead to conflicts of interest. Any personal relationships with an organization, such as family member employment or personal business or vendor relationships, should be disclosed. More information can be found in the Code's [Avoiding Conflicts of Interest](#) section.

Policies to Reference:

- Contribution, Solicitation, Canvassing & Distribution of Literature Policy in the [Employee Policy Manual](#)

“Part of our commitment to our customers and employees is building strong and vibrant communities for all people we serve. When we do this, we effect positive change, empower the underserved and engage our neighbors where we live, work and contribute.”

Kala Gibson

Chief Corporate Responsibility Officer



2.5 Environmental Sustainability

At Fifth Third, our Core Value to Take Accountability requires that we recognize and hold ourselves accountable for the potential impact that our operations, lending and investment decisions have on communities and the environment. Fifth Third also sees environmental sustainability as a way to manage emerging risks like climate change, and identify new business opportunities to help our customers and our communities become stronger, healthier and more resilient. Integrating environmental sustainability into our culture, risk management, strategies, products and services will help us become the One Bank people most value and trust.

We encourage you to bring a sustainable culture to your workplace, understand your environmental impact and pursue actions that will allow Fifth Third and our communities to thrive. We support continued innovation in our strategy, products and services by finding new ways to deliver services that meet customers' and communities' long-term sustainability goals.

When dealing with suppliers, customers and clients, let them know that Fifth Third is working to be as sustainable as possible, and that we encourage others to do the same.

Policies to Reference:

- [Environmental and Social \(E&S\) Risk Management Framework](#)

“We have a responsibility and an opportunity to integrate environmental sustainability into all aspects of our business. Fifth Third is committed to being an environmental leader in the financial services sector and to leading the transition to a sustainable future.”

Melissa Stevens
Chief Marketing Officer



2.6 Human Rights

Consistent with our Vision, and Core Values at Fifth Third, we support fundamental human rights and aspire to conduct our business consistent with principles such as those in the Universal Declaration of Human Rights. This includes just and favorable remuneration and prohibitions against employing underage children, forced labor, and human trafficking. Our commitment is demonstrated in our Code of Business Conduct and Ethics and our [Third Party Code of Conduct](#). For more information, please read our [Human Rights Statement](#).

“We embrace the privilege and responsibility of impacting our communities. In delivering innovative solutions, strong local leadership and employees committed to doing the right thing, we are living our Purpose to improve lives.”

Kris Garrett

Group Regional President and Head, Wealth & Asset Management





3.0 Complying With Laws, Regulations and Policies

A fundamental part of our commitment to integrity is adhering to the letter and the spirit of applicable laws, regulations and Bancorp policies. All employees are required to comply fully with all applicable laws, rules and regulations, as well as with all Fifth Third policies and procedures. In no case shall an employee, officer or director use illegal or unethical means or methods when acting on behalf of Fifth Third. Each of us must be committed to following these rules and reporting violations that could put ourselves or the Bancorp at risk.

Questions regarding compliance with laws, rules and regulations should be directed to your manager or Fifth Third's Legal Department or the Compliance Department.

3.1 Interactions with Auditors, Examiners and Legal Counsel

All employees, officers and directors should respond to and deal honestly, factually and candidly with the Bancorp's regulators and internal and external auditors and attorneys.

Additionally, employees are not authorized to share regulatory Confidential Supervisory Information (CSI) with anyone internally unless they have a legitimate business need to know. Employees are prohibited from sharing any CSI with anyone externally unless specifically authorized by the Legal Department, after receiving approval from the appropriate regulatory agency. Examples of CSI include, but are not limited to:

- Information related to regulatory exams; e.g., first day letters or other correspondence.
- Information related to regulatory findings including, but not limited to: Matters Requiring Attention, Matters Requiring Immediate Attention, Memorandums of Understanding and Civil Investigative Demands.
- Any regulatory information contained in letters, emails, telephone, or other in-person communications that are designated non-public or confidential.
- Any regulatory information pertaining to the status of regulatory approvals, applications or notifications.

“Each of us must act with integrity, including adhering to the letter and spirit of applicable laws, regulations and Bancorp policies and reporting violations that could put ourselves, our customers or the Bancorp at risk. As always, if you see something, say something.”

Bob Shaffer
Chief Risk Officer



Q&A

A customer comes in to make a weekly deposit of about the same amount each time. Recently she came in on a different day to make an unusually large withdrawal, and she seemed very anxious. I sensed that something wasn't right, but a co-worker said it was none of our business. Should I let it go?

Fifth Third is committed to combating financial crimes, and every employee must be aware of potential warning signs of financial crimes and internal policies and procedures for dealing with suspicious transactions. You should report the situation promptly to your manager or submit the [Fraud and AML Referral Form](#), available on the [The Landing > Security & Risk > Fraud Awareness & Financial Crimes](#).

3.2 Anti-Money Laundering and Financial Crimes

Fifth Third Bank holds a strong commitment to conducting business and operations with the highest ethical standards and in full compliance with the Bank Secrecy Act (BSA), USA PATRIOT Act, and other fraud, terrorist financing and anti-money laundering laws. Fifth Third employees must not engage in financial crimes such as embezzlement, kiting, forgery, tax evasion, or other improper use of funds, property or assets. Additionally, every Fifth Third employee has a role in protecting the Bank and its customers by reporting all suspected fraud cases.

You never should assist a customer in evading reporting requirements, including lowering transaction amounts to avoid Currency Transaction Report filing, altering information or instructions in wire payments to avoid or circumvent economic sanctions (a process known as “wire stripping”) or any other method designed to evade federal or state law or Fifth Third policies and procedures. The penalties for doing so are severe and could include personal liability via civil and criminal penalties, as well as job termination. Do your part to prevent money laundering at Fifth Third; report suspicious activity to the Financial Crimes Compliance Department via the [Fraud and AML Referral Form](#) located on the [The Landing](#). Employees are responsible for being knowledgeable about the BSA and anti-money laundering (AML) laws that apply to Fifth Third so they can properly identify and report violations. Additionally, you should never disclose to a customer or other party that Fifth Third has filed or is considering filing a Suspicious Activity Report.

Policies to Reference:

- [Financial Crimes Compliance Customer Due Diligence Policy](#)
- [Financial Crimes Compliance Policy](#)

3.3 Competition and Antitrust Laws

Antitrust laws, also referred to as “competition laws,” are rules developed by the U.S. government to protect consumers from predatory business practices. Their goal is to ensure that fair competition exists in the marketplace.

Business activities that involve any of our competitors should be conducted carefully. Agreements between competitors relating to prices, allocations of territories or customers or limitations of products are unlawful. Employees should not use competitors’ confidential or proprietary information. Employees are prohibited from engaging in other anti-competitive behavior, including, but not limited to: making disparaging or false statements in relation to competitors, misappropriating competitors’ trade secrets, boycotting a competitor, customer, or third party, and encouraging competitors’ customers to break contracts. Where banking relationships involve loan participants and the like, discussions should be limited to the specific transaction involved. Competitive marketing and bidding activities should be fair and ethical. Antitrust laws require that parties to a merger or acquisition remain separate and independent entities until the transaction is consummated. The pre-closing exchange of competitively sensitive information between merger parties and the coordination of otherwise competitive business activities between parties could raise antitrust concerns to the extent such activities diminish pre-closing competition between the parties. If you have any questions as to whether any conduct may be collusive or anticompetitive, consult with your compliance or legal partner.

Policies to Reference:

- [Anti-Tying Policy](#)

3.4 Anti-Bribery and Anti-Corruption

Corrupt practices are anti-competitive. They inflate the cost of doing business globally, and contracts secured through bribery may not be legally enforceable. They also can have destructive effects within a business that undermine employee confidence and create an atmosphere in which other types of corporate misconduct can seem to be permissible, e.g., self-dealing, fraud and embezzlement. They ultimately undermine a business's interests.

Fifth Third and our employees are responsible for adherence to the anti-bribery and anti-corruption regulations of the countries in which we operate. This includes the Foreign Corrupt Practices Act (FCPA), Canada's Corruption of Foreign Public Officials Act (CFPOA) and the U.K. Bribery Act, as well as other applicable laws and regulations. These regulations generally prohibit companies and persons from offering to pay, paying, promising to pay or authorizing payment of money or "anything of value" to any foreign or domestic government official for the purpose of influencing that official. Even if the payment did not take place or the advantage was not won, a violation has occurred due to its intention. These regulations also apply to conduct both inside and outside of United States territory. These regulations also apply to third parties conducting business for Fifth Third such as vendors, suppliers and consultants.

The consequences of violating anti-bribery or anti-corruption regulations like the FCPA are extremely severe, including possible civil and criminal penalties for both Fifth Third and associated individual(s). In the United States, nothing of value may be provided to government personnel unless clearly permitted by law and any applicable regulation.

Giving gifts is appropriate at times; however, many laws regulate the giving of gifts, especially to government officials. Employees must comply with all laws regarding giving gifts. Employees also must never give a gift with the intent for it to influence a business decision. More information can be found in [Section 4.11.5](#).

Policies to Reference:

- [Ethics Guidelines for Gifts and Gratuities to Public Officials and Employees](#)

Q&A

Some foreign officials are visiting our city, and the local chamber of commerce is organizing a small reception for local businesses to greet them. As our branch representative, can I give the officials some small welcome gifts?

There are many federal and state laws that limit the types of gifts that can be given to government officials and public employees. Additionally, it is critical that such gifts do not create the appearance of improper influence. In this situation, a token gift of nominal value might be acceptable, but contact the Conflicts Council (ConflictsCouncil@53.com) for approval.

3.5 Job-Specific Responsibilities

Based on your position or your specific line of business, some employees have additional responsibilities beyond those described in the Code. If you are one of these employees, make sure you know what is expected of you and that you meet all applicable requirements.

Additional training and reporting commitments must be completed by employees with special regulatory status and those who hold licenses to perform certain financial services activities. If you have questions about licensing or training requirements, contact your HR business partner or compliance partner.

3.6 Trading Restrictions and Ethical Investing

As employees of a financial institution, we may, from time to time, obtain non-public information about Fifth Third, our clients, customers, or counterparties when performing daily job responsibilities. The following rules are designed to comply with the securities laws, expectations of our regulators, and to prevent employees from engaging in unethical personal securities trading. You may not buy, sell, donate, or recommend the securities (or derivatives in respect thereof) of any issuer (including Fifth Third) for any proprietary, customer, employee, or other account while in possession of material non public information (MNPI). MNPI is generally defined as any information about the issuer of a public security, or the security itself, that has not been made public that a reasonable investor would consider important in deciding to buy, sell, or hold a security, including information that would likely affect the market price for that security. All personal investment activities must align with the Enterprise Insider Trading and Ethical Investing Policy.

Also there are supplemental guidelines within the Enterprise Insider Trading and Ethical Investing Policy that apply to specific Fifth Third departments or units who may have enhanced access to, or increased risk associated with, MNPI. These procedures are intended to prevent the flow of information from employees in units that may have access to MNPI about issuers of securities, to employees in units that buy, sell or recommend securities. Employees within these groups may have additional restrictions on personal securities transactions. It is your responsibility to understand and comply with all policies and procedures that relate to your area of responsibility. Violations will lead to disciplinary action, up to and including termination of employment. Additionally, significant penalties may be levied on both you and Fifth Third if these rules are broken.

If you have any questions about the Enterprise Insider Trading and Ethical Investing Policy or how it applies to you, please contact the Compliance Information Control Group (controlgroup.cincinnati@53.com or 513-534-4030). If you encounter MNPI about a customer or Fifth Third that you believe was inadvertently or mistakenly disclosed to you, you must report this information to the Compliance Information Control Group.

Policies to Reference:

- [Enterprise Insider Trading and Ethical Investing Policy](#)

3.7 Corporate Travel

When incurring expenses on behalf of Fifth Third, employees should be good stewards of Bancorp resources. The Core Values serve as a guide to employees in determining the appropriateness of expenses incurred on behalf of the Bancorp. You are expected to adhere to the reimbursement procedures contained in Fifth Third's Travel and Entertainment Policy, giving careful attention to accuracy and appropriate supporting documentation when submitting expense reports.

Travel to a foreign country on behalf of the Bank may constitute a taxable presence or include marketing activity triggering licensing requirements, exposing the Bancorp to regulatory fines and reputational risk. Therefore, employees must follow the international travel pre-screening process to ensure alignment with laws, regulations and the Bancorp's strategic plan. Fifth Third tracks and reports international travel activity.

Policies to Reference:

- Travel and Entertainment Policy in the [Employee Policy Manual](#)
- [Director Air Travel Policy](#)

“Employees should be good stewards of Bancorp resources.”

Q&A

I've been asked by my manager to travel to another country on business. Are there any special approvals I need?

In accordance with the Travel and Entertainment Policy, employees with a business need to travel internationally are required to complete the International Travel Pre-Screening Request Form (available in the [Forms Library](#)), obtain manager approval and submit the form to the International Travel Tracking Mailbox prior to arranging travel. The form requires travelers to list the countries they will be visiting (including any layovers in a foreign jurisdiction) and the customers or prospects they plan to meet. The Foreign Activity Council is responsible for approving all international travel requests. Each employee who travels internationally must also complete the post-travel section of the form upon their return.

FIFTH THIRD BANK



4.0 Avoiding Conflicts of Interest

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Access your cash
a Fifth Third easier.

CAUTION
DOOR

ACTIVATES SWITCH
TO OPEN

A conflict of interest exists when you have an outside interest or relationship that interferes, or appears to interfere, with your responsibilities to Fifth Third. Such a conflict can make it difficult for you to remain objective and act in the best interest of Fifth Third, our clients and our shareholders. You are responsible for avoiding conflicts of interest, potential conflicts of interest and even situations in which there is only the appearance of a conflict of interest. This section provides guidance on some of the most common conflicts of interest, but it cannot cover every situation.

If you are unsure whether something is a conflict of interest, start by asking yourself these questions:


- Could my job performance at Fifth Third be compromised?
- Would I have to use Fifth Third systems, information, resources or Bancorp time?
- Could my independent judgment be compromised?
- Could there be a negative impact on Fifth Third?
- Could an outside observer believe a conflict exists, even if it actually doesn't?

If you answered “yes” to any of these questions, you should discuss the situation with your manager or HR business partner, or contact the Conflicts Council at ConflictsCouncil@53.com.

Examples of circumstances that may present an actual or potential conflict of interest, include but are not limited to:

- Outside employment.
- Holding public office.
- Participation in outside organizations, including board positions.
- Employment of relatives.
- Intimate or romantic relationships.

Conflicts Disclosure Process

<p>Conflict Submission</p> <p>Employees are required to submit conflicts through the annual disclosure process and on an ongoing basis, as they arise.</p> 	<p>Ongoing Requests</p> <p>Submission Process</p> <p>Option 1: Form Conflicts form on The Ethics Office ILP</p> <p>Option 2: Email Email to the Conflicts Council</p>	<p>Annual Disclosure</p> <p>Submission Process</p> <p>Complete annual disclosure</p>
<p>Ethics Office Review</p> <p>Disclosures are reviewed by the Ethics Office and prepared for submission to the Conflicts Council for consideration.</p> 	<p>Ongoing Requests</p> <p>Review Timeline</p> <p>Option 1: Form 1 business day (if all information has been provided)</p> <p>Option 2: Email 2-4 weeks (depending on required follow-up)</p>	<p>Annual Disclosure</p> <p>Review Timeline</p> <p>3-6 months for review (depending on required follow-up)</p>
<p>Conflicts Council Review and Decision</p> <p>Conflicts Council reviews the disclosure to determine if the conflict or potential conflict is permissible or may be mitigated.</p>	<p>Ongoing Requests</p> <p>Decision Timeline</p> <p>Generally within 1 week (depending on Council questions)</p>	<p>Annual Disclosure</p> <p>Decision Timeline</p> <p>Generally within 1 week (depending on Council questions)</p>

4.1 Self-Dealing

As an employee, you are expected to act in a way that places the interests of Fifth Third above the personal interests of yourself, your family and your personal friends. Self-dealing occurs when a Fifth Third employee acts in a manner that places the employee's personal interests (or those of the employee's family or personal friends) above the interests of Fifth Third, whether or not the Fifth Third employee receives monetary benefit.

This means, among other things, that transactions or other activity with respect to your accounts and those of your family and personal friends must be:

- Processed by an impartial Fifth Third employee.
- Consistent with Fifth Third's established policies, practices and procedures.
- On terms no more favorable than those that are generally available to Fifth Third's customers.

Additional guidance with respect to self-dealing can be found in Fifth Third's Self-Dealing Policy.

Policies to Reference:

- Self-Dealing Policy in the [Employee Policy Manual](#)

“Personal interests must never influence professional judgment. It’s important that Fifth Third employees demonstrate integrity to avoid even the appearance of a conflict.”

Liz Osborne
Chief Audit Executive



Q&A

My sister and mother both have Fifth Third accounts. My mother asked me to transfer money from her account into my sister's account for her birthday. Can I do this?

No, you may not process the transfer for your mother. Under the Self-Dealing Policy, all transactions related to you, your family and friends must be processed by an impartial Fifth Third employee.

4.2 Personal Finances

As an employee, any personal financial services that you, your family and personal friends use that are provided by Fifth Third should be offered on the same terms that are available to the general public, all Fifth Third employees or to all employees in your market or line of business.

Your personal transactions must be handled according to Fifth Third policies and standard procedures. Examples of inappropriate transactions include, but are not limited to:

- Opening, closing, or altering accounts without proper authorization.
- Transferring funds without authorization.
- Misappropriating funds.
- Performing any transaction in a manner outside of Fifth Third's established policies or procedures.

You may not process or approve any transactions for yourself, your family members, personal friends, organizations in which you hold a material management or financial interest and for which you are an authorized signer, or for any non-profit organization for which you serve as a board or committee member. Examples of such transactions include, but are not limited to:

- Extending personal loans.
- Extending lines of credit.
- Increasing existing credit lines.
- Approving commercial loans.
- Approving mortgages.
- Opening checking accounts.
- Issuing certificates of deposit.
- Opening investment accounts or credit.
- Transferring funds between accounts.

Reversals of service fees, late-payment charges, and other charges to your account may only be made with prior approval from your manager in accordance with the appropriate policies and processes, and must be processed by an objective third-party employee whose responsibilities typically include such transactions.

Additional requirements and restrictions may apply based on your position or line of business. In such cases, supervisors should communicate these requirements, and employees are required to adhere to the more stringent standard. If you have questions, contact your manager, HR business partner, or legal or compliance representative.

Policies to Reference:

- Self-Dealing Policy in the [Employee Policy Manual](#)

Family member: For the purpose of the Code, family includes spouse or domestic partner (current or former); parent, sibling, child, grandparents and grandchildren; members of the employee's immediate household or children of these groups; any individual related by blood or affinity whose close association with the employee is the equivalent of a family relationship. For the purposes of the Code, the definition also includes other personal relationships with whom a dating, intimate or romantic relationship exists.

4.3 Outside Employment and Outside Activities

As an employee of Fifth Third, your activities must not compromise or appear to compromise the interests of the Bancorp. Among other things, this means you cannot profit personally from information or opportunities discovered through your job or take for yourself any corporate opportunity that may otherwise benefit Fifth Third. You may not use, or allow others to use, Fifth Third's property, information or your position at the bank for personal gain.

Additionally, Fifth Third employees should not engage in outside employment (including self-employment) or consulting that:

- Interferes with your work hours or job responsibilities.
- Involves the use of Fifth Third resources.
- Involves soliciting Fifth Third employees or customers while working at Fifth Third.
- Is or could be perceived as a conflict of interest.
- Is in certain industries such as real estate or legal services.

The Conflicts Council (ConflictsCouncil@53.com) also must approve, in advance, any type of business venture you may want to pursue with customers or suppliers.

The Conflicts Council must approve any outside activities that could be perceived as a conflict of interest (i.e., starting a financial business).

Fifth Third discourages full-time employees from engaging in employment outside the Bank.

If you are interested in pursuing secondary employment or self-employment while working at Fifth Third, please see our Secondary Employment Policy and Secondary Employment Approval Form.

There may also be line of business specific approval requirements for secondary employment.

Policies to Reference:

- Secondary Employment Policy in the [Employee Policy Manual](#)

Q&A

I've been offered an opportunity to teach an amateur photography class at a community center. Can I take it?

Employees who are interested in secondary employment must send a Secondary Employment Approval Form (from the [Forms Library](#)) that has been approved by their manager and a VP or above to Employee Relations.

Secondary employment must not:

- Compete or conflict with Fifth Third interests.
- Have a negative impact on Fifth Third.
- Involve the use of Fifth Third resources.
- Pose a personal conflict of interest.
- Interfere with your work hours or responsibilities.

I own a great rental property at the beach and want my co-workers to be able to enjoy it. Can I ask my co-workers if they would like to rent a week?

You should not solicit Fifth Third employees to take part in your personal business.

“You may not use Fifth Third's property, information or position for personal gain.”

4.4 Personal Investments

When making personal investments, you should avoid situations that could influence your business judgment or advice.

In addition, you should avoid the following:

- Any investment for which Fifth Third is an underwriter or placement agent in the offering, or for which one of the underwriters, placement agents or other investment banks involved in the offering is providing, has provided, or may likely provide in the future, products or services to (or for) Fifth Third, unless the transactions are conducted on arms-length terms with no possibility for a conflict of interest.
- Any substantial investment in the business of a customer, supplier or competitor unless the security is publicly traded on a national exchange and there is no possibility for a conflict of interest. A substantial investment is an investment that gives you potential influence over the company's decisions.
- Any investment in an initial public offering of any company if Fifth Third is an underwriter or if one of the underwriters or other investment banks involved in the offering is providing, has provided, or may likely provide, products or services to or for Fifth Third.
- Use of confidential or proprietary information or work product developed or acquired during the course of employment as a means of realizing any personal gain. You should only make investments that comply with both the Code and any other Fifth Third policies or procedures to which you are subject in your employment capacity.

4.5 Personal Relationships

A conflict of interest or the appearance of a conflict can arise when you perform work for a family member or for someone with whom you have a personal relationship. Even if you try to remain objective, it can be difficult. For that reason, if the following employment relationships exist, approval by your manager and Employee Relations is required:

- When a supervisor-subordinate relationship is created within the same operating unit between family or two people with a personal relationship.
- When a real or perceived conflict of interest exists. This includes, when one individual has or appears to have influence over the other's compensation, performance evaluation or job security.
- When an employee has a family or personal relationship with an employee of a Fifth Third vendor or supplier and either individual has substantial influence over the vendor or supplier's relationship with Fifth Third.

Policies to Reference:

- Employment of Relatives or Others in Personal Relationships Policy in the [Employee Policy Manual](#)

4.6 Fiduciary Appointments and Inheritances

You may not act as a personal fiduciary or co-fiduciary of any estate, trust, agency, guardianship or custodianship account of a Fifth Third customer without approval from the Conflicts Council.

This excludes cases where:

- Your fiduciary responsibility is clearly within the scope of your employment with Fifth Third (e.g., acting as trust officer).
- The customer is a family member or close personal friend whose relationship with you was established apart from your Fifth Third employment.
- Your fiduciary activity is for a civic or charitable association of which you are a member. Regardless, you may not have check-signing authority on any Fifth Third account(s) associated with the fiduciary appointment, unless dual signatures are required.

You must obtain Conflicts Council approval before accepting an appointment as an executor, personal representative, administrator, custodian, guardian, trustee, attorney-in-fact under a power of attorney or any similar fiduciary or co-fiduciary capacity, unless the appointment is based on a family relationship or close personal friendship and your position with Fifth Third clearly is not the basis for the appointment.

If you are acting as a fiduciary or co-fiduciary of any estate, trust, agency, guardianship, custodial or other similar account(s) of a Fifth Third client, either because you received the required approval by the Conflicts Council or because you are acting as fiduciary or co-fiduciary for a family member or close personal friend, you may not be the Fifth Third employee assigned to service such account(s). In addition, you must adhere to the self-dealing provisions of this policy.

You and your family members* in your household may not accept an inheritance from a client of Fifth Third unless the client is a family member or close personal friend whose relationship with you was established apart from your Fifth Third employment. If a client names you as a beneficiary, you shall contact the Conflicts Council promptly to determine if it is possible to resolve the conflict.

Policies to Reference:

- [Wealth and Asset Management Policies & Guidelines](#)

Q&A

I'm the financial manager for a local gardening club, which has an account at Fifth Third. I do not work at a retail branch. Can I maintain this position?

The Conflicts Council (ConflictsCouncil@53.com) must approve your role as a fiduciary agent for the gardening club. Additionally, if your role as financial manager requires you to sign checks on behalf of the gardening club and it is a Fifth Third account, dual signatures are required.

**For definition of "family member" refer to Page 31.*

4.7 Gifts, Entertainment and Charitable Contributions

4.7.1 Receiving Gifts

Accepting gifts, favors and entertainment are common business practices, but could create the appearance of a conflict of interest, even if there is no inappropriate intent and receiving the gift did not influence a business decision. Additionally, the Bank Bribery Act makes it a criminal offense for an employee to:

- Solicit for oneself or for a third party anything of value from anyone in return for any business, service or confidential information regarding Fifth Third or our customers, or
- Accept anything of value from anyone in connection with the business of Fifth Third, either before or after a transaction is discussed or consummated.

Employees are expected to make business decisions objectively, in the best interests of Fifth Third and our customers. Before accepting a gift, meal or invitation, you should consider the source, the intent of the gift or invitation, and how the situation could be perceived. Avoiding any appearance of impropriety is essential to maintaining the trust of our customers and business partners. You should consult the [Fifth Third Core Values Test](#) when considering if a gift or invitation is appropriate to accept.

- You may accept a gift valued at approximately \$200 or less, so long as it is clear that it was not given with the intent to exert influence on a business decision, and you did not solicit the gift. You cannot accept gifts of cash or cash equivalents, such as gift cards or gift certificates, regardless of value. Gifts should not be accepted from the same vendor, supplier, customer or other business partner more than twice within a 12-month period.
- Gifts may not be accepted from vendors during a Request for Proposal (RFP) process in which the vendor is participating. Gifts may not be accepted from a vendor if there is an active engagement. An active engagement exists whether there is an intent to engage in an RFP in progress, or has recently concluded.
- If travel or lodging is necessary, it should be covered by Fifth Third and not by a customer or supplier. In certain rare circumstances where a vendor or customer offers to cover your travel or lodging for you to attend an event for the benefit of the vendor or customer (such as speaking engagements at conferences or bank lending group meetings), you may ask for approval in advance from the Conflicts Council (ConflictsCouncil@53.com). The Council will consider the details of the expense and the actual or apparent conflict

Gift: Anything of value for which the employee did not pay market value, including, but not limited to: goods; products; services; tickets to an event at which the vendor, supplier, client or other business partner providing the ticket is not present; free use of recreational real estate; and other discounts not generally available to other Fifth Third employees.

Meals and entertainment: Food, beverages or other activities intended to promote or strengthen Fifth Third business, including, but not limited to: breakfast, lunch, dinner, drinks, golf outings, and sports or cultural events which a Fifth Third employee and the vendor, supplier, client or other business partner attend together.

accepting such travel expenses may create. Other factors that the Council considers include, but are not limited to:

- the relationship of the parties independent of business at Fifth Third;
 - if the gift is available to the public on the same conditions, or would be paid for by the Bank as a reasonable business expense if not paid by the other party;
 - the reason for the gift;
 - the relationship of the entity giving the gift to Fifth Third (supplier, customer, etc).
- You can accept occasional meals and entertainment provided by a vendor, supplier, client or other business partner, so long as there is a business purpose, the host is present, and the value is customary and reasonable.
 - With the exception of the RFP process stated above, vendor sponsorship of events, or segments of events, for the benefit of either Fifth Third employees or Fifth Third customers, beyond the occasional meal or entertainment described above must be approved in advance by the Conflicts Council (ConflictsCouncil@53.com).
 - Any gift, rebate or benefit outside of the policy must be approved in advance by the Conflicts Council (ConflictsCouncil@53.com). Some lines of business may have more restrictive requirements related to gifts and entertainment. In such cases, supervisors are expected to communicate the additional requirements, and employees are expected to follow the more stringent standard.

Policies to Reference:

- [Acceptance of Gifts, Meals and Entertainment Policy](#)

4.7.2 Giving Gifts and the Foreign Corrupt Practices Act

There are times when it is appropriate to give gifts; however, there are many laws that regulate the giving of gifts, especially to government officials. You must comply with all laws regarding giving gifts. You also must never give a gift with the intent for it to influence a business decision.

Commercial business entertainment provided by Fifth Third for suppliers or customers that is reasonable in nature, frequency and cost is permitted. Reasonable business entertainment would include, for example, a lunch, dinner or occasional sporting or cultural event, or gifts of nominal value (approximately \$100 or less).

The Foreign Corrupt Practices Act (FCPA) and Canada's Corruption of Foreign Public Officials Act (CFPOA), as well as other laws and regulations, generally prohibit companies and persons from offering money or anything of value to any foreign or domestic government official for the purpose of influencing that official. The consequences of violating the FCPA are extremely severe, including possible civil and criminal penalties for both Fifth Third and associated individual(s). In the United States, nothing of value may be provided to government personnel unless clearly permitted by law and any applicable regulation.

Policies to Reference:

- [Ethics Guidelines for Gifts and Gratuities to Public Officials and Employees](#)
- Travel and Entertainment Policy in the [Employee Policy Manual](#)

4.7.3 Charitable Contributions

Fifth Third encourages our employees to contribute to charities of their choice. Employees should be aware, however, that charitable contributions may create a conflict of interest. A conflict could arise when an employee asks a client or supplier to give to a charitable organization in exchange for a benefit to the client or supplier. A contribution made at the request of a supplier or client to keep or attract business may also present a conflict.

A conflict may also exist when a contribution is made by an employee to charitable clients of the employee (including charitable organizations, board members, and charitable organizations associated with a government employee).

Charitable contributions given to, or at the request of, a government employee may also present issues under relevant anti-corruption and anti-bribery statutes. (See Sections [3.4](#) and [4.7.2](#)).

Policies to Reference:

- [Vendor Solicitation Policy](#)
- Contribution, Solicitation, Canvassing, & Distribution of Literature Policy in the [Employee Policy Manual](#)

4.8 Soliciting During Work

Fifth Third is committed to maintaining an environment where employees are able to perform their daily business activities without unnecessary disruption. While working, employees should not solicit other Fifth Third employees, customers, vendors or visitors. Examples include asking employees, customers, vendors or visitors:

- For funds or contributions;
- To purchase goods for charitable or commercial purposes;
- To sign petitions;
- To join or become members of a group;
- To support political candidates; or
- To support or commit to causes, groups, or interests.

Additionally, Fifth Third employees may not directly or indirectly solicit contributions or donations from vendors on behalf of Fifth Third. This includes, but is not limited to requests:

- For contributions to charitable or civic organizations;
- To fund or contribute to Fifth Third events or activities;
- To fund or sponsor Fifth Third department lunches or meetings;
- To fund gifts or prizes for Fifth Third employees; and
- For special deals or discounts that are not available to all Fifth Third employees or the general public.

Q&A

I want to ask a department vendor to sponsor a prize for the United Way event our department is holding. Is that permissible?

Under the Vendor Solicitation Policy an exception to the general rule prohibiting solicitation of vendors exists for community marquee events such as United Way. The invitation to participate may only be issued by a member of Sourcing in collaboration with Enterprise Committee members.

In accordance with the Vendor Solicitation Policy, limited solicitation for Bank sanctioned charitable events, may be permitted. Contact Employee Relations for information about sanctioned charitable events.

Policies to Reference:

- Contribution, Solicitation, Canvassing, & Distribution Policy in the [Employee Policy Manual](#)
- [Vendor Solicitation Policy](#)

4.9 Recommendation of Professionals or Products

If a recommendation is requested from you in your capacity as a Fifth Third employee regarding professional services such as those offered by accountants, attorneys, investment bankers, real estate agents or insurance agents, or regarding products to be leased or purchased, you should not recommend any specific professional, supplier or product unless, in every case, you:

- Provide several professional or product recommendations based on results (if possible) without indicating any favoritism.
- Are familiar with the work of all of the professionals you name and are satisfied that they are competent and ethical.
- Believe that the recommendation will reflect positively upon Fifth Third.

If you are requested to provide or serve as a reference for a vendor, please contact your Vendor Manager. Requests will be evaluated on a case by case basis, and must be approved by the line of business leader. Any references provided should never include any information related to pricing or key terms of the contractual agreements.

You never should recommend a professional, supplier or product if you or a member of your immediate family receives personal benefits as a result of your recommendation.

4.10 Use of Suppliers, Vendors or Consultants

You should avoid recommending or using your position to influence the use of a supplier, vendor or consultant if you or members of your immediate family receive any personal benefits as a result of our recommendation. A request for an exception may be submitted to the Conflicts Council (ConflictsCouncil@53.com).

Q&A

I am very involved in local politics and would like to volunteer on a friend's campaign for a city office. Can I do this?

You may volunteer personally so long as you do not use any Fifth Third resources or time, you are clear that you are not representing Fifth Third, and your participation does not conflict with any specific laws or guidelines that apply to your position or line of business.

4.11 Political Activities and Government Affairs

We respect your right to engage in personal political activities, so long as they are legal and appropriate for your position at Fifth Third and do not involve Fifth Third time or resources (including, but not limited to, communication methods including email, client lists, stationery, facilities or supplies). You must ensure you represent yourself as an individual and not as a representative of Fifth Third in activities including, but not limited to, volunteering for a political campaign and making personal financial contributions. It is important that you also comply with any special guidance or laws that may apply to your line of business or your position with Fifth Third.

4.11.1 Running for Office

Prior approval by the Conflicts Council (ConflictsCouncil@53.com) must be obtained before an appointment or nomination to any public office is accepted, or before you become a candidate for public office. The Conflicts Council will consider a variety of factors, including the level of interference with Fifth Third job responsibilities, compliance requirements and conflicts of interest (including alienation of customers). You may not solicit employees for political contributions or use vendor, customer or client lists for such solicitations. The Conflicts Council will not base a decision on the party affiliations of the potential candidate. You may not accept compensation for your service in public office, however, de minimis payments designed to reimburse for reasonable and actual costs associated with the office are permitted with Conflicts Council approval.

4.11.2 Lobbying and Government Affairs

Fifth Third participates in the public policy process through its Government Affairs program. The Government Affairs team is part of the Legal Department and implements advocacy strategies at all levels of government. Any meetings or lobbying activities with government officials on behalf of Fifth Third by employees outside of the government affairs team require pre-clearance and acknowledgment by our Government Affairs professionals. The only exception to this pre-clearance requirement is negotiations regarding specific contracts or other financial arrangements in the normal course of your work.

4.11.3 Fifth Third Bancorp Political Action Committee

Fifth Third's government affairs program provides oversight of Fifth Third's Political Action Committees (PACs). The PACs are funded through voluntary contributions from eligible employees and offers those employees interested in supporting Fifth Third's advocacy objectives with an approved means of doing so. Participation in the PACs by eligible employees is a personal choice. Pressuring any colleague to contribute is strictly prohibited.

“You may make personal political contributions on your own behalf.”

4.11.4 Personal Political Contributions

In general, and as described in the Political Activity Policy, you may make personal political contributions to candidates, parties and causes on your own behalf, so long as you do not violate legal or Fifth Third policy restrictions. If your job responsibilities involve soliciting municipal finance business or working with public entities, you are subject to additional restrictions and should consult with Securities Compliance prior to making political contributions.

4.11.5 Gifts and Entertainment for Public Officials

Under the Honest Leadership and Open Government Act, gifts to members of Congress and congressional staff from individual federal lobbyists and the companies that employ or retain them generally are prohibited. Since Fifth Third employs registered lobbyists, this law is applicable to Fifth Third and our employees.

Lobbyists and their employers must not give members of Congress or congressional staff gifts of any value, unless an exception to this prohibition applies. As this ban on gifts applies to the entire Bancorp, no Fifth Third employee may provide any gift of any value to members of Congress or their staff without prior authorization from Government Affairs.

Policies to Reference:

- [Fifth Third Bancorp Government Affairs Policy](#)
- [Honest Leadership and Open Government Act Policy](#)
- [Political Activity Policy](#)

4.12 Board Membership

4.12.1 Serving on For-Profit Boards

Serving as a director for a for-profit corporation can pose risks and potential conflicts of interest for both the employee and the Bank. Accordingly, no Fifth Third employee may serve as a director of a publicly traded corporation or a large, privately held for-profit business (e.g., organizations with annual revenues over \$25 million). Any request for an exception must be approved by the Conflicts Council (ConflictsCouncil@53.com).

Even with such approval, you may not have lending authority or other relationship responsibility for such company or organization and you shall resign your participation or service if and when it is reasonably likely that such company or organization will default on any loan(s) from Fifth Third or will or has engaged in any other act or wrongdoing that would compromise your duty to Fifth Third.

4.12.2 Serving on Nonprofit Boards

Fifth Third encourages employees to engage in volunteer work and responsible civic work. You may serve as an officer or board member of a nonprofit, family, community or charitable organization as long as it doesn't present a conflict of interest, an appearance of a conflict of interest, or unduly interfere with your job responsibilities. In such a role, you should not participate in any discussions,

decisions or votes regarding Fifth Third. Examples where there may be a conflict or potential conflicts are:

- Nonprofits with a client or vendor relationship with the Bank.
- Nonprofits with a reputational issue that would subject the Bank to negative media.

If you are on, or wish to join a nonprofit board in which there is, or may be a conflict, you should promptly contact the Conflicts Council (ConflictsCouncil@53.com) for approval.

Regardless of whether the organization for which you serve on the board is nonprofit, publicly traded or privately held, you must adhere to the following guidelines:

- You should not be the primary relationship manager assigned to the organization.
- You should not participate in any discussions, decisions or votes regarding Fifth Third.
- If the organization is a Fifth Third client, you may have check-signing authority only if dual signatures are required, and you may not transfer funds between accounts on behalf of the organization.
- You should not solicit other employees or vendors on behalf of the organization (with the exception of activities sponsored by Fifth Third).
- You should not use Fifth Third email to conduct sensitive board business.

Policies to Reference:

- Contribution, Solicitation, Canvassing, & Distribution of Literature Policy in the [Employee Policy Manual](#)



5.0 Protecting Fifth Third and Our Customers

5.1 Protection and Proper Use of Bancorp Assets

As part of your job, you have access to and use many types of resources owned by Fifth Third. You must use these resources only for legitimate business purposes and protect them from theft, loss, damage, waste, or abuse. You also must ensure your use of any Fifth Third asset is properly authorized. Please remember that your work time is a valuable Fifth Third resource. Limit personal activities during work time to avoid interfering with your productivity or that of others.

You must not use Bancorp assets to:

- Take opportunities that are discovered through the use, or allow others to use, Fifth Third's property, information, or your position at the Bank for personal gain.
- Compete with Fifth Third.
- Steal, embezzle or misappropriate money, funds, or anything of value, from Fifth Third or our customers.
- Benefit personally or commercially. This includes the use of corporate brand, logos, documents and the Fifth Third name.
- Misuse your internet, phone, or email privileges.

Fifth Third may monitor and inspect your use of electronic systems and resources to ensure productivity is not negatively impacted, that the integrity of the systems is maintained and that activities that could pose a risk to Fifth Third are avoided. You should have no expectation of privacy when using Bancorp-owned technology or communication platforms.

Examples of Bancorp-owned assets include, but are not limited to:

- Computer software or technology
- Corporate cards issued to employees for approved business activities
- Customer lists or information
- Data processing systems
- Databases
- Files
- Furnishings
- Ideas
- Information about corporate or customer transactions
- Innovations
- Intellectual property
- Money and funds
- Private computer systems, including your email and your internet access
- Records
- Reference materials
- Reports
- Supplies or equipment

While employed by Fifth Third, all work that you produce is and shall remain the sole and exclusive property of Fifth Third. Even though information such as customer and prospect names, presentation materials, marketing materials, product information or business methods or processes may otherwise be available to the general public, it remains the property of Fifth Third. You shall have no personal rights to such information or products either during or after employment with Fifth Third.

Any violation or abuse of the terms associated with the protection and proper use of Fifth Third assets subjects you to potential disciplinary action, up to and including termination of employment and potential legal action.

Policies to Reference:

- [Fifth Third Bancorp Disclosure Council Guidelines](#)
- [Information Handling Standard](#)
- Information Disclosure Policy for Employees, Officers and Directors in the [Employee Policy Manual](#)
- Acceptable Use Policy in the [Employee Policy Manual](#)

5.2 Maintaining Accurate Records and Accounts

Business and financial records are critical to Fifth Third Bancorp's operations. We rely on the integrity and accuracy of those records for both internal decision-making and for the benefit of our investors, government agencies, regulators, and others to whom we report. It is imperative that all records and public communications, including, but not limited to, those filed or produced with the U.S. Securities and Exchange Commission (SEC), the U.S. Federal Reserve, the U.S. Office of the Comptroller of the Currency (OCC) are complete, fair, accurate, timely, clear, and transparent.

You must not falsify:

- Information on an expense report or timesheet;
- Client or transaction information; or
- Books or records.

Fifth Third has a Disclosure Council and Disclosure Council Guidelines that govern filing and disclosures. Depending on your position with Fifth Third, you may be called upon to provide necessary information to assure that Fifth Third's filings and public records meet these standards. You must be candid and accurate when providing information for these documents and never make false or misleading entries, and you must provide prompt, accurate answers to inquiries from the Disclosure Council or Fifth Third management related to Fifth Third's filing and public disclosure requirements.

Policies to Reference:

- Timekeeping Policy in the [Employee Policy Manual](#)

“Business and financial records are critical to any operation. At Fifth Third, we take accountability to protect employee, customer, supplier, and other confidential information. It's one of our top priorities.”

Jude Schramm
Chief Information Officer

Q&A

I was processing some loan paperwork for a customer and I noticed he didn't initial one of the pages. I called him to let him know and he said he didn't have time to come to the Bank and asked me to sign for him because it was just an oversight. Can I fill in his initials in this situation?

You may not fill in the customer acknowledgment fields. The process requires those fields to be initialed by the customer, and to violate this process jeopardizes the legal integrity of the document. It is critical that the Bank's records are in complete compliance with all internal policies and legal requirements.



5.3 Information Security

All employees are expected to be security conscious. Security consciousness is the state of being aware of the sensitivity of information and its protection needs.

5.3.1 Protecting Employee, Customer, Supplier and Other Confidential Information

Any information not lawfully and publicly available needs to be protected. It is best to protect all information unless it has been publicly announced or otherwise disseminated in a way that does not breach any confidentiality or fiduciary duty.

Non-public or sensitive information includes, but is not limited to:

- All oral and written communications and information relating to Fifth Third or our past, present, or prospective customers, suppliers, shareholders, or employees of Fifth Third.
- Any work product that is generated while at Fifth Third, such as computer programs, technical or business process documentation and marketing materials not yet released.
- Financial information, including results, budgets, business plans and projections.
- Information on potential mergers, acquisitions, investments or divestitures.
- Information regarding employees, including salary and personal information.
- Information that is intended solely for internal use, such as email distribution lists and internal memos.
- Information about our vendors or outsourced products and services.
- Confidential Supervisory Information (audits) ([See Section 3.1](#)).

It is important to understand and comply with all laws, regulations and Fifth Third policies that restrict using, disclosing, retaining, accessing, or destroying information that needs to be protected.

Information Access

Access to sensitive information must be based on a legitimate business need. Only access the information needed to perform your job. Any unauthorized access, update, or use of Fifth Third systems or data is prohibited.

Public kiosks or workstations, such as those found in airports, hotels and libraries, must not be used for remote access to sensitive information.

Protect your user-name or user-ID and password, as it is the means of gaining access to Fifth Third information. You are responsible for activities tied to your user-ID.

Policies to Reference:

- Acceptable Use Policy in the [Employee Policy Manual](#)
- [Fifth Third Bancorp Enterprise Information Wall Policy](#)
- [Enterprise Information Security Policy](#)
- [Information Protection Policy](#)

5.3.2 Information Disclosure

Managing Information

It is important to ensure the accuracy, completeness and proper maintenance of records, data and any information that Fifth Third owns, creates, collects, uses and manages.

Proper information management includes:

- Following Fifth Third's Information Disclosure Policy for Employees, Officers and Directors, which deals with the handling of information about Fifth Third and partner companies, as well as trading in stock and other securities.
- Understanding how long to keep information; especially that which relates to a pending, threatening or foreseeable investigation audit, regulatory examination or legal proceeding.
- Implementing the correct manner to dispose of information.
- Protecting your workspace. Conceal sensitive information and lock (password protect) your computer when away from your desk.
- Ensuring the identity of the receiving party when making or receiving phone calls.
- Being cognizant of eavesdroppers and others present when a speakerphone is used.
- Never leaving sensitive data on any recorded messaging system.
- Becoming familiar with the Information Protection Policy, Information Handling Standard, Retention and Destruction Standard, Communications Security Standard, and Clean Workspace Guidance.

Please contact the [Privacy Office](#) if you become aware of any unauthorized access, use or disclosure of personal information. A privacy incident checklist is also available on the [Privacy Office Landing Page](#).

Policies to Reference:

- Information Disclosure Policy for Employees, Officers and Directors in the [Employee Policy Manual](#)
- [Information Protection Policy](#)
- [Information Lifecycle Governance Policy](#)

Q&A

I receive an important monthly report that is often late because the employee who generates it is very busy. She offered me her password to the reporting system so that I could get my own reports when I need them. Is this acceptable?

You may not use another employee's credentials for access to a system. If you have a business need for access to a certain system, you should submit an access request.

Be aware

The information entrusted to us has value to cyber criminals. Don't put this information at risk.

- Maintain information security in your workspace, following the Clean Workspace Guidance.
- Be suspicious of external email messages, especially those with attachments and links.
- Never provide your password, username or account number, even if the source appears to be legitimate.
- Provide information to individuals based only on their need to know.
- Question suspicious activity in your work area.
- Report suspicious emails, phone calls or text messages using the resources listed on Page 8.

Restricted Corporate

Information: Restricted Corporate Information means confidential information that is received or created about the general business, actual or proposed transactions or finances of (i) corporate customers and vendors that are corporate entities and (ii) Fifth Third in circumstances that would reasonably be understood to indicate it should be kept confidential.

5.3.3 Photographing and Recording

Taking pictures or making audio recordings on Fifth Third premises, unless authorized, is prohibited. This includes unauthorized recording of conversations with employees or customers without their knowledge or permission. Employees should have no expectation of privacy with regard to calls and emails using Fifth Third systems. Employee calls and emails may be monitored or recorded at any time. Photographing any customer information, unless approved by Financial Crimes or legal representatives, is prohibited.

Policies to Reference:

- Information Disclosure Policy for Employees, Officers and Directors in the [Employee Policy Manual](#)

5.4 Enterprise Information Wall

Fifth Third has an Enterprise Information Wall that is designed to prevent the misuse of material nonpublic information (MNPI) and to mitigate conflicts of interest. Employees who receive (or could receive) Restricted Corporate Information about a client or company in the course of employment are on the “private side” of the Information Wall. All other employees are on the “public side” of the Information Wall. Employees may disclose Restricted Corporate Information only to recipients who have a legitimate business need to know or have access to such information.

Private-side employees who need to engage the expertise or advice of a public-side employee and whose communication is anticipated to include MNPI must contact the Compliance Information Control Group (controlgroup.cincinnati@53.com) or

513-534-4030) to receive pre-clearance prior to contacting the public-side employee.

You are expected to adhere to the requirements and controls within the Enterprise Information Wall Policy. All investment activities must be conducted in accordance with the Enterprise Insider Trading and Ethical Investing Policy.

Policies to Reference:

- [Enterprise Insider Trading and Ethical Investing Policy](#)
- [Fifth Third Bancorp Enterprise Information Wall Policy](#)
- Information Disclosure Policy for Employees, Officers and Directors in the [Employee Policy Manual](#)

“The Enterprise Information Wall is designed to prevent the misuse of material nonpublic information.”

5.5 Records Retention and Legal Hold

Fifth Third Bancorp is required to maintain certain records to meet our legal, tax and regulatory requirements. Employees are responsible for adhering to the Records Retention Policy and securely disposing of records no longer needed. If there is a situation in which you are notified that your documents are put on “legal hold,” you are required to comply and abide by the notification.

Policies to Reference:

- [Information Lifecycle Governance Policy](#)
- Document Data Preservation and Litigation Hold Policy

5.6 Leaving Fifth Third

When your employment with Fifth Third ends, you still have continuing obligations to the Bancorp including:

- Returning all Bancorp property and sensitive information.
- Maintaining the confidentiality of Fifth Third information, as well as the information of those individuals and companies that do business with us.
- Adhering to any contractual agreements with Fifth Third, including non-disclosure, non-solicitation or other legal obligations.
- Refraining from buying or selling securities while in the possession of material non-public information.
- Assisting with investigations, litigation and protection of Fifth Third intellectual property.

Policies to Reference:

- [Fifth Third Bancorp Enterprise Information Wall Policy](#)
- [Enterprise Insider Trading and Ethical Investing Policy](#)

Q&A

A former Fifth Third co-worker now works for another bank. I received some documents from someone else at the same bank that are almost identical to a project my former co-worker had worked on at Fifth Third. Should I let someone know?

It is possible that the information you received is the intellectual property of Fifth Third, which employees must leave with the Bancorp when their employment ends. You should contact Information Security or Fifth Third’s EthicsLine (877-FOR-5353) or 53.ethicspoint.com so that the situation can be investigated appropriately.

5.7 Non-Traditional and Alternative Work Arrangements

Regardless of your work location, and whether that location is temporary or permanent, the Bank's policies and standards always apply. Any non-traditional, alternative workspace being used for Fifth Third business, such as a home office, is considered an extension of the corporate office. While conducting business outside of a traditional office setting, it's important to remain vigilant about Bank standards and expectations, which include, but are not limited to:

- Safeguarding information in accordance with the Bank's Enterprise Information Security Policy, the Information Protection Policy, the Enterprise Information Wall Policy and related guidance and standards. Regardless of work location, you should protect information by keeping computers locked, by securing or locking up confidential information, by shredding sensitive information when disposing, and by not emailing sensitive information.
- Ensuring that your computer screens are not visible to others and that work-related calls are held in an area that provides privacy and allows for confidentiality.
- Carrying out assigned duties, assignments, and other work obligations.
- Taking precautions to protect Fifth Third equipment from theft, damage, or misuse. In addition, you are responsible for any damage to Fifth Third property that is the result of your negligence or misuse.
- Returning Fifth Third property to the Company immediately upon request.
- Complying with all applicable employment policies in the same manner as working on-site.

Questions regarding non-traditional or alternative work arrangements should be directed to your manager.

Policies to Reference:

- [Enterprise Information Security Policy](#)
- [Information Protection Policy](#)
- [Employee Policy Manual](#)
- [Remote Access Approval and Usage Guideline](#)
- [End User Remote Access Standard](#)
- [Information Handling Standard](#)
- [Sensitive Information Elements Matrix](#)
- [Enterprise Information Wall Policy](#)
- [Sensitive Information Elements Guidance](#)
- [Clean Workspace Guidance](#)
- [Fifth Third Email, Messaging & Voice Communication Systems Standards](#)
- [Safeguarding Customer Information Policy](#)
- [Alternative Work Arrangements Policy](#)

5.8 Data Ethics & Management

Data handling, including creation, collection, modification, storage, movement, processing, or usage, are essential to many of our jobs. In a technology-driven and information-intensive environment, advanced analytics such as artificial intelligence, machine learning, and modeling can make ethical treatment of data complex. As an employee of Fifth Third Bank, it is important to understand that data represents a real person. Increasingly, our clients and partners have higher expectations regarding the type of data we collect and how we utilize that data.

Adhering to data governance and data management guidance will support your ethical handling of data.

When handling data, you should take the following actions:

- Understand the source of the data and who owns the source (i.e., database, spreadsheet).
- Have the appropriate business need and authority to obtain the data.
- Minimize data collection and sharing to achieve necessary outcomes.
- Recognize how data use could create potential risk exposure to the organization. (i.e., Who could be harmed?).
- Be aware of the data limitations. (i.e., Potential bias, gaps, or omissions in the data).
- If the data being handled is designated Enterprise Data, reference the Enterprise Data Management Standard for enhanced data management controls. (i.e., Data Dictionary, Data Quality).

Policies to Reference:

- [Enterprise Data Management Policy](#)
- [Enterprise Data Management Standard](#)



6.0 Ensuring Responsible Communications About Fifth Third

One of our highest priorities at Fifth Third is ensuring that information conveyed about the Company is accurate and consistent with our public statements. Only authorized spokespeople are permitted to communicate on behalf of Fifth Third in any public forum. In addition to traditional media such as broadcast and print, this includes conferences, social media, online forums, blogs, message boards and other web-based channels.

Policies to Reference:

- Communication with Outside Agencies and the Press Policy in the [Employee Policy Manual](#)

6.1 Representing Fifth Third

There are exceptions to this policy, including representing Fifth Third at an industry trade conference or a similar setting. Appearances must be approved first by your manager, and then by Corporate Communications. In addition, all prepared materials such as presentation slides or speech scripts must be reviewed in advance by Corporate Communications. Material will be reviewed for brand integrity and for permissible information disclosure. Corporate Communications will review, provide guidance, and refer, when appropriate, to applicable disclosure councils. Any comments made about Fifth Third during the actual event must follow all Bancorp policies, and if personal observations are made, it must be clear that the views expressed are not those of Fifth Third.

6.2 Media Inquiries

All media inquiries (e.g., broadcast, print, radio or digital) seeking comment or information from Fifth Third, without exception, must be forwarded to Corporate Communications. These may be forwarded to individuals in Corporate Communications at the Bancorp level or an authorized individual such as a regional communications manager. Corporate Communications is the only function authorized to initiate contact on behalf of Fifth Third to any reporter, media member or media outlet. This ensures consistency of messaging and that all communications are made in full compliance with all applicable laws and regulations.

Q&A

I've been invited to a local college to give a banking presentation to a class. Do I need to request approval to do this?

Before any appearance at which you are representing Fifth Third, you must have the approval of your manager and Corporate Communications (a list of contacts is available on [The Landing > Divisions > Corporate Communications](#).) If approved, Corporate Communications will need to review any materials or notes prior to your presentation.

6.3 Social Media

Social media is a critical communication channel for Fifth Third, both to address customer needs and inquiries and to provide information during a crisis. It is important that our social media use contributes positively to our image. Consistent with Fifth Third's guidelines regarding members of the news media, only designated employees are authorized to speak on behalf of Fifth Third on social media. There may be additional rules applicable to Bank-sponsored social media use, so authorized employees should review the Social Media Use Policy.

If your social media content refers to Fifth Third or the Bank's interests, then you should ensure that at all times and on all forms of social media you adhere to the guidelines outlined in the Social Media Use Policy, such as:

- Be transparent and make necessary disclosures, including your employee status and that your views are not necessarily those of the Bank when referring to Fifth Third matters. This can be done in a social media bio; for example, "Marketing Manager @FifthThird. Posts are mine." (such disclosures are not required in purely personal posts/accounts that do not otherwise reference Fifth Third or its interests).
- Refrain from responding to negative or disparaging posts about Fifth Third or its brands, do not respond yourself. Instead, notify the Social Media Team.
- Not disclosing internal-use, restricted or confidential information, including information about other employees, customers, vendors or business partners.
- Obtaining permissions for photos or material protected as intellectual property.
- Being truthful, accurate and respectful.

If you use personal social media in the workplace, you are expected to use good judgment, such as:

- Avoiding excessive use of social media during work hours that interferes with productivity.
- Being mindful that others around you may also be able to view your online activity, and exercising care in avoiding content that is inappropriate for the workplace.
- Ensuring that Fifth Third's identity, brand, integrity and reputation are not negatively impacted by your social media content.
- Do not post photographs of other employees without obtaining their consent.

Be aware that personal use is subject to Fifth Third's Code of Business Conduct and Ethics, policies and standards, including those prohibiting discrimination, harassment, retaliation and workplace violence. Nothing in the Code shall be construed as prohibiting any conduct, including concerted activity, protected by law.

Policies to Reference:

- Social Media Use Policy in the [Employee Policy Manual](#)
- Communication with Outside Agencies and the Press Policy in the [Employee Policy Manual](#)
- Acceptable Use Policy in the [Employee Policy Manual](#)
- Information Disclosure Policy for Employees, Officers and Directors in the [Employee Policy Manual](#)

Q&A

I'd like to post some information about a new Fifth Third product through my personal Facebook account, because I think many of my friends would be interested. Since the product is publicly available, is this acceptable?

Employees are generally discouraged from making personal posts about Fifth Third products or services. Fifth Third has designated corporate social media accounts and authorized users who are familiar with regulatory guidance concerning online marketing activities. In this situation, it might be best to direct your friends to the product information available online.

“At Fifth Third, we seek to ensure that our identity, brand, integrity and reputation are protected and advanced through accurate, consistent and responsible actions and communications.”

Susan Zaunbrecher
Chief Legal Officer



Glossary

Antitrust Laws: Laws and statutes that protect consumers from predatory business practices, by promoting fair competition.

Bribery: Offering, promising or soliciting anything of value in exchange for preferential treatment or special favors, or to influence the actions of a person in charge of an official process.

Confidential Information: Information that is not appropriate for broad or indiscriminate distribution. If disclosed, confidential information could reduce the Bank's competitive advantage or cause damage to the image or financial standing of the Bank, a business partner, employee, or customer.

Conflict of Interest: An outside interest or relationship that could interfere, or appears to interfere, with an employee's Fifth Third responsibilities.

Currency Transaction Report: A report U.S. financial institutions are required to file with FinCEN for each deposit, withdrawal, exchange of currency, or other payment or transfer, by, through, or to the financial institution involving a currency transaction of more than \$10,000.

Customer Complaint: Any unwritten or escalated verbal communication stating that something is unfair, unsatisfactory or unacceptable, or that notes the consumer is dissatisfied in regard to a product, service, location or employee.

Derivatives: A security with a price that is dependent upon or derived from one or more underlying assets. Its value is determined by fluctuations in the underlying asset.

Discrimination: Treating an employee unfairly or differently from others, based on a group or category the employee is perceived to belong to, including (but not limited to): race, color, national origin or ancestry, religion, physical or intellectual disability, sexual orientation, gender identity, etc.

Family Member: Family includes spouse or domestic partner (current or former); parent, sibling, child, grandparents and grandchildren; members of the employee's immediate household or children of these groups; any individual related by blood or affinity whose close association with the employee is the equivalent of a family relationship.

Fraud: Wrongful or criminal deception intended to result in financial or personal gain.

Gift: Anything of value for which the employee did not pay market value, to include, but not limited to: goods; products; services; tickets where the vendor, supplier, client or other business partner providing the ticket is not present; free use of recreational real estate; and/or other discounts not generally available to other Fifth Third employees.

Government Official: Any officer, employee, or agent of: any government agency, department or body; any government-controlled entities; any international organizations; or any political parties or candidates.

Harassment: Actions or behavior that create a hostile or intimidating work environment.

Incentive Gaming: Unethically manipulating a pay for performance system to "earn" the compensation or benefit, without actually achieving the target.

Information Management: Handling, transmitting, storing, and securing information related to Fifth Third in compliance with internal procedures and policies.

Intellectual Property: Any products or ideas resulting from a thought, including but not limited to: information, ideas, work products, processes, techniques, patents, copyrights, trademarks, trade secrets, reports, data, etc.

Material Non-Public Information: Any information that has not been made public that a reasonable investor would consider important in making an investment decision.

Meals and Entertainment: Food, beverages or other activities intended to promote or strengthen Fifth Third business, to include, but not limited to: breakfast, lunch, dinner, drinks, golf outings, and/or sports or cultural events where a Fifth Third employee and the vendor, supplier, client or other business partner attend the activity together.

Money Laundering: Attempting to conceal illegally obtained money by making it appear legal, usually through a series of complex transfers.

Proprietary Information: Information unique to Fifth Third that may provide a competitive advantage and should be kept confidential.

Retaliation: Taking adverse actions against someone in response to their report of a violation of the Code of Business Conduct and Ethics, an internal policy or some other concern.

Securities: Tradable financial assets, such as stocks, bonds, debentures, options, partnership interests, and other equity or debt interests.

Self-Dealing: When an employee conducts business or requests that another employee conduct business in a manner that places the employee's personal interests above the interests of Fifth Third, regardless of whether the Fifth Third employee receives monetary benefit.

Social Media: Websites, applications, or electronic forums that allow users to create and share content and interact electronically.

Any waivers of the Code for executive officers or directors of Fifth Third Bancorp may be made only by the Board of Directors of Fifth Third upon the recommendation of the Audit Committee; waivers will be publicly disclosed as required by SEC or NASDAQ rules. Any waivers of the Code for other employees may be made by the Conflicts Council as outlined in the Code. Waiver of a specific provision of the Code with respect to an individual shall not operate as a waiver of that individual's compliance with other requirements of the Code. 1) Nothing in the Code or any other Fifth Third agreement or policy is intended to prohibit or restrict you from participating in, testifying, or assisting in any investigation, hearing, whistle blower proceeding, or filing a complaint with any federal, state, or local government agency or commission, including providing documents or other information without notice to Fifth Third. 2) If a report is made against an employee and the investigation is substantiated, prompt and corrective action will be taken, up to and including termination of employment.

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**WE LIVE HERE, TOO.
WE WORK, PLAY AND
RAISE OUR FAMILIES HERE.**
That's why we've committed
ourselves to improving lives
in all the markets we serve.