

Code of Business Conduct and Ethics

Summary of Key Revisions

The following summarizes key revisions to The Charles Schwab Corporation Code of Business Conduct and Ethics.

- Requirement to adhere to regulatory guidelines in the **Recordkeeping** section.
- Clarified antitrust law language in the **Fair Dealing, Competition and Sales Practices** section.
- Addition of requirements in the **Prohibition of Bribery and Kickbacks** section.
- Updates throughout the Code to reflect revisions made in relevant policies and procedures.
- Removal of duplicative language to improve clarity and movement of some sections for better organization.