

# Code of Business Conduct and Ethics

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## Summary of Key Revisions

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

- In the **Reporting an Issue** and **Non-Retaliation** sections, clarified guidance and updated resources to leverage when reporting any retaliatory behavior.
- Under **Securities Accounts**, clarified guidance for disclosing brokerage accounts.
- Under **Conflicts of Interest**, clarified avenues for escalating potential concerns regarding a conflict of interest.
- Broadened the scope of who may not have a **Financial Interest or Ownership in Other Businesses**.
- Clarified guidance on engaging in **Outside Employment and Other Outside Activities** and **Outside Directorships and Advisory Positions**.
- Added additional guidance on providing **Gifts and Entertainment** to third parties.