

Adopted: October 31, 2004  
Revised: May 6, 2021

## EATON VANCE

### CODE OF BUSINESS CONDUCT AND ETHICS

The Firm<sup>1</sup> desires to be a responsible member of the various communities in which it does business and to assure the welfare of those dependent upon the continuation of the Firm's good health, namely its shareholders, employees, customers (including Clients as defined below) and suppliers. It is the policy of the Firm to comply with all laws and to conduct its business in keeping with high moral, legal, ethical and financial reporting standards. **The Firm's policies apply equally to employees at all levels, and this Code of Business Conduct and Ethics ("Code") applies to all entities wholly-owned by Eaton Vance Corp. prior to its acquisition by Morgan Stanley and includes Eaton Vance Management, Boston Management and Research, Eaton Vance Advisers International Ltd., Eaton Vance Global Advisors Limited, Eaton Vance WaterOak Advisors, Atlanta Capital Management Company LLC, Calvert Research and Management, and Parametric Portfolio Associates LLC.**

In the event this Code conflicts with the Morgan Stanley – Eaton Vance Standard of Conduct ("Standard of Conduct"), the Standard of Conduct governs. Employees are expected to act in accordance with the standards set forth in the Standard of Conduct and all other applicable Firm policies and procedures. All officers and managers of the Firm are responsible for communicating and implementing these policies within their specific areas of supervisory responsibility. This Code is not the exclusive code of ethics applicable to employees of the Firm, who are also subject to the Firm's Code of Ethics<sup>2</sup>, including the policy on personal securities transactions therein, designed to comply with the requirements of rules under the Investment Company Act and the Investment Advisers Act.

Of course, no Code or Standard of Conduct can replace the thoughtful behavior of an ethical officer or employee, and the Firm relies upon each individual within the organization to act with integrity, to use good judgment and to act appropriately in any given situation. Nevertheless, we believe that this Code can help focus the Firm's management on areas of ethical risk, provide guidance to employees to help them to recognize and deal with ethical issues and help to foster a culture of honesty and accountability. We encourage management and each employee to review this Code carefully, ask any questions regarding the policies and procedures embodied in this

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<sup>1</sup> The Firm means all entities wholly owned by Eaton Vance Corp. prior to its acquisition by Morgan Stanley and includes Eaton Vance Management, Boston Management and Research, Eaton Vance Advisers International Ltd., Eaton Vance Global Advisors Limited, Atlanta Capital Management Company LLC, Calvert Research and Management and Parametric Portfolio Associates LLC.

<sup>2</sup> With respect to Parametric Portfolio Associates LLC ("Parametric"), except as otherwise noted, any reference to a specific policy or procedure herein shall refer to a policy or procedure Parametric has adopted and which covers the same subject matter as such referenced policy. Please consult the Parametric Chief Compliance Officer for a copy of such corresponding Parametric policy

Code to ensure that everyone understands each such policy and procedure and the overall intent of the Code, and make every effort to remain in full compliance with both the letter and spirit of this Code.

Without limiting the generality of the above, the following presents the Firm's policy on specific topics concerning business ethics and legal compliance.

### **Conflicts of Interest**

*General.* The Firm's officers and employees have a duty to be free of conflicting interests that might influence their decisions when representing the Firm. Consequently, as a general matter, officers and employees are not permitted to maintain any conflict of interest with the Firm, and should make every effort to avoid even the appearance of any such conflict. A "conflict of interest" occurs when an individual's private interest interferes in any way - or even appears to interfere - with the Firm's interests as a whole. A conflict of interest can arise when an officer or employee takes action(s) or has interests that may make it difficult to perform his or her company work objectively and effectively or when an officer or employee or a member of his or her family receives any personal benefits as a result of his or her position in the Firm. Any officer or employee who believes that he or she may have a potential conflict of interest must report his or her concerns to an attorney in the Eaton Vance/Morgan Stanley Legal Department (the "Attorney") and/or applicable Chief Compliance Officer or delegate<sup>3</sup> immediately.<sup>4</sup> Without limiting the generality of this Code's prohibition on conflicts of interest involving the Firm's officers and employees:

- The Firm's dealings with suppliers, customers, contractors and others should be based solely on what is in the Firm's best interest, without favor or preference to any third party, including close relatives.
- Employees who deal with or influence decisions of individuals or organizations seeking to do business with the Firm shall not own interests in or have other personal stakes in such organizations that might affect the decision-making process and/or the objectivity of such employee, unless expressly authorized in writing by the Attorney<sup>5</sup> of the Firm after the interest or personal stake has been disclosed.
- Employees shall not do business on behalf of the Firm with close relatives, unless expressly authorized in writing by the Firm's Attorney after the relationship has been disclosed.

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<sup>3</sup> For purposes of this policy, an employee or officer of the Firm may notify the Chief Compliance officer of the entity of which such individual is an employee or officer

<sup>4</sup> Conflicts of interest or situations that may give the appearance of a conflict of interest involving a trader (or a person who has the ability to choose the broker that will execute any particular transaction) must be reported to the relevant investment department head, the Attorney and the entity Chief Compliance Officer.

<sup>5</sup> For purposes of this Policy, where required to notify the Attorney, an employee or officer of Atlanta Capital Management Company LLC ("ACM") providing notice to the Chief Compliance Officer of ACM shall be sufficient.

In addition, conflicts may arise from, or as a result of, the contractual relationships between the Firm and the investment companies sponsored or advised by the Firm (the “EV Funds”), the officers of which may also be officers of the Firm. As a result, this Code recognizes that the officers of the Firm, in the normal course of their duties (whether formally for the Firm or for the EV Funds, or for all of them), will be involved in establishing policies and implementing decisions that will have different effects on each entity. The participation of the officers in such activities is inherent in the contractual relationships between those entities and is consistent with the performance by the officers of their duties as officers of the Firm. Thus, if performed in conformity with the provisions of the Investment Company Act of 1940 (“Investment Company Act”) and the Investment Advisers Act of 1940 (“Investment Advisers Act”) or other applicable laws, such activities generally will be deemed to have been handled ethically.<sup>6</sup>

*Gifts*<sup>7</sup>. Officers and employees shall not (1) seek or accept from any prospective or current provider of goods or services to the Firm (“Service Provider”) or (2) provide to any prospective or current investment management client of the Firm (“Client”)<sup>8</sup>, any “gift” of “material value.” The terms *gift* and “material value” are defined below.

- “Gift” includes cash, cash equivalents (such as gift cards or vouchers), any other material goods such as clothing, golf clubs, bottles of wine, or other items, including items given in recognition of a life event such as a wedding, anniversary or birthday. In some cases, occasional entertainment (as defined under “*Entertainment*” below) where an employee of the party providing the entertainment is not present at the event may be considered a gift.
- “Material value” means anything with a value of over \$100.

All gifts, whether given or received, must be reasonable in nature, frequency and cost, singularly and in the aggregate. If an officer or employee is offered a gift, he or she should only accept the gift if he reasonably believes that, it is not material, there is no attempt to influence his or her judgement and he or she does not feel indebted or obligated in some way.

*Entertainment*. Officers and employees shall not participate in any form of “*entertainment*” (as defined below) provided by any Service Provider to the Firm or a Client unless an employee of the Service Provider providing the entertainment is present at the event and the entertainment is not so lavish, excessive, extravagant, unique or frequent as to raise a question of impropriety. For purposes of this policy, entertainment that involves attending playoff of championship professional or college sporting events is considered excessive and is not permitted.

- “Entertainment” includes items such as (i) meals or other gatherings involving food and/or drinks; (ii) conferences, seminars or training events;

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<sup>6</sup> Employees of the Firm may also deal with suppliers, customers, contractors and others on behalf of the Firm’s clients. The prohibition on conflicts of interests set forth herein also applies to such dealings.

<sup>7</sup> Parametric has adopted its own gift and entertainment policy which may differ from these respective gifts and entertainment sections.

<sup>8</sup> Certain representatives of Clients, such as employees of public entities, may be prohibited from accepting gifts of any value. In addition, the Firm may need to publicly disclose certain gifts provided to certain persons, such as public or union officials.

(iii) tickets to events (such as theatre, sports, charitable, cultural events), and (iv) transportation to and/or lodging in connection with any of the events identified in (i) through (iii) above.

Permitted entertainment includes occasional tickets, meals or social gatherings. In addition, if an appropriate senior executive of the Firm approves the receipt of transportation and/or lodging outside of the Service Provider's headquarter city as having a legitimate business purpose, then such transportation and/or lodging may be accepted.

Officers and employees shall not seek to provide to any Client any form of "entertainment" (as defined above) unless an officer or employee of the Firm will be present at the event.

All entertainment must be reasonable in nature, frequency and cost, singularly and in the aggregate. If an officer or employee is offered entertainment, he should only accept if he reasonably believes that there is no attempt to influence his judgement and he does not feel indebted or obligated in some way.

*Additional Policies and Procedures Related to Gifts and Entertainment.* Certain employees are subject to the additional policies and procedures related to giving and receiving gifts and entertainment set forth below. With respect to those employees, to the extent that any provision of the additional policies is more restrictive than the policy stated in this Code, such policies govern.

- Employees that are registered representatives or hold one or more Financial Industry Regulatory Authority ("FINRA") licenses (a "Licensed employee") are also subject to Eaton Vance Distributors, Inc.'s ("EVD") Noncash Compensation Policy and Procedures (the "FINRA Policy").
- Employees of Eaton Vance Management, Boston Management and Research, Eaton Vance Trust Company, ACM, Eaton Vance WaterOak Advisors, and Calvert Research and Management that are portfolio managers, analysts, research associates, or traders in the various Investment Departments of those entities (referred to collectively as "Investment Professionals") are also subject to the Policy and Procedures Related to Gifts and Entertainment from Client Counterparties (the "Gift and Entertainment Policy for Investment Professionals").
- Employees of Eaton Vance Management (International) Limited ("EVMI"), Eaton Vance Global Advisors Limited ("EVGA") and Eaton Vance Advisers International Limited ("EVAI") are also subject to the policy regarding gifts and entertainment in the respective company's Compliance Manual.

*Transactions with Affiliates.* Certain conflicts of interest arise out of the relationship between officers of the Firm and the EV Funds, and may be subject to provisions in the Investment Company Act, the Investment Advisers Act and the regulations thereunder, or other applicable laws that address conflicts of interest. For example, officers of the Firm may not individually engage in certain transactions (such as the purchase or sale of securities or other property) with the EV Funds or funds sponsored by affiliates that are registered with the U.S. Securities and Exchange

Commission (“SEC”) as investment companies because of their status as “affiliated persons” of “affiliated persons” of the EV Funds. The compliance programs of the Firm and the EV Funds are designed to prevent, or identify and correct, violations of such provisions. This Code does not, and is not intended to, duplicate, change or replace those programs, and such conflicts fall outside of the parameters of this Code.

### **Corporate Opportunities**

Each officer and employee holds a personal duty to the Firm to advance the Firm’s legitimate business interests when the opportunity so arises. No officer or employee of the Firm is permitted to:

- take personally, whether for economic gain or otherwise, any business opportunity discovered through the use of the Firm’s property or information or such person’s position with the Firm, where such opportunity might be taken by the Firm, unless, after full disclosure, it is authorized in writing by the Attorney;
- use any of the Firm’s corporate property, information, or his or her position with the Firm for personal gain to the detriment of the Firm; or
- compete with the Firm.

### **Confidentiality/Insider Information**

It is imperative that officers and employees safeguard confidential information including, but not limited to, information regarding transactions contemplated by the Firm and the Firm’s finances, business, computer files, employees, present and prospective customers and suppliers and stockholders. Confidential information may not be disclosed except where disclosure is authorized by the Attorney, or is otherwise required by applicable law. An employee’s obligation to preserve and not disclose the Firm’s confidential information continues even after his or her employment by the Firm ends.

Officers and employees must keep confidential, and not discuss with anyone other than other officers or employees for valid business purposes, information regarding Client investment portfolios, actual or proposed securities trading activities of any Client, or investment research developed in the Firm. Officers and employees should take appropriate steps, when communicating the foregoing information internally, to maintain confidentiality, for example, by using sealed envelopes, by following the Firm’s data protection and privacy policies, and speaking in private.

As noted above, no officer or employee of the Firm may in any manner use his or her position with the Firm or any information obtained in connection therewith for his or her personal gain. Obligations to the Firm in this regard within the context of non-public, or “insider” information regarding the Firm compel particular emphasis. Officers and employees must not disclose or use or attempt to use “confidential” or “insider” information to further their own interests or for personal gain, economic or otherwise or for any other reason except the conduct of the Firm’s business.

Notwithstanding the foregoing, nothing in this Code is intended to restrict an officer or employee from reporting possible violations of a federal law or regulation to

any governmental agency.

“Insider information” is non-public information that could affect the market price of a security or influence investment decisions. Officers and employees are prohibited from disclosing or using non-public information for personal gain, whether through the purchase or sale of securities and are urged to avoid even the appearance of having disclosed or used non-public information in this manner. To use non-public information for personal financial benefit or to “tip” others who might make an investment decision on the basis of this information is not only unethical but also illegal and may result in civil and/or criminal penalties. As an affiliate of Morgan Stanley, officers and employees are restricted from trading on insider information pertaining to Morgan Stanley. Every employee is responsible for being familiar with the Eaton Vance Policies and Procedures in Prevention of Insider Trading<sup>9</sup>.

### **Protection and Proper Use of Other Firm Assets**

All officers and employees should endeavor at all times to protect the Firm’s assets and ensure their efficient use. Theft, carelessness and waste can have a direct impact on the Firm and its profitability. Corporate assets should be used only for legitimate business purposes and in an otherwise responsible and reasonably efficient manner.

### **Fair Dealing**

Although other sections of this Code specifically address compliance with applicable laws and regulations and other standards, as a general matter, all of the Firm’s officers and employees shall endeavor under all circumstances to deal fairly with the Firm’s customers, suppliers, competitors and employees. No officer or employee of the Firm shall take unfair advantage in the context of his or her position with the Firm of any other person or entity through manipulation, concealment, abuse of privileged information, misrepresentation of material fact or any other unfair-dealing practice.

### **Compliance with Laws and Regulations**

The Firm and its employees shall comply with all laws and regulations applicable to its business, including, but not limited to, the following:

*Securities and Related Law.* Federal and state securities laws, including but not limited to applicable provisions of the Securities Act of 1933, the Securities Exchange Act of 1934, the Sarbanes-Oxley Act of 2002, the Dodd-Frank Wall Street Reform Act of 2010, the Investment Company Act, the Investment Advisers Act, the Commodity Exchange Act (the “CEA”), and the rules and regulations of the SEC and the Commodity Futures Trading Commission (the “CFTC”), as well as applicable rules of FINRA, the National Futures Association, applicable non-U.S. rules and regulations and, in the case of Morgan Stanley, the listed company rules of the New York Stock Exchange.

*Antitrust.* Antitrust and related laws designed to protect against illegal restraint of competition. The Firm will not engage or attempt to engage in agreements with

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<sup>9</sup> Employees of Parametric are subject to the Parametric Policies and Procedures on the Prevention of Insider Trading

competitors or suppliers to fix or illegally discriminate in pricing, or participate or attempt to participate in any form of bid rigging.

*Foreign Activities.* The U.S. Foreign Corrupt Practices Act and the applicable laws of foreign countries in which the Firm may do business. Actions taken outside the U.S., whether by non-U.S. employees, officers, or directors personnel or by U.S. employees, officers, or directors operating internationally which may be in conformance with local custom, may be viewed as against permissible American standards of conduct. Accordingly, in instances where U.S. laws, regulations and standards relating to ethical conduct are more restrictive than those of a particular locality outside the U.S., conduct should be governed by U.S. standards. See “Illegal or Unethical Payments” below as well as the Firm’s Anti-Corruption Policy under the U.S. Foreign Corrupt Practices Act and U.K. Anti-Bribery Act.

Officers and employees are not expected to know every detail of these or other applicable laws or rules, but should review the Firm’s formal policies and procedures available on its Intranet site and seek advice from the Firm’s internal auditing staff, independent auditor, or internal legal staff, as appropriate.

### **Illegal or Unethical Payments**

The Firm does not permit illegal, improper, corrupt or unethical payments to be made in cash, property, or services by or on behalf of the Firm in order to secure or retain or attempt to secure or retain business or other advantages, including, but not limited to, payments to any employee of a customer or supplier of the Firm for the purpose of influencing that employee’s actions with respect to their employer’s business. Such payments may constitute a crime in the U.S. and most foreign jurisdictions. In jurisdictions where they are not so considered, they are regarded by the Firm as unethical payments. Agents and representatives of the Firm are required to follow the provisions of this Code in their dealings on behalf of the Firm.

*Foreign Public Officials.* Prior to making any payment, gift or offer to, or entering into a transaction that could potentially involve direct or indirect payments to, a foreign public official, written approval must be obtained from the applicable Chief Compliance Officer and Eaton Vance/Morgan Stanley Legal. Certain employees are subject to the additional policies and procedures related to giving and receiving gifts and entertainment set forth under *Additional Policies and Procedures Related to Gifts and Entertainment* above.

*Customers and Others.* Business entertainment that is reasonable in nature, frequency and cost is permitted, as is the presentation of modest gifts where customary. Because no clear guidelines define the point at which social courtesies escalate to, and may be regarded as, improper or unethical payments, extreme care must be taken in this regard. Certain employees are subject to the additional policies and procedures related to giving and receiving gifts and entertainment set forth under *Additional Policies and Procedures Related to Gifts and Entertainment* above.

*Form of Payments of Amounts Due Agents, Representatives and Others.* All payments for commissions or other similar obligations are to be paid by check or draft, bank wire transfer, or other authorized means, and shall, in each case, be made payable

to the order of the recipient or his authorized agent. The use of currency or other forms of “cash” payments is not acceptable.

See “Compliance with Laws and Regulations” above as well as the Firm’s Anti-Corruption Policy under the U.S. Foreign Corrupt Practices Act and U.K. Anti-Bribery Act.

### **Accounting and Financial Reporting Standards**

The Firm has implemented and will comply with generally accepted accounting principles for entries on its books and records. Entries should be properly authorized, complete, and accurate and reflect the transactions to which they relate. No false, artificial, misleading or deceptive entries should be made for any reason. No employee of the Firm shall provide false information to, or otherwise mislead, our independent or internal auditors.

Bank, brokerage or other accounts shall be fully accounted for and accurately described in the Firm’s records.

### **Outside Directorships and Employment<sup>10</sup>**

No officer or employee of the Firm may serve as a director, trustee, committee member, officer, employee, general partner, contractor or consultant of any firm or other entity, whether or not for pay, (referred to herein as “Outside Business Activity”) without the prior written approval of his or her manager and the applicable Chief Compliance Officers or Attorney (or designee) . Such approval will not be granted in the event that either the manager or the applicable Chief Compliance Officer or Attorney (or designee) determines that the Outside Business Activity represents a conflict of interest between the officer/employee and the Firm or its clients. The Firm will maintain a record of all pre-approved Outside Business Activities of each officer/employee. Outside Business Activities of the officer/employee will be periodically monitored to evaluate whether those activities represent a conflict of interest between the officer/employee and the Firm or its clients.<sup>11</sup> If it is determined that a conflict of interest does exist, the relevant Chief Compliance Officer and/or Attorney shall:

- Ensure that the Outside Business Activity giving rise to the conflict is terminated or some mitigating controls are put in place to address the conflict and any actual or potential for harm to clients;
- Determine whether the conflict resulted in any harm to a client and if so, how to remedy the harm; and
- If the conflict is deemed material and/or resulted in actual harm to a client, notify the affected client(s) of the existence of the conflict.

*Additional Policies and Procedures Related to Outside Business Activity.* Certain employees are subject to the additional policies and procedures related to Outside Business Activity With respect to those employees, to the extent that any provision of

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<sup>10</sup> This section shall not apply to Parametric which has adopted its own equivalent policy

<sup>11</sup> This monitoring generally consists of reviewing any changes in the nature of the outside business activity as reported by the employee through the annual attestation or otherwise.

the additional policies is more restrictive than the policy stated in this Code, such policies govern.

- Employees who are registered representatives and registered principals of EVD must comply with EVD's Outside Business Activity Policy and Procedures requirements with respect to approvals of Outside Business Activity and EVD will retain all records related to such Outside Business Activities.
- Employees of EVMI, EVGA, and EVAIL are subject to the policy regarding Outside Business Activity in the respective company's Compliance Manual.

### **Media Inquiries**

Occasionally, employees may receive an inquiry from a media representative requesting information or comment on some aspect of the Firm's affairs. Such questions must be referred to the Firm's Director of Media Relations (or similar function) or the Legal Department and will generally be handled pursuant to Eaton Vance's Policy and Procedures Regarding Public Statements.<sup>12</sup>

### **Political Activities**

Employees may participate in political activities on their own time and at their own expense provided that such participation complies with the Firm's Rule 206(4)-5 ("Pay-to-Play") Procedures. The Firm will not compensate or reimburse employees for such activities.

The Firm will not contribute anything of value to political parties, candidates for public office or elected officials, except in jurisdictions where such contributions are legal and in compliance with the Firm's Rule 206(4)-5 ("Pay-to-Play") Procedures, and approved by the Legal Department. Furthermore, without such approval, no corporate asset may be used in support of any organization whose political purpose is to influence the outcome of a referendum or other vote of the electorate on public issues.

### **Discipline**

Any person subject to this Code who violates or attempts to violate this Code or any other formal policies, procedures and/or guidelines, or does not complete required training and/or certification requirement(s) under any such policies, procedures and/or guidelines within the prescribed timeframe, of the Firm may be subject to disciplinary action, up to and including termination, in management's discretion. Disciplinary action may be taken regardless of whether the violation is committed during working hours, and regardless of whether Firm equipment or facilities are used for the purpose of committing the violation.

Any person subject to this Code suspected of committing a violation of this Code or any other formal policies of the Firm will be required to co-operate with the Firm's investigation, which may involve handing over relevant records, passwords and/or login details.

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<sup>12</sup> An inquiry received by Parametric may be handled pursuant to the Parametric Media Policy.

## **Periodic Review and Revision**

Management reserves the right to amend and revise this Code in its sole discretion. Employees will be apprised promptly of any material changes to the policies, procedures and obligations set forth herein.

## **Reporting Obligation**

It is the responsibility of each person subject to this Code who has knowledge of misappropriation of funds, activities that may be of an illegal nature, or other incidents involving company loss, waste, and abuse or other violations of this Code to promptly report, in good faith, the situation to the applicable Chief Compliance Officer and/or an attorney in the Legal Department. Nothing in these procedures restricts or prohibits a person subject to this Code from initiating communications directly with, responding to any inquiries from, providing testimony before, providing confidential information to, reporting possible violations of law or regulation to, or from filing a claim or assisting with an investigation directly with a self-regulatory authority or a government agency or entity, including without limitation, the U.S. Equal Employment Opportunity Commission, the Department of Labor, the National Labor Relations Board, the U.S. Department of Justice, the SEC, the CFTC, the FINRA, the Occupational Safety and Health Administration, the U.S. Congress, any other federal, state or local governmental agency or commission, and any agency Inspector General (collectively, the "Regulators"), or from making other disclosures that are protected under the whistleblower provisions of federal, state or local law or regulation. These procedures do not limit a person's right to receive an award from any Regulator that provides awards for information relating to a potential violation of law. People subject to this Code do not need the prior authorization of the Firm to engage in conduct protected by this paragraph, and do not need to notify the Firm that the person has engaged in such conduct. People subject to this code recognize and agree that, in connection with any such activity outlined above, the person must inform the Regulators, the person's attorney, a court or a government official that the information the person is providing is confidential. Despite the foregoing, people subject to this Code are not permitted to reveal to any third-party, including any governmental, law enforcement, or regulatory authority, information the person came to learn during the course of the person's employment with the Firm that is protected from disclosure by any applicable privilege, including but not limited to the attorney-client privilege and/or attorney work product doctrine. The Firm does not waive any applicable privileges or the right to continue to protect its privileged attorney-client information, attorney work product, and other privileged information.

Please take notice that federal law provides criminal and civil immunity to federal and state claims for trade secret misappropriation to individuals who disclose a trade secret to their attorney, a court, or a government official in certain, confidential circumstances that are set forth at 18 U.S.C. §§ 1833(b)(1) and 1833(b)(2), related to the reporting or investigation of a suspected violation of the law, or in connection with a lawsuit for retaliation for reporting a suspected violation of the law.

## **Prohibition Against Retaliation**

The Firm will not tolerate any form of retaliation against individuals who in good faith report possible misconduct even if, upon investigation, their suspicions prove to be unwarranted.

**No Rights Created**

This Code is a statement of certain fundamental principles, policies and procedures that govern the Firm's officers and employees in the conduct of the Firm's business. It is not intended to and does not create any rights in any employee, customer, client, supplier, competitor, shareholder or any other person or entity.

**Procedures Referenced Herein**

Each policy applicable to an officer or employee is available on the respective officer or employee's entity's intranet sites. Officers and employees may contact legal and compliance for copies of the respective policies.