

Wells Fargo Team Member Handbook

January 2020

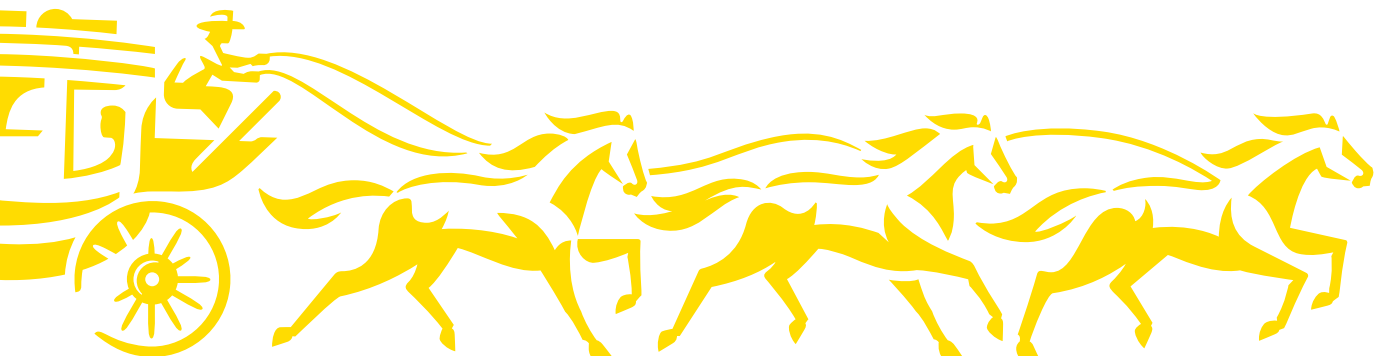


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The primary version of the Wells Fargo *Team Member Handbook* exists online, on Teamworks, Wells Fargo's intranet. The online Wells Fargo *Team Member Handbook* is updated as policies change and should be your first resource when looking for current information. Additionally, the online version includes links to other content within the handbook and on Teamworks.

This printed version is for the convenience of certain team members. Furthermore, it is not updated frequently and does not contain links to other content within the handbook or on Teamworks. Some policy change announcements may be distributed between printings of this printed version of the Wells Fargo *Team Member Handbook*.

Welcome

Here you will find essential information about Wells Fargo Human Resources (HR) policies and certain other corporate policies that will be valuable to you as you begin or continue your career with us.

Note: *Additional corporate and business policies can be found in the Policy Library and on department intranet sites. As a team member, it is important — and **your responsibility** — to be informed about the policies that affect you.*

The handbook applies to team members paid on a Wells Fargo U.S. payroll system, with the exception of the Information Security Policy Overview, which applies to all Wells Fargo team members. The handbook is not a contract of employment nor can it offer an answer for every situation. Employment at Wells Fargo is on an “at-will” basis.

Because this handbook is a key resource outlining team member policies, all team members paid on a Wells Fargo U.S. payroll system are required to sign an acknowledgment that they have been shown how to access it and understand its application to their employment with a Wells Fargo company. This acknowledgment typically occurs at the time of hire.

The handbook contains information on the following topics:

- **Resources & References.** This section provides you with additional HR, communication, and other resources that might be helpful during your employment, including a Glossary that lists frequently used handbook-related terms and their definitions. This section also provides helpful links to Wells Fargo’s Vision, Values & Goals and Behavioral Expectations.
- **Employment & Hiring.** This section provides you with information about our employment practices.
- **Team Member Professionalism.** This section provides you with information on what you can do to help us maintain a professional and productive work environment.
- **Anti-Harassment.** This section provides information on the various forms of harassment, including sexual harassment, and how to report any prohibited conduct.
- **Communications.** This section provides information on using company equipment to communicate with customers and your team and offers information about our social media policy.
- **Career, Performance & Problem Solving.** This section provides you with information about how you can develop the skills and knowledge you need to be successful in our company.
- **Pay & Jobs.** This section provides you with information about our compensation program.

- **Time Away.** This section provides you with information about how you can use time away to support your life events, such as illness, caring for a family member, vacation, volunteering, birth or adoption of a child, and loss of a family member.
- **Safety & Health.** This section provides you with information about our priority to maintain a work environment that promotes and protects the safety and health of our team members.
- **Leaving Wells Fargo.** This section provides you with information when your employment ends with the company.
- **Information Security.** This section provides you with information about your responsibility to protect our information, communication systems, and other assets.
- **Privacy & Solicitation.** This section provides you with information about the significant role you play in protecting our customers’ information and privacy.
- **The Wells Fargo Code of Ethics** has been removed from the *Team Member Handbook* and can now be found on the Wells Fargo Ethics site.

Updates to the handbook

The handbook exists online on Teamworks. Policies change from time to time, and the online handbook will be updated as needed (see Changes as of January 2020). At the bottom of each section in the handbook is a published reference date. That date refers to the last date on which that particular policy was updated.

This handbook supersedes all previous communications, written or oral, regarding these policies. Wells Fargo & Company created these policies, and many Wells Fargo companies have adopted them. Throughout this handbook, when you see the terms “Wells Fargo” or “the company,” it means the Wells Fargo company that employs you directly.

Additional policies

At Wells Fargo, the business groups that form our organization’s structure have a great deal of the decision-making authority. This handbook, for the most part, covers the employment policies adopted by the family of Wells Fargo companies. In many cases, however, specific legal entities or your business group may have additional policies, standards, guidelines, procedures, or approval requirements. You can find out about these from your manager.

We're a team

At Wells Fargo, we believe that every one of us is part of the larger Wells Fargo team. The contribution of each team member is both necessary and valued. And to reflect the depth of our commitment to this concept, we don't call our people "employees" (a cost to be managed) — they are team members (an asset to invest in).

"Team member" implies that we depend on each other to achieve our vision. Teamwork is essential to satisfy all our customers' financial needs and help them succeed financially. Saying that we are one team is not enough; we have to live it. You'll find the term "team member" throughout this handbook — so please think of yourself as an important part of the team. The people who work for each Wells Fargo company are that company. You are. We are. So when you see the words "we," "us," and "our" throughout this handbook, they mean all of us who work for the Wells Fargo family of companies, including the subsidiary that employs you.

It starts with you

Remember, every team member contributes to the culture of Wells Fargo — with the words we use, the actions we take, the way we treat each other, and how we treat our customers. We will build a strong culture together by meeting companywide behavioral expectations that align to our Vision, Values & Goals. These clear and common expectations ensure that everyone understands and lives the Wells Fargo culture in our interactions with each other, our communities, and our customers.

Resources & References

Our approach

Our team members are our greatest assets. Giving you the resources you need to be successful is one of our highest priorities. Beyond this handbook are many additional resources you can turn to for information, help, and guidance.

Your Manager

Your manager is the first person you should go to, whenever possible, when you have questions about:

- Wells Fargo policies, guidelines, and programs
- Workplace issues
- Performance feedback
- Job expectations
- Pay
- Career development

Your manager is one of your most valuable resources at Wells Fargo. You and your manager depend on each other to succeed professionally; he or she is accountable for the work you do and is committed to helping you do the best job you can. In turn, your working relationship contributes to the success of the other team members in your business unit and our overall company goals.

Teamworks

Wells Fargo's intranet offers online access to a variety of team member resources, including:

- Policy and benefits material
- Tools for viewing and changing personal and payroll information
- Team Member Look-Up
- Internal websites maintained by departments throughout the company
- Tools to help you improve your skills and manage your career

Teamworks is an important resource for team members and is used as the primary resource for team member communication at Wells Fargo. You can also access many Teamworks tools and functions from home, at teamworks.wellsfargo.com.

Human Resources

Each business unit in our company is supported by teams of professionals who deliver human resources services, consulting, and support to team members and managers.

Specifically, the ER Solutions team is available to assist you with questions related to Wells Fargo's HR programs, policies, or practices and to work with you in resolving any workplace-related issues or concerns.

Examples of issues or concerns that this team may assist you with include:

- Providing answers and advice for questions or concerns about workplace policies or situations.
- Addressing a sensitive workplace concern that your manager is unable to assist you with or that you are not comfortable speaking about with your manager.
- Facilitating the resolution of a conflict with your manager or a team member that you've made an attempt to resolve.
- Providing consultation to team members and managers about their respective responsibilities.
- Conducting a review of a disputed employment action.

Feel free to contact the ER Solutions team if you need advice or help in solving an issue that you have on the job.

• Online

For nonurgent inquiries, including corrective action reviews, attendance and punctuality issues, behavioral issues, policy interpretation, or initiation of the Wells Fargo Dispute Resolution process, complete the Employee Relations eForm to request a consultation.

• Phone

For inquiries that require an immediate response, including inappropriate behavior, workplace disruption, situations that may result in potential customer impact, or situations that may warrant sending a team member home for the day, call:

1-877-HRWELLS (1-877-479-3557), option 3
Monday through Friday, 8:00 a.m. to 5:00 p.m. in your time zone

In the eForm, please provide your name, Employee ID, telephone number, and the name (and Employee ID if you have it) of the team member you need to discuss. In addition, please provide a brief summary of the issue you would like to discuss along with supporting information or draft corrective action documents, as applicable.

To assist in scheduling time to discuss, please list your availability and time zone.

Alternatively, you may contact ER Solutions by phone at 1-877-HRWELLS (1-877-479-3557), option 3.

Benefits materials

Access materials and plan descriptions in the Benefits section on Teamworks. It's important for you to know where you can refer to this material if you have a question.

Team Member Care

If you have basic questions that aren't covered in the handbook or your benefits materials, you can call Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2, or use the Team Member Care eForm. For TDD access for persons with hearing impairments, please call 1-800-988-0161.

Jobs

Our online job posting site, Jobs, provides you with your most important, ongoing source of information about job opportunities at Wells Fargo. It's available on Teamworks and at home at teamworks.wellsfargo.com.

Employee Assistance Consulting

Many situations and changes in life are complex and may seem overwhelming. With Employee Assistance Consulting (EAC), you have a proven and trustworthy resource to help you and your team through difficult times. EAC offers a comprehensive menu of free services, 24 hours a day, 7 days a week for team members and their household family members. These services include the following:

Services for team members

- Confidential individual consultations and referrals for team members to assist with personal or work-related problems, including:
 - Personal, relationship, and family difficulties
 - Depression, anxiety, or other emotional concerns
 - Work or performance concerns
 - Alcohol and drug use
 - Child and elder abuse
 - Health matters
 - Grief and loss
 - Financial or legal matters
 - Crisis support
- Support for workgroups following robberies, natural disasters, and other critical workplace events
- Individual support for situations involving possible threats and domestic violence in and outside of the workplace

Confidentiality

Contact with EAC for individual assistance concerning personal or work-related problems is strictly confidential and voluntary. Participation in any **individual** EAC services is not communicated to your manager or anyone else without your expressed permission. All EAC records are kept completely separate from official personnel files.

Exceptions to confidentiality are made **only** when you give EAC explicit permission to release your records to an identified person or when required by law, such as:

- Situations that are imminently life-threatening
- Abuse or neglect of a child or vulnerable adult
- If EAC receives a court order for EAC records, those records **may** have to be turned over to a judge

Separate services for managers

- Management consultations on a variety of team member behavioral health situations often involving risks to the workgroup or enterprise, including:
 - Concerning displays of emotion or behavior in the workplace
 - Conflict in the workplace
 - Reports of suicidal thoughts or self-harm
 - Suspected substance abuse
 - Erratic or unusual changes in behavior
 - Accidents, serious illnesses, or a death
 - Fitness-for-duty evaluations
 - Workplace gender transition
- Post-robbery support services
- Threat assessment and management services including domestic violence
- Critical incident response and recovery support services (e.g., bomb threats, accidents, or natural disasters.)
- Business group support services including: facilitations, trainings, and product development on behavioral health topics

For a confidential team member consultation or for management consultation, call Employee Assistance Consulting (EAC) at its direct number 24 hours a day, 7 days a week at 1-888-327-0027. You can also reach EAC when you call 1-877-HRWELLS (1-877-479-3557), option 4. Visit the Employee Assistance Consulting site on Teamworks for more information.

Communication Resources

The table below provides the different communication resources that are available to you.

Business communications	In addition to company-wide communications and publications, your region or business group might have additional internal communications resources. Check with your manager for information about the resources in your business group.
Corporate communications	From time to time, you'll receive publications — on paper or electronically — from Corporate Communications. They provide you with news and information about our company's vision, strategy, and organization and our achievements in local and national markets. Our goal is to act and feel like one team, so it's important for you to read these and learn about what's going on elsewhere in the company.
Emergency information	As part of business continuity planning, each business group has procedures that provide team members with steps to follow in the event of natural disasters or other building emergencies. Ask your manager for a copy of your emergency procedures. Be sure that you understand clearly what to do in an emergency situation. For more information, see Emergency Preparedness.
Information resources	A number of internal communication resources are available to you as a Wells Fargo team member. Keep in mind that internal communications are not to be released publicly unless they are classified as Public information. For specifics on how information is classified (Public, Internal Use, Confidential, or Restricted), see the Information Security section.

Additional Resources

Vision, Values & Goals

The Vision, Values & Goals of Wells Fargo details the enduring principles that guide all Wells Fargo team members in the work they do every day — in serving customers and helping each other. See these resources for more details.

- Vision, Values & Goals
- Behavioral Expectations
- Diversity and Inclusion

The Business of Wells Fargo

Since 1852, Wells Fargo & Company has played an extraordinary role in the financial history and development of America. Visit the resources below to see why today Wells Fargo is an industry leader in providing diversified financial services to satisfy the financial needs of consumers, small businesses, farmers and ranchers, middle-market companies and large corporations, real estate developers, and local governments in more than 36 countries and territories.

- wells Fargo.com
- Wells Fargo Today Quarterly Fact Sheet (PDF)
- Wells Fargo Stories
- Social Responsibility
- Company Business Divisions

Wells Fargo Corporate Library

Books & Journals

The Wells Fargo Corporate Library provides access to a variety of publications to benefit all team members. Publications are accessible online to all team members and through MAC mail to team members in the U.S. Team members may choose to use these publications to expand their knowledge in areas that are important to them and are available at no cost. Books & Journals include:

- Access to online publications including eBooks, magazines, journals, videos, and business book summaries.
- Access to online publications at work or from a personal device with internet connection.
- Access to books, audiobooks, and DVDs delivered by MAC mail (only team members in the U.S.).

The Corporate Library accepts team member recommendations and donations to be evaluated and potentially added to the collection.

Contact the Corporate Library by visiting the Books & Journals site. See Using the Corporate Library for information on loan periods, overdue and replacement items, and copyright guidelines.

Information Research Services

Information Research Services provides the information you need to better understand your clients, ultimately positioning you to deliver superior financing solutions. Information Research Services is staffed by experienced research consultants in New York, Charlotte, San Francisco, and Gurgaon, India, and is available to all team members. We seek to be your one-stop shop for valuable business research with one or more of the following:

- Company research
- Industry research
- Rating agency commentaries
- Comparable deal information and statistics
- Economic data and statistics
- SEC and legal filings research
- News

How to reach us

You can request our services by visiting the Information Research Services site. Click the red Request Form button, complete the form, and click Submit. Refer questions to inforesearch@wellsfargo.com.

Additional information

Other support departments are mentioned throughout this handbook; feel free to contact them with your questions. This handbook gives company-wide numbers and email addresses when available, and you can also find information on these and many other departments by looking for their listings in Sites A–Z on Teamworks.

Glossary

A

Accommodations Management

A resource for team members and managers who need assistance in responding to a medical condition or restriction that impairs a team member's ability to perform one or more of the essential functions of their current job duties.

active working status

Days when a team member is actually on the job (including time on reduced work schedule) or is on regularly scheduled days off, holidays, jury duty, bereavement time off, or Paid Time Off (PTO).

administrative leave

Time away from work in certain situations where appropriate as determined by Wells Fargo (for example, during an internal investigation).

Affirmative Action Plan (AAP)

An annual written action-oriented program designed: to affirmatively reach out to internal and external minorities, women, veterans, and individuals with disabilities; to align appropriate representation of these groups based on availability of qualified individuals inside and outside the organization; and to identify and eliminate any potentially unlawful barriers to employment in the sourcing, recruitment, hiring, promotion, termination, and compensation practices at Wells Fargo. Affirmative Action plans serve to support Equal Employment Opportunity laws and Wells Fargo Diversity Programs.

alternative schedule

A schedule in which the length and number of workdays are predetermined and constant but may be less than five days per week or longer than eight hours per day (for example, a 10-hour day for four days each week).

applicant

A person who expresses interest in employment for an open position by submitting a resume or completing an application through the Wells Fargo website or is otherwise considered by Wells Fargo, and:

- Wells Fargo considers (reviews a resume or employment application, does an impromptu interview, etc.) the individual for employment for the particular position.
- The individual's expression of interest indicates that he or she possesses the basic qualifications and eligibility requirements for the position.
- The individual does not withdraw himself or herself from further consideration.

Arbitration

A formal hearing where both the team member and Wells Fargo present their respective sides before an external, independent arbitrator or panel of arbitrators.

AU

Accounting Unit; see **business group**.

B

base pay

Base pay is a team member's rate of pay for time worked (without bonuses, incentives, commissions, overtime, or shift differentials). Base pay is expressed as an annual salary for exempt team members and as an hourly rate for team members in a nonexempt position.

beneficiary

A person, trust, charitable institution, or an individual's estate that the individual designates to receive benefits upon the individual's death.

blog

An online, real-time posting of content on a common internet or intranet web page. Blogs are interactive; they enable visitors to leave public comments or share and collaborate on documents. Blog entries are dated and time-stamped with content listed in reverse chronological order.

breaks

Paid rest periods of no more than 15 minutes, scheduled as appropriate (or legally required) by the manager.

bulletin boards

An area (on a wall or kiosk or through a computer) for posting official or work-area-specific information.

business group

A group of Wells Fargo businesses or support functions reporting directly or indirectly to members of the company's operating committee; may contain multiple business units.

business need to know

Describes a need to know a fact or circumstance when a team member must have such knowledge to properly perform his or her job or to make appropriate business decisions within the scope of the job. It also exists for those senior managers who must determine whether further investigation or action is necessary to resolve a matter or whether reporting or other action outside of the company is advisable or required.

C

candidate

A generic term used to describe the entire population of job seekers, applicants, and contacts.

chain of reporting relationship

A series of management positions in order of authority.

child (for purposes of FMLA)

A son or daughter who is the biological child, adopted or foster child, stepchild, or legal ward of a person standing *in loco parentis*, if the child is under age 18 (or of any age if incapable of self-care due to a mental or physical disability).

COBRA

The Consolidated Omnibus Budget Reconciliation Act of 1985 (COBRA) is a federal law that created the right to COBRA continuation coverage. COBRA continuation coverage can become available to you and other members of your family when group health coverage would otherwise end. Questions about how your termination of employment will affect your benefits, including information on COBRA health coverage that you and your covered dependents may elect, should be directed to the BenefitConnect | COBRA Service Center. Telephone inquiries for COBRA continuation coverage and rights should be directed to the BenefitConnect | COBRA Service Center at 1-877-29-COBRA (1-877-292-6272), Monday through Friday, 8:00 a.m. to 6:00 p.m. Central Time (excluding holidays). International callers should use 1-858-314-5108. COBRA information can also be accessed online at BenefitConnect | COBRA at <https://cobra.ehr.com>.

computer/computing system

A network of one or more computers or mobile computing devices that leverage software and hardware components, providing interactive business operations to its end users.

confidential information

Refers to sensitive company and consumer data that have a medium to high risk level. Access is limited to groups with a business need to know, as required to perform a particular business function or activity. Unauthorized disclosure or destruction of confidential information may have a negative impact on consumers, Wells Fargo, and its customers or team members or result in regulatory, reputational, or financial consequences.

confirmation letter

A document that acknowledges a verbal offer and acceptance by the applicant. Also see offer letter.

consumer

An individual about whom Wells Fargo has obtained information for any purpose, including marketing its services, evaluating an application for employment, or for other purposes. A consumer is not necessarily a customer or team member of Wells Fargo at the time his or her information is obtained. Not all consumers enter into a relationship with Wells Fargo.

contractor resource

Workers obtained through a third-party supplier to fill short-term staffing needs, including coverage for team members on leave; temporary increases in workload volumes; projects; or for specialized skills. Wells Fargo has the right to direct the resource's work activities. **Work is generally performed on Wells Fargo's premises.**

contingent resource

Individuals who are not employees (non-team members) of Wells Fargo. These resources are either employees of a supplier (e.g., third-party supplier, employment agency) who provide a service to Wells Fargo, or individuals providing a service through a Wells Fargo supplier contract. **Contingent resources may or may not have access to Wells Fargo systems and facilities.**

continuous leave

Uninterrupted time away from work with a defined start and defined or estimated end date as permitted by Wells Fargo for reasons including but not limited to a medically certified health condition, family care, personal needs, or military duty.

corporate hire date

A team member's first actual workday or a rehired team member's previous hire date when the break in service qualifies to be considered continuous service. The corporate hire date is used as the service date applicable for benefits such as PTO, the Short-Term Disability Plan, the Salary Continuation Pay Plan, and service recognition. This date generally reflects prior service from acquisitions made by Wells Fargo.

If a team member has prior Wells Fargo service and is rehired, see the Reemployment section of the *Team Member Handbook* for the impact on the corporate hire date.

corrective action

A specific action, determined by management, to address a performance concern or policy violation by a team member.

covered active duty (or call to covered active duty)

Covered active duty or call to covered active duty means:

- In the case of a member of a regular component of the armed services — duty during the deployment of the member with the Armed Forces to a foreign country.
- In the case of a member of the reserved component of the Armed Forces or National Guard unit — duty during the deployment of the member of the Armed Forces to a foreign country under call or order to active duty under federal law or in support of a contingency operation.

covered service member

A covered service member is a spouse, domestic partner, son, daughter, parent, or next of kin who is either:

- A current member of the Armed Forces, including a member of the National Guard or Reserves, who is undergoing medical treatment, recuperation, or therapy; is otherwise in outpatient status; or is otherwise on the temporary disabled retired list for a serious injury or illness incurred or aggravated in the line of active duty.
- A veteran of the Armed Forces, including a member of the National Guard or Reserves, who was discharged or released under conditions other than dishonorable within five years (or greater than five years for veterans discharged before March 8, 2013) of the first date the Servicemember Care Leave is requested and who is undergoing medical treatment, recuperation, or therapy for a serious injury or illness incurred or aggravated in the line of active duty.

“Son” and “daughter” are defined as your biological, adopted, or foster child, stepchild, legal ward, or child for whom you stand *in loco parentis* and are of any age.

“Next of kin” is defined as the servicemember’s nearest blood relative — other than the servicemember’s spouse, domestic partner, son, daughter, or parent — in the following order of priority: Blood relatives who have been granted legal custody of the servicemember by court decree or statutory provisions; brothers and sisters; grandparents; aunts and uncles; and first cousins, unless the covered servicemember has specifically designated in writing another blood relative as his or her nearest blood relative for purposes of Servicemember Care Leave.

D

de minimis fringe benefits

A de minimis fringe benefit is any property or service whose value is so small that to account for it would be unreasonable or impractical.

discipline

A form of corrective action.

displacement

Termination of employment initiated by management as a result of economic or operational factors requiring workforce reduction.

distribution

The dissemination of information by print, voice, or electronic means.

domestic partnership

A team member and one other person of the same or opposite sex who share a single, dedicated relationship and who can provide a certificate of domestic partnership from a city, county, or state (or, if they live in an area where such a certificate is not available, who share a relationship that meets the criteria outlined for domestic partner benefits offered by Wells Fargo).

double custody (also see dual control)

Requirement that two or more persons be present to process one transaction. Double custody also exists when items or documents reside under the control of at least two persons, both of whom are required to gain access to the items or documents through the use of keys or combinations.

dual control (also see double custody)

When transactions are required to be processed by two or more persons within the same area.

E

electronic device

Equipment used to access data that requires an electric current to operate. Electronic devices are considered “inactive” when disassociated from their power source. This definition includes but is not limited to servers, hard drives, electronic media, remote-access tokens (“security fobs”), and cell phones.

electronic media

Digital or analog material on which data are stored that requires an electronic device to access its content. This definition includes both removable media (for example, digital tapes, VHS tapes, DVDs, CDs, diskettes, floppy disks) and nonremovable media (for example, internal hard drives, solid-state memory).

Electronic Personnel File (EPF)

The Electronic Personnel File is the system that provides team members and managers with online access to Official Personnel File documents.

electronic smoking devices

Products designed to deliver nicotine or other substances to a user in the form of a vapor that can be inhaled. These devices are sometimes designed to resemble a cigarette, cigar, cigarillo, or pipe.

e-message

Electronic communications sent between two or more parties, including email, text messages (SMS, MMS), and instant messages (IM).

employee

See team member.

Employee Assistance Consulting (EAC)

The Wells Fargo Employee Assistance Consulting (EAC) team consists of behavioral health professionals who provide confidential consultation to individual team members and their household family members on a wide variety of personal and work-related concerns. EAC consultants assist with locating local mental health and substance abuse treatment providers and community resources. The EAC team also provides direct support to team members and leaders affected by robberies, threats, domestic violence, disasters, or critical incidents. EAC delivers special consulting services to managers, HR professionals, and corporate partners covering a wide range of topics involving behavioral health risk to the workplace.

For confidential individual team member consultation or for management consultation, call Employee Assistance Consulting (EAC) at its direct number 24 hours a day, 7 days a week at 1-888-327-0027. You can also reach EAC when you call 1-877-HRWELLS (1-877-479-3557), option 4. Visit the Employee Assistance Consulting site on Teamworks for more information.

Employee ID number

The six-digit number assigned to a team member by the Human Resources Information System (HRIS) when the team member is hired. Employee ID numbers never change and are never reissued to new team members. The number becomes inactive if the team member leaves Wells Fargo and is reassigned to the same team member if he or she returns.

employment verification

The formal response by HR Support to inquiries regarding present or past team members, verifying dates of employment and job title.

ER Solutions team

Centralized teams of Employee Relations consultants who specialize in workplace policy interpretation and helping team members and managers resolve workplace conflicts.

essential job functions

Particular tasks or activities of the job that are fundamental and critical to meeting expectations set for a specific job.

exempt team members

An exempt team member is an individual whose position is exempt from the minimum wage and overtime provisions of the FLSA. Exempt team members do not receive overtime compensation.

Other state or local provisions may apply to certain positions. If you have any questions about the classification of your position, please contact your manager.

external consultant

A contingent employee procured through a third-party supplier to provide services for a project or assignment where the supplier, not Wells Fargo, controls the work of the resource.

The resource may or may not work at a Wells Fargo location.

F

Fair Labor Standards Act (FLSA)

The Fair Labor Standards Act (FLSA) is federal legislation that provides for, among other things, a federal minimum wage, overtime compensation for nonexempt positions, and protections against unsafe working conditions and certain child labor practices.

Other state or local provisions may apply to certain positions. If you have any questions, please contact your manager.

falsification

Falsification refers to knowingly misstating, altering, adding information to, or omitting or deleting information from a Wells Fargo record or system that results in something that is untrue, fraudulent, or misleading.

Family and Medical Leave Act (FMLA)

A federal entitlement, for team members who meet eligibility requirements, to have job reinstatement rights when taking time away from work for one of the qualifying family and medical reasons.

family member

For situations unrelated to FMLA, Wells Fargo defines a family member as a team member's:

- Spouse or domestic partner, regardless of gender
- Parents and grandparents (including great-, step-, in-law, domestic partner, foster, and *in loco parentis* relationships)
- Children and grandchildren (including great-, step-, in-law, domestic partner, and foster relationships)
- Brothers and sisters (including step-sibling, in-law, foster, and domestic partner relationships)

For FMLA, Wells Fargo defines the terms “family member,” “covered family member,” and “qualified family member” as referring to a spouse or domestic partner (regardless of gender), parents, and children, including biological, adopted, or foster children, a stepchild, a legal ward or a child of a person standing *in loco parentis*, having a child who is under 18 years of age or 18 years of age or older and incapable of self-care because of a mental or physical disability.

final notice

A form of corrective action; a one-time, written notification just short of termination of employment. If the same or similar situation occurs again at any time during employment at Wells Fargo, employment will be terminated immediately.

fitness for duty

A company-requested examination of a team member, performed by a health care professional outside of the company, with the purpose of obtaining a neutral, professional opinion solely to determine the team member's ability to perform their job based on concerns about:

The team member's ability to safely perform his or her role and duties.

- The team member's behavior being grossly inappropriate for the workplace.
- Workplace safety.

flexible team member

Team members who may work regularly on a flexible schedule but are not classified as regular or part-time. A flexible team member may work any number of hours on given projects, may fill in when needed regardless of the hours, is on call, or may work only certain times of the month or year.

FLSA

See Fair Labor Standards Act.

FMLA

See Family and Medical Leave Act.

formal warning

A form of corrective action that is a written notification of a performance, attendance, punctuality, or work-related conduct issue, including specific requirements for improvement and a warning that termination of employment may result if the required improvement does not occur.

H

hacking

Unauthorized access to computer systems, either for personal enjoyment or for malicious or fraudulent purposes.

health care provider

A doctor of medicine or osteopathy who is authorized to practice medicine or surgery by the state in which the doctor practices. It also includes any other persons whose certification of the existence of a health condition is accepted for purposes of a claim under Wells Fargo's current medical plans.

Human Resources Management System (HRMS)

A database of HR information accessed and maintained by Wells Fargo's computer network. It is a position-driven system that is set up according to Wells Fargo's organizational structure and that tracks all positions and their reporting structure throughout the organization.

I

I-9

The document required by the U.S. Department of Homeland Security to verify employment eligibility under the Immigration Reform and Control Act of 1986 (IRCA).

illegal drugs

Illegal drugs are any controlled substance listed in Schedules I through IV of the federal Comprehensive Drug Abuse Prevention and Control Act. Currently, marijuana is included in the list of controlled substances. (See Drugs and Alcohol.)

incentive pay

Incentive pay is pay contingent on organizational, group, or individual performance against predetermined goals, considered "pay at risk." Incentive pay includes discretionary and formulaic incentives for either short-term or long-term performance.

independent contractor

A contingent resource who holds an agreement with Wells Fargo to provide a specific product or service. These resources are typically engaged for a specialized need or service and Wells Fargo does not have the right to direct or control the work of the individual. Services are primarily performed off Wells Fargo's premises.

informal warning

A form of corrective action that includes written notification of a performance, attendance, punctuality, or work-related conduct issue, including specific requirements for improvement and a warning that termination of employment may result if the required improvement does not occur.

Information Security Consultant (ISC)

See Information Security.

information security incident

An adverse event in an IT system, network, or physical environment — or the threat of the occurrence of such an event (for example, a Wells Fargo laptop containing 1,000 confidential customer records, stolen from a team member's home).

Incidents are divided into four classifications depending upon the criticality of the incident.

information sharing

Refers to a customer's ability to choose not to have his or her information shared internally within the Wells Fargo family of companies for some purposes. The two types of information sharing are:

- Internal sharing: The act of sharing any customer information internally with another Wells Fargo affiliate or legal entity. This includes sharing files of customer information for servicing, analytical, or marketing campaigns as well as one-off sharing, such as referrals.
- External sharing: The act of sharing any customer information externally with a Wells Fargo-approved third-party vendor for servicing, analytical, or marketing purposes.

in loco parentis

Commonly understood to refer to a relationship in which a person has put himself or herself in the situation of a parent by assuming and discharging the obligations of a parent to a child with whom he or she has no legal or biological connection.

instant message (IM)

A form of real-time communication based on typed text. The text is conveyed through applications connected over a network, such as the internet.

insubordination

Includes but is not limited to situations when:

- A team member fails or refuses to follow a manager's lawful instructions or perform assigned work.
- A team member refuses to stop an activity, behavior, or language that a manager has directed him or her to stop.
- A team member's language or verbal or physical conduct in the workplace is openly hostile or inappropriate.

Intermittent leave

Approved leave or leaves taken in separate periods of time because of a single illness, injury, or bonding with a newborn child or a newly placed child through adoption or foster care.

internal use information

Refers to company and consumer data that has a low risk level. It is generally available to team members who have a basic need to know but should not be improperly disclosed outside the company. Unauthorized disclosure or destruction of internal use information would have minimal impact to consumers, Wells Fargo, and its customers or team members.

involuntary termination

Ending of a team member's employment at Wells Fargo's direction.

IRCA

The Immigration Reform and Control Act of 1986 as amended; forms the basis of Wells Fargo's verification of employment eligibility policies.

J

job abandonment

Includes:

- Being absent from work for three or more consecutive scheduled workdays, unless otherwise designated by your state or local law, without notifying your manager.
- Notifying your manager that although you do not intend to resign, and you subsequently fail to report to work for three or more consecutive scheduled workdays or as designated by state or local law.

In some situations, failure to report to work at the end of an approved leave of absence may result in job abandonment.

job class codes

Every Wells Fargo job code is assigned one of three pay categories, or job class codes, based on the job's pay structure. A job class code is used to identify a team member's pay ("covered pay") that is eligible for Wells Fargo & Company (WFC) benefit plans, like life insurance, short-term disability, long-term disability, and pay, as well as parental and critical caregiving leave. Job class code 2 is assigned to most jobs. Job class code 1 is assigned to certain mortgage positions in Wells Fargo's Home Lending Group. Job class code 5 is assigned to jobs with a pay structure designed to deliver 40% or more of target cash through incentives, paid primarily on a monthly or quarterly basis.

job code

A job code is a six-digit code that identifies a specific Wells Fargo job and associated job title.

job family

A job family is a group of jobs that share similar functions, such as retail, operations, or marketing.

job reinstatement

The activity of returning a team member to the same or similar job when he or she returns from a leave of absence.

job seeker

A person who expresses interest in employment through the Wells Fargo website (whether or not this person has the basic qualifications, meets eligibility requirements, or is considered for employment).

job titles

Every Wells Fargo team member has an official job title in PeopleSoft (the payroll system used by Wells Fargo) linking a unique job code and the responsibilities of the job or job family. Your official job title may or may not be the same as the job title you use to describe your job in the course of business (i.e., your functional title). You may be able to use a functional title on your business cards and for daily use. Discuss an appropriate title with your manager.

K

kiosk

A small, free-standing structure with open sides used to post or distribute information or allow access to information, computer systems, products, or services.

L

leave of absence

Time away from work (with or without pay) as permitted by Wells Fargo for reasons including but not limited to a medically certified health condition, family care, personal needs, or military duty.

M

MAC

Mail address code; the internal Wells Fargo address for delivering interoffice mail and reports.

malware

Malicious software. A generic term that covers a range of software programs and types of programs designed to attack, degrade, or prevent the intended use of a device or network. Types of malware include viruses, worms, Trojans, malicious active content, denial of service attacks, and software that passively observes the use of a computer (Spyware).

manager

As used throughout this handbook, a term that includes supervisors and managers and other various levels of management with the authority to hire, assign, promote, evaluate, and reward or discipline other team members; grant salary increases; resolve disputes; terminate another team member's employment; authorize expenditures; or effectively recommend any of these actions.

Manager's Desk File

A file for each team member that contains documents that reflect that team member's employment history. Manager's Desk File contains, but is not limited to, the following items:

- Performance planning (originals)
- Documentation of performance accomplishments, coaching, and feedback for the current performance management cycle
- Performance Journals
- Corrective Action Event Logs
- Flexible Work Arrangements
- Telecommuting Agreements

maximum

The maximum is the upper end of a job's pay range.

meal period

Unpaid time off, ranging from 30 to 60 minutes, scheduled by the manager as appropriate (or legally required) at or near the middle of the shift.

minor

Person under 18 years of age.

mobile computing device

A form of electronic device that includes both portable and handhelds (laptop, PDA, smartphone, tablet) with removable or fixed writable memory (memory card or stick, CD, external hard drive, USB flash drive) used to perform work functions and to store and transport information.

Multimedia Messaging Service (MMS)

A telecommunications standard for sending messages that include multimedia objects (images, audio, video, rich text). MMS, an extension of the SMS standard, allows longer message lengths and uses Wireless Application Protocol (WAP) to display content.

N

new hire

A team member who is hired from outside of Wells Fargo & Company and all related Wells Fargo companies.

O

observed holiday

Standard holidays observed at Wells Fargo.

offer letter

A document sent to extend terms of employment or to confirm an oral offer of employment that the applicant has yet to accept. Also see confirmation letter.

Official Personnel File

The official data that reflect a team member's employment, including documents that the team member has signed. An Official Personnel File may include such items as:

- Employment application
- Resumes
- Offer letter (external and internal hires)
- Tax-withholding forms
- Performance evaluations
- Attendance records
- System and policy acknowledgments
- Trade Secrets Agreement
- Team Member Acknowledgment
- Arbitration Agreement
- License documentation
- Business-specific policy, compliance, and system acknowledgments
- Corrective Actions
- Core Manager Desk File documents
- Resignation letter and supporting termination documentation

operator-assisted calls

Business conference calls that are managed by a contracted Wells Fargo provider. The Operator introduces the speakers for the call, provides participants instructions, manages question and answer sessions as part of a call, and discloses additional details about the call, including recording details of the conference call. (See Conferencing Services, Operator-Assisted Conferencing)

overtime

Overtime is a premium rate of pay required by the Fair Labor Standards Act (FLSA) paid to team members in a nonexempt position who work more than 40 hours in a particular workweek. This does not include time for which pay is received but work is not performed, such as PTO, holidays, jury duty, or other paid time away, including disability and bereavement. The standard overtime rate is 1.5 times his or her regular hourly rate. Some states also have provisions for paying overtime including, in some instances, overtime based on daily hours.

P

Paid Sick Time (PST)

Paid Sick Time (PST) is provided to team members who are covered under federal, state, or local laws. The maximum PST available is governed by the specific laws and may be carried over from one accrual year to the next under a carryover provision separate from Paid Time Off's carryover requirements. PST is available for use by eligible team members for themselves or their qualified family members as defined in the laws for reasons listed in the provisions of those laws.

Paid Time Off (PTO)

Days that a team member may use for a number of reasons, including vacation time, personal or family illness, school activities or conferences, variable holidays, religious observances, personal business, or weather problems. Some team members are also eligible for Paid Sick Time (PST) under federal, state, or local laws, and PST is available for specific reasons under each law.

parent (for purposes of FMLA)

The biological, adoptive, step-, or foster father or mother, or any other individual who stands *in loco parentis* to a team member when the team member is under 18 years of age.

part-time team member

Team members scheduled to work between 17.5 and less than 30 hours per week (other than those classified as flexible team members).

pay period

The two-week period ending at midnight on the Saturday before the regularly scheduled pay day.

pay range

The job's pay range refers to a range of pay associated with a particular job, as determined by Wells Fargo. These values are expressed in annual salary dollars and assume a 40-hour workweek.

performance counseling and corrective action

Any management action designed to correct or address a team member whose job performance, attendance, or conduct does not meet company expectations, deviates from established practices and procedures, or adversely affects Wells Fargo's operations.

performance objectives

Measurable goals or business results that a team member is expected to achieve in a given time frame.

performance evaluation

The formal, written documentation of employee job performance and work-related behaviors that has been approved by the manager and reviewed with the team member.

phishing

The act of convincing potential victims to share sensitive or personal information. Traditional phishing involves widespread distribution of fraudulent emails purporting to be from legitimate companies. These emails contain an urgent request for the email recipient to click a link that directs the recipient to a fraudulent website and requests sensitive information, such as an account number, PIN, or Social Security number. Once captured, this information can be used to commit fraudulent activity, including identity theft.

policy

A policy is a statement of management's expectations that directs team members toward achieving business objectives. Policies establish the business operating principles that help management attain a proper balance between risk and reward. A corporate policy applies company-wide wherever the relevant activity is carried out. A business policy applies to one or more business groups or to one or more businesses within a group.

portable digital storage media (PDSM)

PDSM is a form of electronic media that includes both removable writable memory (for example, SIM card, memory card or stick, CD, external hard drive, or USB flash drive) and mobile computing devices with removable or fixed writable memory (for example, PDA, MP3 player, laptop, smartphone, or tablet) used to store or transport information.

position

A designated slot within the Human Resources Management System (HRMS) database that is assigned to only one team member at a time.

position number

A numerical indicator assigned to each slot in the HRMS database assigned to an individual team member.

primary care giver

The person certified with our leaves and claims administrator as the individual who has primary responsibility for the care of the child at the time of his or her birth or placement and throughout the identified leave period.

promotion

A promotion is a move to a position of significantly greater responsibility, scope, and impact on the organization where typically the target total cash compensation (TTCC) of the new job is 10% or greater than the previous job. TTCC is calculated as the base market reference point (MRP) plus target incentive, if applicable. A promotion can also be a move from one level to another in a job hierarchy (for example, Accountant 3 to Accountant 4).

PTO

See Paid Time Off.

public information

Refers to data either commonly available openly in the public domain or intended for unrestricted use beyond our organization. Disclosure of public information by itself would not result in harm to consumers, Wells Fargo, or its customers or team members.

R

reasonable accommodation

Any change to or in the work environment that the employer can adopt without undue hardship to permit a qualified team member or applicant with a disability to perform the essential functions of the job.

reduced work schedule

The work schedule for a team member who is on a leave of absence for a portion of each regularly scheduled workday or workweek.

reference

A past or present employer, manager, or client with whom an applicant has had a relationship that would allow the person to comment about the applicant's work credentials.

regular team member

Team members scheduled with standard hours of 30 or more hours per week (other than those classified as flexible).

rehire

A new team member who has past employment experience with a Wells Fargo company.

rehire date

The date a team member is reemployed and returns to work at Wells Fargo. Also see corporate hire date.

report to manager

The individual who makes the final decision during selection process. Additionally, the report to manager is the individual to whom a new or transferring team member will report.

resignation

A voluntary termination of employment initiated by the team member.

restricted information

Refers to sensitive company and consumer data that have a high risk level. Access is limited to explicitly predesignated individuals with a stringent business need to know. Unauthorized disclosure or destruction of restricted information would cause severe harm to consumers, Wells Fargo, its customers, or team members; could result in severe regulatory, reputational, financial damage, or all of these; or provide significant advantage to a competitor.

retaliation

Building a better Wells Fargo means counting on our team members to share concerns in good faith and to cooperate with the researching of these concerns. When a manager takes negative action against a team member because the team member raised a concern or participated in fact-finding, that is considered retaliation.

Retaliation can take many forms. It can range from the overt, such as termination or job reassignment, to the subtle, such as a manager avoiding a team member or no longer sharing information with that person. Wells Fargo does not tolerate retaliation in any form.

S

safe time

Certain federal, state, or local laws may provide time away for issues related to domestic violence or stalking under their specific provisions.

salary

See base pay.

salary continuation pay

A form of severance pay provided to eligible team members who experience a qualifying event as defined in the Wells Fargo & Company Salary Continuation Pay Plan (see *Benefits Book*).

salary increase

A salary increase is used to ensure that team members are paid appropriately within the pay range. Factors managers consider when determining a base pay increase include the team member's performance; the complexity, scope, and impact of their role; and the position of their current base pay within the pay range. If a team member's pay is already appropriate within the pay range, he or she may not receive a base pay increase in a given year.

serious health condition

An illness, injury, impairment, or physical or mental condition that involves inpatient care in a hospital, hospice, or residential medical care facility or continuing treatment by a health care provider that includes a period of incapacity of more than three days that also involves two or more visits to a health care provider within 30 days of the first day of incapacity or one in-person visit within seven days of the first day of symptoms that results in a regimen of continuous treatment. With respect to team members, the term "serious health condition" covers conditions or illnesses that affect the team member's health to the extent that they must be absent from work on a recurring basis or for more than three days for treatment or recovery. With respect to family members, the term "serious health condition" is intended to cover conditions or illnesses that affect the health of the family member so that the team member is similarly unable to participate in work, school, or regular daily activities.

shift differential

A shift differential is a premium, calculated as a percent of base pay, paid to team members for hours worked in Shift 2, defined as 4:00 p.m. to 8:00 a.m.

Short Message Service (SMS)

A communication service standardized in the global system for mobile communications, allowing the interchange of short text messages (maximum of 160 alphanumeric characters) between mobile telephone devices.

similar job

A job with like duties and responsibilities, pay, and location.

social media

Online sites and capabilities that enable users to contribute or share content, engage in discussion, rate or indicate approval of content, categorize content, or facilitate connections or communications among users.

solicitation (team member)

A request for time, money, or other resources or commitment from one individual or group to another individual or group of individuals, presented either verbally, electronically, in writing, or by telephone.

solicitation preference (customer)

How a customer prefers to be contacted for marketing purposes.

spam

The abuse of electronic messaging systems to send unsolicited bulk messages that are usually undesired by the recipients. While the most widely recognized form of spam is email spam, the term has been applied to similar abuses in other media channels (for example, instant messaging spam, text message spam, blog spamming).

standard hours

A set number of hours that a team member is expected to work each week, as maintained in the Human Resources Management System (HRMS). Standard hours are **not** the same as scheduled hours — for example, a team member may have standard hours of nine hours per week but, based on business needs, may be scheduled for three hours on Monday, Wednesday, and Friday one week and four-and-a-half hours on Tuesday and Thursday the next week.

standard workweek

A fixed and regularly recurring period of work within the week, usually beginning on Sunday at 12:01 a.m. and ending on Saturday at midnight.

subsidiary

A company that is owned, in whole or in part, by Wells Fargo & Company.

T***team member***

A person who is an employee of Wells Fargo & Company or any of its subsidiaries.

Team Member Care

Formerly known as the HR Service Center, this group is a centralized resource to answer team members' questions about pay, benefits, leaves, employment verification, HR online tools, and many other HR-related topics. This group serves all Wells Fargo team members company-wide.

team member in a nonexempt position

A team member in a nonexempt position is an individual whose position is subject to the minimum wage and overtime provisions of the Fair Labor Standards Act (FLSA). Team members in a nonexempt position are paid overtime (generally at 1.5 times their regular rate of pay) for each hour over 40 hours actually worked in a particular workweek.

Other state or local provisions may apply to certain positions. If you have any questions about the classification of your position, please contact your manager.

Teamworks

Wells Fargo's intranet site for team members.

terms and conditions of employment

Includes but is not limited to wages, benefits, hours of work, performance measures and evaluations, work assignments, discipline, and work policies and standards.

text message

Brief written messages transmitted through cellular networks between two or more mobile phones. Types of cellular text messages include Short Message Service (SMS) and Multimedia Message Service (MMS).

threshold

The threshold is the lower end of a job's pay range.

transfers

Team members transferring from one Wells Fargo company to another, with no break in service.

U

unapproved leave of absence

A leave that does not meet the stated procedures for taking a leave, including the timely submission of required documentation. Team members on an unapproved leave will be subject to corrective action, including termination, and will not be eligible for rehire.

uniformed services

The Armed Forces (Army, Navy, Air Force, Marines, and U.S. Coast Guard), the Army National Guard, the Air National Guard, full-time National Guard, the commissioned corps of the Public Health Service, and any other category of persons designated by the President in a time of war or national emergency.

V

verbal offer

An unwritten offer of employment to an applicant for a specific open position, made by a report to manager or HR.

voluntary termination

Ending of a team member's employment due to resignation, job abandonment, death, or retirement.

W

wiki

Web pages that allow users to add content but also allow others to edit the content. Used collaboratively for content management, allowing documents to be written collectively using a web browser.

work-related injury or illness

An injury or illness to a team member arising out of, and in the course of, employment according to applicable state statutes.

Workers' Compensation

A program that provides benefits to team members for illnesses or injuries arising out of employment. Workers' Compensation is a legal obligation required of employers by state law. As such, the benefits granted will vary from state to state.

work areas

Work sites and areas immediately surrounding them, including areas where customers are present, but not elevators or team member rest areas, including lounges, restrooms, and lunchrooms.

workday

The period between the time on any particular day when a team member is scheduled to start his or her principal activities and the time on that day when those activities are scheduled to stop.

workplace

For purposes of these policies, refers to and includes any place in which a team member conducts business on behalf of Wells Fargo or its customers and any event that is sponsored by Wells Fargo.

work time

All time when a team member is required to be engaged in work tasks; does not include his or her own time, such as meal periods, scheduled breaks, and time before or after scheduled work time.

workstation

A computer, usually intended for use by one individual at a time (that is, a desktop, laptop).

workweek

See standard workweek.

Y

year-end review

Year-end review is when managers assess team member performance, review salaries, and, if appropriate, determine short-term incentive awards and long-term incentives. Year-end reviews at Wells Fargo are typically conducted annually in Q1 but there may be variations in countries outside the U.S.

Employment & Hiring

Our approach

Wells Fargo values and promotes diversity and inclusion in every aspect of our business and at every level of our organization. We recruit, hire, and promote team members based on their individual ability and experience and in accordance with Affirmative Action and Equal Employment Opportunity laws and regulations. Our policy is that we do not discriminate on the basis of race, color, gender, national origin, religion, age, sexual orientation, gender identity, gender expression, genetic information, physical or mental disability, pregnancy, marital status, status as a protected veteran, or any other status protected by federal, state, or local law. We also strive to go beyond these basic requirements to recruit and retain a high-caliber, inclusive workforce that reflects the growing diversity of our marketplace.

Affirmative Action, EEO, and Diversity & Inclusion

At Wells Fargo, we strive to provide advancement opportunities for everyone. Although there are differences between our Affirmative Action, Equal Employment Opportunity, and Diversity & Inclusion strategies and programs, each builds upon the other to make sure that all team members are treated with equality and respect and given the opportunity to make a contribution to our company's success.

As a Wells Fargo team member, you're expected to comply with the spirit and intent of these policies. To better understand the roles of Affirmative Action, Equal Employment Opportunity, and Diversity & Inclusion, it's helpful to define them. To help Wells Fargo build and maintain an inclusive environment, we encourage team members to update their personal information on Teamworks to reflect their own diversity including gender, race/ethnicity, disability, status as a protected veteran, sexual orientation, or gender identity.

Employment at Will

This handbook is not a contract of employment. Your employment with a Wells Fargo company has no specified term or length; both you and Wells Fargo have the right to terminate your employment at any time, with or without advance notice and with or without cause.

This is called "employment at will." Only an officer of Wells Fargo at the level of executive vice president or higher, authorized by the senior Human Resource leader for your business group, may alter your at-will status or enter into an agreement for employment for a specified period of time. Any modification to your at-will employment status must be confirmed in writing by an officer of Wells Fargo at the level of executive vice president or higher and authorized by the senior Human Resource manager for your business group.

Affirmative Action, Equal Employment Opportunity, and Diversity & Inclusion programs

	Affirmative Action	Equal Employment Opportunity	Diversity & Inclusion
Objectives	Hire, retain, and promote minorities, women, protected veterans, and individuals with disabilities for the company's workforce to reflect their representation within the relevant labor pool.	Ensure that all people are given equal opportunity, with respect to employment. Strictly adhere to equal opportunity laws.	Create a diverse, high-quality workforce that mirrors the demographics of the communities served. Promote a working environment where differences are valued and leveraged as a competitive strength. Encourage full utilization of the workforce. Create an inclusive environment. Foster lasting environmental change.
Benefits	Ensures compliance with federal regulations. Measures hiring, promotion, and other employment-related activities to assist in supporting our Equal Employment Opportunity and Diversity & Inclusion objectives.	Encourages equal employment for job opportunities. Encourages consistent administration of personnel policies.	Promotes utilization of entire general labor pool for recruitment, retention, and promotion of the most qualified individuals. Provides a competitive advantage by enhancing ability to market products and services to an increasingly diverse customer base. Creates positive impact on productivity, teamwork, team member involvement, and retention.

Affirmative Action

Companies that do business with the federal government must comply with Affirmative Action laws. Wells Fargo has federal contractor status to the extent that it has ongoing business contracts with the federal government. Affirmative Action plans set goals and timetables for hiring and promoting women and minorities, establish a hiring benchmark for protected veterans, and set a utilization goal for individuals with disabilities. The goals for women and minorities are set based on the difference between:

- The availability of people with the necessary skills who fall into these groups within the general populations of the geographic areas where we do business and
- The actual representation of people in these groups within our company.

Goals vs. quotas

You may have heard the term “quotas” used with Affirmative Action, so it’s important that you understand the difference between quotas and Wells Fargo’s Affirmative Action goals.

- Quotas are court-imposed mandates designed to correct patterns of discrimination against a particular set of individuals (for example, women or specific minority groups) that have been documented by evidence. Wells Fargo’s Affirmative Action planning is not based on quotas.
- Affirmative Action goals are targets that Wells Fargo establishes and tries to reach through good-faith efforts of recruitment, placement, retention, and promotion.

At Wells Fargo, we consider our Affirmative Action plan a resource to help us identify and develop diverse talent and increase diverse and inclusive representation at all levels of the company.

More information

Check with your manager for more information on Affirmative Action. A corporate resource on this topic is Wells Fargo’s Affirmative Action Program booklet, *Developing and Maintaining a Diverse Workforce* (PDF), available as form HRS38139 on Forms Online on Teamworks.

Equal Employment Opportunity

Equal Employment Opportunity refers to government regulations requiring that all people, regardless of race, color, gender, national origin, religion, age, sexual orientation, gender identity, gender expression, genetic information, individuals with disabilities, pregnancy, marital status, status as a protected veteran, or any other status protected by federal, state, or local law,* have equal opportunities for hire, promotion, and with regard to all terms and conditions of employment.

Our equal employment opportunity policy specifies that Wells Fargo team members and job candidates will not be subject to discrimination, harassment, or retaliation for:

- Filing a complaint.
- Assisting or participating in an investigation.

- Inquiring about, discussing, or disclosing your own pay or the pay of another employee or applicant.**
- Opposing any unlawful act or discriminatory practice.
- Exercising any of their rights protected under federal or state laws and regulations.

For related information, see *Working with an Illness or Disability*, *Dispute Resolution*, and *Employee Rights Notice*.

*Laws in certain locations (for example, New York City) indicate additional protected classes, which include creed and citizenship status, both of which are included in this policy by reference.

**A team member whose essential job functions require the regular access of team member compensation information is subject to corrective action for an inappropriate disclosure of such information.

For more information about Wells Fargo’s approach and expectations, team members and managers should access the *Affirmative Action Program Policy & Procedures*.

Diversity and Inclusion

Wells Fargo is committed to diversity and inclusion, promoting a working environment where differences are valued. We believe that success comes from inviting and incorporating diverse perspectives, which drives creativity, innovation, and personal and organizational business opportunities and growth.

Through Wells Fargo’s efforts to integrate diversity and inclusion into the business, we are able to:

- Tap the full potential of the workforce.
- Operate successfully within our varied structures and geographies.
- Serve our marketplace with products and services that meet the needs of our diverse customer base.

For more information about diversity at Wells Fargo, visit the *Enterprise Diversity and Inclusion* site on Teamworks.

Employment of Friends & Relatives

We welcome friends and relatives of Wells Fargo team members to be considered for employment under our usual hiring policies. However, to avoid situations that create actual, potential, or perceived conflicts of interest, favoritism, or potential security or audit risks, we place restrictions on business relationships between team members, contingent resources, and people to whom team members are related — including relationships that develop following hire.

Team members are required to timely notify management of any relationship that could pose a conflict. Failure to inform Wells Fargo of the actual, potential, or perceived conflict will be grounds for corrective action, which may include termination of employment (see *Corrective Action*).

Resolution of personal relationship conflicts

Team members who marry or become related by marriage, domestic partnership, or other arrangement while employed by Wells Fargo may retain their positions, provided that they are not in violation of any provision of this policy. However, if team

members become related such that continued employment creates a conflict, the conflict must be resolved. The affected team members may determine who will no longer continue in their position and will need to inform their management of their decision and take timely and necessary measures to resolve the conflict. If the team members do not make a decision, Wells Fargo will decide in its sole discretion who will remain in their current position.

If a conflict arises from a company-initiated reorganization, merger or acquisition, or other business decision, the team members are expected to work to resolution with the assistance of management and HR. If a resolution has not taken place within 90 days, the team members involved may determine who will no longer continue in their position. If the team members do not make a decision, Wells Fargo will decide as described above.

For more information about Wells Fargo's approach and expectations, team members and managers should refer to the Employment of Friends and Relatives section of the Conflicts of Interest and Outside Activities Policy, which includes definitions and information about resolution of potential policy violations.

Internal Job Opportunities

You, your manager, and Wells Fargo all have contributing roles to play in your career development. As a global financial services company, we offer a variety of businesses that can translate into career opportunities for you within Wells Fargo.

Your manager

Your first step should be to work with your manager so that he or she understands your career interests and can help you form a plan to learn new skills, explore different career paths, or assume new responsibilities within your current work environment. Ideas to help you explore new career opportunities at Wells Fargo include:

- Informal discussions with team members in different areas.
- Volunteering for task force assignments.

Working with your manager makes you both partners in your success, whether in your current role or as you move into different jobs within Wells Fargo. While you may keep your interest in another position confidential as you use the internal job process, if you become a finalist for a position, the report to manager may be in contact with your manager to discuss your performance, skills, abilities, and other work-related issues.

Finding a job

Expressing interest in internal jobs is an important opportunity for your career development and advancement at Wells Fargo. You're encouraged to explore new challenges and manage your own career progress. All jobs are expected to be posted internally. This is one way we can meet our goal of retaining and developing the best people.

Internal job opportunities are regularly published on Wells Fargo's online Jobs Search page, available on Teamworks and at home at teamworks.wellsfargo.com. Both locations list current job opportunities and allow you to create and maintain

an online profile and resume that you can use to express your interest in jobs.

Eligibility

All team members may express interest in any posted job that fits their qualifications and interests. To qualify for further consideration, you need to meet the posted qualifications of the job and meet the eligibility requirements below.

- **Time in job.** You need to have been in your current job and department or branch for at least 12 months to post for a new job, unless your manager waives the requirement or an internal process warrants waiving the requirement.

Note: *An internal process includes, but is not limited to, a situation involving an internal investigation, dispute resolution, or accommodation matter.*

- If you would like to consult with someone on how to approach this conversation with your manager, contact your ER Solutions team.

Note: *The 12-month time period is generally not reset as a result of a company-initiated placement or move (for example, job reorganizations/restructuring, job mapping) when the team member continues in the same job. A team member who has been promoted into a position in the same job family at a different level (for example, Accountant 3 to Accountant 4) must meet the 12-month time period for eligibility (see Promotions).*

Formal warning or final notice. If you have been placed on formal warning or final notice within the last 12 months, you will need to disclose the formal warning or final notice and provide an explanation for the situation when you express interest in a job.

If you are on a Job Search Leave that ends, you are eligible for any posted requisition for which you have applied and not yet been dispositioned. To remain in consideration, refer to Internal Recruiting on Teamworks for more information.

A team member on an approved leave of absence may apply for available positions and participate in the interview and selection process as long as he or she meets the eligibility requirements described above. The team member must have a return to work date by the start date of the new position.

If team members or managers have questions related to posting eligibility, they should contact the ER Solutions team.

Process

To express interest in a posted job, access Jobs on Teamworks at work or at home at teamworks.wellsfargo.com and follow the online instructions to create a Job Seeker Profile and submit your expression of interest.

When interviewing for jobs within the company, you should make every effort to provide advance notice to your manager and schedule interviews at times when your absence would be least disruptive to your business group. Generally, the time you spend participating in internal job interviews is not considered to be work time. Nevertheless, because Wells Fargo supports career growth and development, you are not required

to use Paid Time Off (PTO) for internal interviews. If you are a team member in a nonexempt position, you should use the Nonroutine Event code in Time Tracker to receive nonworking pay for scheduled time missed. If you wish to keep your job search efforts confidential, you should request PTO for interviews during your regularly scheduled work hours.

Once you become a final candidate for the position, it is recommended that you tell your manager because the hiring manager may be in contact with him or her for information.

If you're offered the job and accept it, tell your manager immediately so that your manager and the hiring manager can arrange your transfer date.

If you are offered a position that requires periodic or additional background screenings, you will be required to submit to and successfully complete applicable screening process.

Preferential Hiring (Job Reassignment)

Wells Fargo is committed to providing an inclusive work environment for all team members, including those with medical conditions and disabilities. As part of our commitment to promote a work environment where differences are valued, we seek successful solutions and reasonable accommodations to help team members with disabilities or returning from a Medical Leave to succeed at Wells Fargo.

As an internal job seeker, you may be eligible for preferential hiring under the Americans with Disabilities Act (ADA). As part of the preferential hiring process, Wells Fargo will attempt to reassign eligible team members to a different vacant position. Team members who qualify for preferential hiring will work with an Accommodations Consultant and a designated enterprise job search recruiter to maximize successful placement. Preferential hiring is considered a job reassignment to an equivalent or lower level position. A job opportunity is considered an equivalent position if the preleave pay fits within the salary range of the open position and if the base pay and incentive compensation eligibility remain the same.

Eligibility

To be eligible for preferential hiring, you must:

- Be returning from an approved Medical Leave and your position is no longer available, or
- Be an active team member with a chronic condition that cannot be reasonably accommodated in your current position

A chronic condition is a recurring illness or injury that requires long-term management with lifestyle, medication, diet, and other changes. While a chronic condition may be treated, it may not be cured.

Your responsibilities

If you are contacted by an enterprise job search recruiter or an accommodations consultant to discuss a job reassignment, you are responsible for responding to all inquiries promptly. To ascertain your qualifications and transferable skills, you must provide an electronic copy of your updated resume, and an outline of your job preferences, goals, and geographical areas

where you are willing to work, upon request. To be considered for the position, you must meet the required job qualifications for the position.

Once a position is identified and confirmed, start date, pay, and new manager information will be provided to you. If you decline the position offered, you may elect to continue on a Job Search Leave on your own, but you will transition from the preferential hiring process and be removed from any benefits which may flow from your participation in it, including but not limited to Wells Fargo Salary Continuation Pay Plan benefits, if job reassignment attempts are unsuccessful. Additionally, your failure to participate or respond promptly to inquiries may also impact your ability to participate in the preferential hiring process.

Contact your job search recruiter or accommodations consultant for questions about the preferential hiring process.

Income sources during preferential hiring

Although you are not paid during the preferential hiring process, you may request a lump-sum payout of some or all of your accrued, unused PTO. PTO payouts are permitted only one time during the preferential hiring process and must be requested through your manager. If your manager is not available, contact Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 1, or by completing the Team Member Care eForm for additional guidance. TDD/TYY users may call 1-800-988-0161. You are not required to take a lump-sum payout of your accrued PTO balance during this process, even if there is a loss of income.

Note: *In locations where team member receive paid sick time (PST), the PST balance is not eligible for lump-sum payout.*

External Recruitment

Although all hiring managers are encouraged to fill open jobs with internal team members, to broaden the pool of job seekers who may qualify for the position, it may be necessary to recruit externally as well. An external search can be performed after an internal search or at the same time as the internal search.

All recruiting activities must be conducted in compliance with Wells Fargo's Recruiting and Hiring Policy.

Reemployment

Former team members may be considered for employment along with other external job seekers. There are a few conditions regarding your eligibility for rehire.

- If you leave Wells Fargo voluntarily and receive a distribution (including but not limited to partial or final distributions) from one of the company's qualified retirement plans, three months must elapse from your termination date before you may be rehired by Wells Fargo.
- You may not be considered for placement in a contingent resource assignment at Wells Fargo until there has been a break in service from Wells Fargo for 12 months, unless your position was eliminated as part of a reduction in force. Displaced team members may be considered for a contingent

resource assignment after a six-month break in service. Refer to the Global Contingent Resource & Alternative Staff page on Teamworks or the Corporate Contingent Resource Policy in the Policy Library for more information.

- If you received a lump-sum severance payment from Wells Fargo and your rehire date is before the end of the period covered by the lump-sum severance payment (the “severance period”), you will be responsible for repaying the amount of severance previously paid for the period beginning on your rehire date and ending the last day of the severance period. Contact Team Member Care for details.
- If you have expressed interest in a posted job while on an approved leave, you must be approved to return to work by the start date of the new position.
- If you leave Wells Fargo with a repayment obligation (e.g., Paid Time Off, tuition reimbursement), you may be ineligible for rehire until the repayment obligation is satisfied unless modified by local law. Repayment does not guarantee rehire eligibility if there are other reemployment factors affecting your eligibility.
- Former team members who are designated as “not eligible for rehire” will not be considered for reemployment or placement in a contingent resource assignment at Wells Fargo.
- Former team members who are eligible for rehire may be required to successfully complete a background check before rehire.
- Time served in a contingent resource assignment is not recognized as active team member service with Wells Fargo.

Impact on corporate hire date

For rehired team members, Wells Fargo provides a grace period commonly referred to as “continuous service” of no more than six months during which the team member’s previous corporate hire date will be recognized. That means that if you leave Wells Fargo and are rehired within six months of your Termination Date in our system of record, you’ll retain your previous corporate hire date (see corporate hire date). Otherwise, your corporate hire date will be your rehire date. (The corporate hire date is the team member’s first actual workday.) To see how being rehired might affect your benefits, check your benefits materials or contact Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2. For TDD access for persons with hearing impairments, please call 1-800-988-0161.

Note: For companies merged with or acquired by Wells Fargo, transition policies regarding credit for prior service are communicated to affected team members during the transition.

Impact on retiree health care coverage

If you are enrolled in coverage under the Wells Fargo & Company Retiree Plan (Retiree Plan) and you are rehired as a benefits-eligible regular or part-time team member or as a flexible team member:

- You will not be able to continue your retiree health care coverage under the Retiree Plan.

- Retiree health care coverage terminates the day before your rehire date. (If you or a covered dependent is Medicare eligible and covered by a Wells Fargo & Company sponsored Medicare Advantage plan, coverage will terminate prospectively at the end of the month, but your Wells Fargo active team member coverage, to the extent applicable, will be effective on your rehire date and will be primary for purposes of benefit plan coordination rules.)
- Upon rehire as a benefits-eligible team member (i.e., **not** a flexible team member), you will be contacted by Team Member Care to review your enrollment options; generally, your coverage as a benefits-eligible regular or part-time team member becomes effective on your date of rehire.
- Flexible team members are not eligible to enroll or participate in the Wells Fargo-sponsored benefit plans for team members.

When you retire again you may be eligible to reenroll in retiree health care benefits, depending on the options available under the Retiree Plan to retirees and their eligible dependents and beneficiaries at that time.

- If you are receiving a subsidy toward the cost of retiree health care coverage or are receiving a Retirement Medical Allowance at the time you are rehired, you will not accrue additional years of service for purposes of determining the subsidy amount or amount of the Retirement Medical Allowance.
- If you were eligible for a subsidy when you first retired and did not elect retiree medical coverage, you will not be eligible for a subsidy when you retire again.
- If you were eligible for a subsidy when you first retired and did not elect retiree medical coverage for eligible dependents, your dependents will not be eligible for a subsidy when you retire again should you elect to cover them.
- Rehired retirees who retire again and are eligible for Medicare (or dependents eligible for Medicare) and do not have a subsidy are not eligible for coverage under the Retiree Plan.
- If you are a retiree who has coverage under the Wells Fargo & Company Retiree Life Insurance Plan (the Retiree Life Insurance Plan), and you are rehired as a benefits-eligible regular or part-time team member or as a flexible team member by Wells Fargo, your retiree life insurance coverage will continue under the Retiree Life Insurance Plan.
- See the *Retiree Benefits Book* for additional information.

Team Member Referral

Our approach

The Team Member Referral Program (TMRP) offers monetary awards to eligible team members in the U.S. who refer qualified friends, family members, or members of their professional network for a Wells Fargo open position and their referral is hired and meets all other conditions of the referral program.

Eligible team members

U.S. full-time, part-time, flexible, and Short-Term Assignment Resource (STAR) team members are eligible to participate in the Team Member Referral Program, unless participation in the program would violate the Conflicts of Interest and Outside Activities Policy. The following team members are not eligible to receive a referral award payment through the Team Member Referral Program:

- Managers or team members who are decision makers in the hiring process
- Talent Acquisition Strategy & Delivery and Talent Acquisition Operations team members
- International team members

Eligible candidate referral

For a team member to earn a referral award, the referred candidate:

- Must be hired within 12 months of applying for the job
- Cannot be a current team member or contractor
- Cannot be an intern transitioning to a full-time position, or hired into a university internship or university full-time program
- Cannot have been employed by Wells Fargo as a team member or contractor within 12 months of their application

Team members are not limited in the number of referral awards they can receive. The referral payout is initiated after the referred candidate has been hired and in their new position for 90 days. The award is taxed, counts toward your total earnings, and is included in your W-2 taxable income.

Team members participating in the Team Member Referral Program must not attempt to improperly influence or create the appearance that they could improperly influence the selection or hiring decision.

Please refer to Team Member Referral Program for detailed process instructions.

Employment Eligibility

Age requirement

In order to be considered for employment, applicants must be at least 18 years of age.

Work authorization

We hire only United States citizens and foreign nationals who are lawfully authorized to work in the U.S. We participate in E-Verify, a service operated by the Department of Homeland Security in partnership with the Social Security Administration, to confirm work authorization. The law imposes severe penalties if we fail to comply, so we take this matter seriously and expect all team members to cooperate in meeting this requirement.

Wells Fargo is a global employer with presence in countries outside of the United States. You may however, only perform

work in the country in which you are employed unless you are on an approved International Assignment.

If a business wishes to relocate a team member or a team member wishes to relocate to and work from a country or jurisdiction outside the United States, formal approval is required. For more information about this process, team members should refer to International Work Location Procedures.

New team members

In conjunction with the Immigration Reform and Control Act of 1986 (IRCA), the federal government has defined certain documents that establish an individual's identity and eligibility to work in the U.S. All new team members must be able to provide the requisite documentation on the first day of their employment. Failure to produce valid documents that establish identity and eligibility to work in the U.S. may lead to termination of employment.

Current team members

If your employment eligibility documentation is going to expire, you'll need to reestablish your eligibility on or before the expiration date. It is advisable to begin this process at least 120 days before your employment eligibility documentation expires. Failure to produce valid documents that establish your identity and eligibility to work in the U.S. may lead to termination of employment.

Social Security number validation

Wells Fargo complies with the Social Security Administration's (SSA) validation process confirming that each of the Social Security numbers (SSNs) reported by new hires and team members matches the federal database as belonging to the individual with the specified name.

When the validation process indicates there is not a match for the name and SSN on the SSA's database, employers and the person with the data discrepancy are required to address this discrepancy and send corrections to the SSA. Often the reason the SSA cannot match the combination of SSN and name is due to input or system error. Some examples include:

- A misspelled name
- A SSN with a transposed number
- Input errors by SSA's staff
- A change in the worker's name due to marriage or divorce
- Incomplete information on a Form W-4 or W-2
- Use of compound names that are not perfectly aligned in the government databases

Wells Fargo will notify a team member if a discrepancy occurs and provide the team member with instructions and expectations on resolving the discrepancy. The team member will receive an initial notification in writing from Payroll that will alert the team member to the issue, provide instructions on steps the team member must take, and other expectations.

It is the team member's responsibility to comply with these expectations to resolve the discrepancy.

Reasonable time will be allowed for a team member to work with the SSA to resolve the discrepancy. Failure to comply with the SSA requirements to resolve the discrepancy may lead to immediate termination of employment.

Background screenings

Background screening is an important tool to help ensure that each person employed by Wells Fargo is legally qualified to work for the organization and does not present a risk to the organization, its customers, or other team members. Because of this, it is Wells Fargo's policy that new hires and rehires may not begin work as team members until the background screening process has been successfully completed. In addition, team members transferring to a new position first may be required to successfully complete additional background screening depending upon the requirements of the new position.

A criminal background check is conducted on each person who is offered a job at Wells Fargo, including those who may be rehires. The criminal background check includes a review of criminal history that may be disqualifying under Section 19 of the Federal Deposit Insurance Act, as well as criminal history that may lead to a determination, consistent with applicable law, that the person poses an unacceptable risk to the safety of other team members or customers.

Section 19 of the Federal Deposit Insurance Act

Section 19 of the Federal Deposit Insurance Act, as amended by the Financial Institutions Reform, Recovery, and Enforcement Act (FIRREA), prohibits a national bank and its affiliates from employing anyone who has been convicted of a criminal offense involving dishonesty, breach of trust, money laundering, or the distribution, manufacturing, or trafficking in controlled substances, unless the offense meets the FDIC's *de minimis* criteria or the person has received prior written consent from the FDIC. Under Section 19, disqualifying criminal records include convictions that have not otherwise been completely expunged, as well as the entry into pretrial diversion or similar programs in connection with such offenses even if the charges are ultimately suspended or dismissed.

Where required by federal law or regulation, the background screening process may also include a review of credit history, financial fitness, or other specified criteria to confirm eligibility for a specific position. Wells Fargo may also investigate the employment and education background of any team member. We reserve the right to deny or terminate employment based on the results of that review.

To ensure compliance with regulatory requirements and to ensure appropriate oversight of certain fiduciary responsibilities, Wells Fargo may periodically conduct background rescreening on team members in certain positions. Managers of team members in these positions will be notified of the need to

rescreen. Team members and their managers must fully comply with the rescreening process. Failure to do so can result in corrective action, which may include termination of employment (see Corrective Action).

For more information about Wells Fargo's approach, expectations, and background screening and rescreening standards, team members should refer to the Global Background Screening Policy.

Personal & Personnel Information

Every Wells Fargo team member who has access to personnel information by virtue of his or her position is required to respect its confidentiality. The policies outlined in this section help Wells Fargo protect the confidentiality of your information.

To help Wells Fargo build and maintain the most accurate records, we encourage each team member to update their personal information on Teamworks to reflect their information including gender, race, disability, status as a veteran, sexual orientation, or gender identity.

Personnel File

Information related to your employment at Wells Fargo is kept in the Human Resources Information System (HRIS). It may also be kept:

- In a confidential department file that's kept by your manager (see "manager's desk file").
- In an Official Personnel File maintained in our Employee Records unit.
- If applicable, in a confidential medical or disability file that is maintained separately from all other personnel records.

Access to information

We follow the guidelines below for determining access to and releasing information from your personnel records. In some states, there are additional laws about this subject; when applicable, state law takes precedence over these guidelines.

Your own access

While you're actively employed at Wells Fargo, you may review certain core Official Personnel File documents by accessing the Electronic Personnel File (EPF) system. While you're on a leave of absence, you will not have access to the EPF system. If you need to access any of your documents within the EPF system, you may call your manager for assistance.

Internal access

Only team members with a business need to know are allowed access to your personnel information:

- Your immediate supervisor or manager has access to this information while you're assigned to his or her business unit.

- A manager from outside your assigned business unit may request your personnel information if he or she provides Human Resources with a legitimate business reason for the request.

Note: *If you apply for an internal open position, the report to manager may ask to review information from your personnel file. Your current manager can provide a report to manager with information about your performance and salary. A potential report to manager may ask you to provide documents from your personnel file.*

- Authorized Human Resources staff, investigation staff, and legal counsel have access to your personnel information in performing their job duties.

External access

We provide employment verification through an established automated process (see Employment Verification). Unless required by law, we do not respond to prospective external employers' requests for information about current or former team members' performance and character. Wells Fargo may share with regulators, law enforcement, and other financial institutions information concerning fraud, dishonesty, theft, money laundering, check kiting, and other prohibited conduct. The company may also be required to furnish team member information to comply with federal registration or state licensing requirements (for example, the Secure and Fair Enforcement (S.A.F.E.) Mortgage Licensing Act of 2008) or to satisfy other legal requirements, including, but not limited to, requests for information from courts and administrative agencies.

Employment Verification

We use an automated service to provide employment verification to parties outside Wells Fargo and internal Wells Fargo lenders. We verify basic dates of employment and job titles but will not provide pay information as part of the verification process unless you have made arrangements in advance to authorize the release of this information.

You can find more details about the employment verification process on Teamworks. If you have difficulty accessing Teamworks, call Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2. For TDD access for persons with hearing impairments, please call 1-800-988-0161.

Employment References

As a Wells Fargo team member, you might be asked to provide an employment or character reference for a new employer or educational institution for another team member. While we desire to support team members who are transitioning, we must ensure that we do not create risk for our company and team members. Therefore, you are prohibited from providing references for current or former team members in any written, verbal, or electronic form. This restriction applies to requests received from personal social media accounts. All external inquiries for references and employment verification must be referred to Team Member Care (see Employment Verification)

and Electronic Communications & Social Media. Team members may choose to provide copies of their performance evaluations to prospective employers or educational institutions that want information about job performance.

Team members are also prohibited from providing a job performance or employment reference for an individual completing a contingent resource assignment at Wells Fargo. For additional information, refer to the Global Contingent Resource & Alternative Staff page on Teamworks or the Corporate Contingent Resource policy in the Corporate Policy Library.

Personal references

You might be asked by a current or former team member to serve as a personal reference or to provide a personal endorsement for matters unrelated to prospective employment and unrelated to your role as a Wells Fargo team member (that is, civic or political activities). You may serve as a personal reference in such situations, as long as you:

- Are not providing the information in your role as a Wells Fargo team member but rather on personal experience unrelated to your Wells Fargo employment.
- Do not:
 - Use Wells Fargo letterhead.
 - Use your Wells Fargo email account or other Wells Fargo communication medium.
 - Attach your Wells Fargo business card.

Changing Personal Information

It's important for Wells Fargo to have your up-to-date personal information on file in our personnel records. To make sure that you receive company communications promptly and to manage business operations, we need to have accurate personal contact information, which may include your current phone numbers. By providing this contact information, you are giving consent to its use for business purposes or safety related reasons, including consent to contact you at the numbers provided using automated technology.

It's also important because incorrect information can affect your or your family's eligibility for benefits. A change in your home address may affect your medical plan benefit options. In addition, there are strict Internal Revenue Service guidelines about when you can enroll a new dependent in benefits.

Please refer to the Privacy for Team Members in the U.S. section for more information.

Making changes

You're responsible for promptly reporting any changes in your personal information. You can use the Personal Information tool on Teamworks to update items such as your:

- Home address and telephone number or numbers
- Alternative name for use in Team Member Look-Up
- Wells Fargo work telephone, fax, and other numbers

- MAC/mail station
- Emergency contact information
- Demographic information

If you need to report changes not handled by the tool on Teamworks (for example, additions or changes to your dependents) or if you have difficulty accessing Teamworks, call Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2. For TDD access for persons with hearing impairments, please call 1-800-988-0161.

Breach of Trust or Dishonesty

Because Wells Fargo is federally insured — and because we have an obligation to the customers who trust us with their financial and personal information — we won't hire or continue to employ anyone who fails to meet certain specific criteria regarding trust and honesty.

FIRREA

The Financial Institutions Reform, Recovery, and Enforcement Act (FIRREA) amended section 19 of the Federal Deposit Insurance Act to prohibit a national bank and its affiliates from employing anyone who has been convicted of certain criminal acts of dishonesty, breach of trust, money laundering, or drug trafficking or manufacturing. This law also applies when an individual has participated in a court-authorized diversion program in connection with such an act, even if the charges are ultimately suspended or dismissed.

Bonding

In addition, Wells Fargo is required by federal regulation to maintain a fidelity bond that protects Wells Fargo (including all subsidiaries) from losses. In most cases, except where prohibited by law, this fidelity bond will **not** provide bond coverage for individuals who are known to have committed in fact an act of breach of trust or dishonesty:

- Against any Wells Fargo company at **any** time
- Or
- In connection with any other employment that occurred during the past 10 years and the person was at least age 21 at the time of the act.

Not employable

Any individual who doesn't meet the FIRREA criteria, isn't bondable, or otherwise doesn't meet our background screening requirements cannot be employed or continue to be employed at Wells Fargo. See Involuntary Termination.

Team Member Professionalism

Our approach

At Wells Fargo, we're committed to providing an environment that promotes professionalism and encourages each team member's professional development and achievement. We take this commitment seriously. Consistency, fairness, and respect are essential to good relations between team members, their managers, and Wells Fargo. This approach creates a professional and productive work environment for every team member, in the workplace (see workplace), and at work-related activities such as company meetings, business travel, and recognition programs. The policies outlined here are the guiding principles that will help us all meet these responsibilities.

Wells Fargo's behavioral expectations provide an additional resource for team members outlining clear and common expectations for team members and managers. This resource helps to ensure everyone understands and lives the Wells Fargo culture in our interactions with each other, our communities, and our customers. Throughout the Team Member Professionalism section, as well as in other sections of our *Team Member Handbook*, you will see language reflecting these behavioral expectations to ensure accountability.

Workplace Conduct

Your actions must always reflect the highest possible standards of business conduct and ethics. You're expected to use good judgment and common sense in making work-related decisions and to be accountable for your actions. You are expected to act with integrity and always do the right thing. This includes avoiding obscene, threatening, harassing, discriminatory or abusive conduct that is likely to damage Wells Fargo's business or reputation, negatively affect coworkers, or that could be disparaging to customers.

The way you handle interactions, in person, in writing, or electronically with others is important to the success of your work environment. You're expected to treat your coworkers with courtesy, respect, and professionalism (see Electronic Communications and Social Media). You're also expected to treat your supervisor and other managers with respect, which includes avoiding insubordinate behavior (see insubordination).

Unprofessional and inappropriate team member behavior includes but is not limited to:

- Outbursts
- Yelling
- Rudeness
- Bullying
- Any form of harassment (see Anti-harassment)

- Distracting behavior during work time (such as being on your electronic or mobile device)
- Conduct that interferes with your or another team member's ability to perform job duties or provide effective customer service (see Violence-Free Workplace)

It may also include conduct that is welcome between team members but is inappropriate in the workplace or during work-related activities. Exhibiting unprofessional and inappropriate behavior violates Wells Fargo's policies.

Providing information

To uphold our expectations of professional workplace conduct, sometimes it may be necessary for Wells Fargo to conduct an effective, thorough, and objective review of the concern. In these cases, it's very important that we learn all the relevant information from those who are aware of the situation. If you're asked to be part of such a process, you're expected to cooperate fully and honestly and to not interfere with the integrity of the process. Additionally, in certain situations, you may be placed on Administrative Leave so that the company has time to thoroughly review the circumstances that are under investigation. If this happens, you will be given information about the terms and conditions of your leave at that time. If you have questions about the request to participate in a fact-finding process, contact ER Solutions.

Consequences

You're expected to conduct yourself in a professional manner and to use good judgment in all aspects of your conduct as a Wells Fargo team member, including your actions and decisions. Failure to meet these expectations can lead to a corrective action which may affect your eligibility for pay increases, promotions, or transfer opportunities, or result in the adjustment or elimination of bonus and incentive payments (in accordance with your incentive plan terms). In addition, the corrective action may affect your annual performance evaluation and ratings at the individual objective overall performance level.

Important: *Failure to observe all aspects of the policies outlined here, including failure to participate fully and honestly in any investigative or fact-finding process initiated by Wells Fargo, can result in corrective action, which may include termination of your employment (see Corrective Action.).*

Speak Up and Nonretaliation Policy

Wells Fargo has zero tolerance for acts of retaliation against a team member who makes a good faith report of improper workplace behavior. This includes making good faith reports of unethical or illegal conduct such as fraud, securities law or regulatory violations, and violations of any Wells Fargo policies (including the Code of Ethics and Business Conduct) or sexual or other forms of harassment, discrimination, or other inappropriate workplace behavior.

All team members, including managers, are prohibited from taking retaliatory actions against team members who make good faith reports of improper workplace behavior. Managers must guard against retaliatory conduct by proactively watching for signs of retaliation and reporting any observed conduct that may potentially violate this policy as soon as possible.

- No team member may be retaliated against because that team member has in some manner opposed an employment practice that the team member in good faith believes violates federal or state laws, rules, or regulations.
- No team member may be retaliated against because he or she filed a charge, truthfully testified, provided assistance, or participated in an investigation, proceeding, or hearing related to or arising from an allegedly unlawful employment practice.
- No team member may be retaliated against for asserting rights established by a federal or state law.

Wells Fargo wants all team members to feel comfortable raising questions and concerns without fear of retaliation, which includes discrimination, harassment, or other adverse action taken against a team member for making a report.

For more information about Wells Fargo's approach and expectations, team members and managers should access the Speak Up and Nonretaliation Policy.

Reporting retaliation concerns

If you believe that you or someone else has been subjected to retaliation, you must report it as soon as possible to one of the following:

- Your manager or another manager with whom you feel comfortable
 - Managers — if a team member reports a potential act of retaliation to you, you must report it to Human Resources, Ethics Oversight, or the EthicsLine as soon as possible
- Human Resources team:
 - Team members in the U.S.:
 - A. ER Solutions at 1-877-HRWELLS (1-877-479-3557)
 - Team members outside the U.S.:
 - A. Where applicable, follow the grievance resolution or reporting procedure at the team member's work location
 - B. Where there is no specific grievance resolution or reporting procedure, report to the appropriate Human Resources professional

- Ethics Solutions Team

- EthicsLine (1-800-382-7250 from the U.S. and Canada, or EthicsLine for International Team Members), available 24 hours a day, 7 days a week

Allegations of retaliation against a team member will be researched and investigated promptly, as detailed in the Allegation Management Policy. If a team member has been subjected to retaliatory behavior because that team member has spoken up or attempted to speak up in good faith, in keeping with this policy, the team member found to have retaliated will be subject to corrective action, which may include termination of employment. For additional information, see Corrective Action.

Personal Relationships at Work

All team members are expected to exercise good judgment in their relationships with all team members. If a personal relationship in your business group or area creates a conflict, the appearance of a conflict of interest, or favoritism, or is affecting your work or area, you need to let your manager or ER Solutions team know right away. The relationship may not involve you directly, but it may include a manager or another team member in your group. Managers must avoid any relationship or activity that may be perceived as affecting their ability to remain objective in managing team members or providing work direction to contractor resources.

A team member may seek assistance from his or her HR Professional or ER Solutions (for U.S.-based team members) to understand their responsibilities.

Team members must not take part in any Wells Fargo business selection, evaluation, or payment decision that involves personal relationships.

If a personal relationship is creating an actual, potential, or perceived conflict of interest, Wells Fargo will take whatever action we determine is appropriate to eliminate the conflict situation.

Important: *You are expected to cooperate in any fact-finding process (see the Providing Information **section on the Workplace Conduct page**). Not resolving an actual or perceived conflict of interest can result in corrective action, which may include termination of your employment (see Corrective Action).*

For more information about Wells Fargo's approach and expectations, team members and managers should access the Personal Relationships section of the Conflicts of Interest and Outside Activities Policy.

Faith in the Workplace

Wells Fargo embraces and promotes diversity and inclusion. This commitment includes respecting the religious and spiritual beliefs and traditions of all team members. Consistent with federal and state law, the company will make good-faith efforts to provide a reasonable accommodation to support a team member's sincerely held religious belief. If you or your manager has questions on faith in the workplace or how to handle requests for religious accommodation, contact your ER Solutions team.

Risk Management Accountability

Wells Fargo has prioritized risk management as one of the company's six aspirational goals and has publicly committed to becoming a financial services leader in risk management. At Wells Fargo, we conduct ourselves in a manner that prudently manages the risks arising from our business activities. These risks include but are not limited to credit, market, operational, compliance, strategic, interest rate, liquidity, model, and reputation risks. It's also Wells Fargo's policy to conduct business in a manner that complies with all applicable laws and regulations.

Risk is everyone's business. Team members are accountable for managing the risks they encounter as well as full compliance with applicable laws, regulatory guidance, enterprise policy requirements and Wells Fargo's risk management program. All team members have a duty to speak up and escalate suspected unethical or illegal conduct. The company's business model rests upon the principle that prudent risk management provides the only avenue to long-term profitability and growth. The company manages for the long term — so the effectiveness of its risk management takes priority.

As a Wells Fargo team member, you're fully accountable for:

- Your own knowledge of Wells Fargo's risk management program, Risk Management Framework, policies, and procedures, as well as compliance with the laws, regulatory guidance, and enterprise policy requirements that apply to your job. This means you must understand enterprise policies relating to the job you perform.
- Each of your acts, or any failure to act, that results in any violation of law, regulation, policies, or procedures.
- Acting in accordance with Wells Fargo's Behavioral Expectations, which contribute to the culture of Wells Fargo — with the words we use, the actions we take, the way we treat each other, and how we treat our customers.
- Any of your actions that are inconsistent with or violate any portion of Wells Fargo's risk management program.
- Completing annual risk and compliance training courses to ensure that you stay current with critical risks and issues of our business. Consult with your manager for your business group's specific requirements.

All new team members are required to sign the Team Member Acknowledgment to indicate that they will read and adhere to these accountabilities.

Important: *Failure to fulfill your accountabilities outlined above or refusal to complete the Team Member Acknowledgment can result in corrective action, which may include termination of your employment. Failure to meet these responsibilities may also adversely affect compensation opportunities. For information, see Corrective Action.*

You can find links to Wells Fargo enterprise policies on the Wells Fargo Policy Library site on Teamworks. If you have any compliance, policy, or procedural concerns or questions, consult with your manager or escalate to senior management for attention or resolution — or contact the EthicsLine. The company encourages team members to raise their hand if they have questions or concerns regarding matters that arise in their daily activities.

Attendance & Punctuality

As part of the Wells Fargo team, you are expected to be conscientious about attendance and punctuality at work. The success of your business unit depends on the contributions of each team member. When you're not working, it places an extra burden on your team. Regular and dependable attendance is an essential function of your job at Wells Fargo.

You are considered absent when you do not report for work at all or report more than 60 minutes late or leave more than 60 minutes early. Absences fall into the following categories: scheduled and unscheduled and can be protected or unprotected depending on the circumstances. Unscheduled absences have the most impact on your work team. Unscheduled absences place a burden on your coworkers and may cause customer service and efficiency to suffer. For this reason, even if unscheduled absences are covered with Paid Time Off (PTO), they may still be grounds for corrective action, which may include termination of your employment.

You are expected to report to work in a punctual manner. You are also expected to provide appropriate notice when you will arrive late, depart early, or be absent for all or part of the day. You are considered tardy if you arrive late for work or return late from a break or meal period, or if you leave early without prior approval from your manager, for a period up to 60 minutes.

The Attendance & Punctuality Policy is applicable to all team members (exempt and nonexempt) paid on a U.S. payroll. Team members who fail to follow the policy may be subject to corrective action up to and including termination. For additional information, see Corrective Action.

Policy application approaches

Team members will be covered by either an occurrence-based or performance-based approach as it relates to the Wells Fargo Attendance & Punctuality Policy. Check with your manager to determine the approach used by your business group.

- **Occurrence-based approach:** The occurrence-based approach is applicable for team members who work a structured, regular work schedule. Generally, team members in nonexempt positions are managed under this approach. Unscheduled absences and tardies are tracked separately using a six-month rolling period.

- **Performance-based approach:** The performance-based approach is applicable to team members who do not work a structured, regular work schedule. Team members in exempt positions and flexible team members are generally managed under this approach, but team members in nonexempt positions can be managed under this approach as well. Attendance and tardiness are managed on a case-by-case basis as they relate to the team member's overall performance and impact to the business unit. All circumstances related to the absences and tardies will be considered.

For example, team members who work occasional, irregular, or unstructured hours to fill short-term staffing needs or assignments such as PTO, short-term leaves, special projects, or periodic work volume increases should align to the performance-based approach.

Scheduled absence	A preapproved, planned absence from work is considered a scheduled absence. You are expected to schedule planned absences as far in advance as possible. Only requests that receive manager's approval are scheduled absences.
Unscheduled absence	<ul style="list-style-type: none">• An absence of your regularly scheduled work hours without prior approval from your manager is considered an unscheduled absence.• Partial absence: For the occurrence-based approach, if you are away from work for more than 60 minutes but less than or equal to 50% of your assigned work shift, it will be considered a partial absence. Two partial absences count as one unscheduled absence.
Protected absence	<ul style="list-style-type: none">• A protected absence is not subject to corrective action and is protected by a specific Wells Fargo policy or federal or state laws such as the Family and Medical Leave Act (FMLA), Americans with Disabilities Act (ADA), or applicable paid sick or safe time laws.• This includes but is not limited to:<ul style="list-style-type: none">– Time away for approved Family or Medical Leave, including for work-related injury or illness– Other paid time away, including bereavement, jury duty, or testifying in court– Qualified military time away including training or active duty leave– Other state or local protected time away
Occurrence	<ul style="list-style-type: none">• An occurrence is defined as one to five consecutive scheduled workdays when you are not present at work as scheduled. If you are absent for more than five consecutive workdays, the next one to five consecutive workdays of absence are counted as a new occurrence.• Work time interrupts consecutive absences. When work time occurs, any subsequent absence constitutes a new occurrence. Scheduled PTO and company-observed holidays will not interrupt an occurrence. These days should not be calculated within the consecutive day count.• You are expected to make contact with your manager or take action to apply for the appropriate eligible time away as soon as possible. Failure to do so may result in immediate corrective action up to and including termination. For more information, see the Leaves of Absence page.

Tardiness	<ul style="list-style-type: none"> • A tardy can occur if you are not punctual and are late for your work shift or returning from your meal period or break, or if you leave early from your shift without prior approval for up to 60 minutes. Tardy rules apply to the occurrence-based approach only. • Multiple tardies: Incidents of tardiness can happen multiple times in an individual day. When time away adds up to more than 60 minutes but less than or equal to 50% of your assigned work shift, it will be considered a partial absence. • Grace periods: Depending on business needs, some business groups may allow for either a five- or 10-minute grace period when reporting to work and a five-minute grace period when returning from a meal period. Otherwise, you are expected to report to work at the beginning of your shift and return from a meal period on time (i.e., no grace period). Consult with your manager for your business practice.
Rolling “look back” period	Occurrences, partial absences, and tardies are tracked separately and reviewed on a rolling six-month period. For example, if a team member is absent today, the “look back” period is the six-month period that immediately precedes today’s date.
Job abandonment	<p>Wells Fargo considers the following situations job abandonment, which is a voluntary termination of your employment:</p> <ul style="list-style-type: none"> • If you’re absent from work without notifying your manager for three or more consecutive scheduled workdays unless otherwise designated by state or local law, you’ll be considered to have abandoned your job. <ul style="list-style-type: none"> – You’ll be considered to have abandoned your job in the above situation even if you informed your manager that you do not intend to resign prior to your absences. • In some situations, if you don’t report to work at the end of an approved leave, it may result in job abandonment. <p>Note: <i>If you abandon your job, in most cases, you will not be eligible for rehire by Wells Fargo. For more information, see Voluntary Termination.</i></p>
Unapproved leave of absence	If you don’t comply with the certification requirements, your leave and any benefits associated with it — including job protection under the Family and Medical Leave Act (FMLA) — will be denied. These absences will be considered an unapproved leave and are subject to corrective action up to and including termination of employment. For more information, see the Leaves of Absence page.
Paid sick time¹	Certain state and local governments across the country have enacted paid sick leave laws that require employers to provide paid sick time. In addition, some locations are covered by federal paid sick leave laws. In general, most Wells Fargo team members working in these cities and states (or in locations qualifying for the federal paid sick leave) are eligible to take paid time away for the purposes covered by these laws. Paid sick time absences must not be counted as unscheduled absences and are not subject to corrective action. Any unscheduled PTO used in combination with paid sick time is subject to the attendance and punctuality standards, unless protected by another federal, state, or local regulation. For more information, see the Paid Sick Leave Laws (Paid Sick Time) page.

¹ Paid sick time — federal, state, or local— may be treated differently in compliance with the relevant laws. You are not penalized for absences covered by paid sick leave (PSL).

Corrective action

Occurrence-based approach

The information below reflects corrective action for the occurrence-based approach. Employment at Wells Fargo is at will, and corrective action is not progressive (see Corrective Action). Your manager, with consultation with ER Solutions, will decide the appropriate level of corrective action in each circumstance, which may include termination. All efforts will be made to administer these actions in a timely manner. However, you are accountable for the number of unscheduled or unprotected absences and tardy occurrences you have regardless of whether you have been counseled by your manager.

Unscheduled absences (unprotected)

If within a rolling six-month period you have (counting backward from the most recent occurrence):	It may result in:
Four occurrences of absences	Informal warning
Five occurrences of absences	Formal warning Managers must contact ER Solutions for consultation before proceeding.
Six occurrences of absences	Review for termination Managers must contact ER Solutions for consultation before proceeding.

Tardiness (unprotected)

If within a rolling six-month period you have (counting backward from the most recent tardy):	It may result in:
Five tardies	Informal warning
Six tardies	Formal warning Managers must contact ER Solutions for consultation before proceeding.
Seven tardies	Review for termination Managers must contact ER Solutions for consultation before proceeding.

Performance-based approach

Your manager in consultation with ER Solutions will decide the appropriate level of corrective action, which may include termination. Examples of factors to be considered:

- Performance of the team member.
- Reason for the unscheduled absences or tardiness and whether or not the team member could control the circumstances.
- History of corrective action regarding attendance policies.
- Patterns of unscheduled absence or tardiness (for example, out on Mondays and Fridays frequently).
- Frequency of unscheduled absences.

Patterns or trends of negative attendance

Your manager will address patterns and trends of negative attendance and punctuality behaviors as a performance concern by using the appropriate level of corrective action based on the incidents over a period of time and the overall impact to the business, similar to how corrective action is addressed for team members on the performance-based approach. Managers may contact ER Solutions for consultation using the Employee Relations eForm.

Reporting an absence or tardy

It is your responsibility to make sure that your manager and business unit are notified promptly about your absence or tardy **before** your scheduled work time (unless extenuating circumstances prevent you from contacting your manager). You must make every effort to personally contact your manager (or as otherwise directed by your business unit); if you don't personally notify your manager as soon as possible, your absence or tardiness may be grounds for corrective action, which may include termination of your employment. If you are unable to notify your manager, your designated representative can notify him or her on your behalf to request a medical leave. For more information, see Medical Leave.

Team member expectations

As a team member, your contributions are essential in meeting department and company objectives. You are expected to proactively discuss with your manager any questions or concerns you have with the Attendance & Punctuality Policy and expectations, including notification. You should also notify your manager of any issues you encounter that may prevent you from meeting and sustaining these expectations.

Predictable and reliable attendance is an essential function of your position with Wells Fargo. Reliable attendance is critical to our ability to properly staff so our business can operate timely and efficiently. If you demonstrate an inability to work your regular schedule on a predictable and reliable basis, even with accommodations, you will not satisfy the qualifications to remain in your position. Under such circumstances, you may be subject to termination of employment.

Travel

Team members are expected to consider the more economical options of audio, video, or web conferencing for internal meetings before booking travel. However, Wells Fargo occasionally requires certain team members to travel to meet with customers or for other business purposes. When business travel is necessary, team members are expected to follow the Wells Fargo Corporate Travel & Entertainment Policy (PDF) on Teamworks, which covers all Wells Fargo businesses and all team members. Team members are required to book business travel using the company-designated travel management company. The preferred vendors will be available through the online booking tool or by calling the company-designated travel management company.

Specific standards for air and ground transportation, hotel, meals, and entertainment can be found in Wells Fargo's Corporate Policies, including:

- Gifts and Entertainment Policy
- Domestic Travel Policy
- International Travel Policy

Wells Fargo relies on the good and prudent judgment of all team members when incurring travel and entertainment expenses. Specific business groups may have additional travel guidelines, and team members should always check with their managers to understand requirements of their business.

Misuse or violations of Wells Fargo's Corporate Policies listed above, or inappropriate expense reimbursement for expenses, can result in corrective action up to and including termination (see Corrective Action). For additional information, see Corporate Travel Management or HRG Travel Online.

To meet business needs, you may occasionally need to travel outside of your normal work hours and location. To be paid correctly, it is important to know what constitutes "hours worked" for the purpose of reporting time when you travel to and attend business-related events. Refer to the Recording Nonexempt Travel and Attendance page on Teamworks for more information.

International Travel & Visas

Based on the needs of the business, our team members are traveling outside of the country in which they are employed more frequently. However, remember that you may not perform productive work for Wells Fargo in a country other than the one in which you are employed unless you are on an approved company-sponsored International Assignment.

When you travel for business purposes, you are limited in the types of activities you may engage in. This means that business travel is expected to be short in duration. A business visa is required for such travel, unless the countries you will be visiting on Wells Fargo business participate in a Visa Waiver Program. Team members should contact Wells Fargo's approved corporate travel management company to ensure that they have the correct visa documentation necessary for their destinations,

including a passport that meets minimum validity requirements. Regardless of whether a business visa is required, the business activities you are permitted to participate in are very narrow in scope and may vary by country.

Per the International Travel Policy, all team members are required to complete the International Travel Application questionnaire before travelling on company business. Team members must complete and submit the questionnaire two weeks in advance of the departure date of the trip whenever possible.

Examples of business activities that are permitted:

- Attending business meetings where no productive work is performed. Productive work includes day-to-day work activities that team members would routinely perform in their country of employment.
- Attending business conferences or conventions.
- Consulting with business associates.
- Attending short-term training programs.

Examples of business activities that are not permitted:

- Doing productive work or any form of telecommuting — full-time, part-time, or occasional.
- Receiving funding for work performed.
- Filling in for an absent team member or a vacant position.

When you are traveling abroad on Wells Fargo business, it is recommended that you have the following supporting documents for your trip available to present to an immigration officer, if necessary.

- A sponsor letter from Wells Fargo indicating the purpose and length of the trip.
- Event registration, a brochure of the event, or a printed copy of any materials (including printed material, electronic files, or web pages) that reference the event you're attending, if you are attending a seminar or conference.
- Business cards showing your current work address.

Note: *Team members in a nonexempt position who attend offsite business meetings during or outside of normal business hours — including recognition events, business conferences, or training — as part of their job duties should report their time attending as well as their travel time in Time Tracker. Refer to the Recording Nonexempt Travel and Attendance page of Teamworks for more information.*

If your travel does not meet the permitted requirements for international business travel or if you will be traveling frequently or for long periods of time, you need to be approved for and placed on a company-sponsored international assignment. Be sure to work with your manager to carefully review the business purpose for all international travel. For all international travel of more than 30 days to a single destination, consult with Global Mobility and Immigration to evaluate an international assignment.

Driving on Company Business

This guidance applies to all Wells Fargo team members who drive for company business — either in a rental vehicle, company-owned vehicle, or their personal vehicle.

Driver's License

All Wells Fargo team members must have a valid driver's license to drive for company business and are expected to follow all local, state, and federal driving requirements.

Insurance coverage

Most states' laws require the vehicle owner's insurance to be the primary coverage, not the company's, so if you're driving your own car, you must be sure that you carry personal auto insurance to comply with state insurance requirements. Consult your personal insurance agent to ensure that your coverage is adequate for your protection. For more information on timely reporting of auto accidents, see Auto Claims on the Risk & Insurance Management site on Teamworks.

Traffic citations

Team members are responsible for payment and resolution of any speeding tickets or other traffic or parking citations they may receive while driving for company business. Team members are expected to comply with all applicable traffic rules and regulations, avoid distractions, and practice defensive driving skills. Mobile phones and other devices should not be used when driving on company business (see Distracted Driving).

For more information about driving for company business, please consult the Travel site on Teamworks. For more information about driving safely, see Distracted Driving.

Distracted Driving

This guidance is applicable to team members who drive for company business, to team members who use a company-issued device, and to team members who occasionally use their personal mobile phone to conduct company business.

Distracted driving is any nondriving activity that a person engages in that has the potential to create a distraction from the primary task of driving. Taking your eyes off the road, taking your hands off the wheel, or taking your mind off the task of driving safely are all examples of distracted driving.

When driving while conducting business on behalf of Wells Fargo, you are expected to follow applicable local, state, and federal laws and regulations regarding the use of mobile devices. Mobile devices include, but are not limited to, smartphones, tablets, laptops, wearable technology, and navigation systems.

Wells Fargo considers team member safety to be paramount and therefore does not require, and expects team members to refrain from using, mobile devices while driving for company business. This includes driving a Wells Fargo-owned vehicle, rental vehicle, or personal vehicle. Prohibited practices include:

- Placing or accepting calls.
- Texting, emailing, or using other messaging functions.

- Searching the web or accessing personal social media sites.
- Entering addresses into a navigation system.

Team members are advised to set their mobile device to 'do not disturb' while driving so that calls can be forwarded to their voicemail and retrieved when the vehicle is safely parked.

See also the Risk & Insurance Management FAQs on using Mobile Devices While Driving and Mobile and Electronic Devices.

Important: *You are expected to use good judgment in making sure that your behavior supports our company, policies, and conduct outlined here and throughout the Team Member Handbook. Failure to do so can result in corrective action, which may include termination of your employment. For additional information, see Corrective Action.*

Personal Appearance

We're proud of our public image, and we strive to maintain our high standards of customer service. We feel that the appearance of our team members is one of the factors that make a positive contribution to Wells Fargo's image.

Your customers form their opinion of our organization through their contacts with you, so you're asked to use good judgment in dressing in a way that meets their expectations. This includes presenting a neat, well-groomed appearance and showing courtesy in your actions.

Certain business groups may have specific guidelines about appearance, depending on the amount of customer contact and type of work you do. If you have a question about what's appropriate in your area, refer to your departmental guidelines or contact your manager.

Gambling

In accordance with the National Bank Act and our company policy, we don't allow Wells Fargo team members to engage in any form of gambling on Wells Fargo premises or on Wells Fargo systems and equipment.

Examples of gambling include but aren't limited to:

- Fundraising "lotteries" that require team members to purchase a ticket to participate.
- Any kind of game, contest, lottery, or raffle where proceeds from donations or collections are used to fund or purchase a prize (like a sports pool, fantasy sports league, or a nonprofit organization raffle).
- Any kind of online gambling activity.

Exceptions to this policy are lotteries and raffles with suggested but not required donations that are approved as part of a Wells Fargo-sponsored charitable or community fundraising event.

Wells Fargo does not prohibit team members from participating in any legal external activity, such as playing the lottery or engaging in sports pools or fantasy sports leagues, when such activities are conducted on your own time and either away from work or during nonwork time and in nonwork areas, such as

during your lunch or break time. Team members are reminded that Wells Fargo systems and equipment, including internal communications systems, may never be used to conduct such activities.

Important: *You are expected to take accountability for your actions and decisions. Violating the policy on gambling in the workplace can result in corrective action, which may include termination of your employment. For additional information, see Corrective Action.*

Solicitation & Distribution

To minimize work interruptions, we follow a strict Wells Fargo policy on soliciting and distributing literature during work times and on company property.

You should be aware that:

- Individuals not employed by Wells Fargo, including contingent resources, vendors, customers, or authorized visitors, may not solicit or distribute literature on company property, including parking lots.
- One team member may not solicit another team member or contingent resource while either one of them is on work time or if it interrupts others who should be working.
- Team members may not distribute literature in work areas (see work areas) at any time.

In addition, team members may not use company stationery, supplies, or equipment for solicitation or distribution, including:

- Photocopy machines
- Facsimile
- Computers, electronic mail, and instant messaging
- Wells Fargo's intranet, including blogs and wikis
- Interoffice mail
- Telephone
- Bulletin boards
- Voicemail

"Solicitation" is a request for time, money, or other resources or commitment from one individual or group to another individual or group of individuals that is presented either verbally, electronically, in writing, or by telephone. It includes activities like:

- Requests for signatures
- Requests to volunteer or commit time to attend or participate in an activity
- Contributions for charities
- Support of political activities
- Merchandise purchases
- Requests for donations
- Invitations to participate in virtual social media activities

Examples of solicitation include fundraising for schools or clubs; selling cosmetics, books, or jewelry; requesting participants or pledges for walk-a-thons; or selling tickets for a charity raffle.

"Distribution" is the dissemination of information by print, voice, or electronic means. It includes:

- Literature
- Advertising materials
- Pamphlets
- Handbills
- Leaflets
- Notices of any kind

Examples of distribution include posting notices that advertise a family-owned business or a local church bake sale, sending email about a fundraising website, or handing out or using interoffice mail to distribute pamphlets for a political candidate. Circulating any nonbusiness-related solicitation to Wells Fargo team members using company letterhead, interoffice mail, electronic mail, or communications systems is a violation of the solicitation and distribution policy.

Approved events

The only exception to this policy is distribution for specific events, solicitations, or literature approved by Wells Fargo senior management (head of a business group). In the case of approved events, only the authorized event organizers may distribute information and solicitations for the event. Individual team members participating in the events are not permitted to solicit or distribute information to other team members on work time, in work areas, or by using Wells Fargo systems.

Examples of approved events or literature include:

- The Wells Fargo Community Support and United Way Campaign
- The Wells Fargo WE Care Fund for team members
- Wells Fargo Political Action Committee (PAC) for eligible team members
- Wells Fargo products, services, or team member benefits
- Other identified approved charitable or community-based events

Important: *You are expected to take accountability for your actions and decisions. Violating the solicitation and distribution policy as defined above can result in corrective action, which may include termination of your employment. For more information, see Corrective Action.*

Corporate-Sponsored Political Activities & Personal Political Activities

Corporate-sponsored political activities

Wells Fargo PAC

Wells Fargo's political action committee (PAC) is funded solely by voluntary contributions from our eligible exempt team members as described in the Government Relations and Public Policy Risk Management Policy. The Wells Fargo PAC reports its receipts and expenditures to the Federal Elections Commission and state agencies as required by federal and state law.

Outside PACs

Outside PACs (those sponsored by organizations other than Wells Fargo) are not permitted to conduct solicitations for their PACs within Wells Fargo.

Other political contributions

Wells Fargo does not use company money or resources to influence any U.S. domestic or foreign candidate elections, including assisting candidate campaign committees, political parties, caucuses or independent expenditure or other political committees, or any other type of election-related activity.

Wells Fargo prohibits trade associations and other organizations to which we belong from using our membership dues or other payments for any election-related activity.

Ballot measures

Periodically, Wells Fargo participates in state and local ballot measures, such as initiatives and referenda, constitutional amendments, and bond measures.

Laws regulating the use of corporate funds for political activities vary from state to state. To avoid potential reporting violations and fines, businesses must receive preclearance from Government Relations and Public Policy using the Global Pre-Clearance System.

Inaugural-related events or activities

Corporate contributions for inaugural, transition, or white paper activities are not permitted under corporate policy.

Voter registration and Get Out The Vote

Wells Fargo Government Relations and Public Policy (GRPP) conducts Wells Fargo's voter education and registration events. As outside organizations may be partisan in nature and because we are subject to very strict federal and state regulations about election participation and communications, we generally don't participate with outside organizations on voter registration or get-out-the-vote efforts, nor are they allowed to operate on Wells Fargo property. However, GRPP may partner with appropriate government agencies on voter registration or get-out-the-vote efforts.

Team member personal political activities

Team members may engage in civic and political activities based on their individual desires and political preferences, but not as representatives of Wells Fargo. Activities must not cause a conflict of interest with Wells Fargo, either by using Wells Fargo resources or work time for political activity or by holding political offices that may pose a business conflict of interest. Wells Fargo respects its team members' interest in running for or serving in public office. However, due to the breadth and scope of Wells Fargo's business activity, there is a potential for actual or perceived conflicts of interest with your employment at Wells Fargo. Therefore, preclearance is required before pursuit of or potential candidacy for any government or other public position or office, including as an elected or appointed official or as a member, director, officer, or employee of a government entity or governmental or public agency, authority, advisory board, city council, school board, political party committee, or other similar boards or entities. During the preclearance process, conflicts of interest and potential risk-mitigating conditions will be evaluated. Wells Fargo has a strict policy on soliciting and distributing literature during work times and on company property. A team member may not solicit another team member for any political activity while either one of them is on work time and may not distribute literature in work areas. See the Conflicts of Interest and Outside Activities Policy and the Solicitation and Distribution policy for additional information.

Wells Fargo does not reimburse any personal political contribution. Additionally, covered team members and their immediate family members, as defined in the Business and Personal Activities with Public Officials and Government Entities Policy, must preclear their personal political contributions as required by the policy.

Company & Personal Property

Monitoring

See Equipment Monitoring in the Information Security section.

Secured property

If you have access to secured Wells Fargo property (for example, restricted Wells Fargo facilities, vaults, files) then you're responsible for the security of the item that provides your access (for example, keys, cardkeys, passwords, building access badges). See Protecting Company & Consumer Information in the Information Security section.

Important: *You are expected to take accountability for your actions and decisions. Allowing someone to access restricted Wells Fargo property in violation of this policy, intentionally or unintentionally, can result in corrective action, which may include termination of your employment. For more information, see Corrective Action.*

Protecting company hardware

Wells Fargo provides guidance to help team members protect company hardware assets (see Protecting Company Hardware & Software Assets in the Information Security section).

Personal property

We recognize that you may choose to bring personal items into the workplace. Wells Fargo is not liable for loss, damage, or theft of personal property on its premises. For your own protection, don't leave personal property at work and don't leave personal items unattended while you're at work. Do not have any personal mail or shipments unrelated to Wells Fargo business directed to a Wells Fargo work address (see Mail Systems).

Mobile & Electronic Devices

Personal electronic devices such as smartphones, tablets, laptops, or wearable technology may be indispensable communication tools in our lives, but when used excessively during work hours and in the workplace, they may potentially become a distraction that impacts productivity goals and the ability to serve customers. Your business may have specific restrictions on the use of mobile and electronic devices in the workplace that may include limiting use of personal devices to scheduled break and meal periods. Talk to your manager about the policy in your group. If electronic communication devices are allowed in your workplace, be sensitive to your coworkers when using them and make sure that they don't disrupt work or customer interactions. In public areas (customer areas, hallways, airports, and the like) or where meetings are taking place, reduce or silence the tone settings. Be aware of your surroundings and avoid discussing or displaying sensitive or confidential information in public areas. (See Workplace Conduct, Personally Owned Electronic Devices, and Mobile Computing Devices.)

You are expected to refrain from using a mobile device while driving a Wells Fargo vehicle or traveling to or from company business or in any other manner conducting company business. Using a mobile device while driving is not required by the company and may be in violation of local laws or regulations. Safety must come before all other concerns (see Distracted Driving).

Recording Devices

In the course of doing your work, evaluating your performance or resolving workplace disputes, there will be frequent opportunities for private and confidential discussions with your supervisor and other Wells Fargo representatives. Such conversations are intended to promote open, honest, and transparent dialogue in a way that builds trust.

Wells Fargo respects the privacy of these confidential discussions. Unless approved for use as a medical work accommodation, we strictly prohibit any recording of these conversations by any electronic device with audio or video recording capabilities. This includes personal or business electronic devices such as smartphones, tablets, laptops, or wearable technology. Making a recording of such conversations is not consistent with the environment we want to encourage — one that values open and honest interchange among team members, supervisors, and managers. Additionally, you should be aware that many state laws restrict recording without consent of all parties.

Important: *You are expected to take accountability for your actions and decisions. Recording private conversations in violation of this policy can result in corrective action, which may include termination of your employment. For more information, see Corrective Action.*

Also see Cameras, Photos, and Videos in the Workplace and Recording Conference Calls and Business Meetings.

Cameras, Photos, & Videos in the Workplace

At Wells Fargo, a primary goal is to always do the right thing for customers. This includes protecting company and consumer information and respecting individuals' privacy. There are restrictions on using cameras in Wells Fargo facilities and at internal Wells Fargo events — including still and video cameras or live video streaming using camera-equipped mobile or electronic devices such as smartphones, tablets, laptops, drones, or wearable technology. (These standards do not apply to Wells Fargo-approved security cameras or video-teleconferencing equipment.) Additionally, photos or videos are generally not allowed in Wells Fargo restrooms, lactation rooms (mother's rooms), and other similar areas where team members have the expectation of privacy.

The use of cameras in Wells Fargo facilities for the purpose of recognition, marketing, workplace safety evaluations, or other official company business, including Wells Fargo volunteer activities, is permitted provided that the following conditions are met:

- You obtain approval from your manager.
- Confidential company and consumer information is protected from disclosure (check the area to ensure that information is properly stored or covered, including images on computer screens).
- You respect team member and customer privacy by not including anyone in the picture or video without their prior knowledge and permission.

Important: *You are expected to take accountability for your actions and decisions. Any inappropriate or nonapproved use of any camera or camera-equipped device anywhere within a Wells Fargo facility can result in corrective action, which may include termination of your employment. For more information, see Corrective Action.*

Anti-Harassment

Wells Fargo prohibits sexual harassment and harassment of any of our team members, contingent resources, vendors, applicants for employment, or customers based on an individual's race, color, gender, national origin, religion, age, sexual orientation, gender identity, gender expression, genetic information, physical or mental disability, pregnancy, marital status, status as a protected veteran, or any other status protected by federal, state, or local law. Prohibited conduct includes but is not limited to conduct on company property, in company vehicles, on company communication systems, during company-sponsored events, and in connection with company business. Any such harassment is against Wells Fargo policy, may violate the law, and will not be tolerated in our workplace, at work-related events, or while using electronic communication systems (see also Electronic Communications & Social Media, Drugs & Alcohol, and Workplace Conduct).

Wells Fargo expects cooperation from all of our team members — including coworkers, managers, supervisors, workflow coordinators, workflow directors, and team leaders — to prevent harassment in the workplace and to immediately report harassment (see Reporting Harassment).

It's your responsibility as a team member to report harassing behavior, whether it's directed at you or it's something that you've seen or heard directed at someone else. You're protected from retaliation for reporting or providing information in good faith about an incident of alleged harassment or exercising other rights protected by law.

Any manager or supervisor who learns of or observes harassing behavior, even if it's in another business group, or any manager or supervisor who receives a complaint about this kind of behavior, has a duty to take action and should immediately report the behavior or complaint to ER Solutions (see Reporting Harassment).

Important: *Violating the policy against all forms of harassment, including failure to report, can result in corrective action, which may include termination of your employment. For more information, see Corrective Action.*

Early and ongoing education about harassment is key to preventing harassment in the workplace and ensuring timely reporting of any inappropriate behavior. Team members and managers are required to complete the following training:

Team members

All newly hired team members without direct reports are required to take the team member version of the online harassment prevention training course within 60 days of hire and annually thereafter (see Develop You).

Managers

All managers must complete the manager version of the online harassment prevention training course within 60 days of hire or promotion to manager status and annually thereafter (see Develop You).

- Managers in Connecticut and California must complete a two-hour online training course annually.
- Managers in all other states must complete a one-hour online training course annually.

Each business is responsible for monitoring training compliance of the Enterprise Risk Learning (ERL) Plan. All team members must complete the annual required training in the timeframe communicated by the business.

Sexual Harassment

The company's goal is to ensure a workplace free from harassment, including sexual harassment. Consistent with Wells Fargo's Vision, Values & Goals, team members are reminded to conduct themselves in a courteous, mutually respectful manner and to avoid behavior that is not acceptable or welcomed by all team members. Inappropriate behavior may include actions that sexualize work interactions, and such conduct could be a form of sexual harassment.

All team members are encouraged to speak up anytime another's actions make them feel uncomfortable. If another team member tells you that your actions are making them uncomfortable, you have the responsibility to listen, understand how your behavior is affecting others, and immediately stop the behavior.

"Sexual harassment" is defined by law as unwanted sexual advances, requests for sexual favors, or visual, verbal, or physical conduct of a sexual nature when:

- Submission to this conduct is made either explicitly or implicitly a term or condition of an individual's employment.
- Submission to or rejection of this conduct is used as the basis for employment decisions that affect the individual.
- The conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

Sexual harassment also may be in the form of nonsexual, offensive conduct that is directed at a team member because of their gender. Sexual harassment is not limited to conduct motivated by sexual attraction and may occur between members of the opposite sex or members of the same sex.

Wells Fargo's policy is broader than the legal standards. Our policy may be violated even if the person did not intend to give offense or believed that their conduct was welcome. Examples of prohibited sexual harassment include but are not limited to conduct such as:

- **Written harassment.** Sexually suggestive or obscene letters, faxes, e-messages, texts, instant messages, notes, social media posts, or invitations.
- **Verbal harassment.** Sexual comments, advances, or propositions and derogatory comments, slurs, and jokes and comments about an individual's body or appearance, including comments made on voicemail or another recording device.
- **Physical harassment.** Assault, stalking behaviors, any unwanted or inappropriate touching or body contact or any physical touching that makes you feel uncomfortable, impeding or blocking movement, encroaching on another's personal space (e.g., standing or sitting too close).
- **Visual harassment.** Sexual gestures; staring; inappropriate display of sexually explicit objects, pictures, cartoons, or posters (in hard copy or electronically, through work or personal electronic devices).

Wells Fargo expects cooperation from all of our team members — including coworkers, managers, supervisors, workflow coordinators, workflow directors, and team leaders — to prevent harassment in the workplace and to immediately report harassment (see Reporting Harassment).

Important: *Violating the policy against all forms of harassment, including failure to report, can result in corrective action, which may include termination of your employment. For more information, see Corrective Action.*

Other Forms of Harassment

In addition to sexual harassment, other forms of harassment may also occur when unwelcome conduct:

- Unreasonably interferes with an individual's work performance.
- Creates an intimidating, hostile, or offensive work environment.

Wells Fargo prohibits harassment based on an individual's race, color, gender, national origin, religion, age, sexual orientation, gender identity, gender expression, genetic information, physical or mental disability, pregnancy, marital status, status as a protected veteran, or any other status protected by federal, state, or local law.

Remember that Wells Fargo's policies are broader than federal, state, or local law. Prohibited harassment may take the form of written, verbal, physical, or visual harassment and may include but is not limited to epithets, slurs, derogatory comments, or jokes, intimidation, negative stereotyping, threats, or assault or written or graphic material that denigrates or shows hostility or aversion toward an individual or group because of the characteristics identified above. Wells Fargo's policy may be violated even if the person did not intend to give offense or believed that his or her conduct was welcome.

All team members are responsible for complying with our policies on professional behavior, harassment, and violence-free workplace, even if they are consuming alcohol at a company-sponsored event or conducting business with customers or other non-team members where alcohol use is sanctioned. You're also responsible for using a safe means of transportation if you've consumed alcohol in any of these circumstances (see Drugs & Alcohol).

Wells Fargo expects cooperation from all of our team members — including coworkers, managers, supervisors, workflow coordinators, workflow directors, and team leaders — to prevent harassment in the workplace and to immediately report harassment (see Reporting Harassment).

Important: *Violating the policy against all forms of harassment, including failure to report, can result in corrective action, which may include termination of your employment. For more information, see Corrective Action.*

Reporting Harassment

If you believe that you have been harassed or if you are aware of the harassment of others, including sexual harassment, you must report it as soon as possible to one of the following:

- Your manager
- Another manager with whom you feel comfortable
- Use the Employee Relations eForm (**Note:** While completion of the eForm requires only minimal details to initiate a call with an ER representative/consultant, you should indicate that your request is to discuss an allegation of harassment to ensure appropriate routing.)
- Contact the EthicsLine to report the concern at **1-800-382-7250**, or submit a Wells Fargo EthicsLine Web Reporting form.

For managers looking for additional direction concerning reporting harassment involving a contingent resource, refer to the Global Contingent Resource & Alternative Staff page on Teamworks or see the Contingent Resource Policy in the Policy Library.

Wells Fargo encourages individuals who believe that they are being harassed to firmly and promptly tell the person, if they are comfortable doing so, that the behavior is offensive and that it must stop immediately.

Once you report harassment by contacting one of the resources above, a representative of Wells Fargo will obtain all relevant information from you and in a timely manner will undertake or direct an effective, thorough, and objective review of the harassment allegations. When initiated by the company, all team members are required to cooperate fully in any fact-finding process (see Providing Information). Even if it would be your preference to "stay out of it," you can't choose to withhold information if you are asked to provide it. You're expected to cooperate fully and honestly and to not interfere with the integrity of the process.

You'll be contacted when the review is completed. Wells Fargo will take the corrective action that it determines is appropriate based on its findings. However, Wells Fargo will only share information regarding the review, including any corrective action taken, with those who have a legitimate business need to know (see business need to know).

Nonretaliation

Taking any action against any team member who in good faith reports or provides information about an incident of alleged harassment is unacceptable and could be in violation of the Speak Up and Nonretaliation policy. Wells Fargo will not knowingly permit any retaliation against any team member who complains of prohibited harassment or who participates in a review, whether internal or external.

For more information, see the Speak Up and Nonretaliation Policy.

Further assistance

If you're not satisfied with the way a concern has been resolved in the workplace, you're encouraged to use Wells Fargo's dispute resolution procedure.

Finally, in addition to Wells Fargo's internal dispute resolution procedure, team members should also be aware that the federal Equal Employment Opportunity Commission (EEOC) and the appropriate state agency investigate and pursue complaints of unlawful harassment in employment. Team members who believe that they have been unlawfully harassed may file a complaint with either of these agencies. The EEOC and the state agency serve as neutral fact finders and attempt to help the parties voluntarily resolve disputes.

For additional state and local information, see State Specific Anti-Harassment Information.

Communications

Our approach

Communications takes many forms, including verbal, written, digital, and photographic. What we communicate and how we do it can be conveyed in numerous ways with the advances of technology. We use communications to advance the Wells Fargo brand and share information about us with customers, stakeholders, team members, and communities in which we work. However, information that is misused or communicated inappropriately can cause harm, whether intentional or unintentional. Team members must act in ways that reflect the highest standards of business conduct and ethics that protect our company's reputation and confidential information.

Electronic Communications & Social Media

Social media, email, instant messaging, texting, mobile chats, and branded websites are important ways to communicate digitally at Wells Fargo. Whether you are using internal Wells Fargo systems and devices, a Wells Fargo-approved Bring Your Own Device (BYOD), or communicating on social media externally, the information you create or circulate online should reflect the same standard of professionalism used in traditional forms of written communication, such as letters and memos. Some team members, such as FINRA regulated users, have additional responsibilities related to online and electronic communication; these users should review the compliance requirements for their business or businesses they support.

Team member responsibilities

- Think
- Respect
- Protect
- Identify
- Participate

Think

Before you post anything online or send electronic messages and content (which can easily be copied and distributed widely), use good judgment and follow the Code of Ethics and Business Conduct to ensure that your actions always reflect the highest standards. Remember, what happens online, stays online — forever (see Risk Management Accountability).

Respect

Chances are that those you connect with online are aware you are a Wells Fargo team member, so you should maintain the same standard of professionalism you follow at work. Never send electronic messages through Wells Fargo's communication systems or in Wells Fargo's name that could be reasonably viewed as obscene, threatening, harassing, discriminatory,

abusive, or disparaging to team members or customers. This does not align with our Vision, Values & Goals or behavioral expectations and is inconsistent with our policies and standards (see Team Member Professionalism; Anti-Harassment; Affirmative Action, EEO, and Diversity & Inclusion; and Violence-Free Workplace).

Protect

Our customers and communities place their trust in you. Even though many online tools promise "privacy," never assume that what you share electronically is private. Maintain the confidentiality of Wells Fargo trade secrets and confidential information, including details on the development of systems, projects, processes, know-how, and technology. Do not post internal reports, procedures, or other business-related confidential communications without approval or on nonauthorized systems (see our policies on Protecting Company & Consumer Information, Protecting Electronic Communication Systems, Personal & Personnel Information, Privacy & Solicitation, and Cameras, Photos, & Videos in the Workplace).

Be careful to not share any forward-looking statements or comments on our stock, on our earnings, or on a competitor's business outlook (see Insider Trading). If you are a FINRA regulated team member, you cannot comment on the business of Wells Fargo or financial services in public forums unless in a Wells Fargo-approved program. Remember, unless you are duly authorized, you are acting as an individual and not as a company spokesperson. Respect all trademark, copyright, and other intellectual property rights of Wells Fargo and others (see Intellectual Property). Use care to not say anything disparaging about our customers and never mention customers by name or by any identifying characteristic. Also, use caution when clicking links, as they may direct you to malicious sites or content. Much of the content on Teamworks and Team Moments is for internal purposes. An exception is content on the Wells Fargo Stories website that is specifically identified as suitable for sharing, subject to your business communication rules.

Identify

If you post an online endorsement about Wells Fargo-related matters such as marketing products or services, or issues related to a competitor, then you must identify yourself as a Wells Fargo team member. Make it clear that you are speaking for yourself. Always use your personal email address when you create a personal site or post content to an external site that is not related to Wells Fargo. FINRA regulated team members cannot comment on the business of Wells Fargo or a financial services competitor in a public forum unless the team member is in a Wells Fargo-approved program.

Participate

We have official Wells Fargo content on many digital properties and social media sites. You have an opportunity to participate on these pages by sharing your commitments to the communities we serve, as well as sharing photos or stories from community events and sponsorships. Do not answer customer questions, don't give financial advice, and don't sell. If you see a customer issue in social media outside of Wells Fargo's official social media pages, send it to socialmedia@wellsfargo.com for review.

Work-related communications

Internal

Use company-authorized internal sites such as Teamworks, Team Moments, social collaboration environments, wikis, and blogs as well as e-messages to collaborate and to share business-appropriate content. In addition to professional language, it is expected that team members use good judgment when using emoticons or symbols in their online communications. To avoid disruption to Wells Fargo's internal communication systems and to oversee team members' focus on their job duties, you should not use internal sites and e-messages to send or forward mass e-messages or e-messages containing oversized attachments or audio/video segments to individuals without a business need to know and that are unrelated to your business activities. If you receive an unsolicited mass e-message, avoid further distribution of the message. Do not forward or reply to all recipients as this can further disrupt Wells Fargo's communication systems. In addition, make sure that the information you share is secured appropriately and that access is restricted to team members who have a need to know the information. For example, don't share a sensitive or confidential document or update in a forum that is open to a broad range of team members. The content shared through company-provided internal systems is solely for internal use by Wells Fargo and is not to be provided in any format to anyone outside of Wells Fargo. While you may participate personally in external sites, such as LinkedIn, Facebook Groups, or any external digital collaboration platform such as Slack, you should not use these platforms to support internal collaboration. Skype and Team Moments are authorized Wells Fargo internal collaboration platforms.

Respect trademark, copyright, and other intellectual property of Wells Fargo and others. If using third-party content such as articles, photos, videos, and graphics, you must have prior written permission from the copyright owner. Providing a link to the content is permissible and does not violate copyright law. (See Copyright FAQs and Intellectual Property.)

Visiting and participating in Wells Fargo-sponsored intranet sites is purely voluntary. Accessing these sites outside of work is voluntary and not a condition of your employment. You will not be paid for your time on such sites. Your posting of content on these sites does not necessarily mean that Wells Fargo agrees with the content, ensures its accuracy, or otherwise approves of it. Wells Fargo reserves the right to edit or remove content at any time.

Personal profile

Many of our digital communications systems allow you to edit your profile to add a personal photo to help you identify yourself to other team members and share personal and professional information about yourself, such as what you work on and your business interests and activities, so that other people in the organization can connect with you. Such systems include instant messaging (Skype), email, My Profile on Teamworks, Team Moments, and SharePoint sites, among others. Adding your photo is voluntary and is not a requirement of any internal work system. When adding a personal profile photo, you should use only a business-appropriate photo of only yourself, with no other subjects, where your image is clearly represented and consistent with Wells Fargo's personal appearance policy.

It is important that you follow established policies and guidelines to understand how to avoid inappropriate internal postings, respect copyrights, and report concerns. Visit the Profile Picture Upload Tool and Teamworks Policies page for more details.

External

While Wells Fargo team members may use external digital resources for research, marketing, and other uses, only approved Wells Fargo spokespersons may contribute to public forums in the name of the company and its customers. If a team member wishes to speak on the company's behalf in the media (or identifies themselves as a Wells Fargo team member in the media such that they may be perceived as speaking on the company's behalf), on any issue, they need prior approval from the corporate communications manager in their region or business (see Media Contact). You may not create external social media accounts or pages that may imply endorsement from or association with Wells Fargo without prior approval by Enterprise Digital Properties Governance.

Business communications and personal devices and accounts

Personal electronic communication accounts such as personal email, social media, and instant messaging, should never be used for business communication. Unless you have been approved to use your personal electronic devices under a Wells Fargo Bring Your Own Device (BYOD) program, your personal smartphones and tablets should not be used for conducting Wells Fargo business. This includes calling, texting, emailing, and direct or instant messaging with customers, vendors, or other business-related contacts through your personally owned device. (See Personally Owned Electronic Devices.)

Additional information

Wells Fargo systems may be monitored at any time, so all content accessed by a Wells Fargo computer or system is not considered private (see Monitoring of Company Equipment). Keep in mind that certain business groups such as Wealth and Investment Management and some groups in Wholesale may have additional restrictions on electronic communications due to regulatory requirements. You can always ask your manager, the Social Media Marketing team, or your ER Solutions team for more information. This guidance is not intended to prevent you from discussing terms and conditions of employment at Wells Fargo (see Employment & Hiring).

You can learn more about your social media responsibilities by reviewing Social Media Guidance for Team Members (PDF) and the Electronic Communications and Social Media Policy Frequently Asked Questions (PDF).

Reporting concerns

If you are aware of any conduct by a Wells Fargo team member — or someone representing Wells Fargo in any electronic format — that violates Wells Fargo policy, please advise your manager or your ER Solutions team. If you come across any posts that could be reasonably viewed as obscene, threatening, harassing, discriminatory, or abusive involving Wells Fargo and our competitors, forward them to our spokespersons at corpcsf@wellsfargo.com (see Media Contact).

Important: *You are expected to use good judgment in making sure that your behavior supports our company standards, policies, and conduct outlined here and throughout the Team Member Handbook. Failure to do so can result in corrective action, which may include termination of your employment. For additional information, see Corrective Action.*

Wells Fargo Mail Systems

Enterprise Interoffice Systems provides internal and external mail services to all Wells Fargo business units and use is reserved for business-related needs only. To ship or receive personal items using Wells Fargo resources (to include third-party resources such as FedEx, UPS, or DHL) is a violation of company mail guidelines and may violate corporate policy.

Non-first-class (Periodicals/Marketing) mail such as magazines, newspapers, catalogues, retail store circulars, and other non-Wells Fargo marketing materials are not delivered to team member (or business) mailboxes through interoffice mail.

Any mail addressed to a Wells Fargo business address and received by Wells Fargo, including mail addressed to current or former team members, becomes the property of the company upon delivery. All such mail is subject to be opened for purposes of sorting, imaging, and inspection by the company.

Team member responsibilities

These important reminders for team members ensure efficient and appropriate use of our mail services and systems:

- Scan and email documents whenever possible, instead of sending paper documents through interoffice mail.
- Know and follow all interoffice mailing guidelines including restricted items.
- Set up new, or switch existing, magazine subscriptions to digital or home delivery, or leverage Wells Fargo's free digital resource for online magazines or journals.
- Do not direct any personal mail or shipments unrelated to Wells Fargo business to a Wells Fargo work address. Wells Fargo is not responsible or liable for loss, damage, or theft of personal property on its premises (see Company and Personal Property).

Additional information

If you have questions, or need additional clarification on appropriate use of interoffice mail, review the interoffice mailing guidelines (which includes restricted items), contact Customer Support at 1-866-701-5789, or email your questions to interofficemail@wellsfargo.com.

Recording conference calls and business meetings

Never record conference calls or business meetings in which (1) clients, vendors, regulators, and other third parties participate or (2) confidential or restricted information is shared. There are, however, instances where it may be appropriate to record an internal meeting or conference call that does not involve **confidential or restricted** information. For example, it would be appropriate to record an internal call for a training session or a large “all-hands” team call where the detail shared is informational, and not confidential or restricted. In such instances, the teleconference vendor will have a recorded introduction to the call that announces that the call will be recorded. When you lead a recorded call, be sure to remind participants that the call is being recorded. When you participate in a call and are made aware that it is being recorded, your continued participation in the call is your consent to the recording of the entire conference call. (See **Conferencing Services**.) This policy does not apply to any regulated user when, for compliance purposes, call recording is mandatory.

Recording conference calls or business meetings by use of tape recorder or any electronic device with audio or video recording capabilities is prohibited. This includes recordings using personal or business electronic devices such as smartphones, tablets, laptops, or wearable technology.

Accessible Communications

Americans with Disabilities Act

Our customers, potential customers, or anyone accompanying them may have a disability that requires us to take additional steps to ensure full and equal access to Wells Fargo's products and services. Wells Fargo is committed to doing business with individuals with disabilities and, consistent with the requirements of Title III of the Americans with Disabilities Act (ADA), has set forth standards for effective communication with those individuals. Wells Fargo's Americans with Disabilities Act Title III Policy is a companywide policy that explains our obligation to ensure that people with disabilities have full and equal access to our products and services. This includes standards for telecommunications, auxiliary aids and services, integrated settings, service animals, modification of policies and procedures, accessible facilities, accessible public-facing digital properties, and mobility devices.

Your responsibilities

This information provides valuable guidance for all team members, but it's particularly important to read and understand the entire policy if your job duties customarily involve significant communication on behalf of Wells Fargo with U.S. customers, potential customers, or anyone accompanying them. The policy includes standards for administering the policy and useful definitions and examples. Team members are responsible for understanding the business procedures that apply to their jobs including fulfillment of auxiliary aids and service requests. In addition, team members must respond to complaints in accordance with appropriate business complaint management procedures and the Complaints Management Policy. Your Business ADA coordinator and Wells Fargo Compliance are available for consultation, as necessary.

Resources

If you have questions related to Wells Fargo's Americans with Disabilities Act Title III Policy, visit the ADA Title III page on Teamworks. The website contains business contacts, job aids, auxiliary aid and service request forms, and other ADA resources. Policy-related training may be accessed on Develop You.

Media Contact

To ensure that Wells Fargo media responses are accurate, thoughtful, and consistent with our company-wide messages and communications strategy, we have a process in place for responding to reporters and other representatives of the news media.

Most often media representatives contact Corporate Communications, but sometimes a reporter may find your name and call you directly to request interviews, statements, or other information on behalf of Wells Fargo. If that happens, it's important that you first contact Corporate Communications to help us manage these interview or information requests. You can reach Corporate Communications by email at corpcsf@wellsfargo.com.

Corporate Communications will work with the reporter to try to fulfill the request. In most instances, Corporate Communications will be the designated spokesperson to the media. If your assistance is needed once you refer a reporter, a Corporate Communications team member will contact you.

Any team member who wishes to speak on the company's behalf in the media (or identifies themselves as a Wells Fargo team member in the media such that they may be perceived as speaking on the company's behalf), on any issue, needs prior approval from the corporate communications manager in their region or business. That communications manager will escalate the request, as appropriate, to Corporate Communications. To find the appropriate contact for your region or business, please view the Media Contacts by Business or the Media Contacts by Region pages on wellsfargo.com. Review the Media Relations policy for more details.

Language

English is the business language for Wells Fargo's U.S. operations. At the same time, we recognize that we serve a highly diverse customer base, and in some cases, it's both necessary and desirable to conduct business in languages other than English. In fact, some of our team members have been hired specifically because of their multilingual business skills. So, while business communications in the United States should be in English, it is recognized that the specific business needs of a unit or position may periodically dictate otherwise.

By establishing this language policy, we don't intend to prevent team members from using other languages in appropriate business or social communications. In fact, Wells Fargo encourages an environment that supports our diverse workforce as well as our multicultural customer base. We respect our team members' desire to communicate in languages other than English.

However, this policy allows managers to limit non-English communications if they interfere with clear business communications or with efficient work performance.

Business Cards & Email Signatures

To maintain our professional image, comply with company policy, and protect the company from legal risk, the following standards apply to business cards, email signatures, out-of-office alerts, and other messaging systems. Certain Wells Fargo business groups are required to use approved email disclaimer language appropriate to their business or include identifiers, like a SAFE NMLSR ID, on certain business materials. Check with your manager and line-of-business compliance department to confirm whether you are required to use email disclaimer language on your electronic communications and any other required inclusions. Certain Wells Fargo customer-facing business groups may use URLs or hyperlinks to websites. Please consult with your manager and line-of-business compliance department for direction if you feel this applies to you. Visit the Enterprise Digital Properties Governance website on Teamworks for more information on policies, standards, and guidelines related to outbound email (and other types of e-messaging) sent to customers or prospects.

Business cards for all Wells Fargo team members, regardless of the line-of-business variations, are ordered through Enterprise Procurement. For brand consistency and compliance, this system regulates the design and layout of the business cards appropriate for your business group. Business cards should only be ordered from approved sources, as self-created business cards are not permitted. When writing your title on email signatures or business cards, please refer to the policy on Use of Legal, Medical, and Other Professional Designations.

When using the electronic out-of-office alert, provide alternate contact information consistent with your business group's standards. When using other email-viewing devices such as a Blackberry or iPhone, you are encouraged to use a shortened version of your email signature. Examples can be found on Brand Central (sign on required). Brand Central provides a variety of brand information, including the Email Signature Formatting standards for Wells Fargo team members. There, you can review several options of how email signatures can look at Wells Fargo. These are examples of various formatting options, as our email signature content is managed by your line-of-business leadership, compliance, and legal teams.

Please note: *The same guidance for business email applies to use of features of Wells Fargo's instant messaging systems.*

Email Signature Guidelines

Email signatures should include:

- Your name
- Your functional/officer title
- Your department/group
- Your best business telephone number
- Any other information required by your business group's legal or compliance team

Email signatures may also include:

- Your business and MAC addresses
- Your secondary telephone and fax numbers, if applicable
- Your email address, if applicable
- Your pronoun, for example he/him/his, she/her/hers, they/them/theirs

Email signatures may not include:

- Sayings, quotes, slogans, mission statements, philosophies, quips, etc. (neither personalized nor business-related)
- Company or business taglines
- Graphics in email signatures, whether brand-approved Wells Fargo graphics or from an outside source. Do not try to recreate any brand graphics, like the logo, in any form.
- Statements that are of a political or religious nature
- Links to non-Wells Fargo internet sites (for example, personal blogs, handles, personal social media profiles) or personal email addresses
- Internal designations or titles (like Brand Steward or Innovation Club secretary)

Use of Legal, Medical, and Other Professional Designations

Wells Fargo recognizes that many team members have earned specialized, professional designations. Often, these designations are not connected to or required for the team member's duties with the company. Even if they arguably are useful in the team member's job, these designations can pose risk for the company in certain instances. Accordingly, the following parameters for legal, medical, and other professional designations must be followed:

J.D., Esq., or other lawyer designations

When lawyer designations are used, there is a significant risk that internal and external parties may believe that the team member is holding themselves out as representing the company in a legal capacity. This has many problematic implications. Additionally, there is a risk that internal parties may believe that communications with the person using the designation will be privileged and protected from disclosure when such is not the case.

Consequently, Wells Fargo policy prohibits the use of any lawyer designation by any team member who is not a member of the Legal Department or the Tax Department. There are no exceptions to this policy.

Medical professional designations

Some team members may utilize special training of a medical nature in the performance of their duties for Wells Fargo. In those instances, it is permissible to utilize designations such as M.D. or R.N. so long as the team member is in good standing with applicable regulatory bodies and using the designation within the scope of their employment with Wells Fargo.

In instances where the medical designation is not required for one's job but arguably closely connected to the business, the team member may use the designation but must include any disclaimers required by policy or business practice.

Other professional designations

Team members may also hold other professional certifications and, before using them, should ensure that there is a legitimate business purpose for using the designation and should also abide by applicable rules for their business. Team members must not use a professional designation if their certification is no longer active or maintained, if not approved by or appropriate for the business, or if use of the designation is prohibited by company policy or state or federal rules.

Career, Performance, & Problem Solving

Our approach

Wells Fargo is committed to helping you develop the skills and knowledge you need to be successful in your job. And we believe that open, honest, and direct communication is essential to both your success and the success of Wells Fargo and our team members.

We encourage you to take full advantage of the opportunities open to you for developing yourself and your career. Each day, you interact with a variety of people who have different perspectives, backgrounds, and experiences as well as different skills, abilities, and knowledge. This diversity creates an environment rich in learning opportunities.

At Wells Fargo, we promote the free flow of questions, answers, and ideas. We want you to have accurate and timely information about your company and your job. We also believe that successful communication flows two ways. If you have a question, problem, complaint, or suggestion, tell your manager or contact ER Solutions using the Employee Relations eForm.

Our People

People as a competitive advantage

Team members are our most valuable resource and a key competitive advantage. So, we want to be an employer of choice — a company where people matter, teamwork is rewarded, everyone feels respected and empowered to speak up, diversity and inclusion are embraced, and how our work gets done is just as important as getting the work done.

Our belief in this strategy puts strong emphasis on engaging our team members. Engagement is an emotional connection with, and commitment to, Wells Fargo where we feel included, valued, and supported to do work that energizes us, and where we are inspired to go farther together — for one another, our customers, and our communities.

You truly are Wells Fargo's competitive advantage.

Career Development

Development is a business imperative for our company and is rooted in the belief that everyone can benefit from ongoing learning and focused development. We empower you to explore, grow and achieve through a full range of development opportunities. Our approach to development:

- **Reinforces our values and supports the needs of the business** by embedding our Vision, Values & Goals in all of our development activities and ensuring that development opportunities reflect and support the company's business strategies, goals, and behavioral expectations.

- **Focuses on your strengths** with training and tools to help you identify your talents, turn them into strengths, and grow from good to great.
- **Includes everyone** by recognizing that all team members — whether you are an individual contributor or a manager — are called to be leaders and can benefit from development.
- **Defines expectations** by clearly stating the knowledge, skills, and behaviors needed for success and helping you identify ways to acquire or develop them.
- **Targets your needs** by defining the common learning needed at various stages of development while recognizing and prioritizing the unique needs of team members.
- **Shares accountability** by encouraging team members to own their development and holding managers accountable for supporting their team members' development and career movement within and across businesses and functions.
- **Offers a range of activities** that include courses and programs, relationships and feedback, videos, books and journals, and on-the-job experiences. Your development will be most effective when you choose and blend a variety of development opportunities.

Orientation and getting started

As a new team member, your first weeks and months on the job are important in establishing successful, productive working relationships. The Getting Started at Wells Fargo site on Teamworks will give you the information you'll need to participate in benefits and programs, and understand available resources. You'll spend time getting to know your team, and your manager will discuss your job and how you can be successful. As part of your orientation, you may be invited to attend a group orientation session as well. Each business may establish its own time frames during which new team members should demonstrate job proficiency.

Development

Your career at Wells Fargo can be as varied and dynamic as you want it to be. The company offers a range of career development options and believes in fostering an environment in which you can explore your talents and reach your full potential.

At Wells Fargo, development can mean many things. You may focus on enhancing your current skills, growing skills toward a future role, or even taking steps to build new skills and change directions entirely. Regardless of your career goals, your development can take on many forms. Once you've identified where you want to go, Wells Fargo has several ways to help you get there.

The more deliberate you are about your development, the more likely you are to find opportunities that align with your skills and passions. Development options to build your skills include:

- **Experiences:** Hands-on learning and practice in real situations, either in or outside of your current role.
- **Relationships and feedback:** Learning from others through coaching conversations, mentoring relationships, networks, feedback, or observing and working with role models.
- **Formal and informal learning:** Formal education and training through in-person or online courses and informal learning opportunities such as webinars, books, journals, or videos.

Your business also provides functional and product training that is specific to your job or business within Wells Fargo. Talk with your manager to learn about training that is required or recommended for your job. When you are ready to plan your development, we have the resources to help you build a development plan focused on your strengths and career goals.

Leadership

At Wells Fargo, we believe that everyone's a leader. Regardless of your position in the company, you demonstrate leadership in the way you lead yourself, lead the team, and lead the business. We provide a variety of development opportunities to help you realize your leadership potential.

Jobs

One way to develop your career is to explore other jobs at Wells Fargo. The online Jobs site on Teamworks (see Internal Job Opportunities and Employment and Hiring) allows you the opportunity to access current job postings so that you can change jobs, transfer, or advance according to your qualifications and goals.

To learn more

To learn more about how to plan your development, build your skills, or manage your career at Wells Fargo, visit the Career & Development site on Teamworks, where you can find resources and activities to enhance your performance and align with the direction you want to take your career.

Tuition Reimbursement

Wells Fargo encourages team members to seek career development opportunities through the company's Tuition Reimbursement Benefit, which is available to regular and part-time team members. Flexible team members are not eligible to participate in the program.

More information

For more information about tuition reimbursement, review the Tuition Reimbursement Benefit on Teamworks.

Other classes

Check with your manager if you're interested in a job-related class, certification program, seminar, or workshop, because these programs are not covered under the Tuition Reimbursement Benefit.

If you're interested in education that doesn't meet the eligibility criteria for tuition reimbursement (for example, a class from a nonaccredited institution or a class being taken to achieve a licensure or certification), your manager has the discretion to decide whether the tuition expense will be your responsibility or paid by the business group.

Performance Management

Performance management is a key aspect of our overall culture here at Wells Fargo. It's about motivating and enabling you to achieve high performance, deliver customer satisfaction, and contribute to the success of the team and the business. Performance management can help us outperform the competition, develop a stronger risk management culture, and help team members reach their potential. Refer to the Your Approach to Performance Management page for more information.

Objective setting

At the beginning of the performance management process, managers should work with you to provide written performance objectives that are attainable, clear, and meaningful. Setting clear objectives anchors each of us to Wells Fargo priorities, and business and team goals. Written performance objectives communicate to team members what is expected, why it is important, and how they can be successful. Each year, performance objectives will be based on enterprise, business, and team strategies. Enterprise requirements ensure we focus on priorities unique to our business and core and common priorities such as leadership and risk management. Throughout the year, managers are expected to provide ongoing performance feedback and coaching on progress toward performance objectives and, at the end of the year, complete the annual performance evaluation. As a team member, you are also encouraged to initiate conversations with your manager about your performance.

Performance evaluations

A written performance evaluation summarizing the year's feedback, progress, performance objective rating, and performance indicator will be completed by your manager once a year. The main purpose of the performance evaluation is to provide you with a summary of your performance for the year. It's also a time for you and your manager to discuss how you can continue to contribute as well as ways to improve performance.

Your comments

You will have a chance to read the documentation of your performance evaluation before it is included in your Official Personnel File. You are also free to write your own comments, explanations, or disagreements to be included in your Official Personnel File.

If you haven't had a formal performance evaluation within the last 12 months, let your manager's manager or the Employee Relations (ER) Solutions team know. For information on retrieving historical performance evaluations, see the Official Personnel Files section of Teamworks.

Rating performance objectives

In preparation for the annual performance evaluation, managers will use the following criteria when assessing your performance in achieving each of your objectives:

Definition of objective ratings	
Exceeds	Performance against the objective significantly exceeded expectations. Team member demonstrated exceptional results.
Meets	Performance against the objective consistently met expectations. Team member demonstrated successful results.
Improvement needed	Performance did not meet the expectations of the objective. Team member must demonstrate improvement to achieve results.
Unsatisfactory	Performance against the objective is significantly below expectations. Team member demonstrated poor results.

The individual objective ratings are used by your manager to determine your overall performance indicator and complete the annual performance evaluation.

Performance indicators

The following performance indicators will be used to evaluate your overall performance evaluations at year end:

Definition of performance indicators	
Performing	The most critical goals and key areas of responsibility were met in an acceptable manner, both in terms of what was achieved and how it was achieved.
Improvement needed	The most critical goals and key areas of responsibility were not met in an acceptable manner, or were achieved through unacceptable means.

Performance excellence recognition for team members

If you achieve a Performing overall performance indicator from the annual performance evaluation and you have displayed exceptional and outstanding performance during the year, then your manager may assign a Performance Excellence flag and have a discussion on achievement details with you.

For more information about Wells Fargo's approach and expectations, team members and managers should access the Performance Management Policy.

Problem Solving

Performance counseling and corrective action

It's important to the success of our company that every one of us be a contributing member of the team. Our customers depend on a consistent level of excellence in their interactions with Wells Fargo, no matter what person they're dealing with. So, to make sure that this universal standard is met throughout Wells Fargo, each of us is expected to meet standards of performance, conduct, attendance, and punctuality and to follow company policies and procedures.

In most cases, if you have a performance issue, your manager will work with you to provide the appropriate performance counseling and corrective action so that you have the opportunity to improve. Performance counseling will most often be provided in writing. For example, an optional written informal or formal warning Performance Improvement Plan may be used to document expectations in conjunction with the respective level of corrective action. **However, the policy is not progressive.** This means that your manager does not have to use the levels of corrective action consecutively. Managers reserve the right to use any part of the process that they feel is appropriate for the situation — and, if necessary, to terminate employment without implementing performance counseling and corrective action. This is consistent with the company's employment at will policy.

The level of performance counseling and corrective action depends on considerations such as:

- Nature and severity of the issue
- Timing and frequency of previous issues
- The team member's overall performance

Additionally, during a corrective action process, there may be times when Wells Fargo determines that it is appropriate for you to be out of the workplace, and you may be placed on an administrative leave. If this happens, you will be given information about the terms and conditions of your leave at that time. Because facts and circumstances can vary widely and are sometimes unique to a particular situation, the action that's taken in one situation shouldn't be construed as setting a precedent for any other situations.

Corrective Action

If you have a performance, conduct, attendance, or punctuality issue, your manager will work with you to provide the appropriate performance counseling and form of corrective action so that you have the opportunity to improve. Managers are expected to use the Online Corrective Action tool to document informal warnings, formal warnings, and final notices. The Online Corrective Action tool automatically delivers all corrective action documents to the Official Personnel File — those documents are viewable through the Electronic Personnel File by the team member and the direct manager. Before being shared with you, each formal warning and final notice is reviewed by your manager and ER Solutions. You will receive a copy of any corrective action issued by your manager so that you may review and acknowledge that action.

Refer to the Corrective Action page in Manager Center for more information.

Informal warning

In most cases, if your performance, work-related conduct, attendance, or punctuality doesn't meet specified requirements, your manager will meet with you to discuss the issue. An informal warning that documents a need for improvement will be delivered to you in writing by your manager.

The informal warning generally contains:

- The specific areas of performance, work-related conduct, attendance, or punctuality that don't meet the requirements or expectations of your assigned job duties.
- A plan for improving your performance that you and your manager develop which may even be documented as an informal warning Performance Improvement Plan (PIP).
- A warning that if the issue continues, it can lead to a formal warning or termination of employment.

Note: For your awareness, informal warnings and informal warning Performance Improvement Plans will become a part of your Official Personnel File and are visible to you and your direct manager in the Electronic Personnel File and will include any previously administered corrective action documents within a rolling three-year period. Warnings will remain in the file for the duration of your employment, regardless of improved performance or change in your position, business group, location, or manager.

Formal warning

If your performance, work-related conduct, attendance, or punctuality doesn't appear to improve or keeps declining after an informal warning — or if the nature of the underlying concern requires more formal action — then your manager may document the situation in a formal warning. A formal warning that documents a need for improvement will be delivered to you in writing by your manager.

The formal warning generally contains:

- An explanation of the issue.
- A definition of the expected level of performance or the identified need to improve work-related conduct or adherence to the attendance and punctuality standards. This may be documented as a formal warning Performance Improvement Plan (PIP).
- Clear notice that if the issue continues, it can result in the termination of employment.

The formal warning or formal warning Performance Improvement Plan will become a part of your Official Personnel File and will remain in the file for the duration of your employment, regardless of improved performance or change in your position, business group, location, or manager.

Final notice

Situations that involve a serious policy violation or workplace conduct issue may require corrective action just short of termination. In a situation like this, you may receive a final notice (see Final notice definition in the Glossary) advising you that if a similar action, or any other serious policy violation, occurs again at any time during your Wells Fargo employment, your employment may be terminated immediately.

The final notice:

- Will be written memo sent to you by your manager, providing you the opportunity to review and acknowledge.
- Becomes a part of your Official Personnel File and will remain in place for the duration of your employment, regardless of any change in your position, business group, location, or manager.

If you receive any type of warning or a final notice and are unclear about what it means for you, you should contact your manager or ER Solutions as soon as possible. Issuance of certain types of corrective action may affect your eligibility for pay increases, promotions, or transfer opportunities. In addition, it may result in the adjustment or elimination of bonus and incentive payments (in accordance with your incentive plan terms), or affect your annual performance evaluation at the individual objective and/or overall performance level.

Note: For your awareness, a formal warning or formal warning Performance Improvement Plan will become a part of your Official Personnel File and are visible to you and your direct manager in the Electronic Personnel File and will include any previously administered corrective action documents within a rolling three-year period. Warnings will remain in the file for the duration of your employment, regardless of improved performance or change in your position, business group, location, or manager.

Termination

If you don't achieve the necessary improvement in performance, conduct, attendance, or punctuality that was outlined in the informal warning or formal warning, your employment may be terminated. Employment can also be terminated if the situation documented in a final notice reoccurs or if the problem involves a breach of policy, including a violation of the Code of Ethics and Business Conduct or Information Security Policy, or if your performance or conduct is such that continued employment is no longer in the best interest of Wells Fargo. For examples of this kind of conduct and more information about situations appropriate for immediate termination, see Involuntary Termination.

Contact ER Solutions

Managers are expected to seek consultation from ER Solutions before implementing a formal warning or final notice. Most involuntary terminations and all job abandonment terminations also require consultation with ER Solutions. Refer to the Corrective Action and Leaving Wells Fargo page on Manager Center for more information.

Dispute Resolution

At Wells Fargo, we feel that it's essential to provide team members with a prompt, thorough review of any work-related problem. So we've developed a process through which each team member has an opportunity to use internal problem-solving resources.

Although we can't guarantee that every team member will always be satisfied with the outcome, we can make sure that all team members have dispute resolution methods available when they're needed. In addition, we prohibit retaliation against any team member for using the dispute resolution process (see the Nonretaliation Policy page in the Team Member Professionalism section).

Overview of the dispute resolution process

If you have a work-related dispute, you should first try to resolve it directly with your manager — he or she is usually closest to the situation and in the best position to review it.

If you need alternatives or to escalate your dispute further, you can follow the process described on the Dispute Resolution Resources page. It's strongly recommended that you use these resources in the order they're shown — it's logical that those closest to your situation will be able to understand it best, so you'll want to go to those resources first. It's important to begin the process promptly when the issue arises (normally within 30 days), because delay can affect Wells Fargo's ability to respond to your concerns. This process is not intended to prevent you from discussing terms and conditions of employment at Wells Fargo.

Dispute Resolution Resources

Your manager

In most cases, you should discuss any work-related issue with your immediate manager, because he or she is usually in the best position to help with a prompt resolution. For assistance with preparing for a meeting with your manager or additional support regarding the dispute resolution process, contact Employee Relations.

Your manager's manager

After speaking with your manager, if you feel that you haven't been able to communicate effectively with him or her — or if you want someone else to review the situation — you can meet with your manager's manager (or another manager above your manager in the chain of reporting relationships) to discuss the issue. Again, for assistance with preparing for a meeting with your manager or additional support about the dispute resolution process, contact Employee Relations.

Employee Relations

After you've spoken with your manager's manager, if you feel that you haven't been able to communicate effectively with him or her — or if you want someone else to review the situation — you can contact Employee Relations. A member of this team will work to obtain related information to review the matter, help resolve work-related issues, and make recommendations to you or your group's management if appropriate. Employee Relations may refer the dispute for review to an Employee Relations Consultant. You may initiate contact with Employee Relations by completing the Employee Relations eForm.

Additional review

If you disagree with the outcome of the review and you want your dispute reviewed further, you can request an escalation. Contact Employee Relations and your request will be referred to an Employee Relations manager or leader for evaluation.

- If it is determined further review is warranted, the Employee Relations manager will arrange for an escalated review.
- If it is determined further review is not available, the matter will be considered closed.
- Once closed, additional reviews will only be considered if new, relevant, and substantive information is provided.

Arbitration

Team members hired on or after December 11, 2015

If you've discussed your employment dispute with management and Employee Relations, and it is still unresolved as described above, arbitration offers a more efficient, flexible, and private alternative to court to allow team member claims to be heard. The arbitrator makes the final decision, which is binding for both you and Wells Fargo. Registered team members are already required to arbitrate many claims through the Financial Industry Regulatory Authority.

All team members hired on or after December 11, 2015, are required to sign an Arbitration Agreement in which the team member and Wells Fargo mutually agree to final and binding arbitration of employment disputes (with very limited exceptions outlined in the agreement). The agreement to resolve disputes through arbitration doesn't alter or modify Wells Fargo's "employment at will" policy. If the eligible team member believes arbitration is the best recourse, discuss this option with Employee Relations, as there is a cost for arbitration, which is outlined in the Arbitration Agreement. Please review the Arbitration Agreement for additional details about the arbitration process.

Employee Assistance Consulting (EAC)

If you require emotional support in preparation for a conversation with your manager or following the dispute resolution process, contact Employee Assistance Consulting (EAC) at its direct number 24 hours a day, 7 days a week at 1-888-327-0027. You can also contact EAC when you call 1-877-HRWELLS (1-877-479-3557), option 4. Visit the Employee Assistance Consulting site on Teamworks for more information.

Termination Decision

Termination decision review

If your employment is terminated involuntarily (see Involuntary Termination) or for job abandonment and you want to have that decision reviewed, contact ER Solutions by completing the Employee Relations eForm as soon as possible following the termination (normally within 30 days). If you do not have access to submit an eForm, you may call 1-877-HRWELLS (1-877-479-3557), option 3, and a Team Member Care representative will provide appropriate process guidance. Once any additional review is complete, the matter will be closed and further review will only be considered if new, relevant, and substantive information is provided.

Third-Party Representation

It is the intent of all Wells Fargo policies to provide a productive and respectful work environment. We respect your right to communicate directly, on an individual basis, with your manager, your manager's manager, or your ER Solutions team about any of the terms or conditions of your employment. Within our work environment, we believe that those who are also Wells Fargo team members can be more responsive to your needs and concerns than anyone outside of the company, such as an attorney, labor organization, association, or group.

For that reason, we conduct team member communications and problem-solving, as well as performance counseling, corrective action, and internal investigations, without participation by an individual or a "representative" who is not a Wells Fargo team member. You're expected to cooperate fully and honestly and maintain the integrity of the process.

If you encounter any problems on the job, bring your concerns to your manager or your ER Solutions team. They're willing to discuss any work-related problem, issue, or concern with you on a direct, person-to-person basis.

Our approach

To attract and retain great team members, Wells Fargo offers a total compensation package that's competitive with those offered by our key competitors in the businesses and markets where we operate. Just as importantly, this package balances Wells Fargo's need to remain profitable with our desire to help our team members succeed financially.

The company has established four **compensation principles**, each of which is an essential component to driving strong, risk-managed performance for the company and its stakeholders:

- **Pay for performance.** Compensation should be linked to company, business group, and individual performance.
- **Promote effective risk management.** Compensation should promote risk management consistent with the company's Vision, Values & Goals and should not encourage imprudent or excessive risk-taking.
- **Attract and retain talent.** People are the company's competitive advantage, so compensation should help attract, motivate, and retain people with the skills, talent, and experience to drive superior long-term company performance.
- **Align team member interests with stockholders.** Compensation should align team members' interests with stockholders' interests and encourage behavior consistent with long-term stockholder value creation.

Total Compensation

For most team members, the total compensation package at Wells Fargo is much more than base pay. It may also include annual incentives, commissions, and other forms of incentive compensation including long-term awards in cash or equity. Benefits, such as company contributions toward health care, disability plans, and retirement plans, and work-life policies/programs, such as paid time off, add to a team member's overall compensation package.

Employment & Pay Definitions

There are three employment classifications at Wells Fargo:

- Regular
- Part-time
- Flexible

Employment classifications determine eligibility for most benefits programs, as well as rates for health care coverage and Paid Time Off (PTO) allocations for regular and part-time team members.

Team members consistently working standard hours that are different from their employment classification should discuss with their manager to determine whether a change in employment classification is necessary. Changes will be based on business need.

Employment classification definitions

Regular. Team members scheduled with standard hours of 30 or more hours per week (see standard hours) are classified as "regular" (unless they're in the flexible classification).

Part-time. Team members scheduled with standard hours of at least 17.5 and less than 30 hours per week are classified as "part-time" (unless they're in the flexible classification). Standard hours and the number of hours actually worked may vary somewhat for part-time team members in a nonexempt position, depending on business needs.

Flexible. The flexible classification covers several different scenarios.

It may refer to team members who:

- Work a regular schedule with standard hours of less than 17.5 hours per week
- Work occasional, irregular hours to fill short-term staffing needs such as PTO, short-term leaves, or periodic work volume increases
- Work only certain times of the month or year
- Work any number of hours on specific, short-term projects or assignments with a defined end-date

Note: *Team members in the flexible classification aren't eligible for most Wells Fargo benefit programs.*

Changing employment classification

If your job changes from a position classified as flexible to one classified as part-time or regular, you may become eligible for additional benefits.

If your job changes in classification from part-time or regular to flexible, you will become ineligible for most benefit programs.

Typically, a change in classification within the same position does not result in an adjustment to your base pay.

Pay definitions

Listed below are some of the pay-related terms you'll hear in relation to our pay structure. For additional information, refer to the Glossary.

area differential

Area differentials apply to the job's pay range for a job and account for the differences in the cost of wages across our geographic locations. Wells Fargo defines four area differentials and applies these based on the average pay levels for the specific geographic location.

market pricing

We use market pricing analysis as a factor in the determination of total cash compensation targets for individual jobs — this allows us to establish competitive rates of pay by comparing our jobs with external market data for similar jobs in the markets where we operate. Our market pricing program also reflects differences in pay levels due to geographic locations, allowing us to pay competitively based on the cost of wages in a given location.

Market Reference Point (MRP)

The MRP is the central point of a job’s pay range corresponding to Wells Fargo’s determination of competitive pay in relationship to the external market.

total cash compensation (TCC)

Total cash compensation, sometimes referred to as total cash comp or TCC, is the sum of all cash payments made to an individual (base pay + bonus and incentives) during a calendar year or other defined period.

total compensation

Total compensation includes a team member’s base pay and may also include bonuses, commissions, and other forms of incentive compensation, including long-term awards in cash or equity, and benefits.

Typically, when we discuss comparative salary figures, we talk about an annual amount for a team member who has standard hours (see “standard hours” in Glossary) of 40 hours per week. If you’re in an exempt position with standard hours of less than 40 hours per week, your salary is prorated based on this formula:

Annual salary rate of a 40-hour standard workweek	X	$\frac{\text{Your weekly standard hours}}{40 \text{ hours per week}}$	=	Your annual salary
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If you need to do the reverse calculation, calculate your annual base pay rate as if you worked 40 hours.

Actual annual salary rate	X	$\frac{40 \text{ hours per week}}{\text{Your weekly standard hours}}$	=	Annual salary of a 40-hour standard workweek
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Exempt Biweekly Pay Calculation

As a Wells Fargo team member, you’re paid on a biweekly basis. As an exempt team member, your regular biweekly pay is calculated by dividing your annual salary rate by the number of business days in the calendar year and then multiplying by the 10 business days (including holidays) in each pay period (see Understanding Exempt Pay).

Nonexempt

Team members in nonexempt positions are paid an hourly rate for actual time worked. An approximation of a nonexempt “salary” (sometimes referred to as covered pay) is used for many purposes, such as comparing one job to another, determining salary increases, and establishing the value and cost of certain benefits. A nonexempt job’s annual “salary” is calculated as follows:

Your regular rate	X	Your weekly standard hours	X	52 weeks	=	Your estimated annual salary or covered pay
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If you need to do the reverse calculation, figure hourly regular pay rate based on an annual salary figure. That formula is:

Annual base pay of a 40-hour standard workweek	/	2,080 hours per year
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Benefits and work-life policies/programs are an important part of team member total compensation. Benefits include the opportunity to participate in health and well-being, retirement, life insurance, and disability programs. Work-life policies and programs include paid time away, Paid Parental Leave, Paid Critical Caregiving Leave, Backup Adult Care, and a variety of others.

Exemption Classifications

The terms “exempt” and “nonexempt” refer to legal classifications defining overtime pay requirements applicable to U.S. jobs and were established under the Fair Labor Standards Act (FLSA) and related state laws. If you’re not sure whether your position is classified as exempt or nonexempt, check with your manager.

Exempt

Team members in exempt positions receive base pay in the form of a salary and are not eligible for overtime pay. If you’re an exempt team member, your salary compensates you for all hours actually worked in each workweek, whether it’s more or less than your standard hours.

Shift Differential

Shift differential applies to nonexempt positions. Certain business units may apply shift differentials to some exempt positions that work in production environments such as operations, technology, and call centers, including areas that operate 24 hours a day, 7 days a week. If you are unsure whether your position is eligible for shift differential pay, please ask your manager.

Determining shift differential pay

Shift	Shift time periods	Differential for eligible hours
1	8:00 a.m. – 4:00 p.m.	None
2	4:00 p.m. – 8:00 a.m.	15% for team members in nonexempt team positions 10% for team members in eligible exempt positions

Differential amount

Shift differential: Nonexempt positions

Shift differential is calculated as a percentage of your hourly rate. The differential is only paid for hours worked in shift 2 and applies to each workday in a workweek. Team members in nonexempt positions must work a minimum of four hours in shift 2 to receive the differential for that scheduled work period. The shift differential is paid only for hours worked during shift 2 (as defined above) and is not paid for Paid Time Off (PTO), holidays, or other absences, including a leave of absence.

Shift differential: Eligible exempt positions

Shift differential is calculated as a percentage of your base pay. The table above defines the shift times and related differential. Team members in exempt positions designated as potentially eligible for shift differential must have 50% or more of their regularly scheduled hours of work during shift 2. Team members on a leave of absence will not receive shift differential pay.

Refer to the Shift Differentials page on Manager Center for more information.

Work Hours

Your manager determines and may change your scheduled work hours based on the business needs of the specific area and business, taking into account each position's classification as regular, part-time, or flexible. If you're a team member in a nonexempt position, you must use Time Tracker to complete accurate timesheets. This includes any time spent on electronic devices for business purposes. The standard workweek (see the Glossary) is a fixed and regularly recurring period of work within the week beginning on Sunday at 12:01 a.m. and ending on Saturday at midnight. Depending on business group needs, team members in the regular employment classification may work alternative schedules (other than the usual five-day week). Check with your manager to find out if these options are available in your area.

To meet business needs, team members in nonexempt positions may occasionally need to work or engage in business-related activities outside of their normal work hours and location. To be paid correctly, it is important to know what constitutes "time worked" for the purpose of reporting time when you travel to and attend business-related events. Refer to the Recording Nonexempt Travel and Attendance page on Manager Center for more information.

Meal periods and breaks

Team members in a nonexempt position must take the required meal periods and rest breaks to which he or she is entitled during the workday. Generally, required meal periods are unpaid and required rest breaks are paid. Contact your manager with questions about your schedule. If for any reason, your manager requires you to work or stay at your workstation during your meal period, it's considered paid time and should be recorded as work time. Contact ER Solutions if you have questions about how meal periods and breaks are administered.

Several states have specific requirements for meal periods and paid rest breaks. In states without specific regulations, managers should make every effort to provide team members with two paid 15-minute rest breaks and an unpaid 30-minute meal period during an eight-hour day. Check with your manager and follow the appropriate practice for your state or business.

Private break time for nursing mothers

Returning to work following the birth of a child can be a difficult adjustment. To support new mothers, Wells Fargo provides reasonable breaks and a private space for lactation. Because each mother's needs are different, the frequency and duration of breaks will likely vary. Coordinate your breaks in advance with your manager to ensure business needs are covered during your breaks. This may include using currently scheduled meal or rest breaks. You'll need to provide your manager with a proposed schedule of breaks and the expected duration of each so that he or she can plan for them.

Please refer to the Private Break Time for Nursing Mothers section on the Managing Work Schedules page in Manager Center for more information.

Workplace accommodations

If you require a break to accommodate lactation, disability, or chronic medical condition, it may be necessary to adjust or modify your regular break or work schedule.

A schedule modification may include arriving earlier or departing later to make up missed time. A break modification generally may include:

- Modified break schedule — an adjustment to the usual break schedule, such as three paid 10-minute breaks instead of two paid 15-minute breaks, or breaking up a one-hour unpaid lunch break into two half-hour unpaid breaks.
- Additional breaks with schedule modification — additional unpaid breaks where the time is made up through a schedule modification usually on the same day by extending the beginning or end of the day.
- Additional unpaid break time — an additional unpaid break where the time will not be made up through a schedule modification.

If you are requesting a schedule or break modification related to lactation, disability, or chronic medical condition, please contact Accommodations Management for assistance through the Accommodations Management Request eForm or through Team Member Care at 1-877-HRWELLS, option 2. Managers may also use the Line of Business Approved Accommodation process through the Accommodations Management Request eForm to approve break and schedule modifications.

If you need additional break time due to an ongoing medical condition and you cannot make up the time, contact Lincoln Financial to determine if you are eligible for an FMLA intermittent leave of absence. If you are not eligible for an intermittent leave, Lincoln Financial will refer your request to Accommodations Management for assistance.

Contact your manager to request a schedule modification unrelated to your disability or other medical condition.

Overtime Pay

All team members may be required to work time in addition to their standard hours as directed by their managers. When a team member in a nonexempt position works more than 40 hours in a workweek, the team member will receive overtime pay.²

In certain locations, team members working more than eight hours a day will receive overtime pay for that day.

Overtime pay is a premium rate of pay required by the Fair Labor Standards Act (FLSA) and some state laws.

The calculation of overtime does not include time for which pay is received but work is not performed, such as PTO, paid sick time, holidays, or other paid time away from work, including jury duty, disability, and bereavement.

The standard overtime rate is 1.5 times a team member's regular rate. In addition, when you are paid certain types of incentive compensation for a performance period in which you also received overtime, Wells Fargo recalculates your overtime and pays you an additional amount of overtime that could not have been calculated or paid until the incentive compensation amount was determined.

Nonexempt

If you're in a nonexempt position, you are entitled to pay for all time actually worked, even time that exceeds your regular schedule or that was not approved by your manager. Therefore, you must report **all** time worked in Time Tracker. If you think you're going to need to work overtime, you need to get your manager's approval before you work additional time, if practical. Overtime affects your business group's plan and budget, so it's important that your manager approves it in advance. Advising your manager in advance provides options for getting assistance. Not recording all time worked in Time Tracker, including overtime, without notifying your manager can be grounds for corrective action, which may include termination of

your employment. For more information, see Corrective Action. The table below describes various overtime pay options.

Weekly

You'll receive overtime pay of 1.5 times your regular rate, also called time-and-a-half, if you work more than 40 hours in a workweek. Any type of paid time off and holidays is not counted as work time for overtime purposes. You must report all the time you work in Time Tracker and you are expected to get your manager's approval for overtime.

Daily

Some states also have provisions for paying nonexempt overtime pay based on daily work hours — for example, if you work more than 12 hours in one day. Check with your manager or Team Member Care to see if this applies in your state. Overtime requirements for your state are also posted in your workplace.

Nonovertime hours over standard schedule

If your usual schedule is less than 40 hours a week and you're asked to work additional time — but not enough to qualify for weekly or daily overtime pay as described above — then you'll receive pay for the extra time at your regular rate.

Exempt

If you're in an exempt position, your salary compensates you for all hours actually worked, whether it is more or less than your standard business hours. Wells Fargo restricts unauthorized deductions from your pay. If you feel that an amount has been improperly deducted from your pay, you need to report it immediately (see Pay Voucher and Reporting Procedures).

Holiday Pay

To meet the needs of our customers and business, you may occasionally need to work on one of Wells Fargo's observed holidays. See also Observed Holidays.

If you are a team member classified as regular or part-time with a base pay in an active working status, are not on a leave of absence, and are required to work on an observed holiday, refer to the respective nonexempt or exempt chart below to understand how holiday time away and holiday pay are applied.

Team members classified as flexible, or in a position that does not have a base pay rate, are not eligible for holiday time away or holiday pay.

² Some states have additional provisions for paying overtime.

Nonexempt

For team members in nonexempt positions, holiday pay is defined as your hourly pay rate plus a holiday premium, which is half-time, for a total of one-and-a-half times your hourly pay rate. Team members in nonexempt positions receive holiday pay for actual time worked on the observed holiday.

Team member role	Team member in a nonexempt position scheduled 8 hours a day
Scenario	Team member worked 6.5 hours on a holiday
Time Away Pay	Team member will record 8 hours of holiday time away by selecting the observed holiday
Holiday Pay	<ul style="list-style-type: none">• Team member will record 6.5 hours of time worked and receive 6.5 hours of pay at their regular pay rate• Team member will receive 6.5 hours of holiday premium pay at half-rate of regular pay

Team members in nonexempt positions who are scheduled or asked to work on an observed holiday, but do not report to work, are not eligible for holiday pay or holiday time away pay and must use Paid Time Off or Paid Sick Time, if applicable, to account for any unscheduled time away from work (including scheduled overtime), unless otherwise provided by state or local law.

Note: *If you are on a leave of absence during an observed holiday, you will not receive pay or holiday time away pay. However, if you are working on an intermittent leave or reduced work schedule on an observed holiday, you are eligible to record hours for holiday pay for your actual time worked and holiday time away, consistent with team members who are not on a leave or reduced work schedule.*

Exempt

Team members in regular or part-time exempt positions do not receive additional pay for working on an observed holiday, but if they are required to work on an observed holiday they may take the holiday at another time during the current year as a floating holiday, with the approval of their manager. See Observed Holidays in the Time Away section.

Team member role	Team member in an exempt position
Scenario	Team member required to work
Time Away Pay	<ul style="list-style-type: none">• Team member will not record the observed holiday in Time Tracker• Team member may record a Floating Holiday, with manager approval, to be taken at a later time during the current calendar year
Holiday Pay	N/A

Team members in exempt positions who are scheduled to work on an observed holiday and who do not report to work are expected to use Paid Time Off or Paid Sick Time, if applicable, to account for any unscheduled time away from work, unless otherwise provided by state or local law.

Pay Administration

Regular base pay reviews are part of our compensation program and used to ensure that team members are paid appropriately. Factors considered during a base pay review include the team member's performance; the complexity, scope, and impact of their role; and the position of their current base pay within the job's pay range. If your manager determines your base pay is positioned appropriately based on these considerations, you may not receive a base pay increase in a given year.

Annual year-end review

Your performance and compensation are generally reviewed during the annual year-end review period, which takes place every year typically in the first calendar quarter.

Transfer or promotion

Starting pay at Wells Fargo is appropriate for the position and consistent with an applicant's qualifications. The report to manager will take into consideration your relevant experience and expected proficiency in the new role, pay of comparable peers, and the new job's pay range (see New Hire Pay) when considering any compensation decision for your new role.

Leave of absence

If you are on an approved leave of absence, excluding a Salary Continuation Leave, during the year-end review period, generally any applicable base pay increases will be processed on the year-end review effective date, but any increase to your base pay won't become effective until you return to work and your review date has passed. If you are on a Salary Continuation Leave or working in a Short-Term Assignment Resource (STAR) position, you are not eligible for a base pay increase.

Eligibility for performance and salary review

All regular and part-time team members may be eligible for reviews of performance and base pay during the year-end review process. For more information, see the year-end review eligibility table.

Team members classified as flexible who work as a flexible team member for a year or longer are eligible for an annual performance evaluation, and, if appropriate, their base pay may be increased in accordance with salary increase guidelines.

Base pay increases are not guaranteed and are based on such things as manager assessment of performance and compensation each year.

Promotions

One opportunity you have as a Wells Fargo team member is the ability to explore different jobs and advance your career while staying with Wells Fargo. Career development can take the form of a lateral move to gain new experience and skills or a promotion where you take on greater responsibilities.

A promotion is a move to a position of greater responsibility and scope where typically the Target Total Cash Compensation (TTCC) of the new job is 10% or greater than the previous job. TTCC is calculated as the base Market Reference Point (MRP) plus target bonus, if applicable. A promotion can also be a move from one level to another in a job progression (for example, Accountant 3 to Accountant 4).

Base pay adjustment

You may receive a salary increase at the time you're promoted if your job change meets the definition of a promotion, as described above. Promotional increases are meant to align your base pay within the range of the new position in a manner that also reflects the knowledge and experience you bring to the new job. Increases are applied at the discretion of your manager. When determining an appropriate salary adjustment, your manager will consider things like:

- Your relevant experience to the new job.
- Expected proficiency in the new job and how long it will take for you to become fully proficient.
- How your base pay compares to peers in similar positions with similar skills and experience.
- How your base pay aligns to the job's pay range and compares to market.
- Your business group's overall financial forecast.

Incentive Plans

One way we can link pay to specific company business or individual results is through the use of incentives.

Incentive plans

Some team members participate in incentive pay programs designed to support specific business objectives. These incentive plans provide compensation opportunities in addition to the base pay available to eligible team members in designated jobs for achievement of specific objectives. Incentive compensation opportunities may be decreased or eliminated when any of the following occur:

- Individual, business group, or company objectives are not met.
- You do not adhere to Wells Fargo's Code of Ethics and Business Conduct.
- You do not follow company policies.
- You act in a manner that is inconsistent with the Vision, Values & Goals of Wells Fargo.
- You receive a formal warning, final notice, or other similar actions.

If you're currently eligible to be paid under an incentive plan, your manager will let you know about the plan. If you have any questions about eligibility or how an incentive plan works, ask your manager.

Recognition

The ability to reward team members for their contributions is an important element of recognition and can be an effective way to drive engagement. Team members occasionally receive cash-equivalent or noncash awards or recognition from Wells Fargo — for example, an award for outstanding accomplishments that affected our company or business group strategic priorities. Our recognition programs align with performance related to Wells Fargo's Vision, Values & Goals, and supporting behavioral expectations.

Team members' tenure is celebrated on their key service anniversary dates (the first, third, fifth, and every fifth year thereafter) and upon their retirement from Wells Fargo. In addition, Wells Fargo hosts enterprise recognition events each year to celebrate team members who reach their 25 years of service milestone in that calendar year. Managers are also encouraged to recognize and celebrate a team member's tenure with Wells Fargo upon their retirement from the organization.

Time away from work cannot be used as an award or form of recognition under any circumstances. Refer to the Time Away section of the *Team Member Handbook* for more information about the appropriate uses of time away. As stated in the Corporate Contingent Resource Policy, contingent resources are ineligible to receive recognition through any of Wells Fargo's recognition programs. Life events or holiday celebratory gifts are personal and are not part of any recognition programs. Refer to the Gifts & Entertainment policy for information pertaining to gift giving.

Managers are responsible for understanding the Team Member Recognition policy, published guidelines, and any other policies related to team member recognition. For tax purposes, cash-equivalent awards are always considered taxable income subject to payroll tax withholding and are required to be processed through Payroll for taxation purposes by the Enterprise Recognition team. Additionally, the fair market value of noncash awards or gifts are also considered taxable income subject to payroll tax withholding unless it is determined to be a de minimis fringe benefit. Contact Corporate Recognition with questions or clarification about processing or for reporting to Payroll.

Job Changes

At some point in your Wells Fargo career, you may voluntarily change jobs. Situations like this might include:

- Making a lateral move to a new job where you'll use different skills but have a similar level of responsibility.
- Accepting a job with fewer responsibilities.
- Moving to or from a job with a different job class code where pay eligible for benefits may be different (see Job Class Codes).

The skills and knowledge you bring to the new position will be considered when determining the base pay for the role. Depending on the circumstances, this could result in a base pay that's lower, higher, or the same as your current base pay.

Changing to a job in a lower pay range

If you voluntarily apply for a job in a lower pay range, your salary will be reviewed and you may be offered a reduced salary. You have the choice to accept or decline the job offer.

Changing to a job with a different job class code

If you voluntarily apply for and accept a job with different incentive compensation opportunities, your position's job class code may change (see Job Class Codes).

Getting Paid

As a U.S. Wells Fargo team member, you're paid every two weeks, generally on Fridays (unless a holiday causes a change in the pay date). This means that most months have two paydays, but sometimes (generally two months each year), there is a third payday in the same month.

If you're a team member in a nonexempt position (i.e., paid an hourly rate) in the U.S., you must fill out and submit timely, accurate online timesheets through Time Tracker to receive proper pay, including overtime.

Payment Methods

How you're paid

Although it is not required, you're strongly encouraged to have your check automatically deposited. This ensures accurate and timely posting of your pay and no worry if you are unable to deposit a paycheck while you're on vacation. You are not required to use Wells Fargo for direct deposit, but if you do, as a team member, you're offered a free Wells Fargo checking account by establishing direct deposit of your pay to any Wells Fargo checking or savings account. You'll need to open the account at the Wells Fargo branch of your choice or through the Wells Fargo Customer Connection, following its standard account opening process, and request payroll direct deposit.

You can view your pay voucher, showing gross and net pay and deductions, online on Teamworks, from work or home, two days before each payday (or, if you don't have online access at work or home, you can request a paper voucher). If you do not establish direct deposit, you'll be paid by check. Generally, paychecks are sent each pay period to your work address. If you don't have a permanent work address, your paycheck will be mailed to your home.

Choosing your account or payment method

You set up your direct deposit by completing paperwork when you're first hired. If you later want to change your payment method or account number, you can use the online Direct Deposit tool on Teamworks. If you have questions about using the online tool, you may contact Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2. For TDD access for persons with hearing impairments, please call 1-800-988-0161.

Note: Funds deposited to a closed account cannot be reissued until returned to Payroll, which can take one to five business days. To avoid payment delays when you change checking account numbers, it's best to leave your old account open until you receive a payment notification showing your new checking account number.

Your Wells Fargo account

You must handle your account responsibly and avoid overdrafts. If checks must be returned for insufficient funds or if your account is overdrawn, you'll be required to pay the usual fees. Continued mishandling may result in the closing of your account.

If you choose not to establish payroll direct deposit and you have a Wells Fargo checking account, that account may be subject to Wells Fargo's standard checking account service charges.

Required deductions

Each pay period the following required deductions are typically taken:

- Federal income tax withholding
- Federal Insurance Contributions Tax (FICA) for Social Security and Medicare
- State income tax withholding (where applicable)
- Any other taxes or deductions required by law, such as:
 - State Disability Insurance
 - Local tax

Income tax withholding

You complete your initial tax withholding information by using an electronic form during new hire sign-up. If we don't receive a tax withholding form, we're required to withhold taxes at the status of "single" with no deductions. You must submit a new withholding form if you:

- Begin working, living, or both in a different state
- Change your name or marital status
- Want to change your withholding

Changing your withholding

If you want to change federal or state withholding information, you can use the online W-4 tool on Teamworks.

If you have difficulty using the online tool, you may contact Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2, TDD/TTY 1-800-988-0161, for help with the appropriate forms. If you use a paper form to make changes, be aware that some states require a separate state form. In states where the federal form W-4 satisfies the state's requirements, Payroll will change **both** withholdings unless you clearly write "state only" or "federal only" on the form.

Voluntary deductions

You may also authorize voluntary deductions for Wells Fargo benefits for which you're eligible. Refer to your benefits materials for more information, including eligibility, enrollment, and change instructions.

Authorized voluntary deductions may be taken out of your pay each pay period for items such as company-sponsored medical, dental, or vision plan, 401(k) Plan, etc.

Pay Discrepancies

Overpayments and pay discrepancies

We work hard to ensure the accuracy of all compensation payments. However, you are expected to check your pay voucher (online or paper), direct deposit receipts, or both for accuracy, and you are required to report immediately to your manager any overpayment or any pay discrepancy — including but not limited to wages, base pay, benefits under Wells Fargo's Short-Term Disability Plan, incentive pay, bonuses, Paid Time Off, expense reimbursements, or benefits pursuant to the Salary Continuation Plan.

Your manager will work with you to make appropriate arrangements to remedy the error in a timely manner. Failure to report discrepancies or to make appropriate repayment arrangements is a violation of the Code of Ethics and may result in corrective action, which may include termination of employment, and you will not be eligible for rehire until the amount is repaid in full. If you have questions about your overpayment or pay discrepancy or require assistance in obtaining resolution, contact Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2. For TDD access for persons with hearing impairments, call 1-800-988-0161.

Pay Voucher

You can view your pay voucher online on Teamworks at work or home. Your voucher gives you information about your current benefits and tax withholding choices. You're encouraged to review your voucher each payday to confirm:

- Reported cash compensation is correct.
- The correct deductions are being made for benefit plans you're enrolled in and other deductions you authorized.
- Your personal information is correctly reported (see Changing Personal Information).

If you have questions, check with your manager or contact Team Member Care.

Reporting Procedures

If you have any concerns about your base pay, rate of pay, or compensation structure, please talk with your manager. If your manager is unable to help you resolve your concern, you should report your question or concern as soon as possible by contacting your ER Solutions team. If you're not satisfied with the way your question or concern has been resolved, you're encouraged to use Wells Fargo's dispute resolution process.

If you believe that either you or others have been denied compensation for any hours worked (including overtime), have not been provided with meal and rest breaks in accordance with state law, or have not been paid earned commissions or if you have a question or concern about improper deductions from pay, please contact your ER Solutions team.

Note: *At Wells Fargo, we will not tolerate retaliation against any team member who in good faith reports or provides information about a wage and hour complaint (see Speak Up and Nonretaliation Policy). Engaging in retaliatory behavior in violation of this policy can result in corrective action, which may include termination of your employment (see Corrective Action).*

Time Away

Our approach

Wells Fargo understands that team members have busy lives and diverse needs and believes that you are at your best when you have had the opportunity to relax and rejuvenate yourself. Our time away policy provides a variety of competitive options to accommodate diverse needs and life events including time off for vacation, illness, caring for a family member, volunteering, the birth or adoption of a child, the loss of a family member, and more. We encourage you to use the time away available to you.

In some instances, time away may also be required by federal, state, or local law. Time away mandated by such laws will run concurrent with the applicable Wells Fargo Time Away Program, to the extent permissible under applicable law.

Typically, team members are expected to use one of Wells Fargo's Time Away programs to account for any time away from work (including scheduled overtime) during their scheduled work hours unless otherwise provided by state or local law.

Time off under Wells Fargo's Time Away programs is not transferable from one team member to another.³

Wells Fargo time away options include:

- Paid Time Off (PTO)
- Observed Holidays
- Personal Holidays
- Other Paid Time Away, including Paid Sick Time (PST)
- Leaves of Absence
- Required Absence

Team Member Responsibilities

Effective use of your time away is a personal responsibility. Familiarize yourself with the eligibility requirements and the expectations and approvals for using and recording time away. You are accountable for planning appropriately for both the expected and the unexpected to ensure that you have time away available for the entire calendar year. Managers and team members must balance business needs with team member requests for time away.

- **Team members in exempt positions** are required to use time away in either full-day or half-day increments unless otherwise provided by federal, state, or local law.
- **Team members in nonexempt positions** use time away in accordance with their business group policies unless otherwise provided under federal, state, or local law.

Team members are expected to verify time away balances in Time Tracker and report any discrepancies immediately to their manager. Managers must report all time away balance corrections within six weeks of the pay voucher on which the discrepancy occurred, as indicated on the pay voucher, by contacting Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2. For TDD access for persons with hearing impairments, call 1-800-988-0161. In situations where a team member believes the PTO allowance in Time Tracker does not align with their years of service, the team member must report the possible discrepancy to Team Member Care within six weeks of the first business day of that calendar year, or any additional PTO to which the team member may be entitled will be unavailable for that calendar year. Misuse of time away policies may be considered a violation of the Code of Ethics and subject to corrective action up to and including termination.

Paid Time Off

Wells Fargo provides eligible team members with Paid Time Off (PTO) each calendar year to use for time away from work.

You may use PTO for any number of reasons, including:

- Vacation
- Your illness (or time away during the waiting period for the Short-Term Disability Plan)
- A family member's illness
- School activities or conferences
- Religious observances
- Personal business
- Weather problems

There may be other types of federal, state, or local time away for which you can use your eligible PTO or to which you may be entitled. Consult with your manager or contact ER Solutions using the Employee Relations eForm if you have questions.

Time Tracker

All team members use Time Tracker — Wells Fargo's companywide timekeeping system — to request and record paid time away, holidays, community service time, and other types of time away from work such as bereavement or jury duty. The system also tracks paid sick time for team members in some locations.

If you're a team member in a nonexempt position, use Time Tracker to record actual work time and complete timesheets.

³ Because donating PTO creates tax and legal issues, PTO Donation is not available. Wells Fargo offers other ways for team members to help team members in need. Refer to WE Care Fund for additional information.

All team members are expected to record time away accurately in Time Tracker in accordance with the applicable time away policy. If a team member enters time away into Time Tracker incorrectly, the team member must cancel the incorrect entry and re-request the time away using the correct time away type as soon as possible. Intentionally recording time away inaccurately and other misuse of time away policies may be considered a violation of the Code of Ethics and can result in corrective action, which may include termination of your employment. For additional information, see Corrective Action.

PTO Eligibility

You're eligible for Paid Time Off (PTO)⁴ if you're in a regular or part-time position with a base pay.

If you are classified as flexible or in a position that does not have a base pay, you are not eligible for PTO but may still be eligible for other paid time away. This may include paid sick time away, depending on the applicable state or local law where you work. Refer to the Paid Sick Leave Laws (Paid Sick Time) page for more information.

New Wells Fargo team members are eligible to use PTO beginning on the first of the month following one full calendar month of service.

Calculation for PTO allowance

Your annual PTO is based on three things:

- Your years of continuous service with Wells Fargo
- Your standard hours
- Your active working status

If you have questions about any of these, contact your manager.

Your annual PTO allowance is determined solely by the criteria above; allowances are fixed and may not be adjusted. Managers cannot provide additional PTO. In addition, managers cannot allow team members to “borrow” anticipated PTO from a future year of work under any circumstances.

Years of service

You can calculate your years of service by subtracting the year of your corporate hire date from the current year. For example, if your corporate hire date is any time in 1996, then in 2018, you have 22 years of service for purposes of calculating your maximum PTO allowance.

If you have questions about your hire date, contact your manager.

Annual PTO allowance for active, regular team members

References to days assume an eight-hour workday. This chart is based on a 40-hour workweek. If your standard hours are less than 40 hours a week, see standard workweek.

Years of service*	Days	Hours**
0 – 2	18 days	144
3 – 9	23 days	184
10 – 24	28 days	224
25 or more	33 days	264

*Your years of service allowance is effective January 1 of your anniversary year — for example, if you will reach three years of service on May 15, 2025, you are eligible for 23 days of PTO for the calendar year 2025. If applicable, Paid Sick Time accrues according to the applicable federal, state, or local law. Refer to the Paid Sick Leave Laws (Paid Sick Time) page for more information.

**California team members' (excluding those in Berkeley, Emeryville, Los Angeles, Oakland, San Diego, San Francisco, and Santa Monica) total hours will be adjusted in the amount of any PST allotment you receive. Refer to the California team members only total hours (DOC) resource and the Paid Sick Leave Laws (Paid Sick Time) page for more information.

Standard workweek

Calculating PTO for team members scheduled to work less than 40 hours per week

If you are eligible for PTO but work less than 40 hours a week, your allowance will be a prorated amount of PTO based on your standard hours.

To determine your prorated PTO amount, use the following formula:

Standard hours / 40 x annual allowance = prorated annual PTO allowance for your reduced schedule

For example, you have seven years of service and work 30 hours per week, or 75% of a 40-hour workweek (30 standard hours divided by 40 multiplied by 184 annual allowance equals 138 prorated hours). In other words the 40-hour PTO amount is 184 hours, so you are eligible for 75% of 184 hours, or 138 hours.

4 Federal, state, or local laws may provide additional entitlements, including different accrual and carryover requirements, and Paid Sick Time for eligible team members.

PTO Accrual

You accrue one-twelfth of your annual Paid Time Off (PTO) allowance for each month in which you have an active work status for at least one full and completed shift of your standard schedule or reduced work schedule in that month. Your manager may approve your use of unaccrued PTO according to your business practices. You may not “borrow” anticipated PTO from a future year of work under any circumstances.

In your first year

As a new Wells Fargo team member, you are eligible for PTO on the first of the month following one full calendar month of service. If you work for Wells Fargo less than 12 months during the year, your PTO is prorated for the partial year of work.

For example, if you start on April 6, you are eligible for benefits on June 1. This means that you are benefits-eligible for seven months if you remain at Wells Fargo through the end of the year, so you'll be credited with seven-twelfths of your annual PTO allowance, which you are eligible to use on or after your benefits eligibility effective date of June 1.

If you have paid sick time, it accrues according to your applicable local or state paid sick time law. Refer to the Paid Sick Leave Laws (Paid Sick Time) page for more information.

In your last year

If you retire, leave Wells Fargo, or leave as a result of a displacement, you'll be eligible for PTO based upon the number of months you work before you leave or begin Salary Continuation Leave (see PTO at Termination).

Break in service

If there is a break of six months or less in your Wells Fargo employment, it is considered continuous service for determining your PTO benefits. If you are covered by a Paid Sick Leave (PSL) law and rehired within time outlined in the law, your paid sick time will be reinstated under the terms defined in each law, which may be a different timeframe than the timeframe applied to PTO. If you have had a short break in service like this, ask your manager to verify your employment dates in Staff Management to make sure that you are receiving the correct PTO allowance. With continuous service, you will begin to accrue PTO on the first day worked in the month you are rehired. If there is a break of more than six months in your Wells Fargo employment, your rehire date becomes your corporate hire date, and you will begin to accrue PTO as a new hire does (see In Your First Year).

PTO and leaves of absence

Team members do not accrue PTO during a leave of absence. You will begin accruing PTO when you return to work and have completed at least one full shift of your standard schedule or reduced work schedule in that month. Upon your return from leave, any accrued unused PTO, not to exceed five days, may be carried over into the new year but must be used by March 15 of the following year, unless otherwise directed by law. Team members who use unaccrued PTO before their leave of absence and do not have an opportunity to accrue enough PTO in the remainder of the year are required to repay the overpayment, to the extent permitted by law.

Based on the requirements of Wells Fargo's Short-Term Disability (STD) Plan, you are required to use accrued unused PTO or any available PST, if applicable, for any scheduled workdays to satisfy the STD waiting period eligibility under Wells Fargo's STD Plan, unless the first day of the Medical Leave is also the first day of Parental Leave. If you do not have accrued PTO to use during the waiting period, refer to the STD Waiting Period section of the Medical Leave policy, which is found in the Leaves of Absence portion of this handbook, for additional information.

Team members must use accrued, unused PTO to cover intermittent leaves unless otherwise required by law. If you do not have accrued, unused PTO, you may request to use unaccrued PTO subject to any applicable line-of-business guidelines for usage of unaccrued PTO; however, managers cannot require team members to use unaccrued PTO under any circumstances.

Eligibility Changes

Change to an eligible position

You become eligible for PTO if you move from a job classified as flexible to one that is part-time or regular with base pay. Your corporate hire date (not the date of your job classification) is used to determine your years of service for calculating your PTO allowance. You generally begin accruing PTO in the calendar month in which your job position change is effective. (If you haven't yet completed one full calendar month of Wells Fargo employment, your PTO accrual will begin the calendar month after you complete this requirement.)

Change to an ineligible position

If you change to a position that is not eligible for PTO, then your PTO eligibility for that year is prorated based on the number of months you were in the eligible position. After prorating your PTO, any remaining accrued unused PTO will be systematically paid out to you in your next on-cycle paycheck. If you do not have an on-cycle paycheck for the pay period, you will receive a separate off-cycle check with the PTO payout. Your manager will receive notification of the automatic payout.

Changing schedules

If your standard hours change during the year, your PTO is recalculated based on the amount of time you have spent in each standard hours schedule. If you are covered by a Paid Sick Leave (PSL) law, Time Tracker will reflect a separate Paid Sick Time (PST) balance because PST accrues based on your actual hours worked.

For example, if your annual PTO is 224 hours but you change from a 40-hour-per-week schedule to a 32-hour-per-week schedule (or 80% of 40 hours) on July 1, then your PTO accrued during the first half of the year is six-twelfths times 224 hours, which equals 112 hours, and for the second half of the year is six-twelfths times 80% of 224 hours, which equals 89.6 hours. So your total PTO for the year would appear in Time Tracker as 201.6 hours.

If your standard hours change occurs after the first of the month, your PTO accruals for that month will be recalculated.

Using the above example, if your annual PTO is 224 hours but you change from a 40-hour-per-week schedule to a 32-hour-per-week schedule (or 80% of 40 hours) on July 15, then your PTO accrued during the first half of the month is calculated on a 40-hour-per-week schedule, which equals 9.33 hours, and the second half is calculated on a 32-hour-per-week schedule (or 80% of 40 hours), which equals 7.46 hours. So the total for the month would be 16.79 hours versus 18.66.

Intracompany transfers

If you transfer from one PTO eligible Wells Fargo position to another, you transfer with your accrued, unused PTO. If you transfer from a PTO accrual cap state to a non-PTO accrual cap state, accrued and unused PTO exceeding the amount you are eligible to transfer will be paid out to you after the transfer by the business group that you are leaving. Refer to the Carryover and Accrual Cap section for additional information. Your new manager is responsible for ensuring that Time Tracker is adjusted as necessary to reflect your correct accrued and unused PTO balance after your transfer and payout.

Using PTO

Team members are encouraged to use their accrued Paid Time Off (PTO) each year. However, when a team member uses PTO, and for how many successive days, is subject to manager approval. Your PTO allowance should be used for any absence from work including unexpected circumstances and illnesses. While you may request to take the entire PTO allowance in Time Tracker for any purpose, managers will continue to approve your time away request based on business needs and line-of-business practices.

Team members must use any accrued and unused PTO to cover absences, unless otherwise provided by law.

Team members in exempt positions are required to use PTO in either full-day or half-day increments. Team members working a reduced schedule are required to enter PTO based on their regular work schedule. Team members in nonexempt positions are encouraged to use PTO in hourly or full-day increments based on their scheduled hours (including scheduled overtime); however, Time Tracker will allow team members in nonexempt positions to record PTO in five-minute increments. You must account for all time in your scheduled shift.

Team members working an alternative work schedule, are required to enter PTO based on their normal work schedule. For example, a team member working 10 hours a day, four days a week is required to enter 10 hours of PTO when requesting a day off.

Scheduling

You are expected to schedule your PTO in advance, with your manager's approval. The only exception to this requirement is an illness or other emergency that you cannot predict in advance (see Unscheduled absences below). Your manager will approve requests for PTO based on considerations like workflow, operational requirements, business needs, and length of service.

You should use your PTO during the year it is accrued to avoid exceeding the carryover provision, except in those states where state law affects the carryover provision. You and your manager are responsible for ensuring this happens. While your preferences will be accommodated when practical, there may be times when, due to business considerations, you need to take your PTO on days other than your preferred ones.

Team members are expected to manage their PTO allowance throughout the year. If a team member exhausts PTO and continues to request unpaid time away, it will be considered an unscheduled absence and may be subject to corrective action (see Attendance & Punctuality).

Unscheduled absences

Although time away from work is important, it's equally important that you are at work when scheduled. Regular and dependable attendance is an essential function of your job at Wells Fargo, and for this reason unscheduled absences may be subject to corrective action (see Attendance & Punctuality).

If you do have to miss work unexpectedly, contact your manager as soon as possible — no later than your normal starting time that day — and make every effort to reach your manager personally.

Using unaccrued PTO

If you need to take time away from work, but you do not have unaccrued PTO and your business group does not allow for the use of accrued PTO, the time away from work will be unpaid, unless otherwise required by law. Depending on the circumstances, your time away may also be subject to corrective action (see Attendance & Punctuality).

Team members are not required to use unaccrued PTO unless the time away is for Paid Sick or Safe Time. However, unscheduled absences that are otherwise not protected by law are subject to the Attendance & Punctuality policy.

Team members who are approved for Short-Term Disability (STD) must use accrued unused PTO to satisfy the STD waiting period eligibility requirement under Wells Fargo's STD Plan, unless the first day of the Medical Leave is also the first day of Parental Leave. If you do not have accrued PTO to use during the waiting period, refer to the STD Waiting Period section within the Medical Leave policy, which is found in the Leaves of Absence portion of this handbook, for additional information.

Use of unaccrued PTO may result in an overpayment. To the extent permitted by law, at the end of each year team members are expected to report and repay any overpayments resulting from the use of unaccrued PTO. Failure to report and repay overpayments is a violation of the Wells Fargo Code of Ethics and subject to corrective action up to and including termination. Team members who leave the company with an overpayment of PTO are personally liable, where permitted by law, for the amount of the overpayment and will be considered ineligible for rehire until the overpayment is resolved. Refer to Pay Discrepancies for additional information.

After a leave of absence

To support effective business operations, team members should not schedule PTO immediately after a leave of absence, effectively extending their leave, without their manager's approval.

Carryover & Accrual Cap

PTO carryover

Your Paid Time Off (PTO) should be used during the year that it is accrued. Unless you are subject to the PTO accrual cap, you will lose any PTO in excess of the five days at the end of the year. This five-day carryover cap is based on your standard hours. For example, if your standard hours are 40 hours per week, then you would be permitted to carry over up to 40 hours of PTO to the following year. If, however, your standard hours are 20 hours per week, then you would be permitted to carry over up to 20 hours into the following year.

If you have accrued, unused paid sick time (PST), you may carry over the maximum amount allowed by applicable state or local law. PTO carryover other than PST must be used by the end of the business day on March 15 of the following year.

Note: *If your work location as recorded in the official HR system of record is in California, Montana, or Nebraska, the PTO accrual cap applies, and you will not lose any accrued PTO.*

PTO accrual cap for team members in California, Montana, and Nebraska

Team members in California, Montana, and Nebraska may accrue PTO up to one-and-a-half times their annual eligible PTO allowance. Team members in these states are not eligible to accrue additional PTO once they reach the cap. However, as these team members use PTO and reduce their PTO balance below the cap, they are eligible to again accrue PTO up to the accrual cap in the following month as long as their PTO balance remains below the accrual cap.

Team members transferring from a PTO accrual cap state to a non PTO accrual cap state will receive a payout of their accrued unused PTO balance. Team members that transfer before March 15 will receive their PTO payout on March 15 and team members that transfer after March 15 will receive their payout on December 31 of the same calendar year, unless applicable state or local law requires otherwise.

PTO at Termination

When your employment is terminated (voluntarily or involuntarily), your manager will verify your Paid Time Off (PTO) and, if appropriate, will approve an adjustment to your final pay to payout any accrued, unused PTO.

This payout may not match the PTO allowance displayed on Time Tracker, because Time Tracker displays a PTO allowance that assumes you will work 12 months and accrue PTO hours each month. For example, if your employment ends

in September, your prorated PTO amount is nine-twelfths of 184 hours, or 137.9 hours. From that total, your manager will subtract the hours you have already used. So if you had already used 24 hours of PTO, you would be paid out 113.9 hours of PTO.

If you've used more PTO hours than you have accrued at the time of your termination, you will be asked to reimburse Wells Fargo for the excess amount where permitted by law. For example, in the situation described above, if you had already taken more than nine-twelfths of your PTO amount (in other words, more than 137.9 hours), you'll be asked to reimburse Wells Fargo for the excess balance.

If you request to take PTO after you have given notice that you are leaving Wells Fargo, your manager will follow the policy in your region or business to approve and schedule this time. For example, some business groups do not approve the final workday to be taken as PTO.

Repayment obligations if your employment terminates

If your employment with Wells Fargo terminates (with the exception of termination by displacement or death, including former team members that pass away during the pursuit of a PTO overpayment), you must repay Wells Fargo for the amount of unaccrued PTO that has been taken as of the termination date, in accordance with the Overpayments Policy.

Other Paid Time Away

We recognize there are occasions when you may need time away from work in addition to your Paid Time Off (PTO) and the company's observed holidays. Wells Fargo also offers paid time away from work for specific reasons, such as:

- Bereavement
- Community service time*
- Voting
- Jury duty
- Paid sick or safe time
- Testifying in court
- Nonroutine time away
- Military duty
- Relocation
- Other protected time away

Team members not eligible for Paid Time Off (PTO) may work with their manager to arrange time away for these purposes. This time away will be unpaid unless state or local law provides for paid time away, for example in the form of paid sick and safe time.

There may be other types of time away for which you may be eligible based on state and local laws. Consult with ER Solutions using the Employee Relations eForm if you have questions.

Other paid time away eligibility

You are eligible for time away related to bereavement, jury duty, or civic responsibilities on your hire date and if you are in an active working status in a regular or part-time* position with a base pay or hourly rate. You are not eligible for these kinds of paid time away from work during a leave of absence. You can only record these hours for time away that you would otherwise be scheduled to work.

*Part-time team members are not eligible for Community Service Time.

Bereavement

We understand that the death of a family member is difficult to deal with and that you may need time away from work for your own grief or to attend to matters related to your loss.

Team members classified as regular or part-time who are currently scheduled to work are eligible to request time away with pay for bereavement.⁵

Wells Fargo recognizes that family structures can be unique and diverse in nature. Managers are encouraged to support team members during this time in their lives. If you have a loss that falls outside of the family member designation, like an ex-spouse or former in-law, you may be able to use PTO for needed time away, with manager approval.

If you are on an approved family leave and the family member you are caring for passes away, you will need to contact our leaves and claims administrator to end your leave of absence and reach out to your manager to adjust your time away to bereavement time off.

You are eligible to take up to a maximum of two regularly scheduled workweek for bereavement time off for the loss of each family member (including the loss of a team member's unborn child), in consultation with your manager. To the extent possible, bereavement time should be recorded in Time Tracker before the requested day(s) off. Bereavement time may be taken intermittently in full-day increments with your manager's approval, unless state or local laws provide otherwise. Bereavement leave provided under this policy runs concurrent with protected funeral or bereavement leave under state or local laws, if applicable.

Bereavement time away is a benefit that Wells Fargo offers subject to the Code of Ethics. We trust team members will use it only for qualifying family members, and thus initial proof of eligibility for bereavement time away is generally not required. However, Wells Fargo reserves the right to require documentation to support eligibility.

Bereavement time must be taken within one year of the loss. State or local laws may offer additional unpaid time away; consult with ER Solutions for guidance.

Community Service Time

Community service time (CST) is one of the ways Wells Fargo supports your volunteer involvement in the community in which our team members live and work.

Community service time is time away with pay, separate from Paid Time Off (PTO). If you are a regular team member with a base pay and regularly scheduled to work 30 hours or more per week, you may be eligible for up to 16 hours of community service time per calendar year to participate in eligible community service activities during the time when you would otherwise be scheduled to work. For example, if you are scheduled to work from 9:00 a.m. to 5:00 p.m. and you would like to volunteer for a local organization between 1:00 p.m. and 5:00 p.m., you may use community service time.

Team members with less than six months of employment are eligible for a prorated amount and may take up to eight hours, with manager approval. Team members track community service time in Time Tracker.

Team members in exempt positions are required to use community service time in either full-day or half-day increments. Team members in nonexempt positions may record community service time in full-day, half-day, or hourly increments, except for the restrictions referenced below.

To use community service time, a team member must be volunteering for a community or nonprofit organization in his or her community that is designated as 501(c)(3) or 501(c)(6) by the Internal Revenue Service (IRS); a school; or a city, county, state, or federal board, council, or election department.

Examples of eligible activities include but are not limited to:

- Volunteering at a local school (chaperoning, working at a book fair, reading, whether your child attends the school or not).
- Volunteering at or participating in a charity race, such as a Heart Walk or 5k.
- Serving on advisory boards, councils, or boards of directors of nonprofit organizations.
- Donating blood.
- Serving as an election official for a general election.

Examples of activities not eligible for community service time include but are not limited to:

- Partisan political activities such as campaigning on behalf of a candidate or political party.
- Religious activities not involving community service.
- Volunteer opportunities outside of the U.S.
- Parental activities such as parent-teacher conferences or attending school concerts or sporting events.
- Court-mandated community service.

⁵ The request may include time away for a loss of a team member's unborn child. Team members may also be eligible to qualify for an FMLA-eligible leave in cases of a serious medical condition. Team members who have experienced a miscarriage and have also filed a short-term disability (STD) claim may use bereavement time to satisfy the STD waiting period. Refer to your *Benefits Book* for information on the STD Plan.

While proof of volunteering is not generally required, team members are held accountable for ensuring that the volunteer activity adheres to all policy requirements. Approval by your manager must be recorded in Time Tracker before the requested day off.

If the event in which you want to participate does not meet the criteria for CST as described above, you may request PTO through your normal business process. Once your manager has approved your PTO, you may use it to volunteer for these activities. To avoid significant business interruptions, it is important to obtain manager approval for your request for time away in advance. Contact ER Solutions team for additional clarity on eligible and ineligible activities.

Unused community service time hours cannot be transferred to another team member, carried over into the next year, or paid out as a lump sum during a leave or at termination.

Voting

Voting in general, statewide, or special elections

Team members classified as regular, part-time, or flexible, including fully commissioned team members, who are currently scheduled to work are eligible for voting time away.

Wells Fargo provides up to two paid hours away from work to vote in any general, statewide, or special election. Where the law requires additional time away for voting or covers other types of elections, the law will be followed.

Be sure to arrange your time away with your manager before Election Day, which will allow for the creation of a schedule to adequately balance your civic responsibility with the needs of the business and Wells Fargo's customers. Team members in nonexempt positions should track time away from work for voting in Time Tracker using the Nonroutine Event code.

Jury Duty

Team members classified as regular, part-time, or flexible, including fully commissioned team members,⁶ are eligible for time away while serving on jury duty.

Generally, you are excused from work with pay while serving on jury duty if jury duty interferes with all or part of your normal work schedule. Team members who report to jury duty on an assigned day of service are not required to work that day. If your work schedule is different from the hours required for jury duty, you will not be required to report to work while serving on jury duty. However, if you are excused from your jury duty service early, you are expected to report to work as normal on your next regularly scheduled work day, unless otherwise prohibited by law.

In addition to your Wells Fargo pay, any court reimbursements for your services are yours to keep. Wells Fargo does not reimburse for travel expenses incurred because of jury duty unless otherwise required by law. Team members in exempt and nonexempt positions must record jury duty time away in

Time Tracker using the Nonroutine Event code. Wells Fargo recognizes applicable state laws regarding jury duty.

You are expected to provide advance notice of jury duty to your manager and keep him or her informed of your jury duty status. Wells Fargo reserves the right to require documentation to support eligibility for the time away.

Paid sick or safe time

Certain locations and jobs are covered by Paid Sick Leave laws requiring employers to provide paid sick or safe time (PST) to eligible team members. In general, Wells Fargo team members working in these locations or jobs are eligible to use current paid time away allowances for the purposes covered by these laws, so additional paid time away is not required.

Eligibility

Both PTO-eligible and non-PTO-eligible (flexible and fully commissioned) team members working in locations with PST laws are eligible to use paid time away for the purposes covered by these laws if they meet the specified eligibility requirements. If you occasionally work in a location with a PST law, you may also be eligible for paid time away while you are working in the location. Be sure to review the eligibility requirements for that particular location on the Compliance Posters page of Teamworks.

Using PST

Eligible team members may take time away from work for any of the purposes covered by the applicable law. Absences recorded as PST are protected by these laws and do not count as occurrences under Wells Fargo's Attendance Policy. If unscheduled PTO is used in combination with paid sick or safe time, the unscheduled PTO is still subject to the Attendance & Punctuality Policy, unless protected by another law or regulation. PST may be used during the STD waiting period.

Depending on your location and eligibility for PTO, PST is either a separate balance adjusted from your annual PTO allowance or is included in your PTO balance. When time away is used for the identified purposes, you should record your absence in Time Tracker as paid sick time.

A team member must notify his or her manager on or before the first day of an absence resulting from illness or as soon as reasonably possible. In cases of prolonged illness, team members are expected to keep their managers informed regularly of their anticipated date of return to work. Refer to the Leaves of Absence page if you have a need for an extended absence.

Managers are responsible for the proper recording of this time away by team members. Abuse of paid sick time in any form may violate Wells Fargo's Code of Ethics and be subject to corrective action.

⁶ Team members in fully commissioned positions will continue to receive their draw while serving on jury duty.

California team members

In addition to PST, eligible team members in California are permitted to use up to half of their annual PTO for protected KinCare purposes. KinCare and PST can be used for the same purposes and the same qualified family members (including oneself). Eligible team members can choose to record KinCare or PST based on their preference. Team members who do not have enough PST to cover a qualified absence may choose to use KinCare to protect the absence if sufficient KinCare time is available. Generally, lines of business that allow the use of unaccrued PTO must also allow the use of unaccrued KinCare for the qualified reasons.

PST at termination

Team members are not paid for unused PST balances upon termination. This means that any accrued PST will not be eligible for payout at termination.

Carryover

If PST is included in your PTO balance, then Wells Fargo's PTO carryover provisions apply. If PST is separate from your PTO balance, you may be allowed to carry over accrued PST from year to year, in accordance with applicable law.

After a leave of absence

If eligibility requirements are met, a team member may use any accrued unused PST available following a leave of absence.

Refer to the Paid Sick Leave Laws (Paid Sick Time) page on Teamworks for more information.

Testifying in Court

If you're required to testify in court on behalf of Wells Fargo or if you're subpoenaed for Wells Fargo business, this is considered work time and should be recorded in Time Tracker.

Any court testimony that is personal in nature requires use of PTO, if available. If you are able to provide legal documentation that you are required to testify in court, your absence cannot be counted as an unscheduled absence.

Legal proceedings related to domestic violence may be covered under the Wells Fargo's Paid Sick Time policy and any relevant laws.

Wells Fargo follows any laws that allow team members to take time away to appear in court. In these cases, your absence cannot be counted as an unscheduled absence. Consult with ER Solutions for guidance.

Nonroutine Time Away

Wells Fargo understands that on occasion, team members must take time away from their regular work schedule for nonroutine events. In certain circumstances, Wells Fargo provides nonroutine time away that is separate and distinct from PTO, such as time away for voting, jury duty, or participating in a short-term military activity.

Before requesting Nonroutine Time Away in Time Tracker, you should have a discussion with your manager to ensure the reason is covered by Wells Fargo policy. In most situations, your manager will instruct you on whether it is appropriate to record your time away as a nonroutine event. To the extent possible, you should obtain recorded approval from your manager in Time Tracker before the day of the event, by selecting the appropriate reason in the drop-down menu of the Nonroutine Event code.

Sometimes adverse conditions (for example, widespread uncontrollable circumstances such as inclement weather) may prevent your work location from operating during its normal business hours. In these situations refer to the Time Away for Critical Incidents and Special Events Procedures.

Military Duty

Military duty typically requires you to participate in duty assignments, including monthly drills and training throughout the year. Military duty time away is designated for team members needing 30 consecutive days or less away from work.

Eligibility

Regular, part-time, and flexible, including fully-commissioned team members are eligible to take time away from work for military duty, which includes Military Reserve activities and Military Leave lasting 30 consecutive days or less.

Your responsibilities

Regular Military Reserve activities, including annual training and military drills, that are less than 30 consecutive days are not treated as a Military Leave. Similar to other periods of absence, taking time away from work for military duty requires you to notify your manager in a timely manner, to the extent you can, which will allow your manager to make staffing arrangements while you are away.

If your military duty is more than 30 consecutive days, you must request a Military Leave by contacting our claims and leave administrator through Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2. For TDD access for persons with hearing impairments, please call 1-800-988-0161.

Income sources during military duty

If you're a regular or part-time team member, you will continue to receive your regular Wells Fargo pay through the duration of any required military duty time away that falls during your regularly scheduled workdays. If documentation to validate your military duty is not provided to your manager, your military duty time away will still be approved but the pay benefit associated with the request may be denied and the time away will be unpaid. Team members in nonexempt positions must record their military duty time away in Time Tracker using the Nonroutine Event code.

Job reinstatement rights

You have job reinstatement rights during your time away from work for military duty, including your annual active duty training period.

Returning to work

Before your return to work, contact your manager to confirm the actual date you will be coming to work so that he or she can make any arrangements necessary to be ready for your return.

Relocation Time Away

Wells Fargo recognizes that relocating to a different Wells Fargo location is a major life event and team members may need time away from work before and after their move to care for various relocation activities such as searching for a new home, packing and unpacking personal items or enrolling children into a new school. Wells Fargo provides eligible team members paid time away that is separate from Paid Time Off (PTO) for business-specific relocations or situations where military spouses are required to move due to a military station location change.

Eligibility

Regular and part-time team members with base pay, in an active working status, and not on a leave of absence (unless on an approved Job Search Leave) are eligible for up to one regularly scheduled workweek of Relocation Time Away, to be used continuously or intermittently in full-day increments, when one or more of the following occurs:

- You are a current Wells Fargo team member and you need to change your primary residence because your business group or position has moved to a different Wells Fargo location in the U.S., which results in a material change in work location, as defined by the Displacement Policy.
- You receive a U.S. relocation package from the Global Relocation team.
- You are a military spouse that is relocating to a different Wells Fargo location in the U.S. due to a military station change (referred to as a permanent station change (PCS) or temporary station change (TCS)), provided you have secured a position in the new location

Your responsibilities

Up to one regularly scheduled workweek is available per relocation, subject to approval by your manager. Relocation Time Away must be taken within six months of the first day in your new Wells Fargo location, or any remaining time away balance is forfeited.

Similar to other absences, you are required to schedule time away from work for relocation purposes in advance, to the extent you can, to allow your manager to make staffing arrangements while you are away. You need to secure your manager's approval for the time away and you must record your Relocation Time Away in Time Tracker, using the Nonroutine Events code.

Relocation Time Away is a benefit that Wells Fargo offers to team members who are relocating in response to a particular business need. As with all available time away policies, use is subject to the Code of Ethics. We trust team members will use this time away for the various activities associated with relocating to a new location, as described in the policy. You will not be required to provide any documentation confirming

your eligibility when you enter your time away; however, should questions arise, Wells Fargo may require documentation to support eligibility and use of this benefit.

Nonroutine Event balances are not eligible for payout at termination or as part of a lump-sum payout during a leave of absence.

Other Protected Time Away

Generally, team members are expected to use one of Wells Fargo's Time Away programs to account for any time away from work (including scheduled overtime) during their scheduled work hours. However, in some instances, additional time away is provided by federal, state, or local law. Time away mandated by law can be paid or unpaid, is protected for the specific job reinstatement period outlined in each statute or ordinance, and is not subject to Wells Fargo's Attendance & Punctuality Policy or related corrective action, unless otherwise noted. Generally, protected time will run concurrent with the applicable Wells Fargo time away program, unless otherwise directed by law. Team members are encouraged to discuss the eligibility requirements for other protected time away options with their manager. Managers should contact ER Solutions using the Employee Relations eForm if they have specific questions.

Observed Holidays

Wells Fargo provides up to 10 paid observed holidays company-wide for eligible team members. Team members are expected to follow the holiday schedule — standard or New York Stock Exchange (NYSE) that is observed by their business.

Common holidays observed by Wells Fargo

- New Year's Day
- Martin Luther King Jr. Day
- President's Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Christmas Day

Refer to the standard schedule (PDF) and NYSE schedule (PDF) for specific holidays and dates based on the holiday schedule your business follows.

Generally, when a holiday falls on Sunday, Wells Fargo will observe the holiday on the following Monday. However, business groups who maintain 24 hours a day, 7 days a week operating schedules may observe the holiday on the calendar date (Sunday) for their entire business group. Senior business leaders for these groups will decide and communicate the holiday schedule in advance to ensure that all team members are aware of the schedule and how to record their time appropriately.

Wells Fargo also provides personal holidays and floating holidays. Refer to the appropriate section of the *Team Member Handbook* for additional information.

Holidays eligibility

Regular or part-time team members with a base pay in an active working status and not on a leave of absence are eligible for holiday time.

Team members classified as flexible or in a position that does not have a base pay are not eligible for holiday time.

Holiday balances

Eligible team members have access to a holiday balance in Time Tracker at the beginning of each calendar year. The holiday balance represents the number of holiday hours you're allocated for that calendar year. Record holiday time in Time Tracker in full-day increments (based on an eight-hour day, prorated based on standard hours for team members whose regular schedules are less than 40 hours a week) for observed holidays, personal holidays, and floating holidays.

For example, if you are scheduled 20 standard hours, then your holiday hours are prorated at 4 hours for each holiday (20 hours divided by 5 days equals 4 hours per holiday).

Unused holiday balances cannot be carried over into the next calendar year and are not paid out as a part of a lump-sum payout during a leave or at termination, unless otherwise required by state or local law.

Personal Holidays

Personal holiday time allows you to observe holidays that are not included in Wells Fargo's observed holiday schedule but that have personal significance to you based on recognized religious, cultural, patriotic, community, or diversity observances. Examples of such personal holidays include: Birthday, wedding anniversary, Rosh Hashanah, Good Friday, Eid al-Fitr, Cesar Chavez Day, Chinese New Year, Kwanzaa, Armenian Genocide Remembrance Day, World Alzheimer's Day, ADA Awareness Day, and National Coming Out Day. Wells Fargo provides up to 16 hours to team members following the standard holiday schedule, based on your standard hours, to be used for two personal holidays. Team members following the New York Stock Exchange holiday schedule are provided up to 24 hours (based on standard hours) to be used for three personal holidays. You can take a personal holiday at any time within the current calendar year with prior approval of your manager. Managers should refer to the Observed Holidays page within Manager Center for guidance.

Personal holiday eligibility

You're eligible for personal holidays if you're in an active working status and not on a leave of absence, and you are in a regular or part-time position with a base pay. Personal holidays are available for use upon beginning employment with Wells Fargo. Team members classified as flexible or in a position that does not have a base pay are not eligible for personal holidays. Personal holidays must be taken in full-day increments and can be scheduled to occur consecutively with manager approval.

Keep in mind:

- Personal holidays are separate and distinct from PTO and do not accrue.
- Unused personal holidays cannot be carried over into the next year and are not paid out as a part of a lump-sum payout during a leave or at termination of employment, unless otherwise required by state or local law.
- All personal holidays must be taken, and recorded, in the calendar year they are granted.
- Team members who wish to use a personal holiday must provide advance notice and obtain manager approval, which is subject to business needs.
- Personal holidays must be approved by your manager and recorded in Time Tracker, prior to the day being requested off.

Floating Holidays

Wells Fargo recognizes that team members have many different work schedules. Therefore, in certain instances you may use a floating holiday in place of an observed holiday. You're eligible for a floating holiday in the following instances:

- If an observed holiday falls on a Saturday
- If an observed holiday falls on a day you're normally scheduled to be off work
- If you're a team member in an exempt position and you work on an observed holiday

Floating holidays can be taken at any time within the calendar year that the observed holiday occurs, with prior manager approval. Floating holidays must be taken in full-day increments unless otherwise noted in Scenarios for Working on an Observed Holiday (PDF). Unused floating holidays cannot be carried over into the next year and are not paid out as a part of a lump-sum payout during a leave of absence or at termination. Refer to the Observed Holidays page on Teamworks for more guidance.

Team members in nonexempt positions

If your work location is open on a day when the holiday is being observed and you work on the observed holiday, you will not receive a floating holiday. However, you may record the holiday hours in Time Tracker along with your work hours to receive your regular holiday pay and the holiday premium pay for your actual hours worked on the holiday.

Floating holidays and leaves of absence

If you experience a loss of floating holidays while out on a leave of absence but return from the leave before the end of the current calendar year, you must contact your manager to have the floating holidays added back to the holiday balance in Time Tracker. Managers must contact Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2, TDD/TYY 1-800-988-0161, or submit a request through the Self-Service Time Tracker Support Tool to request the floating holidays be added back to the team member's holiday balance. In cases

where the observed holiday falls on a day you are normally scheduled to work, you are not eligible to take a floating holiday. Any deduction of floating holidays that occurs in that instance would not be added back to your holiday balance.

Impacts to Observed Holidays

Observed holidays and overnight shifts

A holiday is defined as the 24-hour period beginning at 12:00:01 a.m. and ending at midnight on one of the observed holidays. Team members in nonexempt positions who work hours on an observed holiday receive a holiday premium for those hours.

Observed holidays for team members who work more or less than eight-hour days

Holiday hours are based on your standard hours and prorated based on your regular schedule. Keep in mind:

- If you are in a business following the standard holiday schedule, you are allocated up to 80 hours for 10 observed holidays and 16 hours of holiday time to use for personal holidays in a calendar year.
- If you are in a business following the New York Stock Exchange holiday schedule, you are allocated up to 72 hours for nine observed holidays and 24 hours of holiday time to use for personal holidays in a calendar year.
- If you work an alternative work schedule, follow the appropriate process to record your holiday hours, based on your standard hours and schedule. For details, see [Scenarios for Working on an Observed Holiday \(PDF\)](#).

Working on Observed Holidays

If you're in a nonexempt position classified as regular or part-time with a base pay in an active working status, are not on a leave of absence, and are required to work on an observed holiday, you will receive holiday pay for your actual time worked on the observed holiday. Holiday pay is defined as your hourly pay rate plus a holiday premium, which is half-time, for a total of one-and-a-half times your hourly pay rate. For example, a team member who receives \$16 per hour would earn \$24 per hour for any time they worked on the observed holiday. Holiday pay is separate from holiday time away pay, which is a time away benefit. So, in the above example, the team member would also be able to record holiday time in Time Tracker to receive holiday time away pay, which would be in addition to the pay they receive for their actual time worked. See [Observed Holidays in the Time Away section](#) for more information. Team members who are scheduled or asked to work on an observed holiday and who do not report to work are not eligible for holiday pay or holiday time away pay and are expected to use Paid Time Off or Paid Sick Time, if applicable, to account for any unscheduled time away from work (including scheduled overtime) unless otherwise provided by state or local law.

If you are a team member in an exempt position and are required to work on an observed holiday, you may take the holiday at another time during the current calendar year as a floating holiday, with the approval of your manager.

For more information, please review [Scenarios for Working on an Observed Holiday \(PDF\)](#).

Leaves of Absence

As part of our commitment to team members, Wells Fargo offers several leave of absence options to eligible team members needing to take extended time away from work to care for planned and unplanned life events, subject to the Extended Absence policy. Whether planned or unplanned, taking a leave of absence requires a partnership between you, your manager, and the appropriate Wells Fargo leave administrator. Your timely cooperation in this process is essential.

Review the applicable leave of absence section of the *Team Member Handbook* for specific details for each leave type offered by Wells Fargo.

Leave type	Description
Administrative Leave	Time away initiated by Wells Fargo.
Critical Caregiving Leave*	Time away to care for a covered family member with a serious health condition, limited to one regularly scheduled workweek per calendar year.
Family Leave*	Time away, on a continuous or intermittent basis, to attend to or care for: <ul style="list-style-type: none">• A covered family member who has a serious health condition.• A newborn, adopted, or foster child.
Medical Leave*	Time away, on a continuous or intermittent basis, to attend to or care for your own medical condition.
Military Leave	Time away for your own enlistment, call to military active duty, or active duty training (extending beyond 30 days).
Military Exigency Leave*	Time away to attend to matters when a qualifying family member is called to active duty military service.
Servicemember Care Leave*	Time away to care for a covered service member who has incurred a serious illness or injury while on active duty.
Parental Leave*	Time away on a continuous basis to bond with a newborn or adopted child.

Leave type	Description
Personal Leave	Time away for personal reasons that are not covered under another leave of absence.
Job Search Leave	For various reasons when time is needed to search for another internal position.
Workers' Compensation Leave	<p>Time away, on a continuous or intermittent basis, for your own work-related injury or illness.</p> <p>Note: Wells Fargo does not participate in the Texas Workers' Compensation system. Wells Fargo provides the Texas Injury Benefit Plan, rather than Workers' Compensation Leave, to assist Texas team members who have a work-related injury or illness. References to "Workers' Compensation Leave" include the Texas Injury Benefit Plan.</p>

*This leave benefit includes job protection under the Family and Medical Leave Act (FMLA), and/or other similar state or local laws, or municipal ordinances if you meet the FMLA or similar law eligibility requirements.

Team members interested in taking time away from work to participate in one of Wells Fargo's volunteer programs should refer to the Wells Fargo Volunteer Leave Program for additional information.

Leaves of Absence General Requirements

Requesting a leave of absence

You must notify your manager at least 30 calendar days before the leave is scheduled to begin or as soon as you learn of the need for the leave. After discussing your request for a leave with your manager, contact the appropriate Wells Fargo leaves and claims administrator to initiate the leave process. If extenuating circumstances prevent you from notifying your manager or contacting the leaves and claims administrator, someone else must contact your manager so that he or she can initiate the leave request on your behalf.

Requests for a leave of absence may be denied because of ineligibility, failure to comply with notice requirements, failure to provide required documentation, or other factors. Falsifying required documentation can result in corrective action, which may include termination of your employment. Team members taking extended time away from work without an approved leave of absence are considered to be on unapproved time away. This can result in corrective action, which may include termination of your employment. For additional information, see Corrective Action.

During your leave

During your leave, you remain subject to the terms of the *Wells Fargo Team Member Handbook*, Code of Ethics, and all other employment-related policies. Refer to your *Benefits Book* for information on your benefits during a leave of absence.

Your leave of absence is meant to support you when you need time away to care for yourself or others, and Wells Fargo wants you to be able to focus your attention on caring for those needs; therefore, you should not be doing or expected to do Wells Fargo work while you are on a leave of absence (unless you are working a leave-related reduced work schedule). Managers may need to occasionally contact you during a continuous leave for the limited purpose of seeking assistance for transitioning critical work. Managers will also need to contact you to discuss your return to work plans and/or to begin the discussion for determining whether you and your healthcare provider have determined any needs for work accommodations.

Team members on an approved leave of absence may not engage in self-employment or perform work for another employer during that leave when such work is inconsistent with the reason for taking the approved leave, or competes or conflicts with Wells Fargo's interests in violation of the Code of Ethics and Business Conduct.

Refer to the Conflicts of Interest and Outside Activities Policy for additional information on preclearance requirements for outside employment. Team members who do not have access to Teamworks must contact their manager to ensure that the preclearance process is initiated in the Global Pre-Clearance System, if required.

Paid Time Off (PTO) and other paid time away while on a leave

Team members do not accrue PTO while on a continuous leave of absence. Once team members return from leave and complete one reduced or full scheduled work shift (or workday), they will resume accruing PTO in accordance with PTO accrual policy. No exceptions to PTO carryover limitations (including PTO payouts) or accrual cap rules are allowed upon your return from a leave.

Team members who use unaccrued PTO before their leave of absence and do not have an opportunity to accrue enough PTO in the remainder of the year must reimburse Wells Fargo for the usage of unaccrued PTO, unless otherwise prohibited by law. Refer to Pay Discrepancies in the Getting Paid section of the *Team Member Handbook* for additional information.

While on an approved continuous leave, team members are not eligible for bereavement, Community Service Time, jury duty, and military duty paid time away. Eligible team members can use Paid Sick or Safe Time during a leave for any of the purposes covered by the applicable law.

Team members are also not eligible for observed, floating, or personal holidays during the leave period. Team members are eligible to use observed, personal, or floating holidays to satisfy the required five-day waiting period for Medical Leaves provided the holidays requiring manager approval are approved, as indicated in Time Tracker, before the leave start date. Time Tracker automatically adjusts holiday balances for team members who are on a leave of absence. Refer to Floating Holidays and Leaves of Absence for additional information.

Returning from a leave

Notify your manager of the return to work date so that your manager can make the necessary arrangements for your return by following the steps detailed in the Leaves of Absence section in Manager Center. Complete all documentation as requested by the appropriate Wells Fargo’s leaves and claims administrator and return to work on the first scheduled business day following the end date of your approved leave of absence. If you are returning from a Medical Leave, you must provide the medical release to return to work (and any restrictions if applicable) to the leaves and claims administrator. If a manager receives a medical release, the manager should contact Lincoln Financial at 1-877-HRWELLS (1-877-479-3557) for instructions on how to forward the documentation to Lincoln Financial appropriately. Failure to return to work as scheduled following the leave may result in corrective action, up to and including termination of employment.

If you are released to return to work from a medical leave of absence, but your position is no longer available, you may be eligible for job reassignment. Refer to Preferential Hiring (Job Reassignment) for additional information.

Family and Medical Leave Act

The Family and Medical Leave Act (FMLA) is a federal law that provides you with:

- **Up to 12 workweeks of job reinstatement protection in a defined 12-month period for specified family and medical reasons. FMLA protection is available for the following absences or leaves:**
 - When you are unable to perform your job because of your own serious health condition, including pregnancy-related conditions and prenatal care
 - To care for a parent, spouse, or child with a serious health condition (including a child of a person standing *in loco parentis* who is under age 18, or older and incapable of self-care because of a physical or mental disability at the time that FMLA leave is to commence)
 - For the birth or placement of a child with you for adoption or foster care, and to care for the child
 - When a covered family member is called to active duty in the Armed Forces
- **Up to 26 workweeks of job reinstatement protection during a single 12-month period for the following absence or leave:**
 - To care for an injured or ill servicemember

Eligibility requirements

Team members must have been employed by Wells Fargo at least 12 months within the seven-year period preceding leave and must have actively worked at least 1,250 hours in the 12 months immediately before the first day of FMLA leave.

How FMLA is calculated

Wells Fargo uses the 12-month period measured forward method to calculate the 12-month period for FMLA eligibility purposes. This method counts or looks forward for a defined 12-month period starting with the first day of initial use of FMLA. The next 12-month period would begin the first time FMLA leave is taken after completion of the prior 12-month period.

Use of FMLA

Part or all of your FMLA time away can be taken as a continuous period of time, as a reduced work schedule, or on an intermittent basis. Among other qualifying events, the FMLA provides that an eligible team member is entitled to FMLA for a serious health condition that involves a period of incapacity involving more than three full consecutive calendar days that also involves two or more visits to a health care provider within 30 days of the first day of incapacity or one in-person visit within seven days of the first day of symptoms that results in a regimen of continuous treatment. FMLA may be used for continuous absences as well as intermittent absences. For example, you may use FMLA on an intermittent basis for absences that incapacitate you for three consecutive days because of a serious health condition.

Wells Fargo’s types of leave include leaves that qualify for FMLA protection when you meet the FMLA eligibility requirements. If your leave qualifies for FMLA, then any available FMLA job protection will be applied to your leave. For example, if you qualify for FMLA and need a leave for your own serious health condition and Lincoln Financial approves you for 16 weeks of Medical Leave, then the first 12 weeks of your leave will be designated as FMLA protected time. Refer to the chart below for additional details on leaves that can qualify for FMLA based on your reason for time away from work.

For additional information about your rights and responsibilities under the FMLA, including the definition of a serious health condition, refer to the U.S. Department of Labor’s Notice to Employees of Rights Under FMLA form (PDF),* commonly known as Exhibit C and the FMLA poster (PDF).

FMLA Qualifying Reason	Wells Fargo Leave Type(s)
FMLA-protected time away for your own serious health condition including prenatal office visits	Medical Leave
FMLA-protected time away for your own work injury or illness	Workers’ Compensation Leave

FMLA Qualifying Reason	Wells Fargo Leave Type(s)
FMLA-protected time away to care for a family member with a serious health condition	Family Leave** Critical Caregiving Leave**
FMLA-protected time away for bonding with a newborn or newly placed child for adoption or foster care	Family Leave** Parental Leave**
FMLA-protected time away when a covered military family member is called to active duty in the Armed Forces	Military Exigency Leave
FMLA-protected time away to care for an injured or ill servicemember	Servicemember Care Leave

*Wells Fargo has provided this link for your convenience, but does not endorse and is not responsible for the content, links, privacy policy, or security policy of this website.

**FMLA does not extend job reinstatement for the care of domestic partners, however some state laws and Wells Fargo policy extend job protection to you if you need to care for your domestic partner under guidelines similar to FMLA.

Family and Medical Leave Act Poster

Refer to the FMLA poster (PDF) for the most recent version of the Family and Medical Leave Act poster.

Extended Absence

Extended absence policy

Regular and dependable attendance is an essential function of your job at Wells Fargo. We recognize that team members may face periods of time when they are unable to work and need a leave of absence for an extended period.

Generally, your total time away on approved leaves of absence must not exceed 24 continuous months, unless otherwise allowed by federal, state, or local law. Leaves of absence separated by a return to work period of 30 days or less are added together for purposes of determining the 24 months. Multiple periods of leave adding up to 24 months of absence or that do not reach 24 months but demonstrate an inability to work on a sustained basis may result in termination of employment.

Reminder: *Once team members on a Medical Leave become aware that they are able to return to work with restrictions or work accommodations, they are expected to contact Wells Fargo Accommodations Management as soon as possible to explore accommodation solutions that might enable the team member to return to work.*

Administrative Leave

In some circumstances, you may be placed on a company-initiated paid or unpaid leave of absence. This type of leave is referred to as an Administrative Leave. The length of an Administrative Leave can vary depending on the circumstances. You may be placed on an Administrative Leave for the following reasons:

- Wells Fargo is conducting an internal investigation or fact-finding
- Your position requires that you be removed from the workplace during the resignation notice period, whether your termination of employment is voluntary or involuntary
- Your employment eligibility is under review

Wells Fargo Leaves Operations is the leaves administrator for Administrative Leaves. Leaves Operations will process the Administrative leave request once the leave has been approved by the appropriate Human Resources designee.

If you are placed on an Administrative Leave, line-of-business management or the appropriate Human Resource designee will provide information about the terms and conditions of your leave.

Income sources during a leave

Team members on an unpaid Administrative Leave may request a lump-sum payout of some or all of their accrued unused Paid Time Off (PTO), but they are not required to do so. PTO payouts are permitted only one time during the Administrative Leave period and must be requested through your manager. Managers cannot require you to take a lump-sum PTO payout during your leave of absence, even if there is a loss of income.

Note: *Eligible team members may use paid sick time during a leave of absence for any of the purposes covered by the applicable law. Refer to the Paid Sick or Safe Time page for additional information.*

Critical Caregiving Leave

Critical Caregiving Leaves are leaves of absence offered to eligible team members who need time away to provide critical care and support to a family member with a serious health condition as defined by the Family & Medical Leave Act (FMLA). Critical Caregiving Leaves are paid and can be taken one time per calendar year for **five consecutive regularly scheduled workdays or one regularly scheduled workweek**; they cannot be taken intermittently. In cases where a team member is eligible, Critical Caregiving Leave runs concurrent with available FMLA or similar state required leave.

Lincoln Financial is the Wells Fargo leaves and claims administrator for Critical Caregiving Leaves. Lincoln Financial will process all Critical Caregiving Leave requests, according to Wells Fargo's policies, to determine if a leave is eligible for approval.

You are not required to take a Critical Caregiving Leave and this policy does not interfere with your rights under any federal, state, or local leave law. You may be eligible for additional protected time away as an unpaid leave of absence under FMLA, state or local law, or paid time away protection under an applicable state or local law. Refer to the Family Leave and Paid Sick or Safe Time pages for more information or contact Lincoln Financial at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 5. For TDD access for persons with hearing impairments, call 1-800-988-0161.

If you need intermittent time away to care for a family member, refer to the Family Leave page.

On this Page:

- Eligibility
- Your responsibilities
- Medical certification
- Income sources during leave
- Use of PTO during a Critical Caregiving Leave
- Job reinstatement rights
- Returning to work

Eligibility

To be eligible for a Critical Caregiving Leave, you must:

- Be a regular or part-time team member in an active working status not on an approved leave of absence (unless on an approved Medical or Family Leave) on the start date of the requested Critical Caregiving Leave. Team members on an Administrative, Job Search, Military, Personal, or Salary Continuation Leave are not eligible for a Critical Caregiving Leave.
- Be continuously employed by Wells Fargo for 12 consecutive months before the start date of the leave based on your most recent hire date in PeopleSoft.

If you are hired through an acquisition that recognizes service credit, leave eligibility will be based on the corporate hire date in PeopleSoft reflected at the start of your leave.

If you are rehired with continuous service credit, leave eligibility will be based on the corporate hire date in PeopleSoft reflected at the start of your leave.

- Have your family member's health care provider certify that he or she has a serious health condition that requires assistance with activities of daily living or hospice care assistance. These include but are not limited to grooming, hygiene support, and meal preparation.
- Initiate the leave request no more than 30 days after the first day of the leave.

The following situations are not eligible for Critical Caregiving Leave:

- Team members who are providing care for a parent-in-law
- Team members who are receiving long-term disability benefits

Your responsibilities

Taking time away from work for a Critical Caregiving Leave requires you to take certain actions in a timely manner. Taking action in the specified timeframes allows your request to be processed timely and provides your manager the ability to make the necessary staffing arrangements.

You must notify your manager of the need for a Critical Caregiving Leave at least 30 days in advance of the planned absence or as soon as you determine a Critical Caregiving Leave is necessary. A Critical Caregiving Leave request must be initiated no more than 30 days after the first day of leave by calling our leaves and claims administrator at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 5; TDD/TYY: 1-800-988-0161; or filing an online claim at My Lincoln Portal (new users may register with Company Code = WELLS). Team members who initiate Critical Caregiving Leave requests after the 30-day period are not eligible for this leave and the request will be denied. After you have notified your manager, contact Lincoln Financial to initiate a Critical Caregiving Leave. Lincoln Financial will evaluate your request to determine your eligibility for Critical Caregiving Leave, FMLA, and any similar state law eligibility. You must complete and submit the necessary forms, including the medical certification form by your family member's health care provider, to Lincoln Financial within the prescribed timeframe. Falsifying required documentation can result in corrective action, which may include termination of your employment. Taking extended time away from work without an approved leave of absence can result in corrective action for the team member, which may include termination of employment. For additional information, see Corrective Action.

Until you receive formal acknowledgment of your Critical Caregiving Leave from Lincoln Financial, you must properly report your absence to your manager as outlined by your line-of-business standards. Team members taking extended time away from work without an approved leave of absence are subject to corrective action, up to and including termination of employment.

Medical certification

You'll need to provide a medical certification from your family member's health care provider confirming that you are required to be available for caregiving for a serious health condition. Other documentation may be required based on the reason for your leave.

If you do not comply with all medical certification requirements within 30 days of the request for documentation, your Critical Caregiving Leave and any benefits associated with it will be denied and unapproved time away will be designated as an unapproved absence. This can result in corrective action, which may include termination of employment. For additional information, see Corrective Action.

Medical documentation reminder: *All medical documentation shall remain confidential and be maintained by Lincoln Financial. If a manager receives any medical documentation, the manager should contact Lincoln Financial at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 5, for instructions on how to forward the documentation to Lincoln Financial appropriately.*

Income sources during leave

All eligible team members who qualify for a Wells Fargo Critical Caregiving Leave receive 100% of covered pay for a maximum of five consecutive regularly scheduled work days or one regularly scheduled workweek.

Covered pay is based on the job classification (job class code) in effect on the day before your leave as indicated in the Wells Fargo HR system of record:

- **Job class 2 (most positions)** — Covered pay is defined as annual base pay. It does not include overtime pay, shift differentials, language differentials, incentives bonuses, commissions, or perquisites such as parking or auto allowances or commuter subsidies.
- **Job class 1 (Mortgage Consultants) and job class 5 (Variable Incentive Compensation)** — Covered pay is based on benefits base, which is calculated quarterly based on salary and incentives paid in the last 12 months divided by the months with earnings greater than \$0. Generally, quarterly calculations are completed on the first Sunday after the first payday of every quarter. The amount of covered pay would be updated on the date of the calculation and used for any leaves starting on or after that date. The benefits base is capped at the annual IRS compensation limit for qualified retirement plans, which is subject to change by the federal government at its discretion.

Critical Caregiving Leave will run concurrently with any benefits received (or eligible to be received) from either the state or a state agency and will be coordinated by Lincoln Financial. Wells Fargo will coordinate income from all sources so that you do not receive more than 100% of your covered pay during the term of the leave. To view your covered pay, log into Your Benefits Tool, and select **Elements of your pay used for benefit calculations**.

Use of PTO during a Critical Caregiving

There is no requirement to use any accrued Paid Time Off (PTO) or paid sick time (PST) before taking an approved Critical Caregiving Leave. However, if you have not obtained prior approval before the time away begins, you will be required to use accrued unused PTO until the leave is approved. If accrued PTO is not available and your business unit has placed restrictions on the use of unaccrued PTO, then some or all of the Critical Caregiving Leave will be unpaid until the leave is approved. Upon approval of the leave, any PTO usage will be credited back to your PTO balance in Time Tracker upon your return from leave.

Job reinstatement rights

Job reinstatement protection is available while out on a Critical Caregiving Leave under one or a combination of the following protections as outlined under the applicable law, as determined by Lincoln Financial:

- **FMLA.** If your leave qualifies under FMLA, the job reinstatement period (generally up to 12 total workweeks in a 12-month period measured forward from the first day of any FMLA leave) applies to your approved Critical Caregiving Leave.

- **State laws.** If your state has a law similar to FMLA, your job reinstatement period under the state law generally runs concurrently with the FMLA job reinstatement period unless the state law specifically outlines separate job reinstatement rights. Lincoln Financial will make this determination when your leave is processed.
- Some states' laws provide separate job reinstatement rights and benefits for certain medical-related leaves of absence. In some states, these run concurrently with FMLA (see the Family & Medical Leave Act page); in others, they are in addition to FMLA. FMLA and state job-reinstatement protection run concurrently if the eligible team member meets the eligibility requirements of both.

The concurrent use of Critical Caregiving Leave and eligible FMLA or any similar state leave means that the time you are away for Critical Caregiving Leave will also count against available FMLA and state leave protection, thus decreasing, in whole or in part, the amount of FMLA or state leave available to an eligible team member.

Returning to work

When you're ready to return to work, follow the instructions provided by Lincoln Financial, including contacting your manager to confirm the actual date before you return to work so that he or she can make any arrangements necessary to be ready for your return, update your work status in Staff Management, and restore any applicable system access. Keep your manager informed on any changes in your return to work status.

If you would like to return to work on an alternative or reduced work schedule before the end of the identified leave period, you must contact your manager to discuss, seek approval, and make the appropriate arrangements.

Team members who choose to return to work before exhausting their approved Critical Caregiving Leave will forfeit any remaining balance of the Critical Caregiving Leave period.

Family Leave

Family Leave is a leave of absence offered by Wells Fargo on a continuous or intermittent basis (including a reduced work schedule) to provide care for a family member with a certified serious health condition. A continuous or intermittent Family Leave can also be taken to care for or bond with a newborn, adopted, or foster child, but must be completed within 12 months of the birth, adoption, or placement. In addition, continuous or intermittent Family Leaves can be taken for absences from work that are required before the actual placement into foster care or adoption of a child.

The duration of a Family Leave is determined by the job reinstatement period available under the Family and Medical Leave Act (FMLA) or a similar state law, provided you meet the eligibility requirements. Continuous family leaves must be more than three consecutive calendar days.

Lincoln Financial is the Wells Fargo leaves and claims administrator for Family Leaves. Lincoln Financial will process all family leave requests, according to Wells Fargo policies, to determine if a leave is eligible for approval.

Manager approval is required for intermittent Family Leaves for bonding with a child. If approved, you may be required to take the intermittent Family Leave in time increments set by your business. Refer to Bonding time for additional information.

If you need to care for a family member who is a military servicemember, see the Servicemember Care Leave page. If you need five consecutive regularly scheduled workdays or one regularly scheduled workweek to care for a family member with a serious health condition, see the Critical Caregiving Leave Policy.

On this page:

- Eligibility
- Your responsibilities
- Medical certification
- Income sources during leave
- Intermittent leave
- Bonding time
- Job reinstatement rights
- Returning to work

Eligibility

To be eligible for Family Leave, you must:

- Be a regular, part-time, or flexible team member in an active working status or on another approved leave of absence (excluding Salary Continuation Leave).
- Meet the eligibility requirement under FMLA or a similar state law, including having been employed by Wells Fargo for at least 12 months within the last seven years and having actually worked at least 1,250 hours in the 12-month period immediately preceding the first day of your leave.

Note: Some states may have different laws with different eligibility criteria for Family Leave. Contact Lincoln Financial at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 5, for additional information. For TDD access for persons with hearing impairments, call 1-800-988-0161.

You may also be eligible for paid sick time to care for your family member. Refer to the Paid Sick or Safe Time page.

Your responsibilities

Taking time away from work for a Family Leave requires you to take certain actions in a timely manner. Taking action in the specified timeframes allows your request to be processed timely and provides your manager the ability to make the necessary staffing arrangements.

You must notify your manager and file for a Family Leave with our leaves and claims administrator as soon as you determine a Family Leave is necessary by calling the leaves and claims administrator at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 5; TDD/TYY: 1-800-988-0161; or filing an online claim at My Lincoln Portal (new users may register with Company Code = WELLS).

Until you receive formal acknowledgment of your Family Leave from Lincoln Financial, you must properly report your absence to your manager as outlined by your line-of-business standards. Taking extended time away from work without an approved leave of absence can result in corrective action for the team member, which may include termination of employment. For additional information, see Corrective Action.

Once an intermittent Family Leave has been approved, notify your manager before the first absence occurs or within a reasonable period of time. You must continue to notify your manager as outlined by your line-of-business standards for each intermittent absence taken. Clearly indicate to your manager that the absence is being taken as an FMLA intermittent absence.

Medical certification

You'll need to provide a medical certification from your family member's health care provider confirming that you are needed to care for a family member's serious health condition. For Family Leaves taken to care for or bond with a newborn, adopted, or foster child, you may be asked to provide a birth certificate or other documentation that confirms the birth, adoption, or placement of the child.

Once the leave has been initiated, you will receive written notice of the required forms from Lincoln Financial to complete the request. All required documentation, including the health care provider certification form, must be completed and returned to Lincoln Financial within 15 calendar days. If you are unable to comply with the 15-day period because of extenuating circumstances, you must notify Lincoln Financial or the leave request and all benefits associated with it will be denied. Falsifying required documentation can result in corrective action, which may include termination of your employment. Unapproved time away from work will be designated as an unapproved leave and can result in corrective action, which may include termination of your employment. For additional information, see Corrective Action.

During the course of your Family Leave, medical recertification of your family member's condition maybe requested as often as every 30 days, unless applicable state or local laws provides otherwise. Generally, if the minimum duration of the medical condition is more than 30 days, Lincoln Financial will wait until the minimum duration expires before requesting recertification. Typically, associated costs related to medical certification or recertification are your responsibility, unless otherwise provided by law.

If you do not comply with all medical recertification requirements, the Family Leave and any benefits associated with it will be denied, and unapproved time away will be designated as an unapproved absence and can result in corrective action, which may include termination of your employment. For additional information, see Corrective Action.

Medical documentation reminder: *All medical documentation shall remain confidential and be maintained by Lincoln Financial. If a manager receives any medical documentation, the manager should contact Lincoln Financial at 1-877-HRWELLS (1-877-479-3557) for instructions on how to forward the documentation to Lincoln Financial appropriately.*

Income sources during leave

Although Family Leaves are unpaid, you may be eligible for one or more of the income sources listed below. Your income sources during your leave period may not exceed 100% of your preleave covered pay. Wells Fargo will coordinate your income sources to make sure that total income does not exceed your preleave base pay or benefits base rate.

The income sources available during a Family Leave are:

- State-specific sources. Some states provide state-administered income benefits for workers on Family Leave.
- A lump-sum payout of accrued unused Paid Time Off (PTO).

If you apply for and are approved for a paid Parental Leave or paid Critical Caregiving Leave, you will receive pay in accordance with the applicable policies; either of those leaves may run concurrent with your Family Leave.

Upon receipt of your request for a Family Leave, Lincoln Financial will open a claim to determine if you are entitled to any state-administered benefits during your leave period. You will receive communications directly from Lincoln Financial on what is required to determine eligibility for any applicable state-administered benefits. Be advised that in some cases you may be approved for a Family Leave and not approved or not eligible for any state-administered income benefit. Separate communications will be sent to you directly to inform you of your leave request status and your income benefit claim status. To find out what state benefits you may be eligible for, contact Lincoln Financial at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 5. For TDD access for persons with hearing impairments, call 1-800-988-0161.

Once eligibility for income benefits is determined by Lincoln Financial, you may request a lump-sum payout of some or all of your accrued unused PTO if your income benefits are below 100% of your base pay. PTO payouts are permitted only one time during the leave period and must be requested through your manager. Managers cannot require you to take a lump-sum payout of your accrued PTO balance during your leave of absence, even if there is a loss of income.

Note: *Eligible team members may use paid sick time during a leave of absence for any of the purposes covered by the applicable law. Refer to Paid Sick or Safe Time for additional information.*

Intermittent leave

If approved for an intermittent Family Leave, you are required to use accrued unused PTO (calculated on the monthly accrual) to cover time away from work, where permitted by law. If you are in a nonexempt position, you must enter PTO to cover all intermittent leave. For example, if you work four 10-hour days and you are out for a full day of intermittent leave, you must enter 10 hours of PTO to cover the time away. If you are in an exempt position, you must take PTO in full- or half-day increments and can charge a maximum of eight hours per day against PTO to cover intermittent leave, even if you work an alternative schedule (e.g., four 10-hour days).

If your business allows time missed on intermittent leave to be made up during the same workweek, then you are not required to use PTO to cover the time away from work. Any missed time is counted against your available FMLA allotment but does not count as an occurrence under the Attendance & Punctuality Policy. Managers have discretion on whether work time may be made up within the same workweek for team members in a nonexempt position.

You may use unaccrued PTO if your business practices allow, but you are not required to do so. Managers cannot require team members to use unaccrued PTO from the current or future calendar year under any circumstances. If no accrued unused PTO is available or the business does not allow for use of unaccrued PTO, then you must take the time as unpaid in accordance with line-of-business guidelines, unless otherwise provided by law.

You will continue to accrue PTO while using intermittent Family Leave as long as you work the required time each month under the PTO accrual policy.

Bonding time

If requesting a Family Leave for the purposes of bonding with a newborn or newly placed child for adoption or foster care, you may also be eligible for a Parental Leave. It is important to remember that while a Parental Leave cannot be taken intermittently, Family Leaves for the purposes of bonding can be taken continuously or intermittently. Manager approval is required for intermittent Family Leaves for bonding with a child. If approved, you may be required to take the intermittent Family Leave in time increments set by your business and you must use accrued PTO to supplement pay during those absences.

In certain situations, team members may be eligible for both a Parental Leave and a Family Leave for the purposes of bonding with a child. Refer to the chart below for more information.

Scenario	May be eligible for additional bonding time under FMLA?	Maximum length of bonding time available under FMLA
Team member does not meet Family Leave eligibility requirements under FMLA	No	None
Team member becomes eligible for a Family Leave under FMLA after the birth of the child, within one year of the child's birth	Yes	Up to 12 weeks, within one year of the child's birth*
Team member exhausts Parental Leave as primary caregiver (16 weeks)	No	None
Team member ends Parental Leave early as primary caregiver	Yes	12 weeks minus Parental Leave, within one year of the child's birth*
Team member exhausts Parental Leave as nonprimary caregiver (4 weeks)	Yes	Up to 8 weeks, within one year of the child's birth*
Team member ends Parental Leave early as nonprimary caregiver	Yes	12 weeks minus Parental Leave taken, within one year of the child's birth*

*The length of bonding time available is determined based on your FMLA eligibility and any FMLA leaves you have previously taken.

Job reinstatement rights

Job reinstatement is available while out on a Family Leave under one or a combination of the following as outlined under the applicable law, as determined by Lincoln Financial:

- **FMLA.** The job reinstatement period is generally up to 12 workweeks in a 12-month period measured forward from the date the first FMLA leave is taken. The length of your Family Leave is limited to the reinstatement period available under FMLA at the start of your Family Leave.
- **State laws.** Some states' laws provide separate job reinstatement rights. Where permissible, the state law will run concurrent with the FMLA job reinstatement period. If the state law outlines separate job reinstatement rights, the job reinstatement period could extend beyond the FMLA protection. Refer to the Compliance Posters page for information pertaining to state specific leave laws, or Contact Lincoln Financial through Team Member Care 1-877-HRWELLS (1-877-479-3557), option 2. For TDD access for persons with hearing impairments, call 1-800-988-0161.

Returning to work

When you're ready to return to work, follow the instructions provided by Lincoln Financial, including contacting your manager to confirm the actual date before you return to work so that he or she can make any arrangements necessary to be ready for your return, update your work status in Staff Management, and restore any applicable system access. Keep your manager informed on any changes in your return to work status.

Job Search Leave

Job Search Leaves are leaves of absence offered by Wells Fargo for a **minimum of 180 calendar days**, to search for another internal position when one of the following occurs:

- You have been released to work from a Medical Leave with medical restrictions that the business is unable to accommodate, or you otherwise have medical restrictions that cannot be accommodated in your current role, and you were not offered an alternative position through the job reassignment process.⁷

⁷ For team members returning from all other leaves excluding Personal Leaves: The team member will be placed on a Job Search Leave and may also be eligible for a benefit under the Salary Continuation Pay Plan.

- You have been released to work from a Medical Leave, your position is no longer available, and you were not offered an alternative position through the job reassignment process.
- You have been released to work from another approved leave of absence (excluding Personal Leave), and your position is no longer available.
- Your previous position has been moved to a different location and you desire time to search for another internal position.
- You had a change in your work schedule and, after being given a period of time (which may vary by position) to adjust to the new schedule, you are unable to accommodate the schedule change.
- You are not eligible for a position requiring additional successful background checks — for example, a Secure and Fair Enforcement for Mortgage Licensing Act (SAFE)-registered position or a Loan Originator position.
- You were unsuccessful in obtaining the required license for a position.
- You are unable to successfully complete a training program.

Wells Fargo's Leaves Operations is the leaves administrator for Job Search Leaves. Leaves Operations will process all job search leave requests to determine if a leave is eligible for approval.

On this page:

- Eligibility
- Your responsibilities
- Income sources during leave
- Job reinstatement rights

Eligibility

To be eligible for a Job Search Leave, you must:

- Be a regular, part-time, or flexible team member in active working status or on any approved leave of absence (excluding Salary Continuation Leave or Personal Leave)
- Receive approval from your manager, an Accommodations Management consultant, or HR professional

Your responsibilities

Job Search Leaves must be initiated by your manager, Human Resources, or their designee by calling Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 1, TDD/TTY 1-800-988-0161, or by completing the Team Member Care eForm.

Job Search Leaves can end before the 180-day minimum period has expired if you secure a new position, elect to participate in the Wells Fargo & Company Salary Continuation Pay Plan and you qualify for pay benefits that are less than 180 days' pay, or your employment with Wells Fargo terminates for any reason. If you secure an internal or external position within the Job Search Leave period, you are responsible for informing your manager or the Leave Operations representative who initiated your leave as soon as you accept the new position.

Income sources during leave

Although Job Search Leaves are unpaid, you may request a lump-sum payout of some or all of your accrued unused PTO. PTO payouts are permitted only one time during the leave period and must be requested through your manager. Managers cannot require you to take a lump-sum payout of your accrued PTO balance during your leave of absence even if there is a loss of income.

Note: *In locations where team member receive paid sick time (PST), the PST balance is not eligible for lump-sum payout.*

Job reinstatement rights

Job Search Leaves do not have job reinstatement protection. If the Job Search Leave expires and you have not secured a new position, your employment will be terminated. Team members who are placed on a Job Search Leave after Wells Fargo's unsuccessful efforts to reassign to a vacant position, upon return from a Medical Leave or because their medical limitations could not be accommodated in their preleave position may qualify for extensions of Job Search Leave or benefits under the Salary Continuation Pay Plan.

Medical Leave

Medical Leaves are leaves of absence offered by Wells Fargo on a continuous or intermittent basis and can be taken if you have a serious health condition (including a pregnancy-related condition) that is preventing you from performing one or more of the essential functions of your job. For leaves that do not qualify for FMLA or similar state or local laws, time away from work must exceed seven consecutive calendar days to qualify as a continuous Medical Leave. Medical Leave that qualifies as FMLA or leave under a similar state or local law may be taken on a continuous or intermittent basis. Intermittent leave is leave taken in separate periods of time because of a single illness or injury, and can be taken in increments less than seven consecutive calendar days. Job reinstatement rights are available for up to 12 work weeks if you are eligible under the Family and Medical Leave Act (FMLA). Refer to Job Reinstatement Rights for additional information.

The length of a Medical Leave is subject to the 24-month Extended Absence policy.

Lincoln Financial is the Wells Fargo leaves and claims administrator for Medical Leaves. Lincoln Financial will process all medical leave requests, according to Wells Fargo policies, to determine if eligible for approval.

If you experience a work-related injury or illness preventing you from performing your job, refer to the Workers' Compensation Leave page for additional information.

On this Page:

- Eligibility
- Your responsibilities
- Medical certification
- Income sources during leave

- STD waiting period
- Intermittent leave
- Job reinstatement rights
- Returning to work

Eligibility

To be eligible for a Medical Leave, you must:

Be a regular, part-time, or flexible team member in active working status or on any approved leave of absence (excluding a Salary Continuation Leave). Flexible team members must meet the eligibility requirements of FMLA (see Family & Medical Leave Act) or applicable state law to be eligible for a Medical Leave.

Have your health care provider certify that you have a serious health condition.

If you have questions about your eligibility, contact Lincoln Financial at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 5. For TDD access for persons with hearing impairments, call 1-800-988-0161.

Your responsibilities

Taking time away from work for a Medical Leave requires you to take certain actions in a timely manner. Taking action in the specified timeframes allows your request to be processed timely and provides your manager the ability to make the necessary staffing arrangements.

You (or your representative) must notify your manager and file for a Medical Leave with our leaves and claims administrator as soon as you determine a Medical Leave is necessary by calling the leaves and claims administrator at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 5; TDD/TTY: 1-800-988-0161; or filing an online claim at My Lincoln Portal (new users register with Company Code = WELLS).

Until you receive formal acknowledgment of your Medical Leave from Lincoln Financial, you must properly report your absence to your manager every day, as outlined by your line-of-business standards. Team members must use accrued unused Paid Time Off (PTO) — or paid sick time (PST) where available — to cover the first five days of their Medical Leave. If your leave request or your short-term disability (STD) claim is not approved, PTO used for this five-day period will not be credited back to your annual PTO allotment. If accrued PTO is not available and your business unit has placed restrictions on the use of unaccrued PTO, then some or all of the time away will be unpaid. Taking extended time away from work without an approved leave of absence can result in corrective action for the team member, which may include termination of employment. For additional information, see Corrective Action.

Medical certification

You must provide timely and appropriate medical documentation that certifies that you are medically unable to work in order for your medical leave to be approved. Once the leave has been initiated, you will receive written notice of the required forms from Lincoln Financial to complete the request. All required documentation, including the health care provider

certification form, must be completed and returned to Lincoln Financial within 15 calendar days. If you are unable to comply with the 15-day period because of extenuating circumstances, you must notify Lincoln Financial or the leave request and all benefits associated with it will be denied. Falsifying required documentation can result in corrective action, which may include termination of your employment. Unapproved time away from work will be designated as an unapproved leave and can result in corrective action, which may include termination of your employment. For additional information, see Corrective Action.

Note: *If you apply for benefits under Wells Fargo's Short-Term Disability (STD) or Long-Term Disability (LTD) Plans, provide timely medical information to Lincoln Financial in support of your benefits claim, and are approved for the STD or LTD benefits, the same medical documentation will be used by Lincoln Financial to approve your Medical Leave. If you are not approved for STD or LTD benefits based on the medical information you provided, then you will be required to have your health care provider complete a separate health care provider certification form to determine if your condition meets the serious health condition criteria for an unpaid Medical Leave. This step helps you preserve approved Medical Leave status while you continue to pursue your STD or LTD benefits claim through any required appeals process.*

During the course of your leave, medical recertification may be requested as often as every 30 days, unless state or local law provides otherwise. Generally, if the minimum duration of the medical condition is more than 30 days, Lincoln Financial will wait until the minimum duration expires before requesting recertification. Typically, associated costs related to medical certification or recertification are your responsibility, unless otherwise required by law.

If you don't comply with all medical recertification requirements, your Medical Leave and any benefits associated with it will be denied, and unapproved time away will be designated as an unapproved absence and can result in corrective action, which may include termination of your employment. For additional information, see Corrective Action.

Medical documentation reminder: *All medical documentation shall remain confidential and be maintained by Lincoln Financial. If a manager receives any medical documentation, the manager should contact Lincoln Financial at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 5, for instructions on how to forward the documentation to Lincoln Financial appropriately.*

Income sources during leave

Although Medical Leaves are unpaid, you may be eligible for one or more of the income sources listed below after any applicable waiting period is satisfied and all requirements are met. Your total income sources during your leave period may not exceed 100% of your predisability covered pay. Your covered pay is determined by the job classification code (job class code) for your position as indicated in the Wells Fargo HR system of record. Wells Fargo will coordinate your income sources to make sure that total income does not exceed your preleave base pay or benefits base rate.

The income sources available during a Medical Leave are:

- Wells Fargo's STD Plan.
- Wells Fargo's LTD Plan.
- State Disability Insurance, if available in your state.
- Lump-sum payout of accrued unused PTO.

Upon receipt of your medical leave request, Lincoln Financial will perform a consultation with you to assess if a disability claim should be opened to evaluate your eligibility for STD, LTD, or state disability insurance income benefits during your leave period. You will receive communications directly from Lincoln Financial on what is required to determine your eligibility for STD, LTD, or state disability insurance benefits. Be advised that in some cases, you may be approved for a Medical Leave and not approved for STD, LTD, or state disability insurance benefits during your leave period. Separate communications will be sent to you directly from Lincoln Financial to inform you of your leave request status and your disability claim status.

Once eligibility for income benefits is determined by Lincoln Financial, you may request a lump-sum payout of some or all of your accrued unused PTO if your income benefits are below 100% — in other words, if you experience a loss of income — of your predisability covered pay. PTO payouts are optional and permitted only one time during the leave period and must be requested through your manager. Managers cannot require you to take a lump-sum payout of your accrued PTO balance during your leave of absence if there is a loss of income.

Note: *Eligible team members may use PST during a leave of absence for any of the purposes covered by the applicable law. Refer to Paid Sick or Safe Time for additional information.*

Refer to your *Benefits Book* for information on the STD and LTD Plans.

STD waiting period

To be eligible for STD, you must complete a five-business-day waiting period before your STD income benefits become payable. During the STD waiting period, you are required to use accrued unused PTO (or PST if applicable), if available. If accrued PTO is not available and your business unit has placed restrictions on the use of unaccrued PTO, then some or all of the STD waiting period must be unpaid. In lines of businesses that allow use of unaccrued PTO, PTO from a future calendar year cannot be used to cover any portion of the STD waiting period.

Observed, personal, and floating holidays can be used during the STD waiting period, provided they are recorded in Time Tracker and approved by your manager as indicated in Time Tracker before the scheduled day.

Refer to the *Benefits Book* on Teamworks for information about STD, LTD, and the state disability insurance plans available.

Intermittent leave

If approved for an intermittent Medical Leave, you are required to use accrued unused PTO (calculated on the monthly accrual) to cover time away from work, where permitted by law. If you are in a nonexempt position, you must enter PTO to cover

all intermittent leave. For example, if you work four 10-hour days and you are out for a full day of intermittent leave, you must enter 10 hours of PTO to cover the time away. If you are in an exempt position, you must take PTO in full- or half-day increments and can charge a maximum of eight hours per day against PTO to cover intermittent leave, even if you work an alternative schedule (for example, four 10-hour days).

If your business allows time missed on intermittent leave to be made up during the same workweek, then you are not required to use PTO to cover the time away from work. Any missed time is counted against your available FMLA allotment but does not count as an occurrence under the Attendance & Punctuality policy. Managers have discretion on whether work time may be made up within the same workweek for team members in a nonexempt position

You may use unaccrued PTO if your business practices allow, but you are not required to do so. Managers cannot require team members to use unaccrued PTO from the current or future calendar year under any circumstances. If no accrued unused PTO is available or the business does not allow for use of unaccrued PTO, then you must take the time as unpaid in accordance with line-of-business guidelines, unless otherwise provided by law.

You will continue to accrue PTO while using intermittent Medical Leave as long as you work the required time each month under the PTO accrual policy.

Once an intermittent Medical Leave has been approved, notify your manager of late arrival plans or unscheduled absences at least an hour before the start of your regularly schedule shift, before the absence occurs, or within a reasonable period of time (generally within one hour) of the start of your regularly scheduled reporting time. Additionally, plans to take intermittent leave by early departure due to illness should be communicated to your manager as soon as practicable. Medical appointments are to be scheduled in advance and at times deemed to be the least disruptive to your business unit unless scheduled due to an immediate medical need. You must continue to notify your manager as outlined by your business standards for each intermittent absence taken. Clearly indicate to your manager that the absence, late arrival, or early departure is being taken as an approved intermittent absence.

Job reinstatement rights

Job reinstatement is available while out on a Medical Leave under one or a combination of the following as outlined under the applicable law, as determined by Lincoln Financial:

- **FMLA.** The job reinstatement period is generally up to 12 workweeks in a 12-month period measured forward from the date the first FMLA leave is taken. If you meet the FMLA eligibility requirements, FMLA job reinstatement applies to your Medical Leave for the period still available under FMLA. For example, if you used four weeks of FMLA during a Family Leave taken two months before your Medical Leave, then the remaining FMLA will be applied to your Medical Leave for job reinstatement protection during the first eight weeks of your Medical Leave.

- **State laws.** Some states' laws provide separate job reinstatement rights and benefits for medical conditions, including pregnancy-related conditions. Where permissible, the state law will run concurrent with the FMLA job reinstatement period. If the state law outlines separate job reinstatement rights, the job reinstatement period could extend beyond the FMLA protection.
- **American with Disabilities Act (ADA).** If you are not eligible for FMLA or separate job reinstatement rights under applicable state law, or if FMLA and state leave protection has expired, job reinstatement protection may be extended under the ADA. Your business group will evaluate how long it can provide you with reinstatement protection. The length of ADA reinstatement period will vary and the determination takes several factors into account, such as how long you will be out and your department's business needs. Keep your manager informed on when your health care provider is planning to release you to return to work. Periodically, your manager may need to contact you to engage in an interactive dialogue about your anticipated return to work date and ask whether or not you and your health care provider can recommend accommodations that will allow you to return to work earlier, with or without accommodations. You are expected to participate in these discussions with your manager. You are expected to speak with your health care provider about potential accommodation needs you may need upon return to work and keep Lincoln Financial and your manager informed of those proposed restrictions or accommodations.

Returning to work

When returning to work from a Medical Leave, you must complete the following steps:

1. Confirm with your health care provider the anticipated date you will be released to return to work.
2. Submit the return to work documentation, including the effective date of the return and any medical restrictions, directly to Lincoln Financial.
3. Immediately follow up with your manager to make him or her aware of the effective date of your return to work and any medical restrictions so your manager can make arrangements for your return and determine whether and how to accommodate restrictions. Your manager must update your work status in Staff Management and restore any applicable system access.
4. Keep your manager informed on any changes in your return to work status.

If you are released to return to work with medical restrictions requiring a work accommodation, begin discussing any required medical restrictions with your manager — do not provide any medical documentation to your manager. Medical documentation or release forms outlining restrictions must be provided to Lincoln Financial, and if necessary provided to Accommodation Management. Discussions with your manager about any medical restrictions should begin before your return to work so that your manager can determine whether

the accommodation request can be met without a business hardship. If an accommodation solution does not seem feasible or additional assistance is needed, you may be eligible for the job reassignment process. Contact Accommodations Management at 1-877-HRWELLS (1-877-479-3557). For TDD access for persons with hearing impairments, call 1-800-988-0161.

If you are released to return to work without medical restrictions and your position has been eliminated or replaced and you have not been offered an alternative position through the job reassignment process, you will be placed on a Job Search Leave. You may be eligible for benefits under the Salary Continuation Pay Plan (PDF). Contact Leaves Operations at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 1, for additional information. For TDD access for persons with hearing impairments, call 1-800-988-0161.

Military Exigency Leave

Military Exigency Leaves are leaves of absence offered by Wells Fargo on a continuous or intermittent basis for a period of **up to 12 workweeks** for several qualifying reasons as described in the Family and Medical Leave Act (FMLA). The length of Military Exigency Leave is for the duration of job reinstatement available under FMLA.

Military Exigency Leaves can only be taken if your spouse or domestic partner (regardless of gender), son, daughter, or parent is a member of the Armed Forces, including the National Guard or Reserves ("military member"), and is on covered active duty or called to covered active duty status. "Son" and "daughter" are defined as your biological, adopted, or foster child; stepchild; legal ward; or child for whom you stand *in loco parentis* and are of any age.

Military Exigency Leaves can be taken for one or more of the following reasons:

- **Short-notice deployment.**
 - To address any issues arising from the fact that your military member is notified of an impending call or order to covered active duty seven or less calendar days before the date of deployment.
- **Military events and related activities.**
 - To attend any official ceremony, program, or event sponsored by the military that is related to the covered active duty or call to covered active duty status of your military member.
 - To attend family support or assistance programs and informational briefings sponsored or promoted by the military, military service organizations, or the American Red Cross that are related to covered active duty or call to covered active duty status of your military member.
- **Child care and school activities.**
 - To arrange for alternative child care for your military member's "child" when the covered active duty or call to covered active duty status of your military member necessitates a change in the existing child care arrangement.

Note: “Child” is defined as biological, adopted, or foster child, a stepchild, a legal ward of a covered military member, or a child for whom your military member stands in loco parentis who is either under age 18 or age 18 or older and incapable of self-care because of a mental or physical disability at the time that FMLA leave is to commence.

- To provide child care for your military member’s child on an urgent, immediate-need basis (but not on a routine, regular, or everyday basis) when the need to provide such care arises from the covered active duty or call to covered active duty status of your military member.
- To enroll or transfer to a new school or day care facility your military member’s child when enrollment or transfer is necessitated by the active duty or call to active duty status of your military member.
- To attend meetings with staff at a school or day care facility, such as meetings with school officials about disciplinary measures, parent-teacher conferences, or meetings with school counselors for your military member’s child when such meetings are necessary due to circumstances arising from the covered active duty or call to covered active duty status of your military member.

- **Parental care.**

- To arrange for alternative care or to provide care on an urgent, immediate basis for your military member’s parent when the parent is incapable of self-care and the covered active duty or call to covered active duty status of the military member necessitates a change in the existing care arrangement for the parent.
- To admit or transfer your military member’s parent to a care facility as well as attend meetings with the staff of the care facility (not including routine or regular meetings) when necessitated by the covered active duty or call to covered active duty status of the military member.

- **Financial and legal arrangements.**

- To make or update financial or legal arrangements to address your military member’s absence while on covered active duty or call to covered active duty status, such as preparing and executing financial and health care powers of attorney, transferring bank account signature authority, enrolling in the Defense Enrollment Eligibility Reporting System (DEERS), obtaining military identification cards, or preparing or updating a will or living trust.
- To act as your military member’s representative before a federal, state, or local agency for obtaining, arranging, or appealing military service benefits while the military member is on covered active duty or call to covered active duty status and for a period of 90 days following the termination of the military member’s covered active duty status.

- **Counseling.**

- To attend counseling provided by someone other than a health care provider for yourself, your military member, or the military member’s child, provided that the need for counseling arises from the covered active duty or call to covered active duty status of your military member.

- **Rest and recuperation.**

- To spend up to 15 days with your military member who is on short-term, temporary, rest and recuperation leave during the period of deployment beginning on the date the military member begins leave.

- **Post-deployment activities.**

- To attend arrival ceremonies, reintegration briefings and events, and any other official ceremony or program sponsored by the military for a period of 90 days following the termination of your military member’s covered active duty status.
- To address issues arising from the death of your military member while on covered active duty status, such as meeting and recovering the body and making funeral arrangements.

Lincoln Financial is the Wells Fargo leaves and claims administrator for Military Exigency Leaves. Lincoln Financial will process all military exigency leave requests, according to Wells Fargo policies, to determine if a leave is eligible for approval.

On this page:

- Eligibility
- Your responsibilities
- Income sources during leave
- Job reinstatement rights
- Returning to work

Eligibility

To be eligible for a Military Exigency Leave, you must:

- Be a regular, part-time, or flexible team member in active working status or on an approved leave of absence (excluding a Salary Continuation Leave).
- Meet the eligibility requirement under FMLA or a similar state law, including having been employed by Wells Fargo for at least 12 months within the last seven years and having actually worked at least 1,250 hours in the 12-month period immediately preceding the first day of your leave.

Note: Some states may have different laws with different eligibility criteria for Military Exigency Leave. Contact Lincoln Financial through Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 5, for additional information. For TDD access for persons with hearing impairments, call 1-800-988-0161.

Your responsibilities

Taking time away from work for a Military Exigency Leave requires you to take certain actions in a timely manner. Taking action in the specified timeframes allows your request to be processed timely and provides your manager the ability to make the necessary staffing arrangements.

You must notify your manager and file for a Military Exigency Leave with our leaves and claims administrator as soon as you determine a Military Exigency Leave is necessary by calling the leaves and claims administrator at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 5; TDD/TYY: 1-800-988-0161; or filing an online claim at My Lincoln Portal (new users register with Company Code = WELLS).

You will be required to provide one of the following documentations, as requested by Lincoln Financial:

- Your family member's Active Military Duty Orders
- Your family member's orders for Rest and Recuperation Leave
- Other documentation issued by the military indicating that your family member is on covered active duty, the dates of the leave, and the certification of your qualifying reason for taking the leave as appropriate

If the required documentation is not provided, your Military Exigency Leave and any benefits associated with it will be denied, and unapproved time away will be designated as an unapproved absence and can result in corrective action, which may include termination of your employment. Falsifying required documentation can result in corrective action, which may include termination of your employment. For additional information, see Corrective Action.

Until you receive formal acknowledgment of your Military Exigency Leave from Lincoln Financial, you must properly report your absence to your manager as outlined by your business standards. Taking extended time away from work without an approved leave of absence can result in corrective action for the team member, which may include termination of employment. For additional information, see Corrective Action. Once an intermittent Military Exigency Leave has been approved, notify your manager before the first absence occurs or within a reasonable period of time. You must continue to notify your manager as outlined by your line-of-business standards for each intermittent absence taken. Clearly indicate to your manager that the absence is being taken as an FMLA intermittent absence.

Income sources during leave

Although Military Exigency Leaves are unpaid, you may be eligible for one or more of the income sources listed below. Your total income sources during your leave period may not exceed 100% of your preleave covered pay. Wells Fargo will coordinate your income sources to make sure that total income does not exceed your preleave base pay or benefits base rate.

The income sources available during Military Exigency Leaves are:

- State-specific sources. Some states provide state-administered income benefits for workers on Family Leave — your reason for Military Exigency Leave may also qualify for these state-administered benefits.
- Lump-sum payout of accrued unused Paid Time Off (PTO).
- State or local ordinance-specific paid sick time if your reason for Military Exigency Leave includes care for your family member. Refer to the Paid Sick or Safe Time policy.

Upon receipt of your request for a Military Exigency Leave, Lincoln Financial will open a claim to determine if you are entitled to any state-administered benefits during your leave period. You will receive communications directly from Lincoln Financial on what is required to determine eligibility for any applicable state administered benefits. Be advised that in some cases you may be approved for a Military Exigency Leave and not approved or not eligible for any state-administered income benefit. Separate communications will be sent to you directly to inform you of your leave request status and income benefit claim status. To find out what state benefits you may be eligible for, contact Lincoln Financial through Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 5. For TDD access for persons with hearing impairments, call 1-800-988-0161.

Once eligibility for income benefits is analyzed and determined by Lincoln Financial, you are allowed to request a lump-sum payout of some or all of your accrued unused PTO if your income benefits are below 100% of your base pay. PTO payouts are permitted only one time during the leave period and must be requested through your manager. Managers cannot require you to take a lump-sum payout of your accrued PTO balance during your leave of absence, even if there is a loss of income.

Note: *Eligible team members may use paid sick time during a leave of absence for any of the purposes covered by the applicable law. Refer to Paid Sick or Safe Time for additional information.*

Job reinstatement rights

Job reinstatement is available while out on a Military Exigency Leave under one or a combination of the following protections as outlined under the applicable law, as determined by Lincoln Financial:

- **FMLA.** The job reinstatement period is generally up to 12 workweeks in a 12-month period measured forward from the date the first FMLA leave is taken. If you meet the FMLA eligibility requirements, FMLA job reinstatement applies to your Military Exigency Leave for the period still available under FMLA. For example, if you used four weeks of FMLA during a Family Leave for bonding taken two months before your Military Exigency Leave, then the remaining FMLA will be applied to your Military Exigency Leave for eight weeks of job reinstatement protection.

- **State laws.** Some states' laws provide separate job reinstatement rights. Where permissible, the state law will run concurrent with the FMLA job reinstatement period. If the state law outlines separate job reinstatement rights, the job reinstatement period could extend beyond the FMLA protection. Refer to the Compliance Posters page for information pertaining to state specific leave laws or contact Lincoln Financial through Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 5. For TDD access for persons with hearing impairments, call 1-800-988-0161.

Returning to work

When you're ready to return to work, follow the instructions provided by Lincoln Financial, including contacting your manager to confirm the actual date before you return to work so that he or she can make any arrangements necessary to be ready for your return, update your work status in Staff Management, and restore any applicable system access. Keep your manager informed on any changes in your return to work status.

Military Leave

Military Leaves are leaves of absence offered by Wells Fargo for a period of **31 or more consecutive days up to five years** (except for active duty service that is exempt as designated by the Department of Labor) if you are:

- Called to active duty
- Enlisted or inducted into the uniformed services
- Dispatched to assist in designated natural disasters as a federal emergency worker
- Participating in a Reserve Officers' Training Corps (ROTC) program

Lincoln Financial is the Wells Fargo leaves and claims administrator for Military Leaves. Lincoln Financial will process all Military Leave requests, according to Wells Fargo policies, to determine if a leave is eligible for approval.

Refer to Military Duty for team members needing to take less than 31 days away from work for annual reserve training.

In this section:

- Eligibility
- Your responsibilities
- Income sources during leave
- Job reinstatement rights
- Returning to work

Eligibility

To be eligible for a Military Leave you must be a regular, part-time, or flexible team member in active working status or on an approved leave of absence

If you have questions about your eligibility, contact Lincoln Financial through Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2. For TDD access for persons with hearing impairments, call 1-800-988-0161.

Your responsibilities

Taking time away from work for a Military Leave requires you to take certain actions in a timely manner. Taking action in the specified timeframes allows your request to be processed timely and provides your manager the ability to make the necessary staffing arrangements.

As soon as you receive military notification of active duty service, you (or your representative) must notify your manager and file for a Military Leave with our leaves and claims administrator as soon as you determine a Military Leave is necessary by calling the leaves and claims administrator at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 5; TDD/TYY: 1-800-988-0161; or filing an online claim at My Lincoln Portal (new users may register with Company Code = WELLS). If the requested documentation is not provided, your Military Leave requests will still be approved but the military pay benefit associated with the request will be denied and the leave will be unpaid. If you do not provide the requested documentation when the leave request is initiated, Lincoln Financial will continue to attempt collection of the requested documentation during your leave period. Falsifying required documentation can result in corrective action, which may include termination of your employment. For additional information, see Corrective Action.

If you are unable to initiate your own Military Leave because of the nature of your active duty service, you will need to coordinate with your manager to do so on your behalf.

Income sources during leave

Wells Fargo provides regular pay (or benefits base for team members in job class codes 1 and 5) for the initial 30-day period of an approved Military Leave followed by 23 months of supplemental pay during the Military Leave. Wells Fargo requires you to submit your military orders or other documentation supporting the need for Military Leave to Lincoln Financial to receive the regular pay and supplemental pay. To qualify for 30 days of regular pay for any subsequent periods of Military Leave, you must return to work for a period of 365 calendar days measured from your return to work date following the last day of the previous Military Leave.

You are also required to submit a current copy of your military Leaves and Earnings Statements (LES) at the beginning of your leave period to determine your military pay grade status for the 23 months of supplemental pay. The LES must identify your name and either contain the period of time that the military pay covers or the designated pay period.

In addition to the income benefit provided by Wells Fargo, you are also allowed to request a lump-sum payout of some or all of your accrued unused Paid Time Off (PTO) if you are below 100% of your base pay. PTO payouts are permitted only one time during the leave period and must be requested through your manager. Managers cannot require you to take a lump-sum payout of your accrued PTO balance during your leave of absence if there is a loss of income.

Note: *Eligible team members may use paid sick time during a leave of absence for any of the purposes covered by the applicable law. Refer to Paid Sick or Safe Time for additional information.*

Job reinstatement rights

Job reinstatement is available while out on a Military Leave for up to five years as defined by the Uniform Service Employment and Reemployment Rights Act (USERRA). Job reinstatement protection may be extended beyond the five years for reasons including but not limited to:

- Initial enlistment lasting more than five years
- Periods of National Guard and Reserve duty during times of national emergency or war
- Involuntary extensions and recalls during a time of national emergency

Your right to job reinstatement will immediately terminate if you:

- Separate from military service because of any reason besides honorable conditions — for example, a dishonorable or bad conduct discharge
- Are a commissioned officer and are dismissed because of a situation involving a court martial or by order of the President in time of war
- Are a commissioned officer and are dropped from the role because of absence without authority for more than three months or are imprisoned by a civilian court

If one of these events occurs, your employment with Wells Fargo will terminate immediately upon Wells Fargo’s notice of the event.

Some state laws also provide job reinstatement rights and benefits for time away from work to perform military duty.

If you have questions about federal and state job reinstatement rights, contact Lincoln Financial through Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2. For TDD access for persons with hearing impairments, call 1-800-988-0161.

Returning to work

Team member responsibilities

When returning to work from a Military Leave, you must report back to work within the timeframe provided under federal or state military notification requirements, as applicable, following your release from military service, as long as additional time is not necessary for recuperation from a uniformed services-related injury or illness. The time period between your last day of military service and the date you return to work will be unpaid. Team members should contact their manager if they would prefer to use PTO or another type of time away. Refer to the table below for the specific job reinstatement requirements based on your length of military service.

Length of service	Notification requirements
30 days or less	Notify your manager at the beginning of the first regularly scheduled workday — that is, eight hours following release from military service.
31 – 180 days	Notify your manager no later than 14 days following completion of military service.
181 days or more	Notify your manager no later than 90 days after completion of military service.

When returning to work from a Military Leave, you must complete the following steps:

1. Contact Lincoln Financial to confirm the anticipated date you will return to work so that your manager can make any arrangements necessary to be ready for your return, including updating your work status in Staff Management and restoring any applicable system access.
2. Notify your manager of your return to work date as indicated above, based on your length of military service, and any medical restrictions so that he or she can make arrangements for your return.
3. Keep your manager informed on any changes in your return to work status.

If you have incurred an injury or illness related to uniformed services during your service and require accommodations related to a medical condition, contact Accommodations Management for assistance through Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2. For TDD access for persons with hearing impairments, call 1-800-988-0161.

If you are released to return to work without medical restrictions and your position has been eliminated or replaced and a new position has not been offered, you will be placed on a Job Search Leave. You may be eligible for a benefit under the Salary Continuation Pay Plan (PDF).

Manager responsibilities

Team members returning from a Military Leave are required to return to the same position or a position equivalent to the position they would have been in had they not taken a Military Leave, with the same seniority, status, pay, and benefits, as long as the team member is qualified for the position or can become qualified after reasonable efforts by Wells Fargo.

Managers are also required to make reasonable efforts to provide team members with any necessary training, information, or resources needed to return to their position. If there is not an established training program, managers are responsible for developing a training program that can occur in a variety of forms, including:

- Job shadowing
- Continuing education
- Partnering with another team member for a period of time

If a team member is returning to work with medical restrictions, a line-of-business manager is responsible for contacting Accommodations Management for assistance through Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2. For TDD access for persons with hearing impairments, call 1-800-988-0161 if the team member is unable to do so.

If upon return from Military Leave the team member's position is no longer available, his or her manager or another appropriate line-of-business representative must complete the Employee Relations eForm to request a consultation for further guidance.

Parental Leave

Parental Leaves are leaves of absences offered to eligible team members who are becoming parents or expanding their families and need continuous paid time away from work to bond with their new child and adjust to their new family situation. Subject to the eligibility requirements, you may use Parental Leave to take paid time away from work for the birth or the adoption of a child under 18 years old.

The length of a Parental Leave depends on whether your time away is as the child's primary or nonprimary caregiver as follows:

- Up to 16 weeks for the parent who certifies as the primary caregiver.⁸
- Up to four weeks for the parent who certifies as the nonprimary caregiver.

Multiple births or adoptions (for example, the birth or adoption of twins) does not change the eligibility or conditions of the Parental Leave, including the length of the leave.⁹

Caregiver designation

Team members requesting a Parental Leave must designate if they are the primary or non-primary caregiver of the child by completing the Certificate of Care for Parental Leave form that is provided by the leaves and claims administrator, Lincoln Financial. Only one parent may certify as the primary caregiver, and the designation cannot be changed after certification. The caregiver designation is at the discretion of the parents and must be made at the start of the leave by completing and submitting the Certificate of Care for Parental Leave form to Lincoln Financial. Under multiple birth or adoptions scenarios where both parents are Wells Fargo team members, only one parent can be designated as the primary caregiver. Changes to caregiver designation are not permitted after the Certificate Care for Parental Leave Form has been submitted to Lincoln Financial.

Start of leave

- The primary caregiver must begin the leave at the birth of the child or placement of the adoptive child in the home.
- The nonprimary caregiver must begin the leave within six months of the birth of the child or placement of the adoptive child at the home.

In cases of adoption, child placement is when there is an enforceable legal obligation for total or partial financial support of the child in anticipation of finalizing the adoption of the child.

If you certify as the primary caregiver, the start of your 16 weeks of Parental Leave begins at the date of birth or adoption placement of the child in the home.¹⁰ If you fail to begin your leave at the birth or placement of the child, you will only be entitled to the remaining balance as of the date you began your Parental Leave. You will not be permitted to add any of the delayed time to the balance of your leave. For example, if you continue to work two weeks after your child is born or placed in the home, the duration of your Parental Leave will be 14 weeks. Additionally, if you choose to return to work before exhausting your available Parental Leave, you will not be able to use the remaining balance of the approved leave period.

⁸ Primary caregiver is defined as the person who certifies with the leaves and claims administrator as the individual who has primary responsibility for the care of the child at the time of birth or placement and throughout the leave period.

⁹ Team members in locations with more generous parental leave laws will be eligible to take those leaves in accordance with those laws. Such leaves run concurrent with Parental Leave, unless state or local law provide otherwise.

¹⁰ If an adoptive parent is required to travel or attend court proceedings before the placement of the child in the home, he or she may request to take a Family and Medical Leave Act (FMLA)-protected unpaid Family Leave under Wells Fargo's policy. Once the child is placed in the home, the team member must contact Lincoln Financial to request to transition to a Parental Leave.

In situations where your child's medical release post birth is delayed because of admittance to a Neonatal Intensive Care Unit (NICU), the start of the baby bonding portion of parental leave can be deferred until the discharge of your child from the hospital or NICU. Please note that Parental Leave is automatically applied during the six to eight week postpartum short-term disability (STD) period and runs concurrently with STD. Only the baby bonding portion of time may be deferred, as it is the portion that does not run concurrently with STD. For example, if your baby was born on July 9 and must remain in the hospital for 10 weeks (September 17) and your STD ends on August 20 (six weeks after delivery), then you can defer the baby bonding portion of Parental Leave until your baby is released from the NICU (September 17). Parental Leave deferment is only allowed once in this instance. You are not required to defer.

Lincoln Financial is Wells Fargo's leaves and claims administrator for Parental Leaves. Lincoln Financial will process all parental leave requests, according to Wells Fargo's policies, to determine if a leave is eligible for approval.

You are not required to take a Parental Leave and this policy does not interfere with your rights under any federal, state, or local leave law. You may be eligible for additional time away as an unpaid leave of absence under FMLA or state protection, or paid time away under an applicable state or local law. Refer to the Family Leave and the Paid Sick or Safe Time pages for more information or contact Lincoln Financial at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 5.

Note: *Parental Leave cannot be taken intermittently pursuant to this policy. However, you may be eligible for additional bonding time at the conclusion of your Parental Leave under FMLA or an applicable Paid Sick Time law. Refer to the Family Leave and Paid Sick or Safe Time pages of the Team Member Handbook.*

On this section:

- Eligibility
- Your responsibilities
- Income sources during leave
- Use of PTO during a Parental Leave
- Job reinstatement rights
- Returning to work

Eligibility

To be eligible for Parental Leave, you must:

- Be a regular or part-time team member, regardless of gender, in an active working status or on an approved Medical Leave or Family Leave on the start date of the requested Parental Leave.
- Be a birth parent, spouse, or partner — as defined in Wells Fargo *Benefits Book* (PDF, 3.58MB) — of a birth parent or adoptive parent.
- Be continuously employed by Wells Fargo for 12 full consecutive months before the start date of the leave based on your most recent hire date in PeopleSoft.
 - If you are hired through an acquisition that recognizes service credit, leave eligibility will be based on the corporate hire date in PeopleSoft reflected at the start of your leave.
 - If you are rehired with continuous service credit, leave eligibility will be based on the corporate hire date in PeopleSoft reflected at the start of your leave.

The following situations are not eligible for a Parental Leave:

- Surrogate mothers who do not maintain parental rights¹¹
- Biological parents (mother or father) with no parental rights or where the child is no longer in the parent's custody (e.g., the child is placed for adoption)
- Sperm donors
- Miscarriage or death of a child¹²
- Being named as a guardian
- Entering into a foster parent arrangement¹³
- Adopting a spouse's or partner's child
- Those who are receiving long-term disability (LTD) benefits, unless the LTD is related to or an extension of the pregnancy-related short-term disability (STD) claim
- Team members on a leave must return to an active work status to be eligible to request a Parental leave.¹⁴

Your responsibilities

Taking time away from work for a Parental Leave requires you to take certain actions in a timely manner. Taking action in the specified timeframes allows your request to be processed timely and provides your manager the ability to make the necessary staffing arrangements.

¹¹ Under Wells Fargo's Benefit Plan, surrogate mothers are generally eligible for certified Medical Leave and STD benefits.

¹² Team members may be eligible for bereavement time away. Refer to the Wells Fargo *Team Member Handbook* for details.

¹³ In cases where team members are entering into a foster care relationship with the intent to adopt, they are not eligible for Parental Leave until they can produce documentation that would prove the foster care relationship is being entered into for the purposes of permanent placement for adoption.

¹⁴ Team members on a medical or family leave may be eligible for Parental Leave. Contact Lincoln Financial for more information.

You must notify your manager of the need for a Parental Leave at least 30 days in advance of the planned absence or as soon as you determine a Parental Leave is necessary by calling our leaves and claims administrator at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 5; TDD/TYY: 1-800-988-0161; or filing an online claim at My Lincoln Portal (new users may register with Company Code = WELLS). After you have notified your manager, contact Lincoln Financial to request a Parental Leave. Lincoln Financial will evaluate your request to determine your Parental Leave, FMLA, and any similar state law eligibility. You must complete and submit the necessary forms to Lincoln Financial within the prescribed timeframe to gain approval. To care for or bond with a newborn or adopted child, you may need to provide a declaration of birth or applicable legal documentation that confirms the birth or placement of the adoptive child (including court or official adoption documentation supporting the official date of custody or placement for adoption). Other documentation may be required based on the reason for and length of your requested leave.

Until you receive formal notification that your Parental Leave has been approved, you must properly report your absence to your manager every day, as outlined by your business standards. Taking extended time away from work without an approved leave of absence can result in corrective action for the team member, which may include termination of employment. For additional information, see *Corrective Action*.

Medical documentation reminder: *All medical documentation will remain confidential and is maintained by Lincoln Financial according to established procedures and agreements. If a manager receives any medical information, they must contact Lincoln Financial at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 5, for instructions on how to forward the documentation to Lincoln Financial appropriately. Falsifying required documentation can result in corrective action, which may include termination of your employment. For additional information, see *Corrective Action*.*

Income sources during leave

All eligible team members who qualify for a Wells Fargo Parental Leave receive 100% of covered pay for the approved period of Parental Leave.

Covered pay is based on your job classification (job class code) in effect on the day before your leave as indicated in the Wells Fargo HR system of record:

- Job class 2 (most positions) — Covered pay is defined as annual base pay. It does not include overtime pay, shift differentials, language differentials, incentives bonuses, commissions, or perquisites such as parking or auto allowances or commuter subsidies.
- Job class 1 (Mortgage Consultants) and job class 5 (Variable Incentive Compensation) — Covered pay is based on benefits base, which is calculated quarterly based on salary and incentives paid in the last 12 months divided by the months with earnings greater than \$0. Generally, quarterly calculations are completed on the first Sunday after the first payday of every quarter. The amount of covered pay would be updated on the date of the calculation and used for any leaves starting

on or after that date. The benefits base is capped at the annual IRS compensation limit for qualified retirement plan, which is subject to change by the federal government at its discretion. Any disability benefits received (or eligible to be received, even if the team member fails to apply) from either a state (or state agency) or the Wells Fargo's STD Plan will run concurrently with Parental Leave and will be coordinated by Lincoln Financial.

Income from all sources will be coordinated by Wells Fargo so team members do not receive more than 100% of their covered pay. Refer to the *Benefits Book* for information on the STD and LTD Plans. To view your covered pay, log into Your Benefits Tool, and select **Elements of your pay used for benefit calculations**.

Use of PTO and accrual of PTO during a Parental Leave

Team members are not required to use Paid Time Off (PTO) or paid sick time before taking or during a Parental Leave because the income benefit is 100% of preleave covered pay. If a team member's Parental Leave and Medical Leave with STD benefits begin simultaneously upon the birth of the child, the team member is not required to use PTO to satisfy the STD waiting period because covered pay from Parental Leave satisfies the STD waiting period, as described in that Plan.

Team members do not accrue PTO during a leave of absence. You will begin accruing PTO when you return to work and have completed at least one full shift of your standard hours or reduced work schedule in that month. Upon your return from leave, any accrued unused PTO, not to exceed five days, may be carried over into the new year but must be used by March 15 of the following year, unless otherwise directed by law. Team members who use unaccrued PTO before their leave of absence and do not have an opportunity to accrue enough PTO in the remainder of the year are required to repay the overpayment, to the extent permitted by law.

Job reinstatement rights

Job reinstatement protection is available during your entire approved Parental Leave period, even if you are not eligible for or have exhausted FMLA or other state law leave protection. To the extent you are eligible for FMLA or other state law leave during your Parental Leave period, as determined by Lincoln Financial, your available FMLA or state law protection runs concurrent with your approved Parental Leave.

- **FMLA.** The job reinstatement period is generally up to 12 workweeks in a 12-month period measured forward from the date the first FMLA leave is taken. If you meet the FMLA eligibility requirements, FMLA job reinstatement applies to your Parental Leave for the period available under FMLA and runs together with your company-provided job protection for Parental Leave.
- **State laws.** Some states' laws provide separate job reinstatement rights and benefits for bonding time after birth or placement for adoption. These state law protections also run concurrent with your Parental Leave, unless otherwise provided by law.

The concurrent use of Parental Leave and any eligible FMLA or similar state leave will decrease, in whole or in part, the amount of FMLA or state leave available to an eligible team member. If the Parental Leave extends beyond the FMLA-protection, then the Parental Leave includes additional company-provided job protection to the end of the designated leave period. For example, if the Parental Leave is 16 weeks and there are 12 weeks of FMLA available, the additional amount of company-provided job protection is four weeks.

Returning to work

When you're ready to return to work, follow the instructions provided by Lincoln Financial, including contacting your manager to confirm the actual date before you return to work so that he or she can make any arrangements necessary to be ready for your return, update your work status in Staff Management, and restore any applicable system access. Keep your manager informed of any changes in your return to work status.

If you choose to return to work full time, part time, or on an alternative or reduced work schedule before the end of the identified leave period, you must contact your manager to discuss and make the appropriate arrangements. Team members who choose to return to work before exhausting their approved Parental Leave become ineligible for Parental Leave for the same child and thus lose eligibility for any remaining balance of the Parental Leave period.

Personal Leave

Personal Leaves are leaves of absence offered by Wells Fargo for a **minimum of seven calendar days up to 180 calendar days within a 12-month period** when you need to be away from work for personal reasons that are not covered under another leave type, including but not limited to:

- Traveling for personal reasons
- Time to search for a new Wells Fargo position due to personal reasons (for example, if you choose to relocate)
- Additional bonding time with a newborn or adopted child after the job reinstatement period has expired
- Additional time needed beyond what another type leave of absence provides, subject to the Extended Absence policy

A Personal Leave must be continuous with a defined start and end date, more than seven consecutive calendar days or one scheduled workweek, and cannot exceed 6 months in a 12-month period from the first day of the leave. Multiple occurrences of Personal Leaves, once combined, cannot exceed 6 months in the 12-month period.

A Personal Leave is subject to manager approval. In deciding whether to approve your request, your manager will take into consideration the impact it will have on your business group's ability to continue to meet its business needs. If your Personal Leave request is approved, job reinstatement is not guaranteed upon your return from leave. If your position is not available upon your return from leave, your employment will be terminated at the end of the approved leave period.

Leaves Operations is the Wells Fargo leaves and claims administrator for Personal Leaves. Leaves Operations will process all Personal Leave requests, according to Wells Fargo policies, once the leave request has been approved by the team member's manager.

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Eligibility

To be eligible for a Personal Leave, you must:

- Be a regular or part-time team member in an active working status or on an approved leave of absence (excluding a Salary Continuation Leave or Job Search Leave)
- Receive approval from your manager to take the requested time away from work as a Personal Leave

Your responsibilities

Taking time away from work for a Personal Leave requires you to take certain actions in a timely manner to provide your manager the ability to make the necessary staffing arrangements. Speak with your manager directly to discuss your need for Personal Leave as soon as you learn of your need to take time away from work. In deciding whether to approve your request, your manager will take into consideration the impact it will have on your business group's ability to continue to meet its business needs. If your leave request is approved, your manager, Human Resources, or their designee is required to initiate the leave by calling Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 1; TDD/TYY: 1-800-988-0161; or complete the Team Member Care eForm. You will receive correspondence from Wells Fargo Leaves Operations once your Personal Leave request has been processed.

Income sources during leave

Although Personal Leaves are unpaid, you are allowed to request a lump-sum payout of some or all of your accrued unused Paid Time Off (PTO). PTO payouts are permitted only one time during the leave period and must be requested through your manager. Managers cannot require you to take a lump-sum payout of your accrued PTO balance during your leave of absence, even if there is a loss of income.

Note: *Eligible team members may use paid sick time during a leave of absence for any of the purposes covered by the applicable law. Refer to Paid Sick or Safe Time for additional information.*

Job reinstatement rights

Personal Leaves do not have job reinstatement protection. If your position is not available upon your return from Personal Leave, your employment will be terminated at the end of the approved leave period.

Returning to work

When you're ready to return to work, contact your manager to confirm if your position is still available. If your position is available, confirm your return to work date so that your manager can make any necessary arrangements, update your work status in Staff Management, and restore any applicable system access. If your position is not available upon your return from Personal Leave, your employment will be terminated at the end of the approved leave period. Keep your manager informed of any changes in your return to work status.

Servicemember Care Leave

Servicemember Care Leaves are leaves of absence offered by Wells Fargo on a continuous or intermittent basis for a period of **up to 26 workweeks** if you need to care for a covered service member with a serious injury or illness incurred in the line of duty while on covered active duty, including preexisting conditions that were aggravated while in the line of duty.

A Servicemember Care Leave can be taken when your family member is a current military member and is:

- Rendered medically unfit to perform his or her military duties.
- Placed on the temporary disability retired list.

A Servicemember Care Leave can be taken when your family member is a military veteran and discharged from covered active duty and has an injury or illness that is:

- A continuation of a serious injury or illness incurred or aggravated in the line of duty that rendered the servicemember unable to perform the duties of his or her office, grade, rank, or rating.
- A physical or mental condition for which the veteran received a U.S. Department of Veterans Affairs Service-Related Disability Rating of 50% or greater and the need for leave is related to that condition.
- A physical or mental condition that substantially impairs (or would impair without treatment) the veteran's ability to work because of a disability or disabilities related to military service.
- An injury, including a psychological injury, on the basis of which the veteran is enrolled in the Department of Veterans Affairs Program of Comprehensive Assistance for Family Caregivers.

Lincoln Financial is the Wells Fargo leaves and claims administrator for Servicemember Care Leaves. Lincoln Financial will process all Servicemember Care Leave requests, according to Wells Fargo policies, to determine if a leave is eligible for approval.

In this section:

- Eligibility
- Your responsibilities
- Income sources during leave
- Job reinstatement rights
- Returning to work

Eligibility

To be eligible for a Servicemember Care Leave, you must:

- Be a regular, part-time, or flexible team member in an active working status or on another approved leave of absence (excluding Salary Continuation Leave).
- Meet the eligibility requirement under the Family and Medical Care Act (FMLA), including having been employed by Wells Fargo for at least 12 months within the last seven years and having actually worked at least 1,250 hours in the 12-month period immediately preceding the first day of your leave, or a similar state law.

Note: Some states may have different laws with different eligibility criteria for Servicemember Care Leave. Contact Lincoln Financial through Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2, for additional information. For TDD access for persons with hearing impairments, call 1-800-988-0161.

You may also be eligible for paid sick time to care for your family member. Refer to the Paid Sick or Safe Time policy.

Your responsibilities

Taking time away from work for a Servicemember Care Leave requires you to take certain actions in a timely manner. Taking action in the specified timeframes allows your request to be processed timely and provides your manager the ability to make the necessary staffing arrangements.

You (or your representative) must notify your manager and file for a Servicemember Care Leave with our leaves and claims administrator as soon as you determine a Servicemember Care Leave is necessary by calling the leaves and claims administrator at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 5; TDD/TTY: 1-800-988-0161; or filing an online claim at My Lincoln Portal (new users may register with Company Code = WELLS).

When the leave has been initiated, you will receive written notice of the required forms from Lincoln Financial to complete the request. All required documentation, including the Servicemember Care Form, must be completed and returned to Lincoln Financial within 15 calendar days. If you are unable to comply with the 15-day period because of extenuating circumstances, you must contact Lincoln Financial or the leave request and all benefits associated with it will be denied. Falsifying required documentation can result in corrective action, which may include termination of your employment. Unapproved time away from work will be designated as an unapproved leave and can result in corrective action, which may include termination of your employment. For additional information, see Corrective Action.

Until you receive formal acknowledgment of your continuous Servicemember Care Leave from Lincoln Financial, you must properly report your absence to your manager as outlined by your business standards. Taking extended time away from work without an approved leave of absence can result in corrective action for the team member, which may include termination of employment. For additional information, see Corrective Action. Once an intermittent Servicemember Care Leave has been approved, notify your manager before the absence occurs or

within a reasonable period of time. You must continue to notify your manager as outlined by your line-of-business standards for each intermittent absence taken. Clearly indicate to your manager that the absence is being taken as an FMLA intermittent absence.

Medical documentation reminder: *All medical documentation shall remain confidential and be maintained by Lincoln Financial. If a manager receives any medical documentation, the manager should contact Lincoln Financial at 1-877-HRWELLS (1-877-479-3557) for instructions on how to forward the documentation to Lincoln Financial appropriately.*

Income sources during leave

Although Servicemember Care Leaves are unpaid, you may be eligible for one or more of the income sources listed below. Your total income sources during your leave period may not exceed 100% of your preleave covered pay. Wells Fargo will coordinate your income sources to make sure that total income does not exceed your preleave base pay or benefits base rate.

The following income sources are available during a Servicemember Care Leave:

- **State-specific sources.** Some states provide state-administered income benefits for workers on Servicemember Care Leave.
- **Lump-sum payout of accrued unused Paid Time Off (PTO).**

If you apply for and are approved for a paid Critical Caregiving Leave, you will receive pay in accordance with the applicable Critical Caregiving Leave Policy and it may run concurrent with your Servicemember Care Leave.

Upon receipt of your request for a Servicemember Care Leave, Lincoln Financial will open a claim to determine if you are entitled to any state-administered benefits during your leave period. You will receive communications directly from Lincoln Financial on what is required to determine eligibility for any applicable state-administered benefits. Be advised that in some cases you may be approved for a Servicemember Care Leave and not approved or not eligible for any state-administered income benefit. Separate communications will be sent to you directly by Lincoln Financial to inform you of your leave request status and your income benefit claim status. To find out what state benefits you may be eligible for, contact Lincoln Financial through Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2. For TDD access for persons with hearing impairments, call 1-800-988-0161.

Once eligibility for income benefits is determined by Lincoln Financial, you may request a lump-sum payout of some or all of your accrued unused PTO if your income benefits are below 100% of your base pay. PTO payouts are permitted only one time during the leave period and must be requested through your manager. Managers cannot require you to take a lump-sum payout of your accrued PTO balance during your leave of absence, even if there is a loss of income.

Note: *Eligible team members may use paid sick time during a leave of absence for any of the purposes covered by the applicable law. Refer to Paid Sick or Safe Time for additional information.*

Job reinstatement rights

Job reinstatement is available while out on a Servicemember Care Leave under one or a combination of the following as outlined under the applicable law, as determined by Lincoln Financial:

- **FMLA.** The job reinstatement period is generally up to 26 workweeks in a single 12-month period. The duration of your Servicemember Care Leave is for the same period as your available FMLA job reinstatement period. The 26-week job reinstatement period is “per servicemember, per injury” minus weeks taken for any other FMLA-qualifying reason within the single, 12-month period, provided that you cannot take more than the allotted 12 weeks of protected leave for any other FMLA qualifying reason during this period
- **State laws.** Some states’ laws provide separate job reinstatement rights. Where permissible, the state law will run concurrent with the FMLA job reinstatement period. If the state law outlines separate job reinstatement rights, the job reinstatement period could extend beyond the FMLA protection. Refer to the Compliance Posters page for information pertaining to state specific leave laws or Contact Lincoln Financial through Team Member Care 1-877-HRWELLS (1-877-479-3557), option 2. For TDD access for persons with hearing impairments, call 1-800-988-0161

Returning to work

When you’re ready to return to work, follow the instructions provided by Lincoln Financial, including contacting your manager to confirm the actual date before you return to work so that he or she can make any arrangements necessary to be ready for your return, update your work status in Staff Management, and restore any applicable system access.

Workers’ Compensation Leave

Workers’ Compensation Leaves are leaves of absence provided by Wells Fargo as a statutory obligation and can occur on a continuous or intermittent basis if you experience a work-related illness or injury preventing you from performing your job. The duration of a Workers’ Compensation Leave varies depending on the Claims Administrator’s determination of disability eligibility status as well as state-specific legal requirements, subject to the Extended Absence policy. Workers’ Compensation Leave runs concurrently with leave provided under the FMLA, or similar state or local laws, if applicable.

Wells Fargo Risk & Insurance Management is the leaves administrator for Workers’ Compensation Leaves. Sedgwick is Wells Fargo’s Workers’ Compensation claims administrator¹⁵ and Lincoln Financial is Wells Fargo’s FMLA and Short-Term Disability (STD) Plan administrator. Wells Fargo Risk & Insurance Management will process all Workers’ Compensation Leave requests to determine if the Workers’ Compensation Leave is eligible for approval.

15 North Dakota and Wyoming’s Workers’ Compensation claims are administered by the State Fund.

If your request for Workers' Compensation Leave is not approved, you may still qualify for a Medical Leave. Refer to Medical Leave for additional information.

Note: Wells Fargo provides the Texas Injury Benefit Plan, rather than Workers' Compensation Leave, for Texas team members who have a work-related injury or illness. For Texas team members, references in this section to Workers' Compensation shall mean the Wells Fargo Texas Injury Benefit Plan.

On this page:

- Eligibility
- Your responsibilities
- Income sources during leave
- Job reinstatement rights
- Returning to work

Eligibility

To be eligible for a Workers' Compensation Leave, you must be a Wells Fargo team member and have sustained a compensable work-related injury or illness.

Note: States may have different laws with different compensability criteria for Workers' Compensation Leave. Contact Risk & Insurance Management through Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 3. For TDD access for persons with hearing impairments, call 1-800-988-0161.

Your responsibilities

You must notify your manager immediately if you experience a work-related illness or injury, whether or not it results in your missing time from work.

To initiate a claim for Workers' Compensation Leave, you or your manager must report your injury or illness to Risk & Insurance Management through Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 3; TDD/TYY: 1-800-988-0161; or by completing the team member On-The-Job Injury Report Form. Refer to Workers' Compensation Program Overview for additional details on how to initiate a claim. If your claim for Workers' Compensation Leave is approved, you will be required to provide ongoing medical documentation to Wells Fargo Risk & Insurance Management about your work ability.

Until you receive notification that your Workers' Compensation Leave and related claim have been approved, you must properly report your absence to your manager every day as outlined by your line-of-business standards. Team members taking extended time away from work without an approved leave of absence are subject to corrective action, up to and including termination of employment.

If a request for intermittent Workers' Compensation Leave is approved, you must continue to notify your manager as outlined by your line-of-business standards for each intermittent absence taken. Clearly indicate to your manager if the absence is being taken as an intermittent absence eligible under FMLA.

Workers' Compensation waiting period

Once eligible, in order to receive Workers' Compensation benefits, you must complete the statutory waiting period, which is governed by state law for the state in which you work. During the Workers' Compensation statutory waiting period, you should track your time away from work using the Nonroutine Event code in Time Tracker.

Observed holidays that fall during the Workers' Compensation statutory waiting period should be used and recorded in Time Tracker.

Income sources during leave

You may be eligible for one or more of the income sources listed below after any applicable waiting period is satisfied and all requirements are met. Your total income sources during your leave period may not exceed 100% of your pre-leave covered pay. Your covered pay is determined by the job classification code (job class code) for your position as indicated in the Wells Fargo HR system of record. Wells Fargo will coordinate your income sources to make sure that total income does not exceed your pre-leave base pay or benefits base rate.

The following income sources are available while on Workers' Compensation Leave:

- Workers' Compensation. (**Note:** Not available for team members in Texas; see Texas Injury Benefit Plan.)
- Texas Injury Benefit Plan. (**Note:** Only available for team members in Texas.)
- Wells Fargo's STD Plan.
- Wells Fargo's Long-Term Disability (LTD) Plan.
- Lump-sum payout of accrued unused Paid Time Off (PTO).

Refer to Medical Leave for additional information.

Job reinstatement rights

Job reinstatement is available while out on Workers' Compensation Leave. Refer to Medical Leave for additional information.

Returning to work

When returning to work from a Workers' Compensation Leave, you must complete the following steps:

1. Confirm with your health care provider the anticipated date you will be released to return to work.
2. Submit the return to work documentation, including any medical restrictions, directly to Risk & Insurance Management.
3. Immediately contact your manager to make him or her aware of your return to work date and any medical restrictions, in order for him or her to make arrangements for your return.
4. Keep your manager informed of any changes in your return to work status.

If you are released to return to work with medical restrictions requiring a work accommodation, begin discussing any required medical restrictions with your manager — do not provide any medical documentation to your manager. Medical documentation containing restrictions should be provided to your Risk & Insurance Management consultant. Discussions with your manager about any medical restrictions should begin before your return to work so that your manager can determine whether the accommodation request can be met without a business hardship.

If an accommodation solution does not seem feasible or additional assistance is needed, contact Risk & Insurance Management through Team Member Care at 1-877-HRWELLS (1-877-479-3557), option 2. For TDD access for persons with hearing impairments, call 1-800-988-0161.

Refer to the Workers' Compensation Program Overview for additional information. You may also email Risk & Insurance Management.

Wells Fargo Volunteer Leave Program

We value our team members' commitment to devoting their time and talents to their communities and the causes they care about. Through one of Wells Fargo's volunteer programs, team members have the opportunity to provide full-time expertise to build the capacity of nonprofits, schools, and nongovernmental organizations (NGOs). If selected to participate, team members will receive full pay and benefits while volunteering from three days up to three months. Team members interested in becoming a Volunteer Leave Program participant must refer to the Volunteer Leave Program page on Teamworks for additional details or contact Team Member Philanthropy at volunteerinfo@wellsfargo.com.

- Requesting a Volunteer Leave
- Time and length of leave
- During a Volunteer Leave
- Returning to work

Requesting a Volunteer Leave

You are responsible for coordinating a request for volunteer leave with your manager — requests may be approved based on the needs of the business and are subject to the terms of the *Team Member Handbook*, Code of Ethics and Business Conduct, and all other employment-related policies while participating in the Volunteer Leave Program.

Time and length of leave

The length of a Volunteer Leave is outlined in each of the approved Volunteer Leave programs. The specific length of time that a team member can be out on Volunteer Leave is determined by the selection committee based on the team member's application and impact to the team member's business. The leave must begin within the prescribed period as outlined in the Volunteer Leave Program, and specific dates are coordinated with your manager to alleviate the impact to the business. The leave must be taken as one continuous block of

time and cannot be broken down into intermittent time away from work or otherwise staggered unless outlined as a part of the Volunteer Leave Program. Your manager is responsible for notifying you of the agreed-on timing of the leave at least one month before the leave is scheduled to begin.

During a Volunteer Leave

Benefits and income sources during a leave

During the Volunteer Leave, you continue to preserve your employment status with Wells Fargo, receive income replacement equivalent to your base pay, and participate in all benefit plans for which you remain eligible subject to the following exceptions:

- Wells Fargo Business Travel Accident Insurance
- Wells Fargo Workers' Compensation Insurance coverage
- Commuter Benefit Program

Job reinstatement rights

Team members on any of the approved Volunteer Leave programs have full job reinstatement protection. Wells Fargo reinstates you to the same position in the same location you held before the leave unless:

- Documented business necessity or hardship requires the position to be filled. Team members would be made aware under these circumstances and provided an opportunity to return to work.
- Written confirmation is received from you notifying the company that you do not intend to return to the same position.

Team Member Philanthropy will partner with your manager to facilitate this return to work. The impact of displacement is described in the Wells Fargo Salary Continuation Pay Plan.

Use of PTO and Time Tracker

You are not required to use PTO during the Volunteer Leave. If you wish to extend your Volunteer Leave by using PTO, you must obtain management approval before scheduling the PTO. You may not enter time worked while on Volunteer Leave into Time Tracker as hours worked, since it is not time worked for Wells Fargo. However, you should record all of the time you work at, or on behalf of, your nonprofit in the My Volunteer Time tool when you return to work at Wells Fargo. Any PTO approved for the leave must be entered into Time Tracker as PTO by either you or your manager.

Information security

To protect Wells Fargo's information, you should not be conducting Wells Fargo work while participating in a Wells Fargo Volunteer Leave. Systems access for team members in a nonexempt position will be suspended for the duration of the Volunteer Leave. Your manager is responsible for taking timely steps to ensure that you are reinstated to your access to Wells Fargo and line-of-business systems upon return from leave.

Returning to work

Before you return to work, you are required to contact Team Member Philanthropy to confirm the actual dates of your return. Team Member Philanthropy will partner with your manager to coordinate all return-to-work arrangements, including the restoration of system access. You and the nonprofit agency where you completed your volunteer service will each be required to submit reporting to Team Member Philanthropy as outlined in the Volunteer Leave program. You should record all of the time you worked at or on behalf of your nonprofit in the My Volunteer Time tool once you return to work.

Required Absence

Each team member who works in a job that is identified as a sensitive position, or who is otherwise subject to the Required Absence policy, is required to be away from work in a manner that removes all work responsibilities associated with the team member's current work role for a minimum of two consecutive work weeks (10 consecutive working days) each calendar year.

To comply with the Required Absence policy, team members may use a combination of the following absences or assignments:

- Paid Time Off (scheduled or unscheduled)
- Personal holidays
- Floating holidays
- Leaves of absence
- Other Paid Time Away, as defined in the *Team Member Handbook*
- Off-site training or professional conferences
- On-site training, temporary job reassignments or temporary assignments specifically designated and approved by line-of-business senior management and the group risk officer

The following absences will not be adequate to meet the requirement of the Required Absence policy:

- Observed Wells Fargo holidays
- Business travel

Scheduling a required absence

Team members determine when to schedule (and request approval where needed) a required absence.

Managers determine at their discretion if and when a required absence in the form of a temporary job reassignment, or on-site training is appropriate. Managers also approve Paid Time Off in accordance with line-of-business practices.

Review the Required Absence policy, including definitions of sensitive position and restricted work activities.

Our approach

At Wells Fargo, we believe that one of our most important priorities is to keep you, your colleagues, our customers, and our visitors safe. We are committed to maintaining a workplace environment that promotes and protects the safety and health of everyone who comes through our doors. Keeping our workplace safe — and being ready for any emergencies that might happen — requires the commitment of every team member.

Violence-Free Workplace

One of our overriding concerns at Wells Fargo is that team members and customers are provided with a safe, businesslike work environment. Weapons of any kind are strictly prohibited in the workplace. Under no circumstances will we tolerate physical violence or threatening behavior in the workplace, on company premises, at work-related functions, when you're traveling on business, or working from home or another location. Threatening behavior directed at the workplace or at other team members from your home or through personal communications accounts is also not tolerated. Wells Fargo reserves the right to determine if particular actions are considered physical violence or threatening behavior, and you are expected to cooperate in any fact-finding process (see Providing Information).

Important: *Violating the policy against violence or weapons in or toward the workplace can result in corrective action, which may include termination of your employment (see Corrective Action). Also see the Violence Free Workplace Policy for additional information.*

Examples of threatening behavior

Violent behavior or examples of behavior that would be considered violent, threatening, or intimidating to others include but are not limited to:

- Threats or insinuations of “getting even”
- Physical aggression — demonstrated or threatened
- Assault, fighting, pushing, grabbing, slapping, kicking, or other hostile action
- Profane or abusive language
- Aggressive horseplay or gestures
- Dangerous pranks or practical jokes
- Intimidation
- Deliberate or reckless destruction of company property or another team member's personal property
- Possession of a weapon in the workplace by someone other than security personnel
- Any form of harassment that is of a violent or threatening nature, such as stalking (see Anti-Harassment)

Personal situations

Sometimes team members may experience personal situations that could adversely affect the workplace. Team members need to tell their manager and Corporate Security immediately if they are in — or know of — any of the following situations:

- Incidents of domestic abuse, violence, or threats against a team member, where there's a possibility that the other party will seek out the team member at work or where the other party is another team member.
- A team member has obtained a restraining order, making his or her workplace a restricted area.
- A team member is receiving threatening or harassing telephone calls, emails, voicemails, or other messages at work.
- A team member is the target of unwanted pursuit by someone who has been seen at or near the workplace.

Where to call

Immediately report violent or threatening behavior — and any situation that causes anxiety or fear — to:

- Security Response Center at 1-877-494-WELLS (1-877-494-9355), option 1. Note: This phone number might work only in limited international locations (for example, England, Mexico, Canada). International callers who do not have 877 service available to them should call 001-480-437-7599.
 - The 24-hour Security Response Center number is one of the preventive measures that we've taken at Wells Fargo to support the violence-free workplace policy for our team members.
- Employee Assistance Consulting (EAC). For confidential individual team member consultation or for management consultation, call the direct number 24 hours a day, 7 days a week at 1-888-327-0027. You can also reach EAC when you call 1-877-HRWELLS (1-877-479-3557), option 4. Visit the Employee Assistance Consulting site on Teamworks for more information.
- Your manager or your ER Solutions team.

Resources

Team members who are experiencing domestic violence or family problems and need outside assistance can get confidential, professional help through Wells Fargo's Employee Assistance Consulting (EAC) program at its direct number 24 hours a day, 7 days a week at 1-888-327-0027. EAC can also be reached by calling 1-877-HRWELLS (1-877-479-3557), option 4. Visit the Employee Assistance Consulting site on Teamworks for more information.

Find additional resources and assistance by calling the National Domestic Violence Hotline at 1-800-799-SAFE. (This is not a Wells Fargo-sponsored service.)

While Wells Fargo is not responsible for the safety of our team members away from the workplace, we encourage them to contact their local community services, Corporate Security, or Employee Assistance Consulting, for safety tips on how to avoid and prevent becoming a victim of violence.

Weapons

Possessing weapons on company premises or at company-sponsored events is dangerous to team members and is strictly prohibited. **Other than security personnel**, Wells Fargo team members are not permitted to carry, either openly or in a concealed manner, any weapon, such as a knife or firearm, while acting in any capacity for Wells Fargo. This policy applies even in states where the law may allow (subject to a private property owner's restrictions) persons to openly carry firearms or to carry concealed firearms. There are Wells Fargo team members specifically authorized by the Senior Security Director who are exempt from this rule. Those team members must meet the requirements of the Corporate Security Firearms and Safety Policy and maintain weapons as part of their employment; For example, someone in specific security or cash vault guard positions.

Wells Fargo recognizes applicable state laws that may allow the storage of firearms in locked vehicles in employer parking lots. For purposes of this policy, a "weapon" means any item designed primarily for the purpose of inflicting bodily injury, which may include items that are legal to own. Again, you are not permitted to have these items at work or while you're conducting business on behalf of Wells Fargo. See the Weapons Policy for additional information.

Building Access Controls

All Team Members

All team members play a critical role in maintaining and adhering to proper building access controls, which help ensure the safety of team members, customers, and company assets.

Managers must ensure all team members understand and comply with site-specific access control responsibilities and requirements. Business management is also responsible for granting access approval for their visitors, team members, and third party service providers or vendors. Examples of prohibited activities include:

- Sharing keys, building access card or badge also known as Physical Access Control System (PACS), or access codes
- Failing to display a personalized PACS badge when required
- Preventing controlled doors from closing and locking completely
- Failing to follow local rules for obtaining badges for guests and visitors

- "Tailgating" or "piggybacking;" this refers to allowing another person to accompany or follow a person into an access-controlled area without proper credential or access device
- Failing to follow access card or badge entry and exit procedures required by the particular physical security policy at a facility

Drugs & Alcohol

Wells Fargo is dedicated to maintaining a drug-free workplace. All team members are required to perform their job duties unimpaired by illegal drugs, alcohol, or the improper use of legal substances. You are prohibited from working or reporting to work when impaired by alcohol or drugs.

Important: *You are expected to take accountability for your actions and decisions. Any team member who is unfit to work because of alcohol or drug use may be sent home and this can result in corrective action, which may include termination of employment. For more information, see Corrective Action.*

Drug-free workplace

We have absolutely no tolerance for illegal drugs — or the solicitation, distribution, or misuse of legal drugs — at Wells Fargo. As a federal contractor, Wells Fargo must comply with federal law. While a substance may be legal in a particular state, if it is an illegal substance under federal law, it may not be brought into any Wells Fargo workplace.

Important: *The sale, purchase, manufacture, dispensation, distribution, possession, or use of any illegal drug or any mind-altering or nonprescribed controlled substance, or the nonprescribed use of a controlled substance, on company premises, during work-related activities, or while conducting company business is prohibited and is cause for immediate termination of your employment. In addition, illegal substances found on company premises can be turned over to outside legal authorities for further investigation.*

Alcohol

Although the use of alcohol may be legal, you are prohibited from performing your job duties, which includes driving while on company business, if you are impaired by the use of alcohol.

You're responsible for complying with our policies on professional behavior, harassment, and violence-free workplace, even if you're consuming alcohol at a company-sponsored event or conducting business with customers or other non-team members where alcohol use is sanctioned. You're also responsible for using a safe means of transportation if you've consumed alcohol in any of these circumstances.

Alcohol on company premises

Drinking alcohol on Wells Fargo premises is allowed only at select Wells Fargo-sponsored events where alcohol is served.

Serving alcohol at this kind of event must be approved by the head of the business group sponsoring the event. If you are planning an event where alcohol will be served, please review the alcohol guidelines found in the Special Events section of the Risk & Insurance Management site.

Treatment

Our policies on substance use in the workplace are strict. We recognize that alcohol and drug abuse can have negative consequences to family, work, and social life; however, substance abuse can be successfully treated. If you believe that substance use or abuse is a problem for you — or for one of your household family members — you're encouraged to get **confidential** professional help by contacting:

- Employee Assistance Consulting (EAC) at its direct number 24 hours a day, 7 days a week at 1-888-327-0027. You can also reach EAC when you call 1-877-HRWELLS (1-877-479-3557), option 4. Visit the Employee Assistance Consulting site on Teamworks for more information.
- Your particular health plan (refer to your health plan material).

Smoke-Free Workplace

We provide a smoke-free workplace for our team members and customers. This means that you're not permitted to use tobacco products, including smokeless tobacco or electronic smoking devices, in any Wells Fargo facility or vehicle, or during work-related activities at any time, 24 hours a day, 7 days a week. "Wells Fargo facility" includes all Wells Fargo-owned, -leased, and controlled space, including:

- Private offices
- Lunch and dining rooms
- Hallways
- Elevators
- Stairwells
- Conference rooms
- Vestibules
- Loading docks
- Lobbies
- Common areas
- Restrooms
- Parking areas

Smoking or vaping is allowed only in designated outdoor areas. If there is a smoking area at your location, it will be an outdoor area designated by site management and Corporate Properties. Ask your manager for details on your location.

For confidential, individual team member consultation on help to quit smoking, team members can call Employee Assistance Consulting (EAC) at its direct number 24 hours a day, 7 days a week at 1-888-327-0027. You can also reach EAC when you call 1-877-HRWELLS (1-877-479-3557), option 4. Visit the Employee Assistance Consulting site on Teamworks for more information.

Working with an Illness or Disability

We're committed to maintaining a healthy and productive work environment at all Wells Fargo locations. This includes complying with regulatory safety standards and taking precautions to protect the safety and well-being of team members.

We also recognize the valuable contributions that can be made by team members with disabilities and those who are subject to a life-threatening or terminal illness. We're committed to providing any of these team members an opportunity to work, if they're able to safely perform the essential functions of the job and meet performance standards. At the same time, we are committed to protecting privacy by keeping personal medical information confidential. (See Medical Work Accommodations.)

Medical Work Accommodations

Wells Fargo is committed to the health, safety, well-being, and success of its team members with medical conditions and disabilities. Our commitment is in alignment with the Americans with Disabilities Act and related state or local regulations pertaining to medical leaves of absence and disabilities.

Wells Fargo is dedicated to providing team members with ongoing or chronic medical conditions and disabilities (including pregnancy and pregnancy-related conditions) the opportunity to be successful in their Wells Fargo careers. Consistent with this commitment, Wells Fargo collaborates with team members in exploring reasonable work accommodations that will support them in successfully performing their jobs within the position expectations and to enjoy equal benefits and privileges of employment, without imposing an undue business hardship.

The goal of medical work accommodations is to support you in performing your job within the expectations of the position. For that reason, essential job duties of your role cannot be eliminated as a form of accommodation. For example, if meeting sales or productivity goals is one of the primary expectations of your position, accommodations should help you meet those goals, not eliminate or lower them. Once a job modification or accommodation is offered and made, your manager will work with you to make sure that it is enabling you to perform your job within standards. You are expected to meet the performance standards of your regular job duties, with or without accommodations.

Participation in the request process is voluntary; it's up to you to decide whether to work with your manager and Accommodations Management and provide the appropriate medical information necessary to evaluate your request. However, if you choose not to participate in the process, you may not be offered your requested accommodation. Like any team member, if you don't meet performance standards, you are subject to the corrective action guidelines of your group, which may include termination of your employment. For additional information, see Corrective Action.

Eligibility

Team members who have an ongoing or chronic medical condition or disability, including pregnancy or a pregnancy-related condition, that is affecting their ability to perform their regular job duties or enjoy the benefits and opportunities of employment are eligible to participate in the accommodation process. An ongoing or chronic medical condition excludes illnesses such as a cold, flu, sore throat, cough, upset stomach, or similar minor/short term illness, unless it is a symptom of or affects a chronic medical condition. Accommodations are for a team member's own medical condition. For assistance with time away to care for a family member, please review the Family Leave policy then contact Lincoln Financial at 1-877-HRWELLS (1-877-479-3557), option 2, 3, 5.

Responsibilities

If you need to request a medically-related work accommodation, you should advise your manager either verbally or in writing that you have a request. Team members are not required to, nor should they feel obligated to, share or disclose any private health information to supervisors, subordinates, or peers. If you prefer to discuss your request with someone other than your manager or have questions about the accommodations process, you can contact Accommodations Management directly.

Managers, including report to managers, who receive requests for work accommodations from team members or job seekers, should contact Accommodations Management to discuss the request. Some simple accommodations can be implemented by a manager without the assistance of Accommodations Management: Requests for schedule changes, break modifications, dress code exceptions, small ergonomic equipment, lighting modifications, and telecommuting requests can be made by the manager directly without Accommodations Management, after assessing if there is undue hardship. The solution should then be documented in the Self-Service Accommodations Management Request form. If the manager believes there is undue hardship, the request must be discussed with Accommodations Management before declining the request. To better understand your responsibilities as a manager, visit the Workplace Accommodations page on Manager Center.

Process

Team members may make work accommodation requests through various channels either verbally or in writing, including in-person, by phone, or online.

- Submit a request as soon as the need for an accommodation becomes apparent to you. You can make a request in any of the following ways:
 - Directly to your supervisor or manager.
 - By contacting the Accommodations Management team through the eForm.
 - By calling 1-877-HRWELLS (1-877-479-3557), option 2. For TDD access for persons with hearing impairments, call 1-800-988-0161 during normal business hours.

- If medical information is needed from a health care professional, Accommodations Management, with your consent, will work with your health care provider to understand functional limitations and explore ways to accommodate these restrictions.
 - All medical information will be maintained confidentially. The manager will be advised only about your limitations as they relate to accommodations or modifications in the workplace that may help you perform your job.
- Once the Accommodations Management consultant (AMC) has gathered the pertinent information, the request will be evaluated and reasonable accommodations recommended during an interactive process that includes you and your manager. The modification or accommodation identified may not necessarily be your preferred choice, but it should be effective in helping you perform your regular job duties within the expectations of the position and should not cause an undue business hardship.
- Internal job seekers with a disability needing assistance to apply for a job within Wells Fargo can request assistance by using the contact information on the Jobs Sign-On page. Internal job seekers may request an accommodation online, by phone, and through TTY.
- The Accommodations Management team, in partnership with the Recruiting team, will work with job seekers needing accessibility or accommodation assistance due to chronic or ongoing medical restriction or limitation in the job posting and interview process to enable them to participate fully in the job application process.

Implementing the selected accommodation

Once an accommodation has been identified and offered during the interactive process, the team member is provided with written confirmation of the offered accommodation. The manager is ultimately responsible for implementing the accommodation.

After an accommodation is implemented or put into place, the team member and their manager should continue to evaluate the effectiveness of the implemented accommodation.

If modifications to the implemented accommodation are needed, the team member and their manager may contact the Accommodations Management to reevaluate the situation.

Unable to fulfill a request

When a reasonable accommodation cannot be identified for the medically related work accommodation request, the Accommodations Management team will explore alternative options available to you, which may include a medical leave, job reassignment, or a job search leave.

Workers' Compensation

Workers' Compensation* is a statutory obligation that is available to all Wells Fargo team members in the U.S. who have a work-related illness or injury. Coverage starts on your first day of employment. If you sustain a work-related injury or illness, Workers' Compensation pays your medical bills and provides compensation to help replace your lost income until you can return to work. When you are hurt, no matter how slightly, notify your manager immediately and report your injury to Risk & Insurance Management by calling 1-877-HRWELLS (1-877-479-3557), or for TDD access for persons with hearing impairments, 1-800-988-0161, or by sending a message to workerscompensation@wellsfargo.com. To report injuries online or for additional information regarding Wells Fargo's Workers' Compensation program, go to the Workers' Compensation website (see also Workers' Compensation Leave).

*Wells Fargo does not participate in the Texas Workers' Compensation system. For Texas team members, Wells Fargo provides the Texas Injury Benefit Plan, rather than Workers' Compensation, to assist Texas team members who have a work-related injury or illness.

Fitness for Duty

To protect the well-being and safety of all our team members and customers, Wells Fargo may request a Fitness-for-Duty evaluation when:

- There is reasonable cause for serious concern about a team member's ability to perform his or her job and duties safely.
- A team member's behavior is grossly inappropriate for the workplace.
- There's reasonable concern for workplace safety.

For confidential individual team member consultation or for management consultation, call Employee Assistance Consulting (EAC) at its direct number 24 hours a day, 7 days a week at 1-888-327-0027. You can also reach EAC when you call 1-877-HRWELLS (1-877-479-3557), option 4. Visit the Employee Assistance Consulting site on Teamworks for more information.

Safety & Health Responsibilities

At Wells Fargo, we believe that one of our most important priorities is to keep you, your colleagues, our customers, and our visitors safe. We are committed to maintaining a workplace environment that promotes and protects the safety and health of everyone who comes through our doors. Keeping our workplace safe requires the commitment of every team member.

Risk & Insurance Management (RIM) is the program administrator of the Wells Fargo Injury & Illness Prevention Program (IIPP) and has the authority and responsibility for establishing, implementing, and maintaining this program. **Managers** are responsible for implementing and maintaining the IIPP in their work area and for answering team member questions about the IIPP. **Team members** are responsible for following safe work practices and reporting any unsafe work condition to their managers or property manager. **Team members** may also contact the confidential EthicsLine, where they can choose to remain anonymous.

OSHA

Risk & Insurance Management, in partnership with Corporate Properties and business groups, supports compliance with the Occupational Safety and Health Act (OSHA).

Hazard identification and reporting

All team members are expected to work safely and to report safety and health hazards to their manager immediately. Managers are responsible for following up on reported safety and health hazards and implementing appropriate risk mitigation practices.

All team members are expected to report safety or health hazards to their manager without fear of reprisal or retaliation. Additionally, you may also report safety and health issues to Loss Prevention by calling Risk & Insurance Management at 1-877-WFC-RISK (1-877-932-7475), option 4, or emailing lossprev@wellsfargo.com.

Any work-related accident, injury, or illness should be reported immediately by calling 1-877-HRWELLS (1-877-479-3557) or completing the Team Member On-the-Job Injury Report Form.

Contingent resources should report work-related injuries directly to their employer. Wells Fargo managers should report contingent resource injuries to Risk and Insurance Management by calling 1-877-HRWELLS (1-877-479-3557) to appropriately document the incident.

Hazard communication

While Wells Fargo operations do not typically require the use of hazardous chemicals, some Wells Fargo operations may require the use of products that contain one or more hazardous chemicals. Team members who use hazardous chemicals must receive training and information, including safe handling and emergency precautions, related to the potential hazards of these chemicals. Regardless of exposure potential, all team members should complete general Safety Data Sheet (SDS) training. For training resources and information, visit the Risk & Insurance Management site.

Team member safety and health training

Safety and health training may be accessed through the New Team Member Safety Orientation and online training on the Risk & Insurance Management site.

Communication of safe work practices and conditions

Safety and health information may be communicated through various methods including the Risk & Insurance Management site, Teamworks articles, and newsletters.

Your manager will let you know about any important site-specific safety and health information you need to perform your job safely.

Important: *Unsafe work practices are promptly addressed and can be subject to corrective action, which may include termination of your employment (see Corrective Action).*

More information

If you'd like more information about Wells Fargo safety and health programs, visit the Safety & Health section of the Risk & Insurance Management website; call 1-877-WFC-RISK (1-877-932-7475), option 4; or email lossprev@wellsfargo.com.

Business Continuity Planning

Wells Fargo is committed to safeguarding and protecting customers, team members, assets, and long-term market share in the event of an unplanned business interruption. Wells Fargo's Enterprise Business Continuity Planning (EBCP) office administers business continuity and provides the necessary guidance and support to each line of business in developing, implementing, and testing effective business continuity plans.

The Business Continuity Planning Policy establishes the requirements to ensure that business continuity-related risk is effectively identified, assessed, monitored, managed, and reported throughout Wells Fargo while supporting a philosophy of distributed decision making and management. Adherence to this policy enhances and supports operational risk management throughout Wells Fargo's lines of business.

The BCP program depends on team members knowing what to do in the case of a business disruption. Know what your business group's recovery strategies are and how you'll contact your management. Visit the Enterprise Business Continuity Planning site for more information.

Emergency Preparedness

One of our most important priorities at Wells Fargo is to keep our team members, customers, and visitors safe — and we all have a role to play. Being ready for any emergency that might happen requires the commitment of every team member.

Team member responsibilities

As a team member, you have important emergency preparedness responsibilities. Do **not** wait for someone to tell you what you need to know. You are expected to:

- Understand what to do in an emergency within your building, including:
 - Where the fire or evacuation alarms are and how to use them.
 - The sounds and signaling methods of fire and evacuation alarms.
 - The pathway to at least two alternative exits from every room or area in the workplace.
 - The number of desks or cubicles between your workstation and two of the nearest exits so that you can escape in the dark if necessary.
 - Whom to contact in an emergency and how to contact that person.
 - Where to gather outside the building to ensure that everyone is safe.

- Act immediately. Do **not** hesitate by looking around to see what others are doing when an alarm sounds or there are signs of danger.
- Follow all Wells Fargo Emergency and Security Procedures.
- Participate in site emergency plans, evacuation drills, and other emergency-procedure trainings and exercises when requested.
- Communicate to your manager any need you have for assistance in completing emergency procedures (for example, use of a wheelchair).
- Take the Emergency Response and Violence-Free Workplace training through Develop You (search for "Emergency Response").

Ask your manager if you have any questions related to your responsibilities.

Enterprise Incident Management

As part of the Enterprise Business Continuity Planning office, Enterprise Incident Management (EIM) establishes companywide coordination, support, and communications for all high-severity incidents at Wells Fargo.

The objectives of Enterprise Incident Management are to improve Wells Fargo's ability to respond to an incident by providing the following:

- An enterprise focus to ensure that team members respond safely during an emergency at work and for the enterprise to prudently respond to crises of any origin and scope.
- Situational awareness imperative to the speed and efficacy of response and informed prudent decisions during critical incidents. Situational awareness is obtained through monitoring and expert review of available information and strong information-sharing partnerships and relationships within communities and public agencies.
- Monitoring of team member safety and well-being issues.
- Consistency of message internally and externally.
- Effective prioritization of resources in incident response.
- Facilitation of the Enterprise Governance and Incident Response Structure to include the Enterprise Incident Coordination Center (EICC) and Situation Room.

Emergency and security procedures

All Wells Fargo locations are required to have procedures in case of a fire or other emergency that requires evacuation or sheltering. These procedures are described in the Wells Fargo Emergency and Security Procedures pamphlet, available from Forms Online or the supply warehouse as form number HRS1099, or from the Emergency and Security Procedures website on Teamworks.

More information

Ask your manager if you have any questions regarding emergency procedures and/or the Enterprise Business Continuity Planning program. You can also find information on these Enterprise Incident Management (EIM) Teamworks sites:

- Emergency and Security Procedures
- Training resources
- Team member preparedness
- Manager emergency responsibilities
- Site emergency plans
- Emergency supplies
- Travel Risk Management
- International team member emergency preparedness

Leaving Wells Fargo

Our approach

Whether the decision to terminate employment is yours or Wells Fargo's, it's our intent that every team member who leaves the company feels that he or she has been treated with dignity, respect, and courtesy. These decisions are never made lightly, and they are never easy. This section will provide you information and support during this process.

Voluntary Termination

If you decide to leave your job at Wells Fargo, we recommend you notify your manager two weeks in advance, preferably in writing. You'll need to confirm your last working day, and we'll ask you to provide your reason for leaving.

Job abandonment

Wells Fargo considers the following situations as job abandonment, which is a voluntary termination of your employment:

- If you're absent from work without notifying your manager for three or more consecutive scheduled workdays, unless otherwise designated by state or local law, you'll be considered to have abandoned your job.
- You'll be considered to have abandoned your job in the above situation even if you informed your manager that you do not intend to resign prior to your absences.
- In some situations, if you don't report to work at the end of an approved leave, it may result in Job Abandonment.

Note: *If you abandon your job, in most cases, you will not be eligible for rehire by Wells Fargo.*

Review of the decision to terminate

Each termination for job abandonment is reviewed by the manager and ER Solutions before the termination occurs, unless the team member did not return from an approved Workers' Compensation Leave. In those instances, managers should contact Risk & Insurance Management.

Involuntary Termination

If Wells Fargo initiates the termination of your employment, it's considered an involuntary termination. Reasons for this might include, for example, policy violations, performance problems, or displacement.

Review of the decision to terminate

Each involuntary termination is reviewed by the manager and HR representative before the termination occurs. Some involuntary terminations require contact with the ER Solutions team or an Employee Relations Consultant.

Review of termination

If your employment is terminated involuntarily, Wells Fargo provides you the opportunity to have the decision reviewed. Please refer to the dispute resolution process.

Performance Problems

To run our businesses smoothly and meet the ongoing needs of our customers, we need the contributions of every single team member. So as a member of the Wells Fargo team, you're expected to meet Wells Fargo's standards of performance, attendance, punctuality, and conduct and to follow company policies and procedures, including Wells Fargo's Code of Ethics and Business Conduct.

Generally, if you have a performance issue, your manager will decide the appropriate performance counseling and corrective action to let you know that you need to improve. This process can also include the termination of your employment if you fail to meet the required standards or if your continued employment is considered to be no longer in the best interest of Wells Fargo.

Immediate Termination

Employment may be terminated immediately if you engage in illegal conduct on Wells Fargo premises or if your performance or conduct is such that *continued* employment would no longer be in the best interest of Wells Fargo. Examples of conduct that may result in immediate termination of employment include but aren't limited to:

- Certain violations of the Wells Fargo Code of Ethics and Business Conduct.
- Certain violations of the Wells Fargo Risk Management Accountability Policy.
- Certain violations of the Wells Fargo Information Security Policy.
- Violation of the standards for appropriate workplace behavior described in the Team Member Professionalism section of the handbook.
- Certain actions with personal bank accounts or accounts in which you have an interest — for example:
 - Approving any transactions for yourself.
 - Check kiting (floating funds between two or more different accounts to cover withdrawals).
 - Conducting a transaction that violates the Bank Secrecy Act.
 - Making false ATM deposits to receive immediate cash (including depositing empty envelopes).
 - Reversing or waiving fees or charges for personal gain or for family, roommates, or other people with whom you have a personal relationship.

- Except as authorized by the Senior Security Director, possession of firearms and dangerous or lethal weapons, including tasers, stun guns, etc.:
 - On company premises or at company-sponsored events.

Note: Wells Fargo recognizes applicable state laws that may allow storage of firearms in locked vehicles in employer parking lots.
 - On company business.
 - In company vehicles, including car rentals while on company business.
- Failure to participate fully and honestly in an investigation or fact-finding process initiated by Wells Fargo.
- Failure to timely comply with the Social Security Number validation process.
- Falsification of records. Examples include:
 - Entering false identification (ID) information, including falsifying the number, the issuance or expiration date, or both into a Wells Fargo record or system.
 - Entering false sales or referrals on a sales tracking system.
 - Entering fictitious customer information into a Wells Fargo record or system.
 - Falsifying control logs (including but not limited to Record of Cash Movement Logs, Night Depository Register, ATM Balancing).
 - Force-balancing teller cash.
 - Intentionally misstating time worked in any timekeeping and attendance system or in a timekeeping document.
 - Making false statements or omissions in information provided at time of hire.
 - Notarizing a document without the document signer being present.
 - Pinning, enrolling, or activating online banking on behalf of a customer.
- Fighting on company premises or performing physical intimidation, violence, or threats of violence.
- Insubordination (for example, refusal to perform your job duties — see insubordination).
- Manipulating or misrepresenting sales (“gaming”) in an attempt to meet sales goals or receive compensation.
- Misuse of a company-issued credit or travel card.
- Misuse or inappropriate use of company property or equipment.
- Other acts involving dishonesty or breach of trust.
- Theft, attempted theft, or damage to Wells Fargo’s or a team member’s property.

Terminations resulting from misconduct related to code of ethics violations, dishonesty and fraud, professionalism, sales and service misconduct, and violation of company policies result in a “not eligible for rehire” status.

See Employment at Will in the Employment & Hiring section of this handbook.

Employment Ineligibility

Team members will not be permitted to continue their employment at Wells Fargo if they:

- Are not eligible for coverage under the terms of Wells Fargo’s fidelity bond (see Breach of Trust or Dishonesty).
- Do not meet the requirements of the Federal Institutions Reform, Recovery, and Enforcement Act (FIRREA) (see Breach of Trust or Dishonesty).
- Do not comply with the federal registration or state licensing requirements (for example, the Secure and Fair Enforcement (S.A.F.E) Mortgage Licensing Act of 2008) or fail to satisfy other legal requirements (see Personnel File).
- Cannot provide documents establishing their eligibility to work in the United States (see Employment Eligibility).
- Are otherwise determined to be ineligible for employment at Wells Fargo (see Employment Eligibility).

Displacement

Like any business, Wells Fargo is constantly evaluating customer service, efficiency, and profitability and makes appropriate changes in our organizational structure. In some cases, this may result in team member displacement, an involuntary termination initiated by management as a result of economic or operational factors requiring workforce reduction.

Wells Fargo leaders balance the needs of the business with key aspects of our company’s values. Our policies and processes are based on the values of treating and supporting team members as a competitive advantage and on our high ethical standards. To support these values during a displacement, a defined, consistent process must be followed by managers, in partnership with Human Resources.

Displacements are not voluntary; therefore, team members may not volunteer for displacement. The displacement process is also not to be used as a substitute for performance management of a team member. For more information about displacement standards, team members and managers should access Wells Fargo’s Displacement Policy.

If you are notified of displacement, the company will provide you with information about the programs or services available to assist you during the transition period. The *Benefits Book* provides information on the Wells Fargo & Company Salary Continuation Pay Plan, which governs eligibility for team members who are displaced and is designed to provide compensation to assist eligible team members in these situations while they are seeking new employment.

Notice period

Wells Fargo provides a 60-day notice period to all displaced team members, unless otherwise required by federal, state, or local laws. This means that team members will be notified 60 days in advance of the actual displacement. Team members may or

may not be required to work during their notice period. Based on the business need, the business determines whether the notice period is all working, all nonworking, or a split between working and nonworking. Regardless of working or nonworking, the team member's employment status is still considered to be active during the entire notice period and all policies, including Wells Fargo's Code of Ethics and Business Conduct, apply.

Retain philosophy

At Wells Fargo, we have a strong commitment to retaining qualified team members whenever possible — this “retain” philosophy is intended to give an opportunity to find new positions within the company with a focus on team members who:

- Return from a certified Medical Leave when their positions are no longer available
- Are active team members with a qualifying disability that cannot be reasonably accommodated
- Have been displaced

For team members returning from a certified Medical Leave and/or qualifying disability that cannot be reasonably accommodated, Wells Fargo Accommodations Management and Wells Fargo Recruiting will partner with each team member to find another position suitable for reassignment. If no suitable positions are available and the team member is not offered, reassigned, or placed in a position with the company, the team member will be placed on Job Search Leave and may be eligible for benefits under the Wells Fargo & Company Salary Continuation Pay Plan (the “Plan”) if the team member meets the eligibility requirements.

For displacement purposes, throughout the company, business groups or regions may devise their own specific policies and practices to support the retain philosophy. To support this philosophy, Wells Fargo created the Short-Term Assignment Resource (STAR) Program designed to provide short-term assignments for eligible team members who have been notified of displacement. Team members cannot be displaced and be brought back in the same position in a short-term assignment (STAR Program) or as a contingent resource.

Retirement

The decision to retire is an exciting step in your professional and personal life. As you approach your retirement, you'll need to make key decisions and complete several steps to ensure a smooth transition.

At least 90 days before you retire, review Your 5-step Guide to Retiring from Wells Fargo (PDF, 3.3 MB). This guide is designed to help you understand what benefits may be available to you in retirement and what action steps you may need to take before and after your retirement date.

You'll also find a high-level retirement timeline and printable checklists to help you navigate each step of the retirement process. Below is information about some of the key benefits that you may be thinking about in retirement.

Retiree health care

If you meet the below eligibility requirements, you may be eligible for access to retiree health care coverage under the Wells Fargo & Company Retiree Plan. This includes Wells Fargo-sponsored retiree medical plans (and dental plan if you are under age 65).

To be eligible for retiree health care, you must:

- Be in a benefits-eligible regular or part-time position on your last day of employment and meet one of the following:
 - Age 55 with at least 10 completed years of service
 - Age 65 with at least one completed year of service
 - 80 points (based on age + completed years of service); or
- Be in a benefits-eligible position and on Wachovia's payroll as of December 31, 2009, and both of the following:
 - Your age plus full years of service equaled 50 or greater as of January 1, 2010
 - On your last day of employment with Wells Fargo, you are at least age 50 with 10 or more years of service

Generally, if you terminated employment and were rehired within six months of your termination, your prior service counts in calculating the eligibility above. Your completed years of service are measured from your corporate hire date or adjusted service date, whichever is earlier. Partial years are not included.

A limited number of team members are also eligible for a subsidy toward the cost of Wells Fargo-sponsored retiree medical coverage. If you are eligible for a subsidy when you retire, and your eligible spouse or domestic partner is also eligible for a subsidy, you must choose to cover your eligible spouse or domestic partner at the time of your retirement for your eligible spouse or domestic partner to receive a subsidy. If you choose to add your eligible spouse or domestic partner to coverage later based on a Qualified Event your eligible spouse or domestic partner will not receive a subsidy.

If you are eligible for Medicare but you are not eligible to receive a subsidy toward the cost of Wells Fargo-sponsored retiree medical coverage, you will be able to enroll in individual Medicare-eligible medical coverage through a voluntary Medicare coordinator service called Via Benefits™ rather than coverage under a Wells Fargo-sponsored plan.

To find out if you're eligible for a retiree health care subsidy and access to a Wells Fargo-sponsored retiree health care plan, or to find out if you're eligible for access to Via Benefits, contact the Wells Fargo Retirement Service Center at 1-877-HRWELLS (1-877-479-3557), option 1, 3. Representatives are available Monday through Friday, 7:00 a.m. to 7:00 p.m. Central Time. Relay service calls are accepted. You can also sign on to benefitconnect.wf.ehr.com/ess.

For additional information about the Wells Fargo & Company Retiree Plan, refer to the *Retiree Benefits Book*.

401(k) Plan

If you have a balance in the 401(k) Plan, you'll need to decide what you want to do with your account balance upon retirement. You may request a distribution from your 401(k) Plan account at any time after you have terminated employment with Wells Fargo (and its affiliates) or if you become disabled, as defined by the 401(k) Plan.

If your total vested 401(k) Plan account balance is \$1,000 or less at the time of distribution, you will automatically receive a lump-sum distribution as soon as administratively feasible following the date that you terminate employment unless you request an earlier distribution date. If your vested 401(k) Plan account balance is over \$1,000, you may defer final distribution until April 1 of the calendar year following the later of the calendar year you attained age 70½ or the calendar year you terminated employment with Wells Fargo.

Following your last day of employment, you'll receive a brochure in the mail, which will provide information about your 401(k) Plan distribution options. Along with this brochure, you'll receive a Special Tax Notice Regarding Plan Distributions ("Special Tax Notice"), which provides general tax and rollover information, including the special tax treatment for certain distributions of Wells Fargo & Company common stock. You can also access the 401(k) Plan Summary Plan Description for important information about the 401(k) Plan, including distribution options in retirement. Review these materials anytime on the 401(k) Plan site and talk to a tax or financial advisor before taking a distribution from the 401(k) Plan.

A team of plan specialists is available to help you understand your distribution options. They will explain how each option might affect your 401(k) Plan savings and walk you through the distribution process. You can contact a plan specialist at **1-877-HRWELLS** (1-877-479-3557), option 1, 1. Plan specialists are available Monday through Friday, 7:00 a.m. to 8:00 p.m. Central Time. Relay service calls are accepted.

Cash Balance Plan

The Cash Balance Plan is a pension plan that was available to eligible team members before July 1, 2009. If you are eligible, you may begin the distribution process up to 90 days, but no less than 30 days, before the date that you want to begin receiving your benefit after your termination of employment.

If your total vested Cash Balance Plan account balance is \$1,000 or less at the time of your termination of employment, you will automatically receive a lump-sum distribution as soon as administratively feasible following your termination of employment unless you request an earlier distribution date. If your vested Cash Balance Plan account balance is over \$1,000, you may defer final distribution until April 1 of the calendar year following the later of the calendar year you attained age 70½ or the calendar year you terminated employment with Wells Fargo.

Refer to the Cash Balance Plan Summary Plan Description for additional details about eligibility and distribution options.

If you are eligible for the Cash Balance Plan, you can view your current Cash Balance Plan benefit and estimate what your monthly Cash Balance Plan benefit will be with different

benefit commencement dates and with different distribution options by signing onto the BenefitConnect site. You can also request a Cash Balance Plan information packet by calling the Wells Fargo Retirement Service Center at **1-877-HRWELLS** (1-877-479-3557), option 1, 1. Representatives are available Monday through Friday, 7:00 a.m. to 7:00 p.m. Central Time. Relay service calls are accepted.

If you choose to apply for reemployment at Wells Fargo & Company or its affiliates after you have retired and taken a distribution (including but not limited to partial or final distributions) from one of the company's qualified retirement plans, three months must elapse from your termination date before you may be rehired by Wells Fargo.

The information above is intended to summarize aspects of some benefit plans ("Plan(s)") sponsored by Wells Fargo & Company ("Wells Fargo") in an easy-to-understand format. It is not intended to provide a full description of each Plan. Please review the applicable Summary Plan Descriptions and the official Plan documents for more information. In case of any conflict between the information provided above and the official Plan documents, the official Plan documents govern. If there are any errors in this information, Wells Fargo reserves the right to correct such errors. Wells Fargo also reserves the unilateral right to amend, modify, or terminate any of its benefit plans, programs, policies, or practices at any time, for any reason, with or without notice. Any such amendment, modification, or termination may apply to current and future participants, covered spouses or domestic partners, covered dependents, and beneficiaries.

Team Member Obligations at Termination

Your responsibilities when your employment terminates

If your employment with Wells Fargo terminates, you are expected to return all company property and physical assets such as ID badges, keys, credit cards, computer systems, mobile devices, and any intellectual property to your manager on or before your last day. You are expected to comply with the Code of Ethics and Business Conduct which prohibits sharing any proprietary, confidential information or trade secrets about Wells Fargo, team members, customers, or third-party service providers during or after your employment. The transfer of information during employment is limited to properly designated team members or where required by law. For more information, see Information Security or Information Security Identity and Access Management Domain Policy.

Your manager is accountable for retrieval of the company assets and disabling system access in a timely manner.

Report any lost, damaged, or stolen Wells Fargo information or assets to your manager immediately or notify the Security Response Center (SRC) at 1-877-494-WELLS (1-877-494-9355), option 3, or email to compromiseddata@wellsfargo.com.

Repayment obligations if your employment terminates

If your employment with Wells Fargo terminates, refer to PTO at termination and the Overpayment policy to determine if there are any repayment obligations before your last day of employment.

After Leaving

Address changes

Once you leave Wells Fargo, you're responsible for notifying us promptly of any address changes. We'll need this information to make sure that you receive your year-end tax statements and benefits and retirement information. To request an address change while still employed at Wells Fargo, call 1-877-HRWELLS (1-877-479-3557), option 2, or TDD/TTY 1-800-988-0161. After leaving Wells Fargo, you can reach the Wells Fargo Retirement Service Center at 1-877-HRWELLS (1-877-479-3557), option 1. Representatives are available Monday through Friday, from 7:00 a.m. to 7:00 p.m. Central Time. The Wells Fargo Retirement Service Center accepts relay service calls.

Unemployment benefits

Your state unemployment office, not Wells Fargo, determines eligibility for unemployment benefits, based on your reason for leaving work. If you have questions about these benefits, contact your nearest state unemployment office.

Benefits

If you have questions about how your termination of employment will affect your benefits, including information on COBRA health coverage that you and your covered dependents may elect, refer to the *Benefits Book* in the Health & Well-Being section on the Benefits site on Teamworks (also available on BenefitConnect | COBRA at cobra.ehr.com) or contact BenefitConnect | COBRA at 1-877-29-COBRA (1-877-292-6272), Monday through Friday, 8:00 a.m. to 6:00 p.m. Central Time (excluding holidays). International callers should use 1-858-314-5108.

Our approach

Wells Fargo is in the business of trust. Our customers trust us to protect the privacy and security of their information. That's why every team member is responsible for understanding and following procedures that reduce risk to our company and consumers. You are our front line in managing those risks by protecting Wells Fargo's information, communication systems, and other assets. You are responsible for understanding information security and the operational risks associated with your role and managing those risks appropriately.

The material contained in this section highlights information that is important to you and requires full compliance. Details of the entire Information Security (IS) Policy and its associated control standards can be found in the Information Security Risk Management Tool (ISRMT) Wells Fargo's online system of record for Information Security Policy.

Important: All new team members are required to sign the Team Member Acknowledgment to indicate that they will read, acknowledge, and abide by the provisions of our Information Security Policy, summarized in this *Team Member Handbook* Information Security Policy Overview. Refusal to complete the Team Member Acknowledgment can result in corrective action, which may include termination of your employment. For additional information, see Corrective Action. In addition, team members are required to complete Information Security compliance training.

Information Security Policy overview

The requirements documented in this section describe the essential principles that help secure information.

Team members are expected to comply with these principles at all times:

- Act in ways that protect company and consumer information
- Use Wells Fargo's assets for business purposes
- Use Wells Fargo's communication systems in an appropriate and safe manner

This overview should not be considered comprehensive, because not every situation can be addressed here. Wells Fargo expects team members to use sound judgment and to act in ways that protect Wells Fargo's information, assets, and communication systems. Your business unit may have more stringent policies and procedures than stated within this section. If you have questions, you should work with your manager and assigned Information Security Consultant (ISC) to ensure that your actions comply with the Information Security Policy.

Failure to act in ways that protect Wells Fargo's information, assets, and communication systems, or failure to cooperate with inquiries or investigations, can result in corrective action, which may include termination of your employment. For additional information, see Corrective Action.

Every team member is required to immediately report anything that may violate the Information Security Policy or place the company's information, assets, and communication systems at risk. Methods for reporting such situations are outlined within this section. No retaliation may be taken against a team member because he or she, in good faith, reports a possible breach of information security or risk to Wells Fargo's information, assets, or communication systems.

Appropriate Use

The use of Wells Fargo's electronic communication systems is a privilege based on business needs. These systems give team members the ability to communicate with customers, business partners, and other team members in a safe and reliable manner while minimizing risk and maintaining compliance with regulatory and legal standards.

To mitigate risk, team members are required to follow established requirements and business procedures on the use of electronic communication systems, including using electronic communication, systems features, and content appropriately.

The following are examples of prohibited activities:

- Hacking, including attempting to gain unauthorized access to computing resources, including attempts to disrupt service.
- Posting or storing proprietary content in unapproved or personal websites, blogs, chat rooms, mobile applications, or other social media websites.
- Online gambling and any illegal internet activity. In addition to being prohibited under Human Resources guidelines, these types of sites may be associated with information-stealing tools and information theft.
- Downloading or forwarding chain letters and viruses.
- Viewing, storing, downloading, or forwarding pornographic images or other perceived obscene, racist, or harassing materials. In addition to being prohibited under Human Resources guidelines, they may contain viruses or malware.

Under no circumstances are team members allowed to use Wells Fargo communication systems in a way that could violate the company's policies.

Monitoring of Company Equipment

Wells Fargo will monitor and may control access to and use of its equipment and electronic communication systems, including but not limited to original and backup copies of email, instant messaging, text messaging, voicemail, and internet use. You should not expect privacy in connection with your use of any company resources, equipment, or property. Even if information is encrypted and you have created or have access to passwords to protect against unauthorized access, you should not consider activities or correspondence using that password to be private. In addition, phone calls made or received on any business telephone may be monitored or recorded. Monitoring may be conducted remotely or locally using software, hardware, or other means. Information obtained through monitoring may be shared with management, human resources, and corporate security. It will be treated confidentially and retained for a reasonable period to accomplish the purposes as determined by Wells Fargo, and it is subject to any rights team members may have under applicable law.

If you have questions or concerns about the appropriate use of electronic communication systems, contact your manager or Information Security Consultant (ISC).

Reporting Security Incidents

Any team member who believes that an information security incident has occurred must report it immediately. This helps to contain the incident and assists with managing its impact. Under certain circumstances, Wells Fargo is required to notify customers and others if information related to them is compromised.

Notify your management if you detect any unauthorized use or attempted misuse of your personal authenticators, terminal sessions, or equipment. If a mobile computing device is lost, stolen, or confiscated or company, customer, consumer, or personnel information is modified, destroyed, lost, stolen, or confiscated, it is your responsibility to immediately notify your manager and the Security Response Center (SRC) at 1-877-494-WELLS (1-877-494-9355), option 3, or 001-480-437-7599 for international callers who do not have 877 service. You can also send an email to compromiseddata@wellsfargo.com. To report a security incident anonymously, contact the EthicsLine at 1-800-382-7250 or online through the Web Reporting System.

All reports will be treated as confidential to the extent possible. No retaliation will be taken against any team member because he or she, in good faith, reports a possible security incident.

Protecting Company & Consumer Information

Company and consumer information is an asset of the company and requires every team member's protection to preserve consumer trust and business integrity. All types of company and consumer information are important assets that require appropriate protection.

Protecting information applies not only to our company and supplier or third-party service provider, but also to anyone who may have a relationship with Wells Fargo, including individuals,

businesses, and team members. You have a responsibility to protect company and consumer information.

Information owners must limit the availability of information on *Teamworks* based on the classification of the information and the business need for access.

As part of your job, you must take appropriate measures to safeguard company and consumer information from inappropriate use, access, alteration, disclosure, or destruction.

Business need to know

Your access to company resources and information is considered a privilege. An appropriate level of information access is granted to team members according to their business role and need.

Team members may receive proprietary information relating to Wells Fargo in the course of their work and are obligated to protect such information from disclosure. Team members must disclose information only to authorized parties who have a business need to know. Company and consumer information may be disclosed only within Wells Fargo or to nonaffiliated parties in accordance with applicable law, confidentiality agreements, and privacy policies. It is your responsibility to ensure that the request for information meets these requirements.

To report unauthorized attempts to obtain information without a valid business need to know, notify the Security Response Center (SRC) at 1-877-494-WELLS (1-877-494-9355), option 3, or 001-480-437-7599 for international callers who do not have 877 services. You can also send an email to compromiseddata@wellsfargo.com.

Information Classification

You should classify information based on the potential impact to the company if the information is not properly protected. Our information categories and information types are documented within the Information Classification Matrix - Exhibit, which provides a common foundation for consistent classification of information. The matrix contains a representative set of examples for each of the four classifications: Public, Internal use, Confidential, and Restricted. When in doubt, refer to the Information Classification Matrix - Exhibit for guidance in determining how to classify and protect information. Otherwise, contact your manager or Information Security Consultant (ISC) for assistance.

For the information you use, be aware of how it is used and its appropriate level of protection. You are responsible for applying the appropriate controls if they are not applied automatically.

Public

Information classified as "Public" refers to:

- Information either commonly and openly available in the public domain or intended for unrestricted use beyond our organization.
- Information that has no restrictions or requirement for protection (for example, public white pages, business cards, press releases, anonymous surveys).
- Information that, by itself, would not result in harm to consumers, Wells Fargo, its customers, or team members.

Internal Use

Nonpublic information classified as “Internal Use” refers to:

- Sensitive company and consumer information that has a low risk level. It can generally be shared between team members with a basic need to know.
- Information that must be protected from unauthorized parties (for example, contact information, employee learning transcript, organization charts, policies, and standards).
- Information that would have minimal impact on consumers, Wells Fargo, its customers, or team members if disclosed or destroyed without authorization.

Confidential

Nonpublic information classified as “Confidential” refers to:

- Sensitive company and consumer information that has a medium to high risk level. Access is limited to groups with a specific need to know, as required to perform a particular business function or activity. Information should be considered confidential if the classification is otherwise unknown or cannot be determined.
- Information must be protected when at rest (stored) or if transmitted externally (for example, Social Security numbers, financial account numbers, check images, personnel files, security plans).
- Information that may have a negative impact on consumers, Wells Fargo, its customers, or team members or result in regulatory, reputational, and financial consequences if disclosed or destroyed without authorization.

Restricted

Nonpublic information classified as “Restricted” refers to:

- Sensitive company and consumer information that has a high risk level. Access is limited to explicitly predesignated individuals who have a stringent business need to know.
- Information that must be protected at all times (for example, passwords, PINs, credit card validation numbers (CCV), secure one-time authentication (SOTA), code of the day (COD)).
- Information that may cause severe harm to consumers, Wells Fargo, its customers, or team members if disclosed or destroyed without authorization. This could result in severe regulatory, reputational, and financial damage or provide significant advantage to a competitor.

Information Handling

Information must be handled appropriately (stored, viewed, and transmitted) and protected from misuse, according to its classification of Internal Use, Confidential, or Restricted. Sharing of company and consumer information must comply with the Wells Fargo principles requiring a valid business need to know.

Classifying and labeling information

When you are classifying information, consider the intended distribution and use of documents, or electronic media, particularly when third parties are involved. Keep in mind that the classification of a file or document can change over its lifetime.

- If you are not certain of the content of electronic media, you must classify it as confidential.
- Labels may optionally contain statements to add further clarification, such as “Do not reproduce.”

For specific instructions on what and how to label beyond the guidance provided above, please refer to specific procedures for your business.

Storage

Information must be stored in a way to prevent unauthorized access. Store your paper and removable electronic media that contains confidential or restricted information in a locked enclosure when it is not under the control of an authorized person.

- Manage and store hard copy documents and records according to the Information Risk Management (IRM), Records Management and Retention Schedule Manager, including any specific procedures within your business.
- Do not leave confidential or restricted information where unauthorized parties can access it. Encryption is required for all confidential and restricted information stored on your workstation, mobile computing devices, and portable digital storage media.
- Appropriate encryption products are available for external drives, thumb drives, CD-ROMs, and other electronic media. Contact your manager or ISC for more information.

Distribution

It is important that you respect all information classifications, copyrights, and other intellectual property protections. You need to ensure that proper precautions are taken before discussing or distributing any proprietary information through manual or electronic methods.

- When in public areas, ensure that others cannot overhear your phone conversations.
- While leading video conferences, turn off messaging pop-ups (for example, email, IM) and close any applications that not required for the meeting to avoid disclosing company and consumer information.

- Immediately retrieve confidential or restricted documents from printers, copiers, and fax machines. Do not print confidential or restricted information on a personal or public printer. Do not print restricted information on a Wells Fargo-owned or -leased printer located in an area that is accessible to the public.
- Validate that the fax is being sent to the proper number — program the fax for frequently dialed numbers. Inform the recipient when you fax confidential information to ensure immediate pickup. Do not send confidential information to public fax machines, and never fax restricted information.
- Encrypt confidential information before sending externally — restricted information must always be encrypted. Contact your manager or ISC for details on how to encrypt.
- Place all confidential information in tamper-evident packaging before distributing by any mail system. Ensure that mailed or shipped information cannot be obtained without the packaging being opened, which would be obvious to the recipient.

Transportation

Confidential and restricted information must be transported in ways to prevent its loss or misuse. Transmit this class of information electronically whenever possible, and encrypt it before transporting it beyond the perimeter of the Wells Fargo environment. Additional controls apply to physical shipments of hard copy documents and unencrypted media that contain confidential or restricted information.

- Do not send unencrypted electronic media outside the company or through interoffice (MAC) mail. The only exceptions are items mailed directly to the impacted consumer, such as statements or check images. If you are uncertain about encryption requirements, consult your manager or ISC.
- Use tamper-evident packaging to ensure that unauthorized opening would be obvious. Validate that both the sender and recipient addresses are accurate.
- Be aware of exactly what information is being shipped and log items as necessary for your business.
- When shipping externally, use Wells Fargo preferred service providers. Log outbound confidential items to identify and recreate the content if lost or stolen. Use an automated tracking service if available — otherwise, track the shipment manually by notifying the recipient to expect the shipment, have the recipient acknowledge its receipt, or both.
- Place outgoing items in a controlled-access area or under visual control until pickup — do not leave them in a public area. If you are not familiar with the party picking up the shipment, verify their identity or credentials.

If an expected shipment containing Confidential or Restricted Information does not arrive when expected, follow up with the sender to inquire about the delay and determine if the shipment is missing. If you are still concerned, immediately report the security incident.

Retention

Make sure that you understand the retention requirements that apply to your business in accordance with Information Risk Management (IRM), and Retention Schedule Manager — what needs to be retained, by whom, and for what length of time.

- Do not keep electronic records and physical documents longer than what is required by the Records Retention Schedule.
- Refrain from storing nonessential information in personal folders. Periodically review your retained computer documents and personal email folders to eliminate outdated, duplicate, and nonessential records.

Disposal

Use the Retention Schedule Manager and destroy proprietary information so that it cannot be recovered, once its retention requirements are met. Refer to Media Destruction or Shred Services for more information.

- Dispose of documents or papers that are no longer needed and contain internal use, confidential, or restricted information in an authorized, locked, secure document disposal receptacle (for example, shredding bin, departmental shredder) or approved desk-side cross-cut shredder.
- Understand the difference between authorized, secure shredding bins and recycling containers — know where these different containers are located. Proprietary documents must not be placed in recycling containers, because the handling of that material is not secure.
- Dispose of internal use, confidential, and restricted information by methods designed for your work area (for example, secure disposal container or shredder).
- Know your site rules for disposing of electronic media (for example, take it to central collection point).

If you are not familiar with your area's document and media disposal procedures or cannot locate the secure shredding bin, contact your manager for assistance.

Work Area Security

Protect information by ensuring proper control of access into any business-related work area and ensuring vigilant housekeeping practices, such as shredding or other secure document disposal.

Passwords, PINs, and IDs

Safeguard all types of personal authenticators to prevent unauthorized use by others.

- Authorization or access to certain systems and information within Wells Fargo or external third-party service provider systems is granted based upon confirmation of your credentials (for example, user ID, password, shared secrets). Protect your authentication credentials just as you would protect other types of restricted information. Choose a complex password of at least eight characters with a minimum of three character types (uppercase letter, lowercase letter, number, or special character).

- Do not disclose, display, or share passwords or PINs with anyone, including your manager.
- Do not request a team member, job seeker, or applicant's username or password to computer account or profiles, including but not limited to social networking sites:
 - Do not require a user to sign on to his or her personal computer accounts to allow you access to view his or her personal information except if the account was established or is used for Wells Fargo business purposes. Refer to Enterprise Digital Properties Governance, Standards & Guidelines for more information.
 - Do not require acceptance of social network site "friend" requests to allow you access to view someone's personal information.
- You may initiate a password change at any time; you will be reminded and required to change it at least every 60 days.
- Change your password or PIN immediately if you suspect that it has been guessed or otherwise compromised.
- You may be provided with additional security devices (for example, security tokens, smart cards) to validate your identity. Any such device must be protected and returned upon termination of employment.

Access badges

Access badges are often used to allow and control entry into designated Wells Fargo facilities.

- When badges are required for access, it is recommended that you wear your badge so that it is visible to others. Follow site rules to obtain temporary badges for guests and visitors. Immediately report the loss of any access badge so that it can be quickly deactivated.
- If you witness an Access Control Violation, it is your responsibility to immediately notify the Corporate Security Response Center (SRC) at 1-877-494-WELLS (1-877-494-9355).
- Offer to escort anyone not recognized as having valid access into a Wells Fargo work area back to the entrance or guard station. Verify the identity of maintenance personnel and other parties claiming a need for access into wiring closets, holding areas, systems, or equipment.

Each team member must use his or her own badge when entering or exiting a secured area.

Physical environment

Always keep your laptop, other mobile computing devices, and portable digital storage media safe and secure.

- Never leave your computer unattended without first shutting it down or locking your screen.
- When on-site, physically secure your laptop when it is not in your possession by using a cable-lock or anchor-lock or a facility-restricted access control such as a guard or badge access or other management-approved control.

- When traveling, take extra precaution to protect your equipment and its information. Power down the laptop before you transport it. Never check laptops as luggage — always keep your laptop with you. Lock your mobile devices and media in the hotel room safe. If not available, use a cable-lock to secure your laptop in a nonvisible location.
- When driving, place your laptop in the trunk or other nonvisible secured cargo area before leaving for your destination. If your destination appears unsafe (for example, a parking lot with no lights), take your laptop and mobile devices with you. Never leave your laptop in an unlocked car or in a car overnight.
- When off-site at meetings, take your laptop with you on breaks or have an authorized person watch it — after you shut it down to enable encryption. When working from home, do not let family members or anyone else use your work computer or any other mobile computing devices or portable digital storage media.
- Power down mobile computing devices when traveling internationally before passing through any immigration, customs, or other border checkpoint.

Clean desk and displays

Ensure that company, customer, and team member information is not left in the open where it can be accessed or viewed by unauthorized parties. Take precautions to prevent others from obtaining nonpublic proprietary information without your knowledge.

- Position your computer monitor so that others cannot easily read it.
- Erase whiteboards that show non-public information when it's no longer needed and before leaving the area.
- Do not post confidential or restricted information on office or cubicle walls or in common areas.
- Immediately place internal use, confidential, or restricted information into a locked secure disposal container or shred it once it is no longer required.

Protecting Company Hardware & Software Assets

Wells Fargo computing hardware and software ("assets") are company property and provided for use to facilitate company business. Only company-managed assets may be used to perform your work.

Assets issued to team members are an extension of the office and must be used and secured in accordance with Wells Fargo policies, standards, and security requirements. Team members are responsible for protecting assets from loss, theft, and damage while they are in the team member's possession.

Under no circumstances are team members allowed to use Wells Fargo assets in a way that could violate Wells Fargo policies, standards, and security requirements. Wells Fargo reserves the right to monitor any company assets to ensure compliance with these policies and to maintain legal and regulatory standards.

Computer systems

All software installed or developed on Wells Fargo computer systems or mobile computing devices, and any information collected, downloaded, or created, is the exclusive property of Wells Fargo. Information may not be copied or transmitted outside the company without a predefined business need, and then only in an authorized manner. Upon termination of employment, no team member shall remove, copy, or destroy such software or information from company systems.

Mobile computing devices

Wells Fargo may issue mobile computing devices for team members to conduct Wells Fargo business. Team members are responsible for ensuring that mobile computing devices are protected from loss, theft, and damage. Under no circumstances are unauthorized parties allowed to use Wells Fargo equipment. Security software (for example, disk encryption, personal firewall, and antivirus) installed on mobile computing devices must not be disabled or removed under any circumstances.

Mobile computing devices are to be protected when not in use and must be transported in a secure manner (see Protecting Company Information for detailed requirements). When using a laptop or tablet, take extra precaution to ensure that unauthorized persons are unable to view your work.

All Wells Fargo portable digital storage media (PDSM) are assumed to contain at least confidential information. Any PDSM used for storing Wells Fargo proprietary information must belong to Wells Fargo and be protected in ways similar to mobile computing devices. Under no circumstances should a Wells Fargo-owned PDSM be connected or inserted into a non-Wells Fargo computer system.

You must immediately report a lost, stolen, or confiscated mobile computing device as a security incident. Notify your manager and the Security Response Center (SRC) at 1-877-494-WELLS (1-877-494-9355), option 3, or 001-480-437-7599 for international callers who do not have 877 services. You can also send an email to compromiseddata@wellsfargo.com. For more information about standards for business-related, public-facing mobile website or application and text message service to customers or prospects, see the Enterprise Digital Properties Governance website.

Personally owned electronic devices

Personally owned electronic devices (for example, laptop, tablet, smartphone, PDA, MP3 player, iPod) must not be used to conduct Wells Fargo business, except as outlined below, and must not be used to store or transmit company information or be connected or attached in any way to Wells Fargo-managed equipment or computer systems. Additionally, team members must not use Wells Fargo computer systems as a power source for personally owned electronic devices.

- Personally owned mobile computing devices that are part of, and used in strict accordance with, a Wells Fargo-approved enterprise Bring Your Own Device (BYOD) program may be used to conduct Wells Fargo business.

- Do not perform personal (non-Wells Fargo business) activity within the Wells Fargo secure container when loaded on a personal mobile computing device (for example, iPhone, iPad).
- Personally owned printers connected to Wells Fargo-managed equipment or computing systems through a USB cable may be used by remote workers to print public and internal-use information.
- Team members using approved remote access solutions may use non-Wells Fargo wireless network equipment to connect to the Wells Fargo network.
- With management discretion, team members who need to use a cellular phone for necessary and reasonable business purpose conversations can use their personal mobile phone.

Protecting Electronic Communication Systems

Wells Fargo's electronic communication systems exist to facilitate business and aid team members in communicating with customers, business partners, and other team members in the conduct of that business. The company relies on individual team members and their managers to make sure that uses of these communication systems are functional for business purposes.

Team members are expected to represent Wells Fargo in a professional manner when using communication systems to conduct business. Team members should remember that much of the information they are transmitting and receiving electronically is sensitive company and consumer information. Accordingly, team members are required to take appropriate steps to protect against unauthorized disclosure of such information and to limit sending information to only those with a business need to know. This includes not disclosing internal matters to the general public or press without the express written consent of Corporate Communications.

If you have questions or concerns about the appropriate use of electronic communication systems, please contact your manager or Information Security Consultant (ISC).

E-Messages

Electronic messages ("e-messages") sent through Wells Fargo's communication systems must comply with company policies.

Team members must never send an e-message through any Wells Fargo communication system that could be reasonably viewed as obscene, threatening, harassing, discriminatory, abusive, or that are disparaging to customers.

E-messages must not include attachments or file extensions that may cause information security vulnerabilities or introduce malware. Refer to the Enterprise Digital Properties Governance website for additional standards for outbound e-messaging to customers and prospects. Visit the Enterprise Messaging website for more information regarding internal e-messaging communications.

Do not use e-messaging systems that are not controlled by Wells Fargo (for example, Hotmail, Gmail, personal email, cell phone for texting) to conduct Wells Fargo business or to send, receive, or store Wells Fargo proprietary information. You must not create accounts on external systems to conduct Wells Fargo business.

Email

Restrict circulation of email messages that discuss confidential matters to team members who have a business need to know. When sending confidential or restricted information to external parties by email, ensure that the content can be properly secured by an approved encryption solution. Do not include confidential, restricted, internal use, sensitive, or any personally identifiable information (PII) about a customer (e.g., a person) in the subject line of an email sent externally (e.g., contact information, financial transaction detail).

Team members must understand Wells Fargo's policies and procedures according to Enterprise Messaging for handling fraudulent email messages. Review your email carefully and use the Report Spam/Phish button on your Outlook toolbar for suspicious messages, especially if you've received them from an external person, company, third-party service provider, or business that is unsolicited. Do not open email attachments or links that could introduce malware. Do not forward the email to anyone unless you don't have the Report Spam/Phish button, in which case you can send the email to SpamReporting@wellsfargo.com or ReportPhish@wellsfargo.com and delete all copies of the suspected phish email from both your inbox and sent email folder.

Wells Fargo monitors and filters all email messages based on specific content, including unencrypted sensitive information (for example, Social Security numbers, financial account numbers).

Messages that contain obscene content will not be delivered. Such messages sent by a Wells Fargo team member can result in corrective action, which may include termination of your employment. For additional information, see Corrective Action. Team members who receive obscene emails not blocked by these filters should forward such email to abuse@wellsfargo.com and then delete the message from their inbox.

Instant messages

Only Wells Fargo-approved solutions may be used for instant messages and online chat ("IM") services. Under no circumstances should any team member attempt to conduct Wells Fargo business by using an unauthorized IM service or software.

Text messages

Text messaging (SMS and MMS) is not considered appropriate technology for secure communication. Do not send nonpublic proprietary information by text messaging.

Internet Use

Team members are allowed to use internet sites for research or other legitimate business purposes. When using corporate PCs remotely for internet research or other legitimate business purposes, connect to the Wells Fargo Virtual Private Network (VPN) or other approved tools, first, in order for enterprise protection controls to be effective. However, you are always expected to represent Wells Fargo professionally when using the internet. Be aware that internet resources not under the control of Wells Fargo are subject to compromise, may be exposed to public view, and may not be secure. Wells Fargo may filter or block access to certain types of websites that it deems inappropriate for business purposes (although failure to block access to websites does not mean that the site is deemed appropriate). Wells Fargo will monitor internet web surfing (browsing) for inappropriate use and introduction of malware.

Software download

Team members are not authorized to download or install software obtained from the internet. Software necessary to conduct Wells Fargo business must be approved by your manager and obtained through Wells Fargo's Desktop Support or your technical support group to initiate the process. Approved Freeware, Shareware, and open source software used for legitimate purposes can be downloaded from the FOSSWARE Enterprise Repository.

Streaming and multimedia

Any internet services that may have a notable performance impact to the Wells Fargo internet connection must be limited to business need and only permitted with prior approval from your manager. The use of audio or video streaming or media download services (iTunes, MP3 sites, etc.) for personal use is explicitly prohibited.

Websites and social media

Access to external public internet websites or social media (for example, blogs, wikis, and social networks) using Wells Fargo-owned equipment and during normal business hours should be reserved for business purposes. While limited use of such resources for personal purposes is allowed, personal use is considered a privilege and is up to the discretion of your manager.

Internet websites and social media (for example, Facebook, YouTube, LinkedIn, Twitter, etc.) may have business utility for certain Wells Fargo team member roles for purposes of research, marketing, and other business driven uses. However, contributing to public forums in the name of the company, its customers, or its employees is restricted to approved Wells Fargo professionals. Under no circumstances should Wells Fargo proprietary information be uploaded to or posted on a public social media or non-Wells Fargo internet website.

Creation of Wells Fargo-branded websites and social media is subject to specific branding, content, and design requirements. You must obtain management approval and follow appropriate policies and standards from Enterprise Marketing, Enterprise Digital Properties Governance, and the Legal Department.

Before you create any content on any externally facing social media or other website that may imply endorsement from Wells Fargo, you must contact your manager or ISC for assistance.

Personal Communications

If you are granted access to Wells Fargo's e-messaging systems, you are expected to use these systems to facilitate your work. You are also allowed to use these communication systems for non-work-related activity during non-work time so long as it does not interfere with team members' work responsibilities, violate Wells Fargo policies, or impact the functioning of Wells Fargo's e-messaging systems. Refer to the Electronic Communication and Social Media policy for information about the professional standards that must be followed.

Wireless Transmissions

Team members must be aware that wireless communication systems are prone to interception by fraudsters. Do not use a wireless communication system to discuss confidential or restricted information without first ensuring that the communication is adequately protected. Contact your manager or Information Security Consultant (ISC) about approved solutions for securing wireless communications.

Working Off-Site

Team members are responsible for ensuring that they use only Wells Fargo-approved remote access. Do not transmit proprietary information over a non-Wells Fargo network without first engaging the Wells Fargo remote access service (for example, MyED). You are expected to adhere to all of Wells Fargo's policies when working remotely.

Understanding Security Responsibilities

Applicability

The expectations as outlined in this section apply to all team members, regardless of position or status.

Roles and responsibilities

Team members

Every team member in every job and position plays an important role in protecting the information entrusted to Wells Fargo by customers, team members, and our third-party providers. As a Wells Fargo team member, you are expected to:

- Read and comply with the Information Security Policy Overview. This information outlines those requirements that are most common to all team members.
- Acknowledge that you understand and are willing to follow the Information Security Policy upon hire and annually thereafter

by completing the required training, Protecting Wells Fargo Information.

- Seek all necessary approvals and risk acceptance as required in the Information Security Policy.
- Support and encourage other team members in complying with the Information Security Policy.
- Report anything that may be considered a violation of the Information Security Policy.

Managers and senior leaders

In addition to the team member responsibilities above, managers and senior leaders are also expected to:

- Understand the information security threats to your business and manage the associated risks properly.
- Support team members in complying with the Information Security Policy to appropriately protect Wells Fargo information, assets, and communication systems.
- Ensure that team members reporting to you complete the annual required training in the time frame communicated by your business.
- Lead by example and foster a culture in which validating compliance and reporting security incidents are encouraged and accepted.
- Seek guidance from your Information Security Consultant (ISC) when you are unsure of how to comply with the Information Security Policy.

Information Security Consultant (ISC)

ISCs, acting as part of the Enterprise Information Security Front Line, work with lines of business and technology teams to ensure risks and threats to Wells Fargo's assets (e.g., business applications, third parties, infrastructure components) are identified as assessed. ISCs partner with the Group ISL teams to ensure that the business is kept informed about their risks and mitigation options. The ISCs ultimately are accountable for the information security risk assessment activities conducted by Enterprise Information Security. See the Information Security Roles and Responsibilities (PDF) document for more information.

Exceptions

Compliance with Information Security Policy is mandatory. In rare instances, to optimize our ability to exercise balance between security and business, there may be occasions when exceptions or variances to policy are necessary.

Information security policy exceptions must be documented in an approved policy exception in the Information Security Policy Exception Management (ISPEM) tool as identified by Enterprise Information Security.

Information about the information security policy exception process can be found at the ISPEM Support page.

References & Contacts

The following references and contact information are provided in support of Wells Fargo's Information Security Policy. This additional information is intended to assist team members in locating detailed guidance on related policies, processes, technologies, and support groups. The supporting materials listed below are organized alphabetically for ease of reference.

- Cyber Threat Management (CTM)
- Electronic Shipping Options (eSO)
- Email Misuse: Spam and phish:
 - abuse@wellsfargo.com
 - reportphish@wellsfargo.com
- Enterprise Digital Properties Governance (websites, social media, mobile, and e-messaging)
- Information Security (EIS): Products and Services
- Information Security: Education and Awareness
- Information Classification Matrix - Exhibit and FAQs
- Information Risk Management (IRM)
 - Retention Schedule Manager
 - Shred Request Tool
- Information Security Consultant (ISC) (list by business)
- Information Security Policy Exception Management Mailbox
- Information Security Risk Management Tool (ISRMT)
 - Policies, Standards, Requirements, Solutions and Security Baselines
 - Mailbox Support
- Security Response Center (SRC): Incident Reporting
 - 1-877-494-WELLS (1-877-494-9355), option 3
 - 001-480-437-7599 for international callers who do not have 877 service
 - Send an email to compromiseddata@wellsfargo.com

Privacy & Solicitation

At Wells Fargo, we value our customers' and team members' privacy. During the course of conducting business, we gather personal and confidential information about our customers and team members that must be protected at all times. As team members, you play a significant role in securing this information. Wells Fargo has established a Global Data Protection and Privacy Policy that establishes principles about how Wells Fargo collects and handles personal data globally. This global policy is an umbrella policy that establishes minimum requirements. The U.S. Privacy and Solicitation Policy requires team members to adhere to the rules and controls set forth in the policy to ensure compliance with laws and regulations applicable in the U.S. about marketing and solicitation, nonmarketing outbound communications, information sharing, and privacy notices. In addition, there are international regional and country policies that provide more details about how Wells Fargo handles personal data in those regions. This policy is not intended to prevent you from discussing terms and conditions of employment at Wells Fargo (see Employment & Hiring).

U.S. Privacy Overview

The term "privacy" relates to our information sharing and solicitation practices that pertain to consumer and business customers and prospective customers.

We use this confidential customer information to:

- Service our customers' accounts.
- Develop new products and services.
- Comply with legal obligations and manage our business.

Privacy's role within Wells Fargo

Within Wells Fargo, Enterprise Privacy develops and administers enterprise policies, practices, and requirements for all business groups to ensure that privacy requirements are appropriately followed. Enterprise Privacy also reviews privacy-related policies, practices, and procedures established by the lines of business and manages Wells Fargo's Privacy and Solicitation Policy.

Privacy and Solicitation Policy is a company-wide policy applicable to our U.S. businesses based on federal and state laws and explains how Wells Fargo uses and protects the information that our customers or prospects provide to us. The policy also establishes company-wide guidelines to ensure that information sharing and solicitation preferences for both customers and noncustomers are consistently honored as required across all lines of business.

Your responsibilities

It is important that team members with any type of customer contact or access to customer information read and understand Wells Fargo's Privacy and Solicitation Policy. As part of required training, team members are expected to acknowledge that they will read and adhere to the provisions of this policy.

The responsibility for adhering to Wells Fargo's Privacy and Solicitation Policy resides with each business group. Businesses are required to demonstrate that they have processes in place to manage information sharing and solicitation practices in their organizations in accordance with federal, state, and provincial laws and regulations.

Privacy notices

Financial institutions are required to provide a notice of privacy policies and information-sharing practices to every individual customer at the time an account is opened and, in certain cases, annually thereafter.

U.S. Consumer Privacy Notice

The Wells Fargo U.S. Consumer Privacy Notice (and various custom versions), maintained by Enterprise Privacy, helps consumers understand their privacy rights and solicitation choices. The notice:

- Describes how Wells Fargo collects, shares, and protects customer information.
- Outlines customer choices on how their personal information may be shared by and within Wells Fargo.
- Explains how customers may record preferences for how they wish to be contacted for marketing purposes.

The notice also highlights key elements of our commitment to protect our customers' privacy:

- We do not share customer information for joint marketing purposes with other financial companies.
- We do not share customer information with nonaffiliates who may wish to market their products to our customers.*
- Within the Wells Fargo companies, we carefully protect customer information from unauthorized access and use, with security measures that comply with federal law, including computer safeguards and secured files and buildings.

*Very limited situations in some business groups allow some sharing with nonaffiliates, subject to opt out and a separate version of the privacy notice.

California Consumer Privacy Act Notice

The California Consumer Privacy Act Notice explains how we collect, use, and disclose personal information about California residents, and explains California Consumer Privacy Act rights and how to exercise them.

Privacy for Team Members in the U.S.

In the course of your working relationship with Wells Fargo (including all applicable Wells Fargo legal entities), we may collect certain personal data about you, your dependents, and your employment-related activities. The data may include information about you and your dependents (such as your home address and personal contact information, Social Security number), work information (such as your business contact information, your title, position, function, supervisor), compensation and benefits information, performance information (such as performance appraisals and promotions), background information (such as credit history, professional qualifications, education), and information about your use of Wells Fargo equipment and systems. Wells Fargo reserves the right to review all team member accounts at any Wells Fargo bank, subsidiary, or affiliate for unusual activity, both regularly and during investigations. Non-Wells Fargo financial institution account data may also be used for investigations, where deemed necessary.

We use this information, and in some cases disclose it to third parties, to carry out the work relationship with you and to manage our business operations. Some uses include providing compensation and benefits, complying with legal requirements, maintaining our systems and a corporate directory, responding in the event of emergencies, and monitoring and assuring compliance with the Wells Fargo Code of Ethics and Business Conduct, other policies and procedures, and applicable laws and regulations. We take care in handling your personal data and handle it in accordance with the Wells Fargo Information Security Policy standards and procedures. We also retain your personal data as required under applicable records retention schedules in accordance with the Records Management Policy.

The California Consumer Privacy Act Notice explains how we collect, use, and disclose personal information about California residents, and explains California Consumer Privacy Act rights and how to exercise them.

Please also refer to any separate privacy notice that may be provided to you under HIPAA in connection with health-related accounts or benefits.

Privacy Preferences

The term “privacy preferences” encompasses both **information-sharing choices** and **solicitation choices**. Wells Fargo offers its customers different choices regarding their privacy preferences.

Information sharing

Information sharing preference refers to a customer’s ability to choose not to have his or her information shared internally within the Wells Fargo family of companies for some purposes. Obviously, some customer information must be shared for account servicing purposes. Customers cannot opt out of that type of information sharing.

Solicitation

Solicitation preference refers to how a customer prefers to be contacted for marketing purposes. Solicitation may occur when you contact an individual customer to offer a product or service or as part of a large direct marketing campaign.

Solicitation Choices

We recognize that some individuals prefer not to receive direct marketing solicitations from Wells Fargo. Part of a great customer experience includes honoring our customers’ contact preferences.

Wells Fargo offers the following solicitation choices:

- Do Not Call
- Do Not Mail
- Do Not Email

Solicitation preferences apply to both individuals and businesses (customers and prospects) and are stored centrally on Hogan CIS. Solicitation preferences must be honored across the Wells Fargo enterprise. To make sure that customer solicitation preferences are honored, team members must follow Wells Fargo’s Privacy and Solicitation Policy.

How solicitation preferences affect Wells Fargo

It’s critical for team members to use care when recording a customer’s solicitation preference because it can permanently restrict the ability of all business groups across Wells Fargo to market to that customer. Team members should record only the preferences that the customer specifically requests. For example, some customers may not want to receive telemarketing calls (Do Not Call) but do still want to receive emails or direct mail about Wells Fargo products and services.

Recording solicitation preferences that were not specifically requested by the customer could have negative implications, such as:

- Preventing bankers from contacting their own customers for marketing purposes.
- Violating Wells Fargo policy by taking action without specific direction from a customer.

Not honoring customer privacy or solicitation preferences also could have a negative impact on the company such as:

- Non-compliance with our privacy notice and related policy
- Non-compliance with the law granting customers these rights
- Increased customer complaints, customers who don’t want to receive marketing and do often complain (who may take legal action against the company for not following marketing related laws)
- Increased regulatory scrutiny and litigation
- Harm to Wells Fargo’s reputation

If in doubt, record the preference or escalate to your privacy leader or Enterprise Privacy for further direction.

Always check before you contact

If you contact individuals or business customers for marketing purposes, you are responsible for honoring customer solicitation preferences before including that customer in any outbound marketing program, or by one-off call, email, or mailing.

How to make sure that a customer's solicitation preferences are honored

Customer solicitation preferences must be verified individually or in a list submitted through the Enterprise Privacy Scrub Service (EPSS). EPSS removes (or “scrubs”) the records of individuals who have designated solicitation preferences from marketing campaign lists. EPSS is the only Privacy-approved scrub service for all business groups.

Resources

If you have questions related to privacy, the Global Data Protection and Privacy Policy, or the Privacy and Solicitation Policy, go to the Information Risk Management Oversight website or email privacypolicies@wellsfargo.com. You may also access privacy training on Develop You or through your business group's training system.

For more information on specific state or federal privacy laws, go to the Telemarketing Laws site on Teamworks or contact your business group's privacy leader or legal representative.

Appendix

In this appendix, you will find several policies that are now located in the Corporate Policy Library. Because the Corporate Policy Library is not accessible from Teamworks at Home, this Appendix provides access to those identified policies and related details.

The following policies are included:

- [Affirmative Action Program Policy & Procedures](#)
- [Global Background Screening Policy](#)
- [Speak up and Nonretaliation Policy](#)
- [Conflicts of Interest and Outside Activities Policy](#)
- [Required Absence from Sensitive Positions Policy](#)
- [Weapons Policy](#)

As a team member, it is important — and your responsibility — to be informed about the policies that affect you.

Affirmative Action, Equal Employment Opportunity, and Diversity and Inclusion Policy

Supplemental to the [Team Member Handbook \(Domestic\)](#)

Published September 27, 2018

Purpose

This policy establishes the expectations and requirements to ensure compliance with Affirmative Action and Equal Employment Opportunity laws and regulations. Additionally, the policy outlines the benefits and objectives of the company's diversity and inclusion program.

Areas Primarily Affected

All U.S.-based Wells Fargo businesses and team members are covered by this policy. The requirements for non-U.S.-based team members are defined by country-specific practices and laws and are not covered by this policy.

Policy Statement

Wells Fargo is committed to diversity and inclusion, promoting a working environment where differences are valued. The company recruits, hires, and promotes team members based on their individual ability and experience, and in accordance with Affirmative Action and Equal Employment Opportunity laws and regulations. Wells Fargo does not discriminate on the basis of race, color, gender, national origin, religion, age, sexual orientation, gender identity, gender expression, genetic information, physical or mental disability, pregnancy, marital status, status as a protected veteran, or any other status protected by federal, state, or local law. The company strives to go beyond these basic requirements to recruit and retain a high-caliber, inclusive workforce that reflects the growing diversity of the marketplace.

Wells Fargo seeks to provide career opportunities for all team members. [Affirmative Action](#), Equal Employment Opportunity, and [Diversity and Inclusion](#) programs work together to make sure that all team members are treated with equality and respect, and are given the opportunity to make a contribution to the company's success.

Definitions

The following definitions are important for understanding this policy.

Affirmative Action

Steps taken to hire and promote minorities, women, protected veterans, and individuals with disabilities for the company's workforce to reflect their representation within the relevant labor pool.

Equal Employment Opportunity

Government regulations requiring that all people, regardless of race, color, gender, national origin, religion, age, sexual orientation, gender identity, gender expression, genetic information, physical or mental disability, pregnancy, marital status, status as a protected veteran, or any other status protected by federal, state, or local law, have equal opportunities for hire, promotion, and in all terms and conditions of employment. Laws in certain locations (for example, New York City) cover additional protected classes, including creed, citizenship status, and sex, all of which are covered by this policy.

Diversity and Inclusion

Diversity is all the ways in which people are different and similar. Business diversity encompasses the differences and similarities in the workforce structure and marketplace. Diversity and inclusion programs create a diverse, high-quality workforce that, to the extent possible, mirrors the demographics of the communities served and helps ensure all employees feel respected and valued.

Standards: Affirmative Action, Equal Employment Opportunity, and Diversity and Inclusion

Affirmative Action

Companies that do business with the federal government must comply with Affirmative Action laws. Wells Fargo is subject to Affirmative Action obligations based on its relationships with the federal government. As such, Wells Fargo is required to develop Affirmative Action plans that:

- Set goals and timetables for hiring and promoting women and minorities
- Establish a hiring benchmark for protected veterans
- Set a utilization goal for individuals with disabilities

The goals for women and minorities are set based on the difference between:

- The availability of women and minorities with the necessary skills and experience who are within the geographic areas where Wells Fargo does business
- The actual representation of women and minorities within Wells Fargo

The hiring benchmark for protected veterans is established and revised annually by the Department of Labor's Office of Federal Contract Compliance Programs.

The representation goal for individuals with disabilities is 7%, as established by government regulations.

Affirmative Action goals are targets that Wells Fargo establishes and tries to reach through good-faith efforts of recruitment, hiring, retention, and promotion. Wells Fargo is not required to set quotas (court-imposed mandates designed to correct patterns of discrimination against a particular set of individuals).

Equal Employment Opportunity and Nonretaliation

Wells Fargo team members and job candidates will not be subject to discrimination, harassment, or retaliation for:

- Filing a complaint
- Assisting or participating in an investigation
- Inquiring about, discussing, or disclosing one's own pay or the pay of another employee or applicant

(Note: A team member whose essential job functions require access to team member compensation information is subject to corrective action for inappropriate disclosure of information)

- Opposing any unlawful act or discriminatory practice
- Exercising any rights protected under federal or state laws and regulations

Diversity and Inclusion

Wells Fargo manages diversity by creating the organizational and personal "know-how" to:

- Tap the full potential of the workforce
- Operate successfully within varied structures and geographies
- Serve the marketplace with products and services that meet the needs of a diverse customer base

Team members are encouraged to review and update their [personal information](#) on *Teamworks* to reflect their own diversity, including gender, race, ethnicity, disability, veteran status, sexual orientation, or gender identity.

Roles and Responsibilities

Corporate Affirmative Action and Equal Employment Opportunity Compliance Team

The Affirmative Action and Equal Employment Opportunity Compliance team is responsible for:

- Supplying teams with affirmative action data and advising teams on how to create plans to comply with Affirmative Action regulations as established under Executive Order 11246, as amended (1965)
- Guiding and advising on the interpretation and practical application of Affirmative Action and Equal Employment Opportunity regulations to Wells Fargo's policies, practices, systems, and business activities
- Consulting with the businesses on the management of Office of Federal Contract Compliance Programs compliance reviews
- Serving as one of the lead corporate liaisons to the Office of Federal Contract Compliance Programs in Affirmative Action compliance reviews
- Advising executive management and businesses on the development and dissemination of Affirmative Action and Equal Employment policies, as well as maintaining relevant recruitment and employment-related policies and procedures
- Supporting the company's diversity and inclusion program, as requested

Managers

Managers are responsible for ensuring compliance with regulations, policies, and expectations concerning Affirmative Action, Equal Employment Opportunity, and Diversity and Inclusion. This includes:

- Using the Talent Management program and career counseling for all team members
- Ensuring recordkeeping obligations are met related to recruitment and employment practices
- Directing and assisting in the development and implementation of action-oriented programs to advance goals and correct identified challenges
- Using compliance-specific data and information to ensure the company is in compliance with regulatory requirements

Human Resources Professionals

HR professionals are responsible for:

- Consulting with managers during the hiring process, organizational changes or displacements
- Being aware of the importance of Affirmative Action and Equal Employment Opportunity regulations, the businesses' Affirmative Action plan goals, and other challenges such as adverse impact and one-to-one hiring
- Ensuring recordkeeping obligations are met related to recruitment and employment practices

- Advising senior management of the program's effectiveness and making recommendations to improve unsatisfactory performance
- Using compliance-specific data and information to ensure the company is in compliance with regulatory requirements

Policy Governance

Reporting

The Affirmative Action Equal Employment Opportunity Compliance team will provide an annual report to senior HR leaders and Operating Committee members. The report will summarize findings of each business's implementation of their respective Affirmative Action plans, including progress toward goals, one-to-one hires, and adverse impact indicators.

Escalation and Exceptions

This policy cannot account for every possible situation. To address a situation not covered by this policy, request a change to this policy, or recommend an alternative practice, business managers will contact the control executive and the policy manager (noted under the Document Information in the Policy Library left navigation).

The policy manager will work with the requesting business to address the needs and escalate the request as necessary.

The discussion may result in an exception request, exemption request, change to existing policy, alternate policy for certain businesses, or a directive for the business to comply with existing policy. Businesses are expected to initiate this discussion before the business is out of compliance or immediately after a policy violation has been discovered. [The following sentence is to be added to the end of this paragraph once the document has been activated with a reviewer table in the Policy Exception Management System:] If the decision is to pursue an exception, exemption, or alternate policy, it must be recorded in the Policy Exception Management System.

If the business does not agree with the decision, or if the policy manager determines the risk warrants further escalation, matters will be escalated to the policy director or on to the Operational Risk Management Committee or Human Resources Committee as appropriate.

Violations

Failure to comply with this policy, without appropriate prior approval, is a policy violation. Policy violations may result in corrective action, including termination of employment.

If a policy violation occurs, the situation must be escalated and related remediation actions taken in a timely manner. Issues must be recorded in the Shared Risk Platform's Issue Management solution when required under the criteria established in the [Issue Management Policy](#).

Policy Authority

The following roles provide leadership and oversight of this policy and its content, as defined in the [Policy Management Policy](#):

- Executive officer: chief administrative officer
- Policy director: human resources director
- Policy manager: head of Talent Acquisition

For questions about this policy, send an email to [include a generic mailbox, or delete this sentence; do not list an individual].

Related Information

Related Law or Regulation

- [Affirmative Action](#)

Related Policies or Resources

- [Affirmative Action, Equal Employment Opportunity, and Diversity Policy – Team Member Handbook](#)
- [Developing and Maintaining a Diverse Workforce \(PDF\)](#), available as form HRS38139 on [Forms Online](#) on *Teamworks*
- [Working with an Illness or Disability, Dispute Resolution and Employee Rights Notice Enterprise Diversity and Inclusion](#) site on *Teamworks*
- [Diversity Training](#)
- [Recruitment and Hiring Policies](#)
- [Speak up and Nonretaliation Policy](#)

Global Background Screening Policy

Supplemental to the [Recruiting and Hiring Policy](#)

Published October 7, 2019

Purpose

This policy establishes the expectations and requirements for conducting background screening to verify employment eligibility, in accordance with all applicable laws and regulations.

Areas Primarily Affected

All Wells Fargo businesses inside and outside the United States (U.S.) are affected by this policy. Team members in Human Resources are primarily responsible for implementing this policy.

To the extent Human Resources engages a third-party service provider to carry out any of the activities covered by this policy on behalf of Wells Fargo, Human Resources is responsible for ensuring the provider is aware of and complies with the applicable requirements. This policy does not include nonemployees, including managed and nonmanaged resources. Please refer to the [Corporate Nonemployee Policy](#) for the requirements covering nonemployees, including managed and nonmanaged resources.

Policy Statement

Wells Fargo is committed to hiring and employing team members who exhibit high standards of integrity and individual behavior. Background screening is an important tool to help ensure each person employed by Wells Fargo meets these standards, is legally qualified to work for the organization, possesses the experience and credentials required for each position, and does not present a risk to the organization, its customers, or other team members. Successful completion of a background screening is required as a condition of hire, where legally permissible.

Standards: New Hire Background Screening

Screening of Persons Working Inside or Outside the U.S.

All offers of employment, which include the rehire of former team members, must be made contingent, where legally permissible, upon the applicable background screenings concluding that the person is employment-eligible and, if applicable, position-eligible before employment begins.

Background screening results are valid for 90 days in the U.S. and 180 days outside the U.S. If employment does not begin within these timeframes, background screening must be repeated.

The following screenings are conducted and reviewed by the U.S. Background Screening Team for all new hires and rehire of former team member in the U.S. and the International Background Screening team for all new hires and rehire of former team members outside of the U.S., unless otherwise noted, to ensure eligibility of employment:

Criminal Background Check

Inquiring about a person's criminal history, where legally permissible, must not occur before a written offer letter is provided to that person. A criminal background check is conducted, where legally permissible, in each country of residence in the last five years (or longer depending on jurisdiction), where the person has resided for at least six months. In the U.S., the screening includes a fingerprint-based check against the Federal Bureau of Investigation's National Criminal Information Center database. Outside of the U.S., if a criminal check is not permissible by law or otherwise impractical to complete, a disclosure from the person regarding criminal activity is requested and reviewed to determine employment eligibility.

Sanctions Screening

A sanctions screening reviews persons against the United States Treasury Department's Office of Foreign Assets Control (OFAC) Specially Designated Nationals and Blocked Persons List (the SDN List), the list of countries subject to sanctions imposed by the United States (U.S. Sanctions), and appropriate local government or agency control lists, as advised by Wells Fargo's Compliance department.

A person may begin employment as a conditional hire in the U.S. if they have a non-U.S. criminal check pending; however, they must have already successfully cleared their U.S. criminal check, sanctions screening, and position-specific checks, if applicable.

A person may begin employment as a conditional hire outside the U.S. if they have a completed criminal check (or disclosure) for the country in which the position is located, and sanctions screening, with employment, education, and other required checks pending, provided that Human Resources has validated that their employment application is satisfactory.

Employment before the entire background check has been completed, where permissible, must be expressly stated to be contingent upon completion of the background screening process to protect Wells Fargo if the results are unsatisfactory.

Position-Specific Screening of Persons Working Inside the U.S.

The U.S. Background Screening team conducts and reviews required position-specific screening on any person who accepts an offer of employment in a regulated position. The requirements of the position-specific screening are established by applicable laws or regulations. The results of the position specific screening must conclude the person to be employment and, position-eligible before employment begins.

Additional Screening of Persons Working Outside the U.S.

In addition to the criminal background screening and sanctions screening, Human Resources International Background Verification team conducts and reviews the following screenings that are required and permissible by country (See Appendix 1) or that apply to certain roles (See [Appendix 2: Roles Matrix \(Non-U.S. Only\)](#)) unless otherwise noted, on all persons working outside the U.S. who have accepted an offer of employment, where legally permissible. These screenings also apply to former team members who have accepted an offer of employment to return to work at Wells Fargo. The results of the screenings must conclude the person to be employment-eligible and, if applicable, position-eligible before employment begins.

Education Verification

Education verification focuses on the highest level of degree, tertiary qualification beyond high school or secondary education, and must include the name of institution, the type of degree obtained, and the year the degree was awarded. Human Resources must either verify education by contacting the institution directly, or by reviewing and authenticating letters, transcripts, and diplomas issued by the institution. Education verification is not required for individuals who will be classified as an intern.

Employment Verification

Employment verification covers the last five years of work history (or a shorter period, if the person has not had five years' working history) to ensure the candidate has accurately represented his or her employment history. The employment verification check must include names of employers, positions (job titles), and dates of employment (month and year, within a six-month range of accuracy). Employment verification is not required for individuals who will be classified as an intern or graduate.

Adverse Media

This is a database search of media and public accounts (not including social media) to identify any potential negative information about the person, where legally permissible.

CV Verification

This is a verification of accuracy of the employment and education data provided by the person upon initial application for employment (found on a resume or Curriculum Vitae), and the information provided by the candidate to the background screening vendor database, where legally permissible.

Position-Specific Checks

Any person who accepts an offer of employment must clear a financial stability check, where legally permissible, if required for the position or country into which the person is being hired. A financial stability check includes a credit, bankruptcy, or civil litigation check.

Professional License Verification

Professional license verification applies only to certain roles, and includes any securities, insurance, mortgage, commodities or other professional licenses (such as Certified Public Accountant, Attorney, etc.).

Directorship

Verification of current or previous directorships applies only to certain roles, where legally permissible.

Regulatory Reference Check

A regulatory reference check applies only to regulated positions, where legally permissible. Regulated roles, as defined by the regulator, are roles that are responsible for exercising autonomous responsibilities over activities in a regulated environment, such as financial services.

Standards: Team Member Background Re-Screening

Rescreening

To ensure compliance with regulatory requirements and to ensure appropriate adherence to fiduciary responsibilities, Wells Fargo periodically conducts background screening on team members in certain positions (rescreening), as determined by the business compliance department or regulatory requirements. Team members in these positions, and their managers, are notified of the need to rescreen. Team members and their managers must fully comply with the rescreening process.

If a business identifies a need to rescreen a team member in a role where there is no regulatory requirement to do so, the business must follow the requirements in the “Exceptions, Escalations and Violations section.

Position Changes

Background screenings are not required for team members who move to a new position or change roles, unless their new position or role requires an additional screening (including certain regulated positions), which must be completed before the team members begin in their new role.

Cross-Border Transfers

The U.S. Background Screening team must conduct a criminal background check (fingerprinting) on team members transferring internally to U.S. employment as a result of a move from another country. A team member who transfers employment from one country to another outside the U.S., as an internal transfer, is not required to complete additional background screening unless required for the position or country to which they are moving. Human Resources must complete the background screening before a team member begins in his or her new role.

Short- and Long-Term Assignments

Team members who are placed on a short- or long-term assignment are not required to complete additional background screening, unless required for the position or country to which they are moving. Human Resources must complete the background screening before the team member begins in his or her new role.

Roles and Responsibilities

U.S. Background Screening Team

This team is responsible for reviewing results that are not cleared by the third-party service provider and determining employment eligibility for U.S.-based candidates.

Talent Acquisition Operations

This team is responsible for initiating the background check request with the third-party service provider for U.S. candidates. In addition, this team confirms the final status of the background check to the U.S. Recruiting team.

U.S. Recruiting Team

This team is responsible for communicating the final status of the background check to the candidate and hiring manager, and confirms the candidate's start date.

International Background Verification Team

This team is responsible for initiating the background check request with the third-party service provider for non-U.S. candidates, monitoring the progress, and reviewing results that are not cleared by the third-party service provider to determine employment eligibility for non-U.S.-based candidates.

International Recruiting Team

This team is responsible for initiating the ordering of the background screening, and managing the end-to-end recruitment process for non-U.S.-based candidates. This team communicates the final status of the background check to the candidate and hiring manager, and confirms the candidate's start date.

Oversight of This Policy

Accountability

The following roles provide leadership and oversight of this policy and its content, as defined in the [Policy Management Policy](#):

- Executive officer: Head of Human Resources
- Policy director: Head of Enterprise Human Capital Risk and Controls
- Policy manager: Head of Global Human Resources Policy Management

For questions about this policy, send an email to ETARiskManagement@wellsfargo.com.

Oversight

The Enterprise Human Capital Controls and Governance team, and the Background Screening Team fulfill its oversight responsibility through the governance and monitoring to ensure candidates do not start employment before the successful result of a background screening has been completed. This includes, but is not limited to identifying employment start dates, reporting on background screening completions and automatic leaves of absence when a start date is before the receipt of a successful background screening, approving and reporting of exceptions, and evidence of engaging with the Legal Department on policy decisions.

Escalations, Exceptions, and Violations

Requirements for applying policies and activities related to escalating risk events and issues, requesting exceptions and exemptions, and addressing policy violations are established in the Standards: Applying and Overseeing Policies section of the [Policy Management Policy](#).

Related Information

Related Law or Regulation

[Section 19 of the Federal Deposit Insurance Act](#) informed this policy.

Remember that when consulting external sources, the Legal Department is the final authority for interpreting laws and regulations on behalf of Wells Fargo. For more information or interpretation of this information, consult your Wells Fargo attorney.

Related Policies or Resources

- [Corporate Nonemployee Policy](#)
- [U.S. Background package selection aid](#)

Appendix 1: Country-Specific Screening Standards

Some screenings cannot be performed in certain countries due to local legislation, privacy laws, or the lack of availability of accurate, consistent, and reliable information.

Where this is the case, candidates either will provide a self-declaration where no check is possible, a certificate where the check must be requested and the results received by the candidate, or the check will not be performed. These permissible variations to the policy are listed below by country.

Country	Standard Package Checks				Exec. and Reg. only		Other
	OFAC + Global Sanctions	Criminal	Employment	Education	Adverse Media	Directorship	Financial Stability
Asia Pacific							
Australia	Yes	Yes	Yes	Yes	Yes	Yes	Exec and Reg only
Bangladesh	Yes	Yes	Yes	Yes	Yes	Yes	Yes
China	Yes	Database check and Self Declaration	Yes	Yes	Yes	Yes	Yes
Hong Kong	Yes	Self Declaration	Yes	Yes	Yes	Yes	Provided by Team member
India	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Indonesia	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Japan	Yes	Self Declaration	Yes	Yes	Yes	Yes	Yes
Malaysia	Yes	Yes	Yes	Yes	Yes	Yes	No
New Zealand	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Philippines	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Singapore	Yes	Self Declaration	Yes	Yes	Yes	Yes	Yes
South Korea	Yes	Self Declaration	Yes	Yes	Yes	No	Yes
Taiwan	Yes	Exec and Reg only	Yes	Yes	Exec only	Yes	Yes
Thailand	Yes	Yes	Yes	Yes	Yes	No	Yes
Vietnam	Yes	Yes	Yes	Yes	Yes	No	No
Europe, Middle East, Africa							
Belgium	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Finland	Yes	Exec and Reg only	Yes	Yes	Yes	Yes	Yes
France	Yes	Exec and Reg only (Certificate)	Yes	Yes	Yes	Yes	No
Germany	Yes	Exec and Reg only, Self Declaration for all others	Yes	Yes	Yes	Yes	Yes
Ireland	Yes	Self Declaration	Yes	Yes	Yes	Yes	Yes

Standard Package Checks					Exec. and Reg. only		Other
Israel	Yes	Self Declaration	Yes	Yes	Yes	Yes	Yes
Italy	Yes	Exec and Reg only, Self Declaration for all others	Yes	Yes	Yes	Yes	Yes
Luxembourg	Yes	Self Declaration	Yes	Yes	Yes	Yes	Self Declaration
Netherlands	Yes	Certificate	Yes	Yes	Yes	Yes	Yes
Norway	Yes	Exec and Reg only	Yes	Yes	Yes	Yes	Yes
South Africa	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Spain	Yes	Exec and Reg only	Yes	Yes	Yes	Yes	Yes
Sweden	No	Self Declaration	Yes	Yes	Yes	Yes	Yes
Turkey	Yes	Yes	Yes	Yes	Yes	Yes	Yes
United Arab Emirates	Yes	Certificate	Yes	Yes	Yes	Yes	Yes
United Kingdom	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Latin America							
Argentina	Yes	Exec and Reg only	Yes	Yes	Yes	Yes	Yes
Bahamas	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Brazil	Yes	Exec and Reg only	Yes	Yes	Yes	Yes	Yes
Chile	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Colombia	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Dominican Republic	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Ecuador	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Mexico	Yes	No	Yes	Yes	Yes	Yes	Yes
North America							
Canada	Yes	Yes	Yes	Yes	Yes	No	Yes

Appendix 2: Roles Matrix (Non-U.S. Only)

Required Screenings by Role

Role Description	Screening Package	Required Screenings
All external experienced hires (includes former team members who have had a break in service)	Standard	Criminal check Adverse media Sanctions screening Employment verification Education verification CV verification
Candidates placed in a defined-length short-term employment program and categorized by Human Resources as an internship	Intern	Criminal check Adverse media Sanctions screening
Candidates hired into a part- or full-time role, who have graduated in the last year	Graduate	Criminal check Adverse media Sanctions screening Education verification
Candidates hired into regulated roles, as specified by regulators (for example Futures Broker or Sales Trader – Future Commission Merchant)	Regulatory	Criminal check Adverse media Sanctions screening Employment verification Regulatory reference Education verification CV verification Financial stability check (credit, bankruptcy, civil litigation) Professional license/qualification Directorship
Candidates hired into positions as Senior Vice President or higher, as defined by Compensation	Executive	Criminal check Adverse media Sanctions screening Employment verification Education verification CV verification Financial stability check (credit, bankruptcy, civil litigation) Professional license/qualification Directorship
This screening package applies to team members who: <ul style="list-style-type: none">• Move to a new role that requires additional screening• Are in a current position defined by regulators as requiring ongoing screening• Transfer to Wells Fargo as part of an acquisition	Rescreen	Criminal check Adverse media Sanctions Screening

Speak up and Nonretaliation Policy

Supplemental to the [Code of Ethics and Business Conduct](#)

Published February 8, 2019

Purpose

This policy establishes the expectations and requirements of team members to raise concerns about any suspected unethical or illegal conduct at Wells Fargo without fear of retaliation. It also establishes the expectation and requirement that Wells Fargo not retaliate against a team member who engages in a [Protected Activity](#).

Areas Primarily Affected

This policy applies to all Wells Fargo businesses and team members inside and outside the United States.

This policy should be applied in a manner consistent with any country-specific policies, systems and legal requirements, which take precedence.

Policy Statement

Wells Fargo is committed to providing an environment and processes to encourage team members to recognize and report, without fear of retaliation, any suspected unethical or illegal conduct, including fraud; securities law or regulatory violations; possible violations of any Wells Fargo policies (including the Code of Ethics and Business Conduct); or other inappropriate workplace behavior. Wells Fargo assures team members that no retaliation of any kind will be tolerated for reports of such matters made in good faith (or otherwise in accordance with applicable country-specific laws).

Definitions

The following definitions are fundamental to understanding this policy:

Protected Activity

Protected activity is an activity that is protected from retaliation, which includes:

- Reports made in good faith or otherwise in accordance with applicable in-country laws of suspected unethical or illegal conduct or activities, including fraud, securities law or regulatory violations, or violations of any Wells Fargo policies (including the Code of Ethics and Business Conduct)
- Opposing an employment practice that the team member, in good faith or otherwise in accordance with applicable in-country laws, believes violates a law, rule, regulation, or Wells Fargo policy
- Filing a charge; truthfully testifying; or providing assistance or participating in an investigation, proceeding, or hearing related to or arising from an allegedly unlawful practice
- Exercising rights established by applicable law

Retaliation

Retaliation means subjecting a team member to harmful conduct in response to a team member engaging in a [Protected Activity](#), including but not limited to any conduct that has a material adverse effect on a team member's compensation, working conditions, or work environment. Examples of retaliation include taking the following actions (where such action is in response to a team member engaging in a protected activity):

- Termination
- Demotion
- Denial of promotion
- Denial of overtime
- Disciplinary action/corrective action
- Denial of benefits
- Failure to rehire
- Harassment
- Making threats against the team member
- Reassignment to a less desirable position or actions affecting prospects for promotion
- Reduction of pay or hours
- Lower performance evaluation

Individual Accountability

Wells Fargo promotes a culture where team members are comfortable speaking up by encouraging team members to raise questions and concerns without fear of retaliation. Team members' proactive participation in raising concerns about suspected unethical or illegal conduct involving Wells Fargo is key to helping Wells Fargo appropriately research, investigate, and address any concerns regarding suspected unethical or illegal conduct.

Wells Fargo relies on team members to report unethical and illegal conduct even if the conduct does not affect the team member making the report. A violation, left unreported, can cause immeasurable damage to Wells Fargo's reputation and put team members and customers at risk. It can also lead to regulatory and legal consequences. Even if a team member is not sure, concerns and suspected violations should be reported, as required by the Code of Ethics and Business Conduct.

Honest, Ethical Conduct Required

Team members are responsible for conducting the company's business honestly, fairly, and ethically. Team members are required to follow the [Code of Ethics and Business Conduct](#) and [Team Member Handbook](#) (for U.S.-based team members) or Human Resources policies as set out in the applicable Team Member Handbook, HR Guide, HR Guidelines, Work Rules, or similar documents at the team member's work location ([for team members outside the U.S.](#)); all other company policies and procedures; and all applicable laws and regulations.

Team members have a duty to speak up whenever they see or suspect unethical or illegal activity.

Team members must recognize, to the best of their ability, unethical or illegal conduct. All team members are responsible for raising concerns about such conduct.

Speak Up

Wells Fargo expects all team members to speak up about suspected unethical or illegal conduct. If a team member believes that he or she or someone else has been subjected to retaliation, the team member must report it as soon as possible. Wells Fargo provides team members with multiple intake channels to immediately raise these concerns:

- His or her manager or another manager with whom the team member feels comfortable
 - If the team member reports the concern to a manager, that manager must report it as soon as possible to Human Resources, Ethics Oversight, or the EthicsLine.
- Human Resources team
 - U.S.-based team member
 - A. [Employee Relations Solutions](#)
 - Non-U.S.-based team member
 - A. Where applicable, follow the grievance resolution or reporting procedure at the team member's work location
 - B. Where there is no specific grievance resolution or reporting procedure, report to the appropriate [Human Resources](#) professional
- [Ethics Oversight](#)
- [EthicsLine](#) (800-382-7250 from the U.S. and Canada, or see [International](#)), available 24 hours a day, seven days a week
 - The EthicsLine provides team members with a confidential way to report inappropriate behavior or concerns about possible violations of unethical or illegal activity
 - Team members have the option to remain anonymous, to the extent allowed by applicable law

Wells Fargo may be required to report certain types of suspicious activity and other activity that may potentially violate criminal laws.

As permitted by applicable laws, team members are not prohibited from voluntarily communicating with regulatory bodies or authorities regarding possible violations of applicable laws, rules, or regulations.

Team members must cooperate fully and honestly with any research or investigative process and must not interfere with the integrity of the process.

Wells Fargo Accountability

There is zero tolerance for [Retaliation](#) against a team member who engages in a [Protected Activity](#).

Wells Fargo ensures concerns are promptly evaluated, assessed, and referred to the proper research or investigative unit for a prompt and thorough review and/or investigation in accordance with the applicable unit's procedures and the [Allegation Management Policy](#).

Leadership

Managers have an even greater level of responsibility. Managers are expected to:

- Reinforce the Company's messages about Wells Fargo's values, high ethical standards, and the importance of reporting unethical or illegal conduct
- Ensure any known, potential, or perceived unethical or illegal conduct is reported through the intake channels above (see [Speak Up](#))
- Regularly remind team members to immediately report concerns related to suspected unethical or illegal conduct to the EthicsLine, Human Resources, or a trusted supervisor or manager

Nonretaliation

Team members, including managers, are prohibited from taking retaliatory actions as a result of another team member engaging in a [Protected Activity](#).

Managers must guard against retaliatory conduct and are required to proactively watch for signs that retaliation may be occurring and report any observed conduct that may violate this policy.

If a team member has been subjected to retaliation because he or she has spoken up or attempted to speak up in good faith or otherwise in accordance with applicable in-country laws, in keeping with this policy, the team member found to have retaliated will be subject to corrective action, up to and including termination of employment.

Research and Investigation

Reported situations will be managed in accordance with the [Allegation Management Policy](#).

Research and investigative units will take all reports of suspected unethical or illegal conduct and any related retaliation seriously, investigate them objectively and thoroughly, maintain confidentiality, share information about such reports only with those who have a legitimate business need to know, and respond in a timely manner, with the goal of understanding and resolving any underlying problem that led to the report.

Policy Governance

Reporting

The Conduct Risk team will provide periodic or ad hoc reports, as appropriate, to the Board of Directors of Wells Fargo or the appropriate board committee or management governance committee regarding suspected unethical or illegal conduct, including retaliation or other alleged adverse action toward team members in response to their reports of suspected unethical or illegal conduct.

Escalation

This policy cannot account for every possible situation. To address a situation not covered by this policy, request a change to this policy or the related standards, or recommend an alternative practice, business managers will contact their control executive or applicable senior risk manager for the risk area (or delegate), and the policy manager (noted under the Document Information in the Policy Library left navigation).

The policy manager will work with the requesting business to address the needs and escalate the request as necessary, including to the Customer Remediation Governance Committee, which has authority to approve alternative processes. (See the [Operational Risk and Compliance Escalation Policy](#) for events that have specific escalation requirements.)

The discussion may result in an exception request, exemption request, change to existing policy, alternate policy for certain businesses, or directive for the business to comply with existing policy. Businesses are expected to initiate this discussion before the business is out of compliance or immediately after a policy violation has been discovered.

If the business does not agree with the decision, or if the policy manager and Human Resources/Employee Relations determine the risk warrants further escalation, matters will be escalated to the policy director, the company's chief risk officer, the appropriate management governance committee, or the Board's Human Resources Committee, as appropriate.

Violations

Failure to comply with this policy is a policy violation. Policy violations may result in corrective action, up to and including termination of employment.

If a policy violation occurs, the situation must be escalated and related remediation actions taken in a timely manner. Issues must be recorded in the Shared Risk Platform's Issue Management solution when required under the criteria established in the [Issue Management Policy](#).

Policy Authority

The following roles provide leadership and oversight of this policy and its content, as defined in the [Policy Management Policy](#):

- Executive officer: chief risk officer
- Policy director: head of the Conduct Risk team
- Policy manager: head of Ethics Oversight

Related Information

Related Policies or Resources

- [Allegation Management Policy](#)
- [Code of Ethics and Business Conduct](#)
- [Contacting HR](#) (U.S.-based team members)
- [EthicsLine](#) (U.S.-based team members)
- [EthicsLine for International Team Members](#)
- [HR Resources for Team Members Outside the U.S.](#)
- [Legal Department](#)
- [Team Member Handbook](#)
- [The Vision, Values & Goals of Wells Fargo](#)
- [Wells Fargo Ethics](#)

Conflicts of Interest and Outside Activities Policy

Supplemental to the [Code of Ethics and Business Conduct](#)

Published November 22, 2019

Purpose

This policy, in conjunction with the Wells Fargo [Code of Ethics and Business Conduct](#), establishes the expectations and requirements regarding the identification and management of actual, potential, or perceived conflicts of interest.

Areas Primarily Affected

All Wells Fargo team members and businesses inside and outside the United States are affected by this policy.

To the extent a business engages a third-party service provider (including managed or nonmanaged resources) to carry out activities covered by this policy on behalf of Wells Fargo, that business is affected by this policy and responsible for ensuring the provider is aware of and complies with the applicable requirements.

Policy Statement

Wells Fargo is committed to taking appropriate steps to identify and prevent or manage conflicts of interest to avoid adversely affecting the interests of its customers and shareholders, and to prevent damaging Wells Fargo's reputation.

Wells Fargo and team members may encounter actual, potential, or perceived conflicts of interest during the normal course of business. Team members must avoid, when possible, conflicts of interest and the appearance of conflicts of interest between their personal, outside business, and investment activities, and the performance of their duties on behalf of Wells Fargo. Additionally, businesses must identify business conflicts of interest and prevent or mitigate them to avoid adversely affecting the interests of our customers. The appearance of a conflict of interest may be just as damaging to Wells Fargo's reputation as an actual conflict of interest. Some conflicts of interest may also be in violation of U.S. and non-U.S. law.

Definitions

Definitions important to the understanding of this policy are in the [“Appendix 2: Glossary”](#) and some common terms used in Wells Fargo policies are in the [Enterprise Risk Glossary](#).

Types of Conflicts of Interest

This policy applies to actual, potential, or perceived conflicts of interest, including those that may arise in the normal course of Wells Fargo business; or may occur when team members pursue certain outside activities; and which may create a material risk of damage to the interests of customers or shareholders, or the interests of Wells Fargo. Types of relationships that can lead to conflicts of interest:

- A team member and Wells Fargo
- Wells Fargo and a customer
- A team member and a customer
- Two or more customers in the context of the provision of products and services by Wells Fargo to those customers
- Conflicts of interest when Wells Fargo is deemed to have a fiduciary capacity

In identifying and resolving conflicts of interest, Wells Fargo considers all of the facts and takes into account whether the actions of Wells Fargo or team members could create an actual, potential, or perceived conflict of interest within the broad categories included in this policy, as follows:

- **A personal conflict of interest** is a situation in which a team member’s [Personal Finances](#), investments, relationships, or outside activities may interfere with the team member’s ability to perform his or her duties or obligations to Wells Fargo, or to act in the best interest of Wells Fargo, or its customers. This may:
 - Create an unfair advantage or provide an improper benefit for the team member or someone with whom the team member has a personal relationship as a result of the team member’s position with Wells Fargo
 - Result in personal financial gain (or avoidance of a financial loss) based on access to or use of material, nonpublic information
 - Put the team member in a position that may require a choice between his or her personal interests and Wells Fargo’s interests or the interests of a customer
 - Encroach on the time that a team member should devote to Wells Fargo work or involve misuse of Wells Fargo’s resources or influence
 - Raise a reasonable question about the appearance of impropriety or a conflict of interest

- **A business conflict of interest** is a situation in which Wells Fargo engages in a transaction or activity where Wells Fargo’s interest is materially adverse to the interest of a customer with regard to that transaction or activity. For example:

- Wells Fargo has a financial or other incentive to favor the interest of a particular customer or group of customers over the interests of another customer
- Wells Fargo offers a service to a customer and in relation to that service receives something of value from that customer or another person or entity other than or in addition to the contracted commission or fee usually charged for that type of service

- **Fiduciary and investment conflicts of interest** include situations where Wells Fargo serves in a fiduciary capacity, executes fiduciary duties or responsibilities, functions as a broker under a suitability standard, or acts in an agency capacity pursuant to a contractual agreement to provide services, and when Wells Fargo’s ability to act in the best interest of the customer may be influenced by factors or circumstances other than the interests of the customer.

Standards: Personal Conflicts of Interest

Overview of Personal Conflicts

Team members must not permit their personal interests or outside activities to conflict with the interests of Wells Fargo. Team members must recognize and avoid situations in which their independent business judgment may be or may appear to be compromised. Team members also should avoid outside activities that interfere with their ability to satisfactorily perform their job duties. When presented with a situation involving an actual, potential, or perceived conflict of interest, the team member should consider whether public disclosure of the matter would embarrass Wells Fargo or lead an outside observer to believe that a conflict exists. The following sections provide standards for specific situations in which the possibility of a conflict of interest is present. Certain activities must be strictly avoided, and others require written pre-clearance in the [Global Pre-Clearance System \(GPS\)](#) before they can be undertaken (see [“Disclosure and Process for Obtaining Pre-Clearance”](#) and refer to any business procedures, if applicable, which may have more restrictive requirements). Team members are responsible for identifying actual, potential, or perceived conflicts of interest and must be familiar with situations that require pre-clearance, as more fully described in [“Appendix 1: Pre-clearance Guidance.”](#)

Personal Relationships

Team members are expected to exercise good judgment in their relationships with all team members, third-party service providers, and [Nonemployees](#). Decision-making can become difficult if a team member is working with someone he or she knows personally. Even if the team member tries to remain objective in his or her business dealings, the personal relationship can create an actual, potential, or perceived conflict of interest.

Team members are **prohibited** from:

- Taking part in any Wells Fargo business selection, evaluation, or payment decision involving a [Personal Relationship](#)
- Exerting undue influence in an existing personal relationship to influence the outcome of a business transaction or process to derive a benefit to Wells Fargo, the team member, or others with whom the team member has a personal relationship
- Engaging in [Self-Dealing](#) or otherwise using the team member's position with Wells Fargo to accept or solicit any personal benefit from a team member, customer, or third-party service provider not generally made available to other people (see the [Gifts and Entertainment Policy](#) for further information on giving and receiving gifts and entertainment with customers, third-party service providers, and U.S. government officials, and the [Anti-Bribery and Corruption Policy](#) for guidelines on providing things of value to non-U.S. government officials)
- Favoring anyone in Wells Fargo business dealings because of their personal relationship with a team member; business dealings must be made on objective criteria, such as price, service, and so forth, and in accordance with established business processes
- Having a romantic, sexual, or close social relationship with a manager or someone the team member manages, either directly (a team member who reports to that manager) or indirectly (any team member who is in the chain of reporting relationships below that manager, or over whom the manager has significant influence, even if in a different business)
- Providing or receiving improper personal benefits as a result of their position with Wells Fargo

Managers must avoid any relationship or activity that may be perceived as affecting their ability to remain objective in managing team members or providing work direction to nonemployee resources.

If a personal relationship in a business or area creates a conflict of interest, the appearance of a conflict of interest, or favoritism, or affects a team member's work or area, the team member must immediately escalate to his or her manager, an HR professional (for non-U.S.-based team members), or the [Employee Relations Solutions](#) team (for U.S.-based team members) to determine the appropriate action to eliminate or manage the conflict of interest. The personal relationship may not involve the team member directly, but it may include a manager, fellow team member, or nonemployee.

Team members must be aware that relationships in the workplace can also present actual, potential, or perceived conflicts of interest, and must know the restrictions that relate to hiring or working with relatives or someone with whom they have a personal relationship. (See "[Employment of Friends and Relatives](#)")

Employment of Friends and Relatives

Friends and relatives of team members are considered for employment under Wells Fargo's usual hiring policies. However, situations creating an actual, potential, or perceived favoritism or conflict of interest or potential security or audit risks must be avoided.

For purposes of "employment of friends and relatives," the following people are considered to be "relatives" and "related" to a team member:

- [Family members](#)
- Other close relatives not specified in the basic definition of "family member"
- Significant others
- Roommates or members of the same household
- Anyone else whose relationship to the team member could be perceived as causing a conflict of interest

Wells Fargo does not allow:

- Related people to hire or supervise one another, either directly (the immediate supervisor) or indirectly (any manager who is above the supervisor in the chain of reporting relationships or who has significant influence over the team member, nonemployee, or individual on a special assignment — such as a [short-term assignment resource \(STAR\) assignment](#) available in the U.S. — even if the team member is in a different business)
- Two related people to control a double custody or dual-control arrangement when required for a business process
- A related person to review or audit the work of another or to conduct a transaction on behalf of the other, whether in the same or a different business

However, in limited circumstances, (for example, sales relationships within Wells Fargo Advisors) Wells Fargo team members who are related may work in positions outside of the reporting or management chain when all of the following criteria are adhered to:

- All activities comply fully with the supervision, audit, or dual-control provisions of Wells Fargo
- The relationships are fully documented, disclosed to, and approved in advance by the business senior Human Resources leader

Team members are required to provide timely notification to their management, Human Resources professional, or Employee Relations Solutions team (for U.S.-based team members) of any personal relationship that could pose a conflict or violate this policy. If team members are or become related such that continued employment is in violation of this policy, the conflict must be reported and resolved. Affected team members are expected to work toward a resolution with the assistance of management and Human Resources. If the affected team members cannot resolve the matter, the company will take additional steps, as necessary, to resolve the conflict of interest, which may include reassignment or termination of employment.

If a conflict of interest arises from a company-initiated reorganization, or a merger or acquisition, the affected team members are expected to work toward a resolution with the assistance of management and Human Resources. If the affected team members are unable to resolve the situation, the company will take additional steps, as necessary, to resolve the conflict of interest, which may include reassignment or termination of employment.

For non-U.S.-based team members, refer to the “[In-Country Requirements for Employment of Friends and Relatives](#)” section for any specific in-country and region requirements.

Personal Finances

Because of the nature of Wells Fargo’s business, any improper handling of a team member’s personal finances could undermine the credibility of the team member and Wells Fargo. A precarious personal financial position might also appear to influence actions or judgments a team member makes on behalf of Wells Fargo. It could also cause others to question the team member’s decision-making on the job. Team members must handle their personal finances responsibly, with integrity, and in compliance with the law.

Team members must generally follow the same procedures for conducting personal financial business with Wells Fargo that customers follow. Personal financial business includes transactions on accounts over which a team member has any ownership interest, control, or signing authority.

To avoid actual, potential, or perceived conflicts of interest, the following are examples of what team members **must not do**:

- **Engage in insider trading.** For example, team members must not:
 - Purchase or sell securities, including Wells Fargo or its subsidiaries’ securities (collectively, “Wells Fargo securities”), if the team member is aware of material, nonpublic information, either personally or for any account over which the team member has direct or indirect control
 - Disclose material, nonpublic information in their possession to family members or others, including other Wells Fargo team members or businesses without a legitimate business need to know and without complying with any additional applicable information-sharing restrictions
 - Deal in a new issue of securities on terms that are in any way different from terms available to the general public

- **Engage in [Derivative](#) or [Hedging](#) transactions involving Wells Fargo [Securities](#),** including short selling.
- **Process transactions for themselves or for those with whom they have a personal relationship.** For example, team members must not:
 - Process their own transactions with Wells Fargo (except for certain permitted brokerage transactions; see “[Brokerage Purchases and Sales for Self or Family](#)”).
 - Request approvals of personal transactions by a coworker or by anyone the team member directly or indirectly supervises.
 - Approve overdrafts, or reverse or waive fees or service charges, for their own accounts or for those of individuals with whom they have a personal relationship.
 - Approve their own expenses, or request approval for expenses of anyone who reports directly or indirectly to them. Approval of expenses must be obtained in accordance with business policies.
 - Receive referral credit for their own accounts or business.
- **Borrow or lend funds improperly.** For example, team members must not:
 - Borrow money from any customer or third-party service provider of Wells Fargo, unless a personal relationship developed independently of Wells Fargo’s business is the basis of the transaction. However, a team member may borrow money or purchase items on credit from a customer or third-party service provider of Wells Fargo that is in the financial services business, as long as the team member does not receive preferential treatment due to the team member’s affiliation to Wells Fargo.
 - Lend personal funds to, cosign, endorse, guarantee, or otherwise assume responsibility for the borrowings of any customer or third-party service provider of Wells Fargo, unless a personal relationship developed independently of Wells Fargo’s business is the basis of the transaction.
 - Borrow money from, or lend money to, cosign, endorse, guarantee, or otherwise assume responsibility for the borrowings of another Wells Fargo team member if doing so would create a conflict of interest, unless a personal relationship developed independently of Wells Fargo’s business is the basis of the transaction. Occasional loans of nominal value (such as for lunch or coffee) may be made to another team member as long as no interest is charged.
 - Regardless of the foregoing, borrow or lend money under any circumstances if doing so would create an actual, potential, or perceived conflict of interest.

Reposessed or Foreclosed Property

Team members must not directly or indirectly (including through personal relationships) purchase real or personal property that has been reposessed or foreclosed on by Wells Fargo or is being marketed or sold at Wells Fargo's direction as servicer of a loan. It is the responsibility of team members to conduct appropriate due diligence to ensure they are not involved in the purchase of a foreclosed or short-sale property owned, marketed, managed, or serviced by Wells Fargo, including understanding that:

- Wells Fargo operates under the trade name Premiere Asset Services for managing the marketing and sale of some of its foreclosed properties; America's Servicing Company is a trade name used by Wells Fargo's servicing group and includes properties for which Wells Fargo has acquired the servicing rights from other lenders.
- Most real estate properties are listed on reo.wellsfargo.com; team members should check with their real estate agent to determine who the seller is or whether the agent works for Premiere Asset Services.
- If a team member has difficulty determining if a property is owned or managed by Wells Fargo or a related entity, the team member may send an email to the internal [Property Purchase](#) mailbox for assistance. In some situations, Wells Fargo may be listed as the lien holder or title holder in its capacity as trustee but may not be the owner or servicer of the loan, in which case a purchase of that property may not be subject to this restriction.

Brokerage Purchases and Sales for Self or Family

Certain team members who are full-service, registered representatives and whose job responsibilities authorize them to recommend, solicit, and place orders to buy or sell securities are permitted to place orders for their own brokerage accounts and the brokerage accounts of family members from whom the team members have written authorization to place such orders and on whose accounts the team members are listed as the broker of record. Such

transactions are subject to all fees and commissions as provided in the applicable fee schedule. A business may, in its discretion, limit or deny this authorization for a team member or group of team members to place orders in their own brokerage accounts or brokerage accounts of family members.

Investment in a Wells Fargo Customer or Third-Party Service Provider

A team member who invests in a customer or third-party service provider may have a conflict of interest when representing Wells Fargo to the customer or provider. This includes any team member (or a family member residing with the team member) who directly or indirectly holds an investment in or an option to acquire an interest in securities (such as stock, bonds, notes, debentures, interests in limited partnerships, or other equity or debt securities), makes a loan to, or guarantees an obligation of a customer or third-party service provider.

For this reason, team members and any family member residing with them **must not invest** in a customer or third-party service provider of Wells Fargo unless one or more of the following is true:

- The team member has no involvement in the approval or the management of business transactions between the outside business and Wells Fargo
- The securities are publicly traded on a national securities exchange and the team member does not participate in decisions involving credit or other business transactions with Wells Fargo that may be significant to the outside business
- Wells Fargo is sponsoring the investment opportunity as a part of an approved team member co-invest program approved by the Corporate Responsibility Committee

In no instance may team members or any family member residing with them invest in a customer or third-party service provider if they have material, nonpublic information about the customer or provider. Team members subject to the provisions of the [Wells Fargo & Company Personal Trading Policy](#) must refer to that policy for additional guidelines and restrictions.

Even for investments allowed under these criteria, team members must obtain pre-clearance in [GPS](#) before they (or family members who reside with them) invest in any business entity with which Wells Fargo has a business relationship if either of the following is true:

- The personal investment creates, or gives the appearance of creating, a conflict of interest.
- The investment is arranged, sponsored, or participated in by a customer or a director of Wells Fargo and is not made available generally to the public on substantially the same terms.

A team member must seek pre-clearance in [GPS](#) as soon as practical and act to prevent or resolve any conflict of interest if the team member (or a family member residing with the team member) owns an investment or an option to acquire an interest in, has loaned money to, or has guaranteed the obligations of an entity that later becomes a customer or third-party service provider of Wells Fargo and, in turn, that investment is brought under this rule.

Business Opportunities

Team members must not take for themselves potential business opportunities that belong to Wells Fargo regardless of how the team member becomes aware of the opportunity. This includes business opportunities that a team member discovers through the course of the team member's employment or representation of Wells Fargo, through the use of corporate property or corporate information, or through his or her position with Wells Fargo. The following list provides examples of what team members **must not do**:

- Compete directly or indirectly with Wells Fargo
- Solicit customers they learn about through Wells Fargo business for their personal outside business opportunity or activity

- Divert business from Wells Fargo
- Fail to act in Wells Fargo's best interest (for example, receiving an improper personal benefit at the expense of Wells Fargo)
- Receive a commission or fee for a transaction the team member has conducted for Wells Fargo — other than compensation, commissions, or incentives paid by Wells Fargo or paid or earned through a Wells Fargo-approved program (for gifts, refer to the [Gifts and Entertainment Policy](#))
- Offer any financial or investment products or services not provided by Wells Fargo
- Show preferential treatment in referring customers to another provider. Any referral by a team member must be done by providing a list of at least three qualifying providers, without indicating a preference or making a specific recommendation, unless the team member's business participates in a Wells Fargo-sponsored internal referral program and is subject to any additional requirements applicable to their business
- Refer a customer whose credit application was denied by Wells Fargo to a third-party credit source in return for a commission, or offer to advance credit to the customer on their own (for example, offering to provide a personally financed second mortgage)

Outside Activities

Wells Fargo recognizes that involvement in charitable, civic, and political activities is beneficial to team members' personal growth and commitment within their communities and profession. Team members may participate in outside activities but must never permit their personal interests or outside activities to conflict, or appear to conflict, with the interests of Wells Fargo or its customers. Generally, this means not engaging in activities that compete with Wells Fargo's businesses; have the potential to affect the team member's objectivity, job performance, or time when acting on behalf of Wells Fargo; or allow the team member to personally gain from a Wells Fargo relationship. Team members must be alert to actual, potential, or perceived conflicts of interest and be aware that they may be asked to discontinue any outside activity if an actual, potential, or perceived conflict arises.

Team Member Candidacy or Service to become a Public Official

Wells Fargo respects its team members' interest in running for or serving in public office. However, due to the breadth and scope of Wells Fargo's business activity, the potential for actual or perceived conflicts of interest between employment at Wells Fargo and running for or serving in public office are heightened. Therefore, pre-clearance is required prior to pursuit of or potential candidacy for any government or other public position or office, including as an elected or appointed official or as a member, director, officer, or employee of a government entity or governmental or public agency, authority, advisory board, city council, school board, political party committee, or other similar boards or entities. During the pre-clearance process, conflicts of interest and potential risk-mitigating conditions will be evaluated. It is imperative that team members submit a pre-clearance request through the [Global Pre-Clearance System \(GPS\)](#) before they pursue, become, agree to become, or announce intention to become a candidate or appointee to a public office or position.

Disclosure and Process for Obtaining Pre-Clearance

Certain outside activities require disclosure and pre-clearance (see "[Appendix 1: Pre-clearance Guidance](#)" for details on requirements).

Prior to undertaking any outside activities requiring disclosure under this policy, or prior to continuing to perform any outside activities in the event of a reorganization, merger, or acquisition, a team member must request pre-clearance through [GPS](#) or, if applicable, through a process specifically defined for his or her business that has been approved by Ethics Oversight. A team member must obtain the approval through GPS **prior** to engaging in the outside activity, where known, and as soon as a conflict is discovered, where the conflict is not known in advance.

Clearance to participate shall not imply that the team member is serving at the direction or request of Wells Fargo.

Team members with securities licenses and team members who are associated with a broker, dealer, or investment advisor must comply with outside activities reporting requirements applicable to their business. Additional business policies and procedures may apply to such team members, and it is the team member's responsibility to be aware of, and adhere to, any additional requirements contained in these policies and procedures. Businesses must inform team members of additional policies, procedures, and reporting requirements.

New Hire Initial Disclosure of Outside Activities and Pre-Clearance Requirements

Before joining Wells Fargo, candidates answer basic eligibility questions. Answers that raise the potential of a conflict of interest will be reviewed by the Human Resources recruiter, who will submit the outside activity to the appropriate Corporate Risk pre-clearance team for pre-hire-clearance. The pre-clearance decision will be provided to the recruiter and the recruiter (or the hiring manager) will communicate the decision to the candidate. The recruiter will resolve conflicts in accordance with this policy, the GPS decision, and any applicable business policies, and work with the hiring manager, Ethics Oversight, Wells Fargo Compliance, and the conduct risk control leader, as needed.

Re-Clearance Requirements

All outside activities requiring disclosure under this policy must be recorded in [GPS](#) (see "[Appendix 1: Pre-clearance Guidance](#)" for details on requirements).

If a team member seeks and receives pre-clearance to participate in outside business, employment, not-for-profit, civic, or political activities, participation must be re-disclosed and re-cleared any time there is a change in relevant facts upon which the original clearance was granted, or upon any upcoming renewals or re-elections related to that particular outside activity (for example, public office, or board membership). A team member may be required to make several requests for pre-clearance at various stages of related outside activities.

Prohibited Activities

Outside activities that compete with Wells Fargo or conflict with Wells Fargo's interests are not acceptable. In general, there is a risk in certain situations that team member involvement in an outside activity could create an actual, potential, or perceived conflict of interest. Because of that, team members must not engage in outside employment or business activities that involve any of the following:

- Performing outside activities that compete or conflict with, or that have the potential to compete or conflict with, or that are perceived to be in competition against or conflict with Wells Fargo and its services and products, wherever those services and products are offered. Wells Fargo engages in a broad variety of business activities and provides a wide selection of services and products in various countries, and these activities, services, and products will be considered competitive or conflicting, even if they do not directly compete against or conflict with a team member's particular outside activities. The following outside activities are prohibited:
 - Engaging in services or businesses provided by a bank, mortgage company, savings and loan association, credit union, trust company, broker or dealer, financial services company, or investment bank
 - Providing investment or legal advice if the team member is compensated, directly or indirectly, for such services
 - Acting as a real estate salesperson, broker, agent, or contractor, except for the limited purpose of the team member purchasing or selling his or her primary or secondary residence
 - Providing services in an outside activity when the knowledge of the individual's employment with Wells Fargo may influence customers
 - Receiving compensation for serving as an "expert witness" in a legal proceeding unless the expertise and legal proceedings are unrelated to employment with Wells Fargo, or Wells Fargo business
 - Engaging in the preparation, audit, or certification of statements or documents that Wells Fargo may rely on to make lending or other decisions
 - Serving as a tax preparer for organizations that offer banking or other services that compete with Wells Fargo
 - Being employed by a third-party service provider that does work for or in a Wells Fargo office or branch location
 - Serving as a director of a publicly held company, unless specifically approved in advance by the [Ethics Oversight pre-clearance team](#) via a [GPS](#) request and Wells Fargo's chief executive officer
- Performing outside business activities or services during regular Wells Fargo working hours (for example, receiving phone calls and preparing reports) or using Wells Fargo equipment, locations, or supplies. In some circumstances limited personal use of company-owned resources may be permitted, as long as team members use good judgment and ensure that personal use does not interfere with the team member's duties and responsibilities, work environment, or in any way violate Wells Fargo policies or security requirements.
- A team member must not use any confidential or proprietary Wells Fargo information an individual has obtained as a team member for personal benefit or gain or otherwise violate a team member's confidentiality obligations to Wells Fargo and its customers.

Wills, Trusts, and Estates

Team members may accept appointments as an executor, personal representative, administrator, guardian, trustee, or any similar fiduciary capacity only for those with whom they have a [Personal Relationship](#), unless the personal relationship developed in the context of a Wells Fargo customer relationship. It must be clear that the relationship, not the team member's position with Wells Fargo, is the basis for the appointment, and the relationship must not arise out of the business of Wells Fargo.

Likewise, a team member may not knowingly be named in and may not accept an inheritance under a will or other instrument from a customer, unless the team member has a personal relationship with the customer that has not developed in the context of a Wells Fargo customer relationship.

Team members must go through the process for pre-clearance in situations involving wills, trusts, and estates that may create an actual, potential, or perceived conflict of interest.

Additionally, team members cannot notarize a customer's will without the customer's attorney present. See "[Disclosure and Process for Obtaining Pre-Clearance](#)."

Notary Activities

Team members may perform outside notary services on a document involving or related to Wells Fargo, provided they do not charge or receive any notary fee, whether directly or indirectly, for the performance of the notarial services.

Businesses must follow state or other applicable laws regarding what documents — for example, last will and testament, living will (medical directive), and so on — may or may not be notarized, or if special requirements must be met prior to notarization.

To avoid conflicts of interest, team members are prohibited from acting on behalf of Wells Fargo in most notary situations involving family members and personal relationships. For more information on proper use of notary services, see the [Notary and Affiant Policy](#).

Standards: Business Conflicts of Interest

Overview of Business Conflicts

Within a multiservice financial institution, business conflicts of interest may arise in a variety of situations. Wells Fargo policies and procedures are designed to ensure businesses take steps to identify business conflicts of interest and prevent them from adversely affecting the interests of our customers.

The following are examples of business conflicts of interest that can arise in relation to services provided by Wells Fargo:

- Wells Fargo may engage in business and trading activities in securities or markets, either for customers or other limited purposes, in which different Wells Fargo customers are also seeking to invest.
- Wells Fargo may act as trustee to investors on a debt security and also act as a lender to the security issuer, such that it may create a conflict of interest between Wells Fargo's obligations as trustee and Wells Fargo's interests as creditor.
- Wells Fargo may enter a transaction whereby Wells Fargo discloses and sells its own credit or transactional exposure in an entity to the transaction counterparty.
- Wells Fargo may provide advisory services to a customer on a transaction and at the same time provide financing to another customer on the same transaction, where the two customers have separate or competing interests in the transaction.

Identifying Business Conflicts of Interest

Wells Fargo businesses are required to implement processes designed to identify actual, potential, or perceived business conflicts of interest; prevent them where possible; and where not prevented, manage them promptly, consistently, and fairly. In order to achieve this, Wells Fargo businesses are required to, at a minimum:

- Establish appropriate policies, procedures, and internal controls
- Design their incentive compensation programs to avoid or mitigate potential conflicts of interest
- Examine new products and services for potential conflicts of interest
- Report and escalate conflicts according to their business procedures
- Maintain a consolidated view of the business's identified potential material conflicts of interest and mitigating controls

Businesses must design processes and controls to identify the potential for business conflicts of interest in specific situations (specific products or services, or unique transactions or relationships) and prevent or mitigate the potential business conflicts of interest. When assessing either potential or specific situations to determine whether a business conflict of interest exists, businesses should consider the following examples in which a business conflict of interest could arise:

- Competition between Wells Fargo and a customer or set of customers

- Multiple businesses' involvement with a single customer or group of customers, particularly when acting in multiple roles with a customer (for example, acting simultaneously as lender, investment banker, trading the customer's securities, or writing research); refer to "[Business Opportunities](#)" for intra-company referral processes
- Different Wells Fargo businesses' involvement with a single product at different points in that product's lifecycle, or from their use of that product for different purposes
- Conflict between two or more customers in the context of services Wells Fargo is providing in the same transaction
- Conflict arising from characteristics or features of complex products and multiparty transactions
- Situations regarding the fair treatment of customers
- Compensation programs that provide incentives to team members in such a way as to create or increase the risk of potential conflicts of interest

Measures of Control for Identification, Prevention, and Management of Business Conflicts of Interest

Wells Fargo businesses and their team members must take appropriate steps to identify and prevent or manage actual, potential, and perceived conflicts of interest. The following are examples of approaches that a business could take that may be appropriate to adequately manage an actual, potential, or perceived business conflict of interest (For example, see the [Enterprise Volcker Rule Policy](#) for additional measures on the identification and management of Volcker-related conflicts of interest, and other business or jurisdictional requirements in the markets in which the business operates):

- Disclose the conflict, when required as described in "[Disclosure of Business Conflicts of Interest and Customer Consent](#)"
- Escalate to the applicable conduct risk control leader, Wells Fargo Compliance (if applicable), or senior management, particularly to those who have responsibility for customer relationships and related reputation risks that may arise from a conflict of interest with a customer (see "[Escalating Business Conflicts of Interest](#)" and the [Reputation Risk Policy](#))
- Do not engage in the transaction or business practice or provide the product or service that gives rise to the conflict of interest
- Maintain and comply with policies and procedures ensuring fair or consistent treatment of customers or classes of customers, including following established referral processes if applicable
- Implement product committees, independent from the Wells Fargo representatives directly involved in the conflict, to oversee and approve (among other matters) transaction and product pricing, placing, and structure, as well as analyzing potential conflicts of interest
- Separate management and supervisory structures
- Recuse individuals from situations or decisions that present an actual, potential, or perceived conflict

- Implement information barriers (“firewalls”), restricted lists (watch lists, gray lists, and similar resources), and other related controls to:
 - Monitor and control the flow of confidential information (including material, nonpublic information) within Wells Fargo
 - Implement ad hoc, transaction-specific information barriers or other additional information segregation controls, where appropriate based on risk
- Train team members on business-specific conflict of interest risks and controls, where necessary
- Seek advice from the business’s respective compliance team or conduct risk control leader who may consult the applicable representative in the Legal Department, for the management of business conflicts of interest

Disclosure of Business Conflicts of Interest and Customer Consent

After a business has identified a conflict of interest, it must determine whether its existing policies and procedures are adequate to manage that conflict of interest in compliance with this policy, or any related regulatory requirements. If measures taken to prevent or manage business conflicts of interest are not sufficient to prevent, with reasonable certainty, the risk of material damage to the interests of one or more customers, then the business must disclose the conflict of interest to the affected customer or group of customers.

Where businesses determine it necessary or appropriate, they may implement additional policies requiring disclosure.

In some instances, disclosure alone may be sufficient. In other cases, it may be appropriate to obtain informed customer consent before undertaking business with or for the customer. The business must determine which course of action is warranted under the circumstances.

Escalating Business Conflicts of Interest

Team members must promptly escalate any concerns regarding actual, potential, or perceived business conflicts of interest in accordance with this policy and the applicable business, regional, or country-specific policies or procedures to their managers, respective Wells Fargo Compliance team, conduct risk control leader, the Legal Department, or applicable individuals (each of whom may escalate further, as appropriate).

Business conflicts of interest involving customers served by a single business are managed within that business. The conduct risk control leader is a critical resource and point of contact for any questions, issues, and escalation of concerns within that business. When a conduct risk control leader is notified of a business conflict of interest involving customers served by different businesses or different business groups, the conduct risk control leader will confer with the conduct risk control leader for the other affected business, as well as control executives, the Legal Department, Wells Fargo Compliance, Ethics Oversight, and management, as applicable, to determine appropriate management of the conflict.

For critical findings, or if the conduct risk control leaders are unable to agree on appropriate management of a business conflict of interest, the issue must be immediately escalated to Ethics Oversight to resolve any issues and determine whether to involve the Enterprise Risk and Control Committee.

The conduct risk control leader has the authority to delay a particular transaction or product until the conflict of interest is effectively managed.

Records

Each business group or business must maintain records of the consolidated view of its identified business conflicts of interest, including those arising solely within the business as well as those involving another business. See “[Identifying Business Conflicts of Interest](#).” Records must be retained in accordance with the [Records Management Policy](#) and [Corporate Records Retention Schedule](#).

Standards: Fiduciary and Investment-Related Conflicts of Interest

Overview of Fiduciary and Investment-Related Conflicts

Where Wells Fargo is serving in a fiduciary capacity, executing fiduciary duties or responsibilities, functioning as a broker under a suitability standard, or acting in an agency capacity pursuant to a contractual agreement to provide services to customers, there may be exposure to actual or potential fiduciary and investment-related conflicts (subsequently referred to as “fiduciary and investment conflicts”). When fiduciary and investment conflicts are identified or where they emerge due to changing circumstances, they must be addressed according to applicable governing law. All businesses that offer fiduciary and investment products or services, or that support fiduciary and investment assets, must have policies and procedures to address fiduciary and investment conflicts, according to governing law. Because the definition of potential fiduciary and investment conflicts may differ based upon the governing law, including federal, state, and other statutes and regulations (“applicable governing law”), that is applicable to specific fiduciary and investment products and services, each business must ensure that policies, procedures, and controls provide for identification of potential fiduciary and investment conflicts according to the standards applicable to their business activities, and also provide for the effective mitigation or elimination of fiduciary and investment conflicts. Directors, officers, team members, and third-party agents are responsible for the effective management of fiduciary and investment conflicts.

Mitigation or Elimination of Fiduciary and Investment Conflicts

Once a potential fiduciary and investment conflict has been identified, businesses must engage risk and compliance management resources and those parties must take the steps to effectively mitigate or eliminate the fiduciary and investment conflict. In certain circumstances, more than one provision of applicable governing law may apply to the fiduciary activities of a business. In such a case, the business must make a determination, in consultation with risk, compliance, and legal partners, as to the applicable governing law that will assist in effective resolution of the conflict. Business policies,

procedures, and controls that provide standards for mitigation or elimination of fiduciary and investment conflicts must be aligned with the applicable governing law.

Fiduciary and Investment Conflicts – Potential Sources

Generally, fiduciary and investment conflicts may exist in any circumstance where the ability to act in the best interest of the customer may be influenced by factors other than the interests of the fiduciary account or service commitment. Fiduciary and investment conflicts may exist when an account is opened, or they may emerge later due to changing circumstances. However, this policy cannot anticipate or provide guidance for all potential fiduciary and investment conflicts that may be encountered. Businesses administering fiduciary and investment accounts and assets or providing fiduciary and investment products and services must:

- Periodically review all fiduciary and investment products and services to identify potential sources of fiduciary and investment conflicts from those business activities
- Develop policies, procedures, and controls to provide direction for the identification, reporting, and resolution (including avoidance if required) of fiduciary and investment conflicts according to applicable governing law
- Develop and implement effective governance practices to provide for effective resolution of fiduciary and investment conflicts

Fiduciary and Investment Conflicts – Regulatory Provisions

Applicable governing law may contain provisions that define prohibited fiduciary and investment conflicts, the parties associated with a business activity that may impact fiduciary and investment conflicts, and methodologies for mitigation or resolution of fiduciary and investment conflicts.

Businesses must identify applicable governing law that affects their business activities and develop and implement policies, procedures, and controls that provide effective requirements for compliance with those standards. Examples of the applicable governing law that might apply are described in the [“Related Law or Regulation”](#) section.

Fiduciary and Investment Conflicts – Business Activities and Transactions

Businesses are responsible for establishing effective processes for identification of existing and potential fiduciary and investment conflicts, and for avoiding or properly mitigating or resolving fiduciary and investment conflicts. Fiduciary and investment conflicts may emerge from within a business, through circumstances existing within other parts of Wells Fargo, or through relationships with third parties. Factors related to the interests of Wells Fargo may also contribute to fiduciary and investment conflicts. For instance, third parties in which Wells Fargo has a financial or business interest may cause or be party to fiduciary and investment conflicts. Policies, procedures, and controls supporting identification and resolution of fiduciary and investment conflicts should include consideration of business activities and transactions, potential

fiduciary and investment conflicts resulting from activities elsewhere throughout the company, and through third-party entity relationships. Fiduciary and investment conflicts can exist or emerge through the execution of business transactions for fiduciary and investment customers with Wells Fargo, its directors, officers, team members, affiliates, related business interests, or other parties with whom there exists an interest that might affect our best judgment, or any entity falling within the definition of a “Party-In-Interest” under ERISA (subsequently referred to as “related entities”).

Examples of the areas of business activities where fiduciary and investment conflicts might exist or emerge include:

- Lending money to or from fiduciary and investment customers
- Purchases of assets from, or sales of assets to, fiduciary and investment customers
- Executing or supporting order-taking or securities transactions for fiduciary and investment customers, including:
 - Soft-dollar arrangements
 - Front-running
 - Best execution
 - Trade allocation
 - Cross-trading
 - Trade confirmations
 - Block trading
- Third-party contracts
- Managing investments or providing other advice or recommendations
- Practices affecting setting, charging, waiving, or processing of fees, commissions, and other revenue-generating transactions associated (directly or indirectly) with any fiduciary and investment activity
- Planning for, and payment of, commissions, incentives, referrals, and other performance-related compensation
- Conducting transactions that are subject to Section 406(b) of the Prohibited Transactions provisions of ERISA or the equivalent provisions of Section 4975 of the Internal Revenue Code
- Conducting transactions associated with fiduciary and investment customers involving proprietary products or services
- Providing or making recommendations on any nonproprietary products, services, or assets in which Wells Fargo has a direct or indirect financial interest
- Conducting fiduciary and investment business activities where the company, through more than one business, is providing products or services to fiduciary and investment customers
- Pricing or valuing assets held in a customer account

- Directors, officers, or team members personally providing services that are considered to be competing with Wells Fargo services
- Directors, officers, or team members improperly using fiduciary assets
- Managing the business interests of fiduciary and investment customers, including team members serving as agents or directors associated with those activities

Multiple Capacities

Wells Fargo often serves in multiple capacities related to customer accounts or relationships. It is important to note that where those services include fiduciary and investment-related capacities, the business must address the related conflicts. Businesses that serve customers by acting in a fiduciary and investment-related capacity, or by supporting fiduciary and investment-related products or services, must have a process to identify and manage (or mitigate) potential conflicts.

International Requirements

In-Country Requirements for Employment of Friends and Relatives

As it relates to the “[Employment of Friends and Relatives](#)” section of this policy, refer to the Human Resources policies as set out in the applicable *Team Member Handbook*, HR Guide, HR Guidelines, Work Rules, or similar documents at the team member’s work location for any specific in-country and region requirements and definitions ([for team members outside the U.S.](#)).

Roles and Responsibilities

Team Members

Each team member is responsible for:

- Exercising sound judgment
- Knowing and understanding the requirements of the Wells Fargo [Code of Ethics and Business Conduct](#), this policy, and all other related corporate and business-level policies and procedures applicable to him or her
- Avoiding [Self-Dealing](#)
- Not allowing his or her personal, outside business, or investment activities to compromise, interfere with, or otherwise call into question his or her judgment, ability to act objectively, and duties and responsibilities owed to Wells Fargo and customers, or otherwise give rise to reputational damage to Wells Fargo
- Identifying and preventing or appropriately managing actual, potential, and perceived conflicts of interest; and escalating conflicts of interest as the team member becomes aware of them
- Avoiding situations giving rise to actual, potential, or perceived conflicts of interest

- Helping to manage conflicts of interest, including fiduciary and investment conflicts
- Seeking advice when appropriate
- Disclosing and obtaining pre-clearance for certain outside activities as required by this policy (see “[Disclosure and Process for Obtaining Pre-Clearance](#)” and “[Appendix 1: Pre-clearance Guidance](#)”)
- Ensuring all of his or her outside activities requiring disclosure under this policy are recorded in [GPS](#)
- Completing, in a timely manner, all companywide and business-specific training associated with understanding his or her responsibilities regarding potential conflicts of interest and how to escalate issues and questions, as appropriate
- Adhering to the highest ethical standards

Business Groups

Each business group is responsible for:

- Owning, understanding, and controlling the ethics-related risk associated with its business activities
- Ensuring team members know and comply with the requirements of this policy, those policies that relate to it, and additional related business- or jurisdiction-specific requirements
- Identifying, preventing where possible, managing, and escalating conflicts of interest associated with the business’s products, services, and activities and the activities of its team members to the conduct risk control leader, including a periodic review of its policies and procedures for adequacy in managing conflicts of interest in that business
- Maintaining high ethical standards and principles in providing products and services to its [Customers](#)
- Ensuring all team members complete required training and providing business-specific new-hire and periodic training to team members whose responsibilities include participation in situations potentially involving conflicts of interest (business-specific training includes information related to awareness and escalation of potential conflicts to the conduct risk control leader, and explains the business’s processes and controls for managing conflicts)
- Reporting pre-clearance activity to the conduct risk control leader and Ethics Oversight when a business-defined process for pre-clearance related to conflicts of interest exists
- Disclosing certain business conflicts of interest to and obtaining consent from customers, when appropriate
- Maintaining a consolidated view of identified business conflicts of interest and mitigating controls
- Protecting the integrity of its relationships with customers, shareholders, communities, and team members
- Developing and implementing policies, procedures, and controls to provide requirements for the identification,

reporting, avoidance (if required), and resolution of fiduciary and investment conflicts according to applicable governing law

- Developing and implementing effective governance practices to provide for effective resolution of conflicts
- Reviewing periodically all fiduciary and investment products and services to identify potential sources of fiduciary and investment conflict from those business activities

Wells Fargo Compliance

Wells Fargo Compliance, an independent risk management function, is responsible for:

- Providing oversight of the front line's compliance with ethics-related regulatory requirements and credibly challenging the front line's risk decisions
- Overseeing compliance with regulatory requirements that are applicable to ethics standards (that is, conduct-related regulatory requirements)
- Executing associated risk management activities for ethics-related risk with regulatory implications
- Supporting the independent testing activities in their subject areas and working with and providing input into the testing scripts utilized by Enterprise Testing, and having dialogue regarding testing results for ethics-related risk with regulatory implications
- Sharing relevant information from risk management activities with Ethics Oversight to assist one another with their respective ethics-related oversight responsibilities, and for communicating and consulting with one another regarding this information to ensure a consistent assessment of ethics-related risks, issues, and corrective actions
- Leading development of companywide training related to conflicts of interest with regulatory implications and approving supplemental training that businesses and international regions develop
- Escalating issues as described in the [Compliance Program Policy](#)

Conduct Risk Control Leaders

Conduct risk control leaders, who are within the control executive organization, perform a front-line function and are responsible for managing ethics-related risk within their business group or enterprise function.

Conduct risk control leaders are responsible for:

- Managing risks related to conflicts of interest for one or more ethics-related business risk programs
- Reporting, and in certain cases, escalating potential breaches or exceptions to the policy, as appropriate
- Notifying Ethics Oversight, and Wells Fargo Compliance as applicable, of all significant conflicts of interest issues in a timely manner

- Reasonably ensuring all conflicts of interest-related issues and key control breakdowns are resolved in a timely manner, and escalating unaddressed concerns
- Monitoring team members to ensure they complete required conflicts of interest training, and identifying and partnering with businesses to address specific training needs, as appropriate

Employee Relations Solutions and HR Professionals

Employee Relations Solutions (which supports domestic team members) and HR professionals who support international team members are responsible for:

- Advising team members within the boundaries of this policy and escalating matters to [Ethics Oversight](#), as appropriate
- Determining the appropriate action to eliminate a conflict of interest after being notified of a personal relationship
- Handling the exception requests related to "[Employment of Friends and Relatives](#)"

Ethics Oversight

Wells Fargo's Ethics Oversight team, an independent risk management function and part of the Conduct Risk team within Corporate Risk, has oversight responsibility for ethics-related risk (inclusive of conflicts of interest) across Wells Fargo. Specific responsibilities include:

- Developing, maintaining, and ensuring compliance with this policy, as well as companywide ethics-related policies and procedures
- Providing centralized coordination and oversight of all business, region, and companywide ethics, business conduct, and conflicts of interest matters, including risk exposures and risk management activities
- Resolving issues of interpretation regarding any aspect of this policy
- Advising conduct risk control leaders and other areas responsible for implementing the requisite controls, processes, and systems to comply with this policy and other ethics-related policies and procedures
- Providing credible challenge to management decisions, business processes, activities, and corrective actions
- Designing and implementing a periodic companywide ethics, business conduct, and conflicts of interest risk assessment process
- Providing guidelines to conduct risk control leaders on their risk assessments
- Leading development of companywide training related to ethics, business conduct, and conflicts of interest and approving supplemental training that businesses and international regions develop
- Escalating concerns and issues according to the [Conduct Risk Team's Escalation Procedures](#) (access is restricted)

- Coordinating with Wells Fargo Compliance with respect to compliance with applicable laws, regulations, and supervisory guidance and expectations relating to ethics-related risk

Chief Executive Officer

The chief executive officer is responsible for:

- Approving public company board membership in partnership with Ethics Oversight
- Handling exception requests relating to an executive officer, in partnership with Ethics Oversight, and any such exception must be approved by the Board or appropriate Board committee

Policy Governance

Reporting

The Ethics Oversight team will provide periodic or ad hoc reports, as appropriate, to the Enterprise Risk and Control Committee on conflicts of interest matters.

The Fiduciary and Investment Risk Oversight (“FIRO”) team is responsible for fiduciary and investment conflicts under this policy and will provide periodic or ad hoc reports, as appropriate, to the Enterprise Risk and Control Committee.

Escalation and Exceptions

This policy cannot account for every possible situation. To address a situation not covered by this policy, request a change to this policy or the related standards, or recommend an alternative practice, business managers will contact the control executive or conduct risk control leaders and the policy manager (noted under the Document Information in the Policy Library left navigation).

The policy manager will work with the requesting business to address the needs and escalate the request as necessary. See the [Operational Risk and Compliance Escalation Policy](#) for events that have specific escalation requirements.

The discussion may result in an exception request, exemption request, change to existing policy, alternate policy for certain businesses, or a directive for the business to comply with the existing policy. Businesses are expected to initiate this discussion before the business is out of compliance or immediately after a policy violation has been discovered.

If the business does not agree with the decision, or if the policy manager determines the risk warrants further escalation, matters will be escalated to the policy director, to the Enterprise Risk and Control Committee, or to the Fiduciary & Investment Risk Committee, as appropriate.

Any exception request relating to an executive officer of Wells Fargo must be escalated to Ethics Oversight and

Wells Fargo’s chief executive officer, and any such exception must be approved by the Board or appropriate Board committee.

Violations

Failure to comply with this policy, without appropriate prior approval, is a policy violation. Policy violations may result in corrective action, including termination of employment.

If a policy violation occurs, the situation must be escalated and related remediation actions taken in a timely manner. Issues must be recorded in the Shared Risk Platform’s Issue Management solution when required under the criteria established in the [Issue Management Policy](#).

Policy Authority

The following roles provide leadership and oversight of this policy and its content, as defined in the [Policy Management Policy](#):

- Executive officer: Head of Corporate Risk
- Policy director: Head of the Conduct Risk team
- Policy manager: Head of Ethics Oversight

For questions about this policy, send an email to [Ethics Oversight](#).

Related Information

Related Law or Regulation

The following laws or regulations informed the fiduciary and investment related standards in this policy.

Laws:

- 12 USC 92a, Trust Powers
- 15 USC 77, The Trust Indenture Act
- 15 USC 78a, The Securities Exchange Act of 1934
- 15 USC 80a, The Investment Company Act of 1940
- 15 USC 80b, The Investment Advisers Act of 1940 (Section 206)
- 12 USC 408, Individual retirement Accounts
- 29 USC Chapter 18, Employment Retirement Income Security Act of 1974

Regulations:

- 12 CFR 9, Fiduciary Activities of National Banks
- 12 CFR 12, Recordkeeping and Confirmation Requirement for Securities Transactions
- 17 CFR 275.204-2, Books and Records maintained by Investment Advisers
- 17 CFR 275.204 A-1, Investment Advisory Code of Ethics
- 29 CFR 2550, ERISA Fiduciary Responsibility
- FINRA Rule 2111, Suitability

Comptroller's Handbook:

- Personal Fiduciary Activities
- Asset Management
- Conflicts of Interest
- Retirement Plan Products and Services
- Investment Management Services
- Custody Services

Treatises:

- Restatement of the Law Third, Trusts
- Uniform Prudent Investor Act of 1994
- Uniform Principal and Income Act of 1997

Industry References:

- CFA Standards of Practice, 2014

Remember that when consulting external sources, the Legal Department is the final authority for interpreting laws and regulations on behalf of Wells Fargo. For more information or interpretation of this information, consult the Wells Fargo attorney supporting your business.

Related Policies or Resources

The following Wells Fargo resources provide additional information related to activities discussed in this policy:

- [Anti-Bribery and Corruption Policy](#)
- [Business and Personal Activities with Public Officials and Government Entities Policy](#)
- [Charitable Contributions and Event Sponsorship Policy](#)
- [Code of Ethics and Business Conduct](#)
- [Enterprise Volcker Rule Policy](#)
- [Gifts and Entertainment Policy](#)
- [Global Pre-Clearance System \(GPS\)](#)
- [Government Relations and Public Policy Risk Management Policy](#)
- [HR Resources for Team Members Outside the U.S.](#)
- [Independent Monitoring, Testing, and Validation Policy](#)
- [Issue Management Policy](#)
- [Legal Department](#) site
- [New Business Initiatives Risk Management Policy](#)
- [Notary and Affiant Policy](#)
- [Policy Regarding Legal Conflicts of Interest](#)
- [Records Management Policy](#) and [Corporate Records Retention Schedule](#)
- [Reputation Risk Policy](#)
- [Team Member Handbook](#) (for U.S.-based team members)
- [Wells Fargo & Company Personal Trading Policy](#)
- [Wells Fargo Ethics](#)

Appendix 1: Pre-clearance Guidance

Outside Activities Pre-Clearance and Disclosure Requirements

All Outside Activity

In all cases of outside activity, your involvement is contingent on the following:

- Your outside activity does not involve a business that, directly or indirectly, competes with Wells Fargo.
- You have no involvement on behalf of Wells Fargo in the approval or management of credit, purchases, or other business transactions relating to the outside activity.
- It is at all times made clear that you are not serving at the direction or request of Wells Fargo.
- You understand the challenges and risks of the outside position and are alert for actual, potential, or perceived conflicts of interest.
- If a decision arises that presents a potential conflict of interest between the outside activity's interest and Wells Fargo's interest, you must disclose that situation promptly to your manager and recuse yourself from the decision-making process.

Do you need to seek pre-clearance of...

...an outside business activity? Yes, almost always.

You must obtain [Disclosure and Process for Obtaining Pre-Clearance](#) under the following circumstances:

- Before accepting a position with any type of for-profit business as a director*, trustee, officer, general partner, or any similar position; or before becoming owner of 25% or more of the business's voting or economic interests (for Wells Fargo's executive officers, the benchmark is 10%)
- Prior to service as a director on the board of a public company (this is generally discouraged and requires approval by the [Ethics Oversight pre-clearance team](#) via [GPS](#) and the chief executive officer of Wells Fargo)
- If considering outside employment or business activities involving the preparation of tax returns (while this is generally discouraged and prohibited when serving as a tax preparer for organizations that offer banking or other services that compete with Wells Fargo, pre-clearance **may** be granted in limited circumstances)
- Prior to commencing any work on an article, book, book chapter, or any writing that will be displayed to the public ("publication") that relates to the team member's job responsibilities or relates to any Wells Fargo products or services, the team member must first obtain the approval of his or her manager and a Management Committee member (or delegate) for the business in consultation with Human Resources. Management approval should entail consideration of a number of factors, including the subject matter of the work, whether the team member will use company time and resources to create the publication, the time and resources that may be required to review and approve content, and the possible reputation risk and benefit to Wells Fargo. If the manager approves the publication, then the team member must submit a pre-clearance request. As part of the pre-clearance process, a decision will be made about whether Wells Fargo or the team member will be the copyright owner of the publication
- Before undertaking activity as a home inspector or appraiser

You are not required to obtain pre-clearance for the following situations, unless pre-clearance is required by your business**:

- Holding outside employment with a for-profit organization, sole proprietorship, or a [Family-Owned Business](#) that does not compete with Wells Fargo in any way, does not provide services to Wells Fargo, does not cause an actual, potential, or perceived conflict of interest, and does not affect your duties and responsibilities to Wells Fargo.
- Providing investment or legal advice to a relative or to another person or entity, provided that you are not compensated, directly or indirectly, for such services.
- Performing activity as a real estate salesperson, broker, agent, or contractor for the limited purpose of purchasing or selling your primary or secondary residence.

...a nonprofit activity? Sometimes, yes. In general, you do not need pre-clearance, but certain situations require it, as specified below.

You must obtain [Disclosure and Process for Obtaining Pre-Clearance](#) in situations where:

- You are asked to participate in any capacity or role for a nonprofit that is a customer or third-party service provider of your Wells Fargo business, and the request arises out of that customer or third-party service provider relationship
- You are asked to manage the finances or investments of the nonprofit
- Your service involves selecting or influencing the selection of financial products or services
- The organization is a customer of Wells Fargo and the financial services relationship is for more than deposit services
- You will be paid for your service

You are not required to obtain pre-clearance for the following situations, unless pre-clearance is required by your business**:

- Volunteer work or charitable acts of service, such as volunteering at a soup kitchen or homeless shelter, serving as a soccer coach, or acting as a mentor or tutor
- Service as a volunteer director, trustee, or other member of the board or similar governing body, or as a volunteer officer of a nonprofit, unless the organization is a customer of Wells Fargo and the financial services relationship is for more than deposit services, and provided your service does not involve selecting or influencing the selection of financial products or services
- Holding a Wells Fargo-appointed board of director position as a representative of Wells Fargo on a board of a nonprofit. This appointment is not held in the team member's personal capacity, but rather at senior executive leadership's direction and request, and the team member will consult on voting with senior executive leadership, as needed.
- Where you raise funds for the nonprofit, provided you are doing so on its behalf and not Wells Fargo (for example, using nonprofit stationery and title) and you do not solicit Wells Fargo customers or third-party service providers for contributions (Refer to the [Charitable Contributions and Event Sponsorship Policy](#))

...political and civic activities? Yes, for certain roles and activities.

You must obtain [Disclosure and Process for Obtaining Pre-Clearance](#):

- Prior to pursuit of or potential candidacy for any government or other public position or office, including as an elected or appointed official or as a member, director, officer, or employee of a government entity or governmental or public agency, authority, advisory board, city council, school board, political party committee, or other similar boards or entities — for example, county commissioner role, state pension board, or other similar role
- For political contributions if you are considered a “covered team member” as defined in the [Business and Personal Activities with Public Officials and Government Entities Policy](#) (and you must follow the pre-clearance process specified in that policy)

You are not required to obtain pre-clearance for the following situations, unless pre-clearance is required by your business**:

- Participation in religious, community, or civic organizations
- Service as a volunteer director, trustee, or other member of the board or similar governing body, or as a volunteer officer of a parent-teacher association, library board, or other similar civic organization, unless the organization is a customer of Wells Fargo and the financial services relationship is for more than deposit services, or your service involves selecting or influencing the selection of financial products or services
- Unpaid volunteering with a political organization and/or campaign (however, if you are considered a “covered team member” as defined in the Business and Personal Activities with Public Officials and Government Entities Policy, you are required to pre-clear in-kind donations of time and work)

*Serving as a director of a publicly held company is generally discouraged and requires advance approval by Ethics Oversight (via [GPS](#)) and Wells Fargo's chief executive officer.

**Some team members are subject to additional requirements and restrictions, including pre-clearance, under their business policies and procedures relating to outside activities and personal investments. This may include team members employed in the brokerage, investment banking, investment research, advisory, trust, and investment management units, as well as senior officers who make or supervise fiduciary investment decisions, as applicable. Contact your respective compliance team with questions about specific laws or regulations that apply to your business, region, or country.

Appendix 2: Glossary

Business Conflict of Interest

Refer to the definition in the [Enterprise Risk Glossary](#).

Customer

For the purposes of this policy, customers include:

- Existing Wells Fargo customers, or a group of customers
- Past Wells Fargo customers where fiduciary or other duties remain in place

Derivative

As defined in the [Code of Ethics and Business Conduct](#), a derivative is 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. For purposes of this policy, a derivative transaction would not include the acquisition or exercise of an employee stock option or other stock right granted as part of a Wells Fargo compensation and benefits program or an investment in or the conversion of Wells Fargo convertible preferred stock.

Family-Owned Business

A family-owned business is a privately held business of which more than 50% of the ownership interest is owned or controlled, directly or indirectly, by a team member or one or more of the team member's family members.

Fiduciary and Investment Conflicts

Conflicts of interest occur when Wells Fargo's ability to act in the best interest of the customer may be influenced by factors or circumstances other than the interests of the customer, or a fiduciary account, or service commitment. The term "fiduciary and investment conflict" is intended to include any type of conflict between Wells Fargo and the customer or the customer account that might emerge through the execution of fiduciary, investment advisory, asset management, brokerage, or other associated business activities.

Hedging

As defined in the [Code of Ethics and Business Conduct](#), hedging is a type of transaction in [Securities](#) that limits investment risk with the use of derivatives, such as options and futures contracts. Hedging transactions purchase opposite positions in the market in order to ensure a certain amount of gain or loss on a trade.

Mitigate

Taking actions to resolve a conflict of interest through steps including disclosure of the conflict and/or acquiring any approvals that may be required. Mitigation does not eliminate a conflict but involves application of a methodology that is informed by applicable legal or statutory provisions for any given business unit, which once satisfactorily completed would allow moving forward in the presence of a conflict.

Nonemployee

See the [Corporate Nonemployee Policy](#) for the definition.

Personal Conflict of Interest

Refer to the definition in the [Enterprise Risk Glossary](#).

Personal Relationship

The following relationships are considered "personal relationships":

- A family member, defined as a team member's:
 - Spouse or domestic partner
 - Parents and grandparents (including great-, step-, in-law, domestic partner, adopted or foster, and in loco parentis relationships)
 - Children and grandchildren (including great-, step-, in-law, domestic partner, and adopted or foster relationships)
 - Brothers and sisters (including step-, in-law, adopted or foster, and domestic partner relationships)
- Personal friend, or anyone else, whose relationship to a team member could create a conflict of interest, the appearance of a conflict of interest or favoritism, or affect a team member's work area

Refer to additional information regarding the definition of personal relationship in "[International Requirements](#)."

Pre-Clearance

The process of requesting and obtaining approval through the [Global Pre-Clearance System](#) (GPS) before an outside activity that may pose a potential conflict of interest can be undertaken, and receiving approval through any business-specific procedures, if required.

Securities

As defined in the [Code of Ethics and Business Conduct](#), securities include but are not limited to stocks, bonds, notes, debentures, limited partnership units, other equity or debt securities, and [Derivative](#) instruments (for example, options, warrants, puts, calls, futures contracts, or other similar instruments).

Self-Dealing

A situation where a team member abuses or takes advantage of Wells Fargo work-related information or his or her position to benefit himself or herself, rather than ensuring all Wells Fargo work-related information is used appropriately for the benefit of Wells Fargo or a customer.

Required Absence from Sensitive Positions Policy

Supplemental to the [Compliance Program Policy](#)

Published November 14, 2019

Purpose

This policy establishes the expectations and requirements for how Wells Fargo mitigates potential risks related to asset misappropriation, fraudulent activity, or other unauthorized transactions, by requiring appropriate periods of absence for team members in roles that include tasks identified as sensitive.

Areas Primarily Affected

All Wells Fargo businesses inside and outside the United States must comply with this policy, which is particularly applicable to those team members in [Sensitive Positions](#). Team members will be notified by their managers if their roles include [Sensitive Tasks](#) and if they are covered by the absence requirements of this policy.

Standards: Required Absence Provisions

Identification of Team Members in Sensitive Positions and Maintenance of Inventory

Businesses are required to define sensitive tasks applicable to their business activities, identify team members in sensitive positions, and maintain an inventory of such team members in the companywide [Required Absence Tool](#). The inventory must be reviewed, and updated if needed, under these conditions:

- New team members join the business.
- Existing team members leave the business.
- Roles or functions in the business change.
- Additional sensitive tasks are identified.
- Changes are identified as part of annual attestation (see [“Annual Attestation and Documentation Maintenance”](#)).

Businesses may have stricter definitions of sensitive tasks, depending on the nature of their business and their business procedures, but business definitions must not contradict this policy or violate National Labor Relations Board rules or similar national, state, or local regulations.

Businesses that have determined they have no sensitive positions must follow the process outlined in the [Policy Exception Management System Reporting for Required Absence from Sensitive Positions Policy – Exhibit](#).

Fraud Risk Controls Other Than Required Absence

Team members in sensitive positions where the sensitive tasks are otherwise well-controlled to mitigate the risk of fraud (applicable to tasks performed) do not have to take a required absence as described in the sections below. Businesses with team members in certain countries where local labor or other laws may prohibit enforcement of required absence (for example, India, Japan, South Korea, and Taiwan) must have other controls that mitigate the risk of fraud (applicable to the sensitive tasks performed). Businesses with at least one team

member whose sensitive tasks are covered by appropriate and effective controls must follow the process outlined in the [Policy Exception Management System Reporting for Required Absence from Sensitive Positions Policy – Exhibit](#).

Required Absence

[Covered Team Members](#) are required to be removed from sensitive tasks for two consecutive work weeks or 10 consecutive working days (see [“Qualified Types of Absences”](#) and [“Excluded Types of Absences”](#) below) each calendar year. The required absence may be longer if needed to allow for all pending transactions to clear, or if required by local law or regulatory requirements.

If a team member becomes a covered team member after March 31, whether as a new hire or because of internal role change, he or she is not required to complete a required absence until the following calendar year.

Managers must communicate absence requirements to covered team members, as soon as possible after the individual is identified as a covered team member.

Qualified Types of Absences

Covered team members must be removed from the sensitive tasks associated with their roles in any combination of the following ways:

- Paid time off (scheduled or unscheduled)
- Floating holiday
- Approved leave of absence
- Other paid time off
- Off-site training or professional conference
- On-site training, rotation of duties, or temporary assignment

Excluded Types of Absences

The following are not appropriate types of absences for compliance with this policy:

- Observed holidays, including country-specific observed holidays
- Business travel

Scheduling Required Absences

Managers may choose when to schedule a required absence in the form of on-site training, rotation of duties, or temporary assignment, provided it has been approved by business senior management and the applicable control executive (or delegate), and subject to national, state, or local regulations.

For all other qualified types of absences, a covered team member may choose when to schedule a required absence, provided it is approved by his or her manager.

Team members must document all scheduled required absences in the [Required Absence Tool](#) and maintain that information as needed.

Work Activities

During the required absence period, the covered team member's sensitive tasks must be performed by another team member. The covered team member on required absence is prohibited from doing any of the following through any media (including, laptop, phone, email, tablet, etc.):

- Performing sensitive tasks, providing work direction, or consulting on or reviewing sensitive tasks.
- Performing or approving any transactions related to his or her sensitive task responsibilities.
- Contacting other team members regarding sensitive tasks.
- Signing into any workstation or system, on-site through the network or off-site through remote access technology (such as Pulse Secure, MyEd, EDNET, etc.) to perform, conduct, consult on, or review any sensitive tasks.

Businesses may prohibit additional work-related activities, depending on the nature of their business and their business procedures, but business practices must not contradict this policy or violate National Labor Relations Board rules or similar national, state, or local regulations.

Access or Monitoring

Businesses must disable or limit access to sensitive tasks for covered team members, where feasible, for the duration of the required absence. This may include disabling:

- AD-ENT login ability.
- Physical badge access.
- Remote access applications.
- Access to specific corporate systems and business applications used for sensitive tasks.

Businesses that are unable to disable or limit access for covered team members on required absence must monitor the activities of these covered team members to detect inappropriate access during the absence; these businesses must review monitoring plans with their control executive team and business-aligned compliance officer.

Contact With Covered Team Members on a Required Absence

Team members who are not on a required absence are permitted to contact a covered team member on a required absence with general questions not pertaining to any sensitive task. If the conversation must include discussion of a sensitive task, the team member who is not on a required absence must first obtain management's written permission. Immediately following the discussion with the covered team member on a required absence, the team member initiating the contact must document a summary of the discussion and submit it to his or her manager. Managers must maintain and retain documentation of all contact with covered team members on a required absence regarding sensitive tasks.

Annual Attestation and Documentation Maintenance

Businesses must maintain the following information (as applicable), provide it to the policy coordinator for this policy when requested (see policy coordinator names in [Corporate Policies and Procedures Owned by Wells Fargo Compliance – Exhibit](#)), and attest to its accuracy on an annual basis:

- Analysis for determining which team members in sensitive positions are covered team members.
- Analysis for determining suite of controls for team members who are in sensitive positions but are deemed otherwise well-controlled and therefore not required to take the required absence.
- Business procedures associated with this policy.
- Documentation evidencing the inventory of systems that were disabled for the covered team member or the monitoring plans and results of monitoring efforts.
- Documentation of contact with covered team members on required absence.

Oversight of This Policy

Accountability

The following roles provide leadership and oversight of this policy and its content, as defined in the [Policy Management Policy](#):

- Executive officer: Chief risk officer
- Policy director: Chief compliance officer
- Policy manager: Head of the Compliance Policy Team

For questions about this policy, send an email to [Compliance Policy mailbox](#).

Oversight

Oversight of this policy is established in the [Compliance Program Policy](#).

Escalations, Exceptions, and Violations

Requirements for applying policies and activities related to escalating risk events and issues, requesting exceptions and exemptions, and addressing policy violations are established in the “Standards: Applying and Overseeing Policies” section of the [Policy Management Policy](#). Additional requirements specific to this policy and use of the Policy Exception Management System can be found in the [Policy Exception Management System Reporting for Required Absence from Sensitive Positions Policy – Exhibit](#).

Reporting Policy Violations

Team members are responsible for identifying potential violations of this policy and must report any potential violations following the instructions in the [Reporting Potential Violations of Wells Fargo Compliance Corporate Policies – Exhibit](#) documentation.

Only the Legal Department can make a determination as to whether a violation of law or regulation has occurred; keep this in mind when completing the potential violation form.

Related Information

Related Law or Regulation

The following laws or regulations informed this policy:

United States

- Federal Reserve Board, Supervisory Letter SR 96-37 (SUP), Supervisory Guidance on Required Absences from Sensitive Positions, December 20, 1996
- Office of the Comptroller of the Currency, OCC - Comptroller's Handbook, Internal Control, January 2001
- Financial Industry Regulatory Authority, Regulatory Notice 08-18, Sound Practices for Preventing and Detecting Unauthorized Proprietary Trading
- Securities and Exchange Commission, Risk Alert: Strengthening Practices for Preventing and Detecting Unauthorized Trading and Similar Activities

International – APAC Region

- China Banking Regulatory Commission, Guidelines on Operational Risk Management of Commercial Banks
- Financial Services Agency of Japan, Comprehensive Guidelines for Supervision of Major Banks, etc. Financial Services Agency of Japan, Inspection Manual for Deposit-Taking Institutions
- South Korea Financial Services Commission, Regulations on Supervision of Corporate Governance of Financial Companies
- Singapore Monetary Authority of Singapore Guidelines on Risk Management Practices - Internal Controls
- Securities and Futures Commission of Hong Kong, Circular to Licensed Corporations Licensed for Dealing in Securities - Protecting Client Assets Against Internal Misconduct
- International – EMEA Region
- Foreign Exchange Working Group, FX Global Code
- Bank of England, Fair and Effective Markets Review – Final Report, June 10, 2015

Remember that when consulting external sources, the Legal Department is the final authority for interpreting laws and regulations on behalf of Wells Fargo. For more information or interpretation of this information, consult your Wells Fargo attorney.

Related Policies or Resources

Wells Fargo resources referenced in this policy include:

- [Corporate Policies and Procedures Owned by Wells Fargo Compliance - Exhibit](#)
- [Policy Exception Management System Reporting for Required Absence from Sensitive Positions Policy – Exhibit](#)
- [Required Absence Tool](#)
- [Team Member Handbook](#) for U.S. definitions of terms used in this policy (international team members should refer to the corresponding country-specific *Team Member Handbook*):
 - Paid time off
 - Floating holidays
 - Leaves of absence
 - Other paid time off
 - Observed holidays

Appendix 1: Glossary

Covered Team Member

As it pertains to this policy, a covered team member is a full-time employee who is in a [Sensitive Positions](#) and is subject to absence requirements of this policy.

Sensitive Positions

Sensitive positions are:

- Roles that may include one or more [Sensitive Tasks](#).
- Others who can influence, direct, or cause fraudulent activities associated with sensitive tasks (for example, direct managers of team members in roles identified as sensitive positions).

Sensitive Tasks

Sensitive tasks may include any of the following:

- Initiation, execution, or approval of cash or check transactions.
- Reconciliation of accounts on behalf of Wells Fargo or any of its customers.
- Preparation and execution of trades on behalf of Wells Fargo or customers, which may include reconciliation or other back-office responsibilities associated with trading.
- Transfer or wiring of funds between Wells Fargo accounts and customer accounts, which may include reconciliation or other back office responsibilities associated with transferring or wiring funds.

Weapons Policy

Supplemental to the [Corporate Physical Security Risk Policy](#)

Published April 26, 2019

Purpose

This policy establishes the expectations and requirements of Wells Fargo team members to help maintain a weapon-free workplace.

Areas Primarily Affected

All Wells Fargo businesses and team members inside and outside the United States must comply with this policy. To the extent a business engages a third-party service provider (including managed or non-managed resources) to carry out any activities on behalf of Wells Fargo while at a Wells Fargo workplace, that business is affected by this policy and responsible for ensuring the provider is aware of and complies with the applicable requirements.

Policy Statement

Wells Fargo is committed to providing team members and visitors with a safe, professional workplace environment in which to work and conduct business. As part of this commitment, the company maintains this policy to keep weapons out of the workplace.

Definitions

The following definitions are key to understanding this policy:

Security Personnel

For the purposes of this policy, security personnel refers to Wells Fargo Corporate Security team members who have been authorized under the business-level [Corporate Security Firearms and Safety Policy](#) by the senior security director to maintain weapons as part of their employment for Wells Fargo.

Workplace

For the purposes of this policy, a workplace refers to company premises or other locations selected by Wells Fargo where a team member conducts business on behalf of Wells Fargo or its customers, or represents Wells Fargo at a Wells Fargo-sponsored event, or when traveling on business.

Weapons

For the purpose of this policy, a weapon is any item designed or adapted primarily for the purpose of inflicting bodily injury, threatening others, or inspiring fear, whether or not such items are legal to own or possess, including a knife (switch-blade, gravity knife, stiletto, sword or dagger), bludgeon (billy club, black-jack or telescoping baton), metal knuckles, or a firearm of any kind (pistol, rifle or shotgun), but not including personal-sized utility tools (such as a Swiss army device or multifunction tool) or pepper spray.

Standards: Prohibited Conduct

Weapons

Possessing weapons at a Wells Fargo workplace is dangerous to team members and is strictly prohibited.

Only duly authorized security personnel may possess weapons at a Wells Fargo workplace. For example, security personnel working in specific roles involving the physical security of persons or assets, or cash vault guard positions, may be authorized to carry weapons for the protection of team members and visitors.

Except for duly authorized security personnel, no Wells Fargo team member is permitted to carry, either openly or in a concealed manner, any weapon while at a Wells Fargo workplace. This policy applies even in states where the law may allow persons to carry weapons, subject to a private property owner's restrictions. Wells Fargo acknowledges that certain states allow persons to store weapons in locked vehicles, and this activity is not prohibited by this policy.

Wells Fargo team members who are working in their place of residence are not subject to the restrictions of this policy, but must still comply with all applicable laws and regulations regarding possession and use of weapons.

Standards: Reporting Weapons in the Workplace

Where to Call

Wells Fargo Corporate Security provides support to team members 24 hours a day, seven days a week through the Security Response Center. To report a weapon in the workplace, team members must act as follows.

Immediate Threats

- Team members must immediately call the emergency number of their jurisdiction (in the United States, for example, **911**) if in imminent danger or in an emergency, and then call **Corporate Security** at **1-877-494-9355, option 1** if in the United States, or **001-480-437-7599** from international locations. (This information is included in the [Emergency and Security Procedures](#) flipchart).
- If a team member is not able to call 911 and Corporate Security, he or she must advise a manager or Employee Assistance Consulting (EAC) at 1-888-327-0027 or 1-877-HRWELLS (1-877-479-3557), option 4; TDD/TTY 1-877-411-0826, who must in turn call 911 and Corporate Security immediately.

Non-Emergency Threats

- To report a non-emergency situation involving a weapon in the workplace, team members must call **Corporate Security** at **1-877-494-9355, option 1** if in the United States, or **001-480-437-7599** from international locations. Alternatively, team members may report the weapon's presence to a manager or to Employee Assistance Consulting (EAC) at 1-888-327-0027 or 1-877-HRWELLS (1-877-479-3557), option 4; TDD/TTY 1-877-411-0826, who must in turn contact Corporate Security immediately.

Roles and Responsibilities

Corporate Security

This team is responsible for:

- Managing reports of suspected or actual weapons in the workplace, including immediate risk assessment and response.
- Investigating and determining outcomes for all reports of suspected or actual weapons in the workplace.
- Engaging appropriate Human Resources teams as needed.
- Maintaining confidentiality regarding reports, reporters, alleged victims of suspected or actual weapons in the workplace, alleged offenders, and others as appropriate.

Human Resources

This team is responsible for:

- Engaging Corporate Security when suspected or actual weapons in the workplace are reported to Human Resources (EAC).
- Consulting with Corporate Security when investigating reports of suspected or actual weapons in the workplace.
- Maintaining confidentiality on all reports, reporters, alleged victims of suspected or actual weapons in the workplace, alleged offenders, and others as appropriate.
- Documenting the conclusions and suggested actions, including disciplinary action, on actual weapons in the workplace situations or bad-faith reports, and placing those conclusions and suggested actions in personnel files as appropriate.

Team Members

Team members, including managers, are responsible for:

- Committing to maintaining a weapons-free workplace.
- Reporting suspected or actual weapons in the workplace, whether having witnessed, or having been asked to report.
- Cooperating with the investigation of suspected or actual weapons in the workplace reports as requested.
- Maintaining confidentiality of all information associated with any incidents of suspected or actual weapons in the workplace.

Oversight of this Policy

Accountability

The following roles provide leadership and oversight of this policy and its content, as defined in the [Policy Management Policy](#):

- Executive officer: Chief financial officer
- Policy director: Head of Enterprise Shared Services
- Policy manager: Head of Corporate Security

For questions about this policy, send an email to corpsec@wellsfargo.com.

Oversight

Oversight of this policy is established in the [Corporate Physical Security Risk Policy](#).

Escalations, Exceptions, and Violations

Requirements for applying policies and activities related to escalating risk events and issues, requesting exceptions and exemptions, and addressing policy violations are established in the Standards: Applying and Overseeing Policies and Procedures section of the [Policy Management Policy](#).

Related Information

Related Policies or Resources

- [Corporate Security](#) site on Teamworks
- [Corporate Security Firearms and Safety Policy](#) (restricted access)
- [Emergency and Security Procedures](#)
- [Employee Assistance Consulting](#)
- [Violence-Free Workplace Policy](#)
- [Violence Free Workplace – Team Member Handbook](#)

