

**City of Los Angeles
Responsible Banking & Investment Monitoring Program
For Investment Banks**

Investment banks providing City investment banking services or seeking City investment banking business must complete and submit this form no later than July 1st of each year to the City Administrative Officer to comply with Chapter 5.1, Section 20.95.1 of the Los Angeles Administrative Code.

Contact Information:

Wells Fargo Bank, National Association

Name of Financial Institution

333 S. Grand Ave.

Los Angeles CA

90071

Street Address

City

State

Zip Code

Michael Engelbrecht, Managing Director

Contact Person Name and Title

213-253-7219

michael.j.engelbrecht@wellsfargo.com

Telephone No.

Email Address

SOCIAL RESPONSIBILITY

Please answer the following questions for the preceding calendar year.

1. Did your firm make monetary donations to charitable programs within the City limits?

Yes No

If yes, please complete the attached form, labeled at Exhibit 1.

2. Did your firm provide any scholarship awards to residents of the City of Los Angeles?

Yes No

- a. How many scholarships were awarded? 75
- b. What was the total value of the awarded scholarships? \$150,000

3. Does your firm have internal policies regarding utilization of subcontractors which are designated as "women owned," "minority owned," or "disabled" business enterprises? Yes No

If yes, please provide a copy of your policies, labeled as Exhibit 2

CONSUMER PROTECTION

1. Is the financial institution currently in compliance with all applicable consumer financial protection laws?

Yes ___ No ___

If no, please briefly explain: Please see Exhibit 4

2. Does the financial institution have policies to prevent the use of illegal predatory consumer adverse sales goals as the bases for evaluation, promotion, discipline or compensation of employees?

Yes ___ No ___

If no, please briefly explain: Please see Exhibit 4

3. Does the financial institution encourage and maintain whistleblower protection policies for its employees and/or customers to report suspected illegal practices, including predatory sales goals?

Yes ^x ___ No ___

If no, please briefly explain: _____

4. In the last five years, has the financial institution been subject to any disciplinary actions such as fines, suspensions, or settlements, undertaken by the Securities and Exchange Commission, the Consumer Financial Protection Bureau, the Municipal Securities Regulation Board, the Financial Industry Regulatory Agency and/or any State regulatory agency?

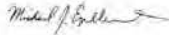
Yes ^x ___ No ___

5. If the answer to question no. 4 is yes, please provide in separate attachment labeled Exhibit 3, what the violation(s) are, the reason for the enforcement action, what government agencies are involved, the date of the enforcement action, what is the current status, and how were or will the issues be resolved?

Please see attached litigation statement in Exhibit 3

CERTIFICATION UNDER PENALTY OF PERJURY (*)

I certify under penalty of perjury that I have read and understand the questions contained in this form and the responses contained in the form and on all the attachments. I further certify that I have provided full and complete answers to each question, and that all information provided in response to this form is true and accurate to the best of my knowledge and belief.

Michael Engelbrecht	Managing Director		08/21/2022
Print Name	Title	Signature	Date

(*) Signature must be that of the Head of Public Finance or equivalent corporate executive.

PLEASE SEND THE ORIGINAL SIGNED FORM TO THE ADDRESS BELOW AND EMAIL A COPY TO CAO.DEBT@LACITY.ORG.

**Office of the City Administrative Officer
200 North Main St. Room 1500
Los Angeles, CA 90012
Attention: Debt Management Group**

Exhibit 1

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Attachment for Question #1 - Responsible Banking Investment Monitoring Program for Investment Banks

Name of Charitable Organization	Type	Amount (\$)
See following pages		

Attachment for Question #1 - Responsible Banking Investment Monitoring Program for Investment Banks

Name of Charitable Organization	Type	Amount (\$)
2021 City of Los Angeles Charitable Giving		\$26.9 million total
A COMMUNITY OF FRIENDS		
ABODE COMMUNITIES		
ADVENTIST HEALTH WHITE MEMORIAL CHARITABLE FOUNDATION		
AFFORDABLE LIVING FOR THE AGING		
ALLIANCE FOR HOUSING AND HEALING		
ALTAMED HEALTH SERVICES CORP		
AMERICAN INDIAN CHAMBER EDUCATION FUND		
AMERICAN NATIONAL RED CROSS		
APLA HEALTH AND WELLNESS		
ASIAN AMERICANS ADVANCING JUSTICE LOS ANGELES		
ASIAN PACIFIC ISLANDER SMALL BUSINESS PROGRAM INCORPORATED		
BIG SUNDAY		
BIZFED INSTITUTE		
BLACK BUSINESS ASSOCIATION		
CALIFORNIA COMMUNITY ECONOMIC DEVELOPMENT ASSOCIATION		
CALIFORNIA COMMUNITY FOUNDATION		
CALIFORNIA HOSPITAL MEDICAL CENTER FOUNDATION		
CENTER FOR THE PACIFIC ASIAN FAMILY INC		
CENTER THEATRE GROUP		
CHARLES DREW UNIVERSITY OF MEDICINE AND SCIENCE		
CHILDRENS HOSPITAL LOS ANGELES		
CHILDRENS INSTITUTE INC		
CHINATOWN SERVICE CENTER		
CHRYSA LIS CENTER		
CLINICA MSR. OSCAR A. ROMERO		
COMMUNITY COALITION FOR SUBSTANCE ABUSE PREVENTION & TREATMENT		
COMMUNITY DEVELOPMENT TECHNOLOGIES CENTER		
COMMUNITY PARTNERS		
COVENANT HOUSE CALIFORNIA		
CSULA AUXILIARY SERVICES INC		
CULTIVALA INC		
DESTINATION CRENSHAW		
DOWNTOWN WOMENS CENTER		
EAST WEST PLAYERS INC		
ECONOMIC DEVELOPMENT CORPORATION OF LOS ANGELES		
EL NIDO FAMILY CENTERS		
ENTERTAINMENT INDUSTRY FOUNDATION		
EQUALITY CALIFORNIA INSTITUTE		
ESPERANZA COMMUNITY HOUSING CORPORATION		
EXECUTIVE SERVICE CORPS OF SOUTHERN CALIFORNIA		
FREEFROM		
FRIENDS OF EXPO CENTER		
GENESIS LA ECONOMIC GROWTH CORPORATION		
GREATER LOS ANGELES AFRICAN AMERICAN CHAMBER OF COMMERCE EDUCATION FUND		

Attachment for Question #1 - Responsible Banking Investment Monitoring Program for Investment Banks

Name of Charitable Organization	Type	Amount (\$)
2021 City of Los Angeles Charitable Giving		\$26.9 million total
GREEN DOT PUBLIC SCHOOLS CALIFORNIA		
GRID ALTERNATIVES GREATER LOS ANGELES		
GRYD FOUNDATION		
HISPANAS ORGANIZED FOR POLITICAL EQUALITY - CALIFONRIA		
INCLUSIVE ACTION FOR THE CITY		
INNER CITY ARTS		
INNER CITY YOUTH ORCHESTRA OF LOS ANGELES INC		
INSTITUTO DE AVANCE INTEGRAL LATINO INC		
INTERNATIONAL MEDICAL CORPS		
JEWISH BIG BROTHERS BIG SISTERS ASSOCIATION OF LOS ANGELES		
JOVENES INC		
JVS SOCAL		
KARSH FAMILY SOCIAL SERVICE CENTER INC		
KOREAN AMERICAN FAMILY SERVICES, INC		
KOREATOWN YOUTH AND COMMUNITY CENTER INC		
L A WORKS INC		
LABC INSTITUTE		
LACBA COUNSEL FOR JUSTICE		
LA-MAS INC		
LEADERSUP		
LIFT INC		
LOCAL INITIATIVES SUPPORT CORPORATION		
LOS ANGELES AREA CHAMBER OF COMMERCE FOUNDATION		
LOS ANGELES BROTHERHOOD CRUSADE BLACK UNITED FUND INC		
LOS ANGELES CONSERVATION CORPS		
LOS ANGELES COUNTY FIRE DEPARTMENT		
LOS ANGELES FIRE DEPARTMENT FOUNDATION		
LOS ANGELES LGBT CENTER		
LOS ANGELES MISSION INC		
LOS ANGELES PARKS FOUNDATION		
LOS ANGELES REGIONAL FOOD BANK		
LOS ANGELES URBAN POLICY ROUNDTABLE		
LTSC COMMUNITY DEVELOPMENT CORPORATION		
M F PLACE INC		
MARTIN LUTHER KING JR COMMUNITY HEALTH FOUNDATION		
MAYOR'S FUND FOR LOS ANGELES		
NATIONAL FOSTER YOUTH INSTITUTE		
NEIGHBORHOOD HOUSING SERVICES OF LOS ANGELES COUNTY		
NEW DIRECTIONS INC		
NEW ECONOMICS FOR WOMEN		
OPEN ARMS FOOD PANTRY AND RESOURCE CENTER		
PACIFIC ASIAN CONSORTIUM IN EMPLOYMENT		
PACIFIC COAST REGIONAL URBAN SMALL BUSINESS DEVELOPMENT CORPORATION		
PARA LOS NIÑOS		

Attachment for Question #1 - Responsible Banking Investment Monitoring Program for Investment Banks

Name of Charitable Organization	Type	Amount (\$)
2021 City of Los Angeles Charitable Giving		\$26.9 million total
PARTNERSHIP FOR LOS ANGELES SCHOOLS		
PEOPLE ASSISTING THE HOMELESS		
PLACE CALLED HOME		
POINT FOUNDATION		
PROJECT ANGEL FOOD		
PROMISES FOUNDATION		
PROYECTO PASTORAL AKA JESUIT HISPANO MINISTRY		
RAISE A CHILD INCORPORATED		
REGENTS UNIVERSITY OF CALIFORNIA LOS ANGELES		
SHELTER PARTNERSHIP INC		
SINGLE ROOM OCCUPANCY HOUSING CORP		
SKID ROW HOUSING TRUST		
SOUTHERN CALIFORNIA CENTER FOR NONPROFIT MANAGEMENT		
SOUTHERN CALIFORNIA GRANTMAKERS		
SPECIAL SERVICE FOR GROUPS, INC.		
SUSTAINABLE ECONOMIC ENTERPRISES OF LOS ANGELES		
TEACH FOR AMERICA INC		
TEAM RUBICON		
TELACU EDUCATION FOUNDATION		
THE CENTER FOR STRATEGIC ECONOMIC STUDIES AND INSTITUTIONAL DEVELOPMENT INC		
THE PEOPLE CONCERN		
TIDES FOUNDATION		
UNION RESCUE MISSION		
UNITED WAY - LOS ANGELES		
UNITE-LA INC		
UNIVERSITY OF SOUTHERN CALIFORNIA		
URBAN LEAGUE - LOS ANGELES		
VERMONT SLAUSON LDC INC		
VISION TO LEARN		
WAYFINDER FAMILY SERVICES		
WEINGART CENTER ASSOCIATION		
WEST ANGELES COMMUNITY DEVELOPMENT CORPORATION		
WEST HOLLYWOOD COMMUNITY HOUSING CORPORATION		
YOUNG MENS CHRISTIAN ASSOCIATION OF METROPOLITAN LOS ANGELES		
YWCA OF GREATER LOS ANGELES		

Exhibit 2

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Supplier Diversity

When we work together,
we grow together.



The Wells Fargo Vision

*We want to satisfy our
customers' financial needs and
help them succeed financially*

Message from Regina O. Heyward

Our Vision

To be a World Class Supplier Diversity organization that is recognized as an industry leader in Diverse Procurement, and Supplier Development.

Supplier Diversity adds value to the organization by ensuring that our supply base looks like the customers and communities we serve. Our Supply Chain Management group is working closely with all lines of business, as well as internal and external stakeholders, to grow relationships with capable diverse businesses. In 2018, our spend was \$1.36 billion with diverse suppliers. Wells Fargo spends more than \$3 million annually funding diverse business development and capacity building programs intended to help diverse businesses grow and scale.

Regina O. Heyward



Regina O. Heyward,
Head of Supplier Diversity

Regina O. Heyward serves on these national boards:

- U.S. Hispanic Chamber of Commerce
- Disability:IN
- Million Women Mentors Entrepreneurship Initiative Chair
- Minority Business News USA Advisory Board



Our Approach

Diverse Spend Growth:

Support strategic thinking and align with businesses around strategic opportunities that include diverse suppliers in competitive sourcing and procurement opportunities.

Supplier Development:

Invest in building capacity and expertise for high potential diverse suppliers.

Outreach:

Work with internal and external stakeholders to deliver information to the diverse supplier community.

Our Process

Engaging Supply Chain Management

- Early engagement of Supplier Diversity will start the data gathering process (benchmark data, peer information, and diverse supplier identification).

Requirements gathering

- Supplier Diversity involvement will support the search and identification of qualified and capable diverse suppliers.
- This allows the gathering of information on any roadblocks that may limit diversity participation.

Evaluate product/service requirements

- Supplier Diversity will analyze the category for diverse supplier engagement (first or second tier).

Sourcing and due diligence

- Supplier Diversity provides input and reviews sourcing document (RFx), ensuring language pertaining to diversity (commitment, spend, reporting, etc.) is present and meets the goals and objectives.

Negotiate contracts

- Supplier Diversity is engaged/notified of any disputes related to second tier contract language and defined goals.

Approvals and signatures

- On-boarding training for second tier tracking and reporting.

Doing business with Wells Fargo

Our Supplier Code of Conduct:

Wells Fargo expects all of its suppliers to comply with the law and act ethically in all matters. Our Supplier Code of Conduct establishes related requirements for our suppliers. Working together, we can achieve great success by doing the right thing.

<https://www.wellsfargo.com/about/corporate/human-rights-statement>

Certification requirement

A “diverse supplier” is a business that is at least 51% owned, managed, and controlled by a diverse person or group. Wells Fargo requires that businesses asserting that they are diverse suppliers must be certified by a third party certification organization. We recognize diverse supplier certifications from local, state, and federal agencies as well as organizations like the NMSDC, WBENC, USPAACC, Disability:IN, NGLCC, United States Department of Veterans Affairs, etc.

Certification of your company helps to ensure the integrity of Wells Fargo’s Supplier Diversity Program and reporting. Noncertified diverse suppliers may submit proposals to do business with Wells Fargo, but may be asked to pursue certification if business is awarded.

Competitive sourcing and procurement

Wells Fargo’s Supply Chain Management organization is responsible for ensuring our needs for products and services are sourced and procured from quality suppliers who can meet the organization’s cost, quality, delivery, innovation, and business strategic needs. In addition to our Supply Chain Management organization, Wells Fargo also has an internal Corporate Properties Sourcing organization responsible for our facilities footprint, retail banking network, and supporting the administrative office needs of our team members across the globe. It is important to our collective organizations that deals are competitively sourced and mutually beneficial for all concerned parties.

We evaluate a broad range of criteria when we identify and source from suppliers, which typically include the following:

1. Supplier capabilities, past performance, management, and expertise
2. Quality standards
3. Competitive pricing
4. Delivery schedules
5. Technology capabilities and infrastructure
6. Financial stability and tax status
7. Insurance requirements
8. Region of operations (scale)

Doing business with Wells Fargo

Basic documentation needed for a competitive RFP or bid

Wells Fargo routinely runs competitive Request for Proposal (RFP) events or competitive bids to evaluate suppliers meeting basic qualification to provide products and services. Although each sourcing activity is unique, and could have different requirements, there are some basic documentation expectations that suppliers should be aware of and prepared to respond to in the event they are invited to bid:

- Diversity certification documents or proof that certification is “in process”
- Dun & Bradstreet number
- NACIS or SIC Code for the products/service you are proposing
- Understanding and compliance with all insurance, regulatory laws, or conditions pertaining to your industry, specific product, or service
- List of references that can support your performance in delivering products and services at the scale which is being proposed. Suppliers doing business in the financial services industry for the first time can provide similar sized project references
- Proof of company’s ability to be “scalable” to all reviewing parties. In other words, how much business can your company effectively handle?
- Basic technology and EDI (electronic data interchange) capacity
- Senior management roles and responsibilities
- Project team details and experience
- Certificate of Insurance (various requirements based on project type, complexity, and location)

Capabilities

It is important that you demonstrate an understanding of how your product or service fits into our business strategy. Prepare to communicate and demonstrate the following:

- Preliminary pricing/differentiation strategy relative to the category or market in which you are operating, including an understanding of your business’ customers, competitors, market concentration, etc.
- Plan for delivering products or services to us and how your model meets our vast and complex business needs.
- Comprehensive market information and insights on products, services, and innovations. Demonstrate an ability to operationalize ideas and bring to market in an efficient and effective manner.

Wells Fargo uses a number of different sources to identify suppliers to provide products and services. The Supply Chain Management group uses the Supplier Registration database, as well as the Supplier Diversity team to identify suppliers. If we determine that a supplier is a potential match, we will contact the supplier to be included in the procurement or sourcing initiative.

We embrace Diversity and Inclusion



Outreach



Highlights of our efforts

Invested

\$3 million annually

Developed

9 signature
development
programs

Engaged

Over 500
diverse-owned
businesses annually

Our outreach expands across regional and national organizations that share our commitment to Supplier Development and provide programs and services that strengthen diverse businesses within our communities. We collaborate with organizations that align with diverse supplier identification, certification, development, and engagement, such as:

- Disability:IN
- National LGBT Chamber of Commerce
- National Minority Supplier Development Council
- United States Black Chambers, Inc.
- United States Hispanic Chamber of Commerce
- United States Pan Asian American Chamber of Commerce
- National Association of Women Business Owners
- WEConnect International
- Women's Business Enterprise National Council
- Women Presidents' Organization

Supplier Development

Wells Fargo believes that by developing diverse suppliers, we help strengthen our supplier base and increase the economic impact that our suppliers have on their communities. We work with organizations that align with our vision and provide diverse businesses access to resources. Through these relationships, it is important to us that diverse suppliers are developed by:

- Enhancing their business and strategic plans
- Increasing their ability to define and communicate their strategic direction and value
- Retooling their competitive position
- Strengthening their communication effectiveness and executive presence
- Establishing trusted relationships
- Modeling how to do business with targeted prospective clients
- Improving innovation and scale



Think

Educational programs and resources to energize your entrepreneur ideals.



Start

Tools and resources to provide a roadmap to business success.



Grow

Enhancing business growth through leadership development and process improvement.

Awards and Recognitions

- **Corporation of the Year Top Performer** — Gazelle Award by the National Minority Supplier Development Council (NMSDC)
- **America's Top Corporation Platinum Distinction Award** for Women's Business Enterprises by the Women's Business Enterprise National Council (WBENC)
- **Program/Initiative of the Year** by the National Business Inclusion Consortium (NBIC)
- U.S. Hispanic Chamber of Commerce (USHCC) **Million Dollar Club**
- **Top 35** for Supplier Diversity by *Black Enterprise* magazine
- **No. 14** Best Company for Diversity, *DiversityInc*
- **Top** Companies for LGBT Employees, *DiversityInc*
- **Perfect Score of 100** on Corporate Equality Index from the Human Rights Campaign
- **Perfect Score of 100** on Disability Equality Index from the American Association of People with Disabilities (AAPD) and the Disability:IN

“Disability:IN partners with business to achieve disability equality and inclusion. Through this, our organization helps corporate partners leverage the talent of people with disabilities to drive performance and innovation. Wells Fargo is a vigorous and dependable business ally, demonstrating a willingness to invest on all fronts in the disability community. Wells Fargo has been a strong supporter of our Supplier Diversity program, and shown true leadership by serving on our Procurement Council, seeking out disability suppliers, and sponsoring executive education programs for disability business owners and service-disabled veteran-owned firms.”

Jill Houghton, President and CEO
Disability:IN

“The Women's Business Enterprise National Council (WBENC) is focused on providing qualified, certified, women-owned businesses for inclusion in our Corporate and Government Member supply chains. We not only locate and certify women-owned businesses, but we also provide resources and opportunities to help these businesses develop and grow, while working to deepen the relationships between corporations and WBENC-Certified Women's Business Enterprises (WBEs). It is because of corporations like Wells Fargo that we are able to deliver on this mission. Wells Fargo has been a true leader and supporter in driving the sustainable inclusion of women-owned businesses in our economy, and their financial support, as well as active involvement in our programming and development of WBEs, continues to make an impact on women, minorities, and the communities they serve. With the economic power of women as consumers, decision-makers, and business owners, Wells Fargo's continued support and investment in diversity and inclusion is not just doing good — it's good business.”

Pamela Prince-Eason, President and CEO
Women's Business Enterprise National Council (WBENC)

“Together we can ensure that women entrepreneurs have access to the information and opportunities they need to be successful, however they define that term. We know and value what an asset our relationship with Wells Fargo has been for our members and hope to have the opportunity to continue it for years to come.”

Jen Earle, NAWBO National CEO



Wells Fargo Resources

We're here to make it easier for you to succeed. Use these resources to find the right information for your business, attract and retain employees, and more.



Wells Fargo Works for Small Business®

Wells Fargo serves approximately three million small business owners across the United States and loans more money to America's small businesses than any other bank (2002 – 2015 CRA government data). To help more small businesses achieve financial success, in 2014 Wells Fargo introduced Wells Fargo Works for Small Business® – a broad initiative to deliver resources, guidance, and services for business owners.

Through **wellsfargoworks.com**, we offer useful guidance on topics such as writing a business plan, marketing your business, managing cash flow, and building credit to help business owners increase their knowledge and confidence. The site includes hundreds of feature stories, informational articles, and videos featuring national small business strategy experts and business owners sharing their experiences.

Hands on Banking®

Hands on Banking is a free, noncommercial program that teaches people in various stages of life about the basics of responsible money management. Available in English and Spanish. For more information, visit **handsonbanking.org**

Wells Fargo Innovation Incubator

The Wells Fargo Innovation Incubator (IN²) is a five-year, \$10 million program designed to facilitate early-stage technologies that provide scalable solutions to reduce the energy impact of commercial buildings. IN² is funded by the Wells Fargo Foundation and co-administered by the U.S. Department of Energy's National Renewable Energy Laboratory (NREL). For more information, visit **in2.wf.com**

Diverse Community Capital

The Wells Fargo Works for *Small Business*: Diverse Community Capital (DCC) program will deliver \$175 million in capital to Community Development Financial Institutions (CDFIs) that serve diverse small businesses. For more information, visit **wellsfargo.com/cdfi**. For more information on Wells Fargo corporate social responsibility, visit **wellsfargo.com/about/csr**.

Supplier Diversity Resources

Wells Fargo requires diverse suppliers be certified by an official third-party certification agency.

- **National Minority Supplier Development Council** – nmsdc.org
- **Women’s Business Enterprise National Council** – wbenc.org
- **National LGBT Chamber of Commerce** – nglcc.org
- **U.S. Black Chambers Inc.** – usblackchamber.org
- **Disability:IN** – disabilityin.org
- **U.S. Department of Veterans Affairs** – va.gov
- **U.S. Hispanic Chamber of Commerce** – ushcc.com
- **U.S. Small Business Administration (SBA) – 8 (a) Certification** – sba.gov
- **United States Pan Asian American Chamber of Commerce** – uspaacc.com
- **National Veteran Owned Business Association (NaVOBA)** – navoba.org



How can we help?

General questions: supplierdiversity@wellsfargo.com

For more information about Supplier Diversity, visit: wellsfargo.com/supplierdiversity

Exhibit 3
Wells Fargo Bank, N.A. Litigation Statement

Wells Fargo Bank N.A. ("WFBNA") is a subsidiary of Wells Fargo & Company ("WFC"), a corporation organized under the laws of Delaware.

As with any large diversified financial institution in the highly regulated banking and securities field, Wells Fargo receives inquiries and subpoenas from regulators and law enforcement from time to time, some of which may be confidential in nature, and is subject to civil litigation. Wells Fargo responds regularly to inquiries and investigations by governmental entities and has in the past entered into settlements of some of those investigations, including those listed below. None have resulted in any material restrictions on Wells Fargo's ability to operate its businesses as related to the services and products addressed in our responses to this RFP.

Wells Fargo Bank, N.A. Municipal Finance Group ("WFBNA MFG"), the party responding to this RFP, is a separately identifiable department of WFBNA and is registered with the Securities and Exchange Commission ("SEC") as a municipal securities dealer, authorized to provide underwriting and investment banking services in connection with municipal securities.

Below is a summary of (i) certain resolved regulatory matters related to WFBNA MFG and WFBNA that are related to municipal securities and (ii) certain matters relating to actions involving municipal entities.

During the fourth quarter of 2011, WFBNA entered into a settlement with various regulators regarding municipal derivatives contracts. Please see the Legal Actions section of WFC's 2011 Annual Report for additional information regarding the municipal derivatives bid practices settlement with the Office of the Comptroller of the Currency ("OCC"), SEC, the U.S. Internal Revenue Service, U.S. Department of Justice and a group of state Attorneys General. See press release dated December 8, 2011 at <https://www.sec.gov/litigation/litreleases/2011/lr22183.htm>.

WFBNA has paid municipal fines in connection with a small number of houses for alleged violations of local housing ordinances, some of which are characterized as misdemeanors.

During the third quarter of 2016, WFBNA entered into settlements with the City of Los Angeles, the Consumer Financial Protection Bureau and the Office of the Comptroller of the Currency regarding certain sales practices. For additional information, see the press release at <https://newsroom.wf.com/press-release/corporate-and-financial/wells-fargo-issues-statement-agreements-related-sales>. (the "2016 Settlement").

Following the announcement of the 2016 Settlement discussed above, certain state and local governmental bodies and municipal entities have temporarily suspended or removed WFBNA MFG as underwriter from certain of such issuers' municipal underwritings.

On February 2, 2016, WFBNA MFG entered into an agreement with the SEC resulting from a self-report submitted to the SEC by WFBNA MFG pursuant to the SEC's Municipalities Continuing Disclosure Cooperation Initiative ("MCDC") (see <https://www.sec.gov/litigation/admin/2016/33-10028.pdf>).

On December 26, 2018, WFC was served with a Complaint for a qui tam action pending in San Francisco County, California, which was subsequently amended to add WFBNA as a defendant. *State of California, ex rel., Edelweiss Fund, LLC v. JP Morgan Chase & Co., et al.*, Case No. CGC-14-540777. The California qui tam action alleges Wells Fargo and other remarketing agents conspired to inflate the interest rates on certain tax-exempt bonds issued by public entities called variable rate demand obligations issued by the State of California or its political subdivisions. In July 2019, the San Francisco Superior Court dismissed the claims against a group of defendants, including WFC, due to untimely service, and the Court of Appeals upheld that dismissal in December 2020. On June 1, 2021, the Court dismissed the Relator's, Edelweiss Fund, LLC, seventh amended complaint without leave to amend. On July 27, 2021, Relator appealed the Court's June 1, 2021 Order. On or about July 26, 2019, another qui tam action was unsealed in Mercer County, New Jersey. *State of New Jersey, ex rel., Edelweiss Fund, LLC v. JP Morgan Chase & Co., et al.*, Docket No. L. 885-15. The New Jersey qui tam action names Wells Fargo & Co. and several other financial institutions as defendants. The allegations in the New Jersey qui tam action are substantially similar to the California qui tam action. On February 20, 2019, the City of Philadelphia filed a putative class action against WFBNA and related entities, along with six other banks and their related entities. *The City of Philadelphia v. Bank of America Corporation, et al.*, No. 1:19-cv-01608, U.S.D.C., S.D.N.Y. The plaintiff alleges that the defendants conspired to inflate the interest rates on certain tax-exempt bonds issued by public entities called variable rate demand obligations from February 1, 2008 to June 30, 2016. On March 25, 2019, the City of Baltimore filed a similar putative class action complaint against WFBNA and related entities, along with nine other banks and related entities. *Mayor and City Council of Baltimore v. Bank of America Corporation, et al.*, No. 1:19-cv-02667, U.S.D.C., S.D.N.Y. The City of Baltimore's allegations are substantially similar to the allegations in the City of Philadelphia case. The Philadelphia and Baltimore cases were consolidated and an amended consolidated complaint was filed on May 31, 2019, naming WFBNA and related entities, along with seven other banks and related entities. On June 2, 2021, a substantially similar class action complaint was filed in the Southern District of New York on behalf of a putative class of California issuers of variable rate demand obligations against the same defendants. (*Board of Directors of the San Diego Association of Governments v. Bank of America Corporation, et al.*, No. 1:21-cv-4893, U.S.D.C., S.D.N.Y.) The complaint includes the same defendants and class period as the Philadelphia and Baltimore consolidated complaint, and largely tracks the allegations asserted in that complaint. In August 2021, the San Diego Association of Governments action was consolidated with the Philadelphia and Baltimore action through an amended consolidated class action complaint. In August 2021, the San Diego Association of Governments action was consolidated with the Philadelphia and Baltimore action through an amended consolidated class action complaint.

WFBNA was named as a defendant in an antitrust case filed in the U.S. District Court for the Middle District of Louisiana on October 21, 2019, by the City of Baton Rouge/East Baton Rouge Parish, Consolidated Parish Employees Retirement System and Police Guaranty Fund. No. 3:19-cv-00725. The plaintiffs allege that WFBNA and 11 other defendants colluded to keep the bid-offer spreads artificially wide in secondary market trading for Government Sponsored Enterprise bonds, including those issued by Fannie Mae, Freddie Mac, and Federal Home Loan Banks. WFC and Wells Fargo Securities, LLC ("WFSLLC") and 23 other parties were named as defendants in a case filed in the U.S. District Court for the Eastern District of Louisiana on July 17, 2020, by the Louisiana Asset Management Pool ("LAMP"). No. 2:20-cv-1095. WFC and WFSLLC and 22 other parties were named as defendants in a case filed in the U.S. District Court for the Eastern District of Louisiana on September 21, 2020, by the City of New Orleans, the New Orleans Municipal Employees Retirement System and the New Orleans Aviation Board. No. 2:20-cv-2570. The allegations in

the LAMP and City of New Orleans cases are substantially similar to the allegations in the City of Baton Rouge case. All three cases were settled and dismissed on June 9, 2021.

On October 7, 2020, WFBNA, JPMorgan Chase & Co., and Stifel, Nicolaus & Co., Inc. were sued in the U.S. District Court for the Eastern District of Michigan on behalf of children who allegedly were harmed by polluted water in the City of Flint, Michigan, LeeAnne Walters et al. v. J.P. Morgan Chase & Co., Wells Fargo Bank, N.A., and Stifel Nicolaus, No. 5:20-cv-12726. The plaintiffs allege that the banks violated their Constitutional rights and Michigan law by underwriting a 2014 municipal bond offering for a Michigan-based water authority with alleged knowledge that the bond offering would result in the City of Flint, Michigan transitioning to an unsafe water source. On March 29, 2022, the Court dismissed the plaintiffs' lawsuit. The plaintiffs have until April 26, 2022 to move for reconsideration and April 28, 2022 to appeal the Court's ruling.

Please be further advised of the following:

On February 2, 2018, WFC entered into a consent order with the Board of Governors of the Federal Reserve System, relating to governance oversight and the company's compliance and operational risk management program. This consent order does not relate to new matters, but rather to prior issues including the 2016 sales practices matter. For additional information, see the press release at <https://newsroom.wf.com/press-release/corporate-and-financial/wells-fargo-commits-satisfying-consent-order-federal>.

In April 2018, WFC entered into consent orders with the Consumer Financial Protection Bureau and the Office of the Comptroller of the Currency that address matters relating to WFC's compliance risk management program and issues regarding certain interest rate-lock extensions on home mortgages and collateral protection insurance placed on certain auto loans. For additional information, see the press release at <https://newsroom.wf.com/press-release/corporate-and-financial/wells-fargo-enters-consent-orders-occ-and-cfpb>.

In August 2018, WFC announced that it entered into an agreement with the U.S. Department of Justice ("DOJ") to resolve a previously disclosed investigation by the DOJ regarding claims related to certain 2005–07 residential mortgage-backed securities activities. For additional information, see the press release at <https://newsroom.wf.com/press-release/consumer-lending/wells-fargo-reaches-agreement-doj-resolve-legacy-rmbs-claims>.

On December 4, 2018, WFC reached an agreement with the Attorney General of the State of Illinois, pursuant to which it agreed to pay \$17.25 million in remediation relating to certain prior RMBS activities.

On December 28, 2018, WFC entered into a settlement with all 50 state Attorneys General and the District of Columbia regarding previously disclosed retail sales practices, auto collateral protection insurance and guaranteed asset/auto protection, and mortgage interest rate lock matters. For additional information, see the press release at <https://newsroom.wf.com/press-release/community-banking-and-small-business/wells-fargo-reaches-agreement-state-attorneys>.

The SEC filed a civil lawsuit in 2016 against Wells Fargo Securities, LLC ("WFSLLC") and a Wells Fargo employee, among others, regarding a 2010 Rhode Island Economic Development Corporation bond offering document. WFSLLC settled the matter with the SEC on March 20, 2019. The Court dismissed all

claims against the Wells Fargo employee on June 11, 2019. SEC v. Rhode Island Commerce Corporation (f/k/a Rhode Island Economic Development Corporation), et al., No. 1:16-cv-107-M-PAS (D.R.I.).

On February 21, 2020, WFC entered into settlement agreements with the U.S. Department of Justice and the U.S. Securities and Exchange Commission to resolve these agencies' investigations into Community Bank sales practices and related disclosures. For additional information, see the press release at <https://newsroom.wf.com/press-release/corporate-and-financial/wells-fargo-reaches-settlements-resolve-outstanding-doj-and>.

WFC also reached an agreement with the Attorney General of the State of Maryland on June 15, 2020, pursuant to which it agreed to pay \$20 million in remediation to resolve claims relating to certain prior RMBS activities.

On January 5, 2021, the Office of the Comptroller of the Currency terminated a 2015 consent order related to WFC's anti-money laundering compliance program. For additional information, please see the press release at newsroom.wf.com/English/news-releases/news-release-details/2021/Wells-Fargo-Announces-Termination-of-AML-Related-Consent-Order/default.aspx.

On September 9, 2021, WFC announced that the Office of the Comptroller of the Currency issued an enforcement action against WFBNA related to loss mitigation practices in the bank's Home Lending business, as well as a civil monetary penalty related to those loss mitigation practices and insufficient progress in addressing requirements under the OCC's April 2018 Compliance Risk Management and Customer Remediation consent order. For additional information, see the press release at Wells Fargo Newsroom - Wells Fargo Issues Statement on OCC Enforcement Action, Expiration of CFPB Consent Order ([wf.com](https://www.wellsfargo.com)).

On September 27, 2021, WFBNA reached an agreement with the United States District Court for the Southern District of New York pursuant to which WFBNA paid \$37.5 million to the United States and provided customer remediation in order to resolve an investigation related to certain activities in WFBNA's foreign exchange business, including whether customers may have received pricing inconsistent with commitments made to those customers.

Many of the actions that Wells Fargo has taken in connection with these settlements are described at <https://www.wellsfargo.com/assets/pdf/commitment/progress-report.pdf>

To the extent any litigation or regulatory matters are required to be reported, they are disclosed in WFC's SEC filings and are matters of public record.

Copies of the (i) Legal Proceedings sections from Wells Fargo & Company recent public filings and (ii) Wells Fargo & Company's most recent periodic reports are available via the internet link below:

https://www.wellsfargo.com/invest_relations/filings

Wells Fargo & Company Annual Report Link:

https://www.wellsfargo.com/invest_relations/annual

Exhibit 4
Responses to Consumer Protection Questions

1. Is the financial institution currently in compliance with all applicable consumer financial protection laws?

WFBNA Response: Wells Fargo Bank, N.A. (“Bank”) seeks to comply with all applicable laws and regulations, including consumer protection laws and regulations. Further, the Bank maintains risk management systems designed to prevent or detect non-compliance with applicable laws and regulations, as well as internal processes to remediate customers impacted from potential non-compliance. Any material disclosures relating to the Bank’s compliance with consumer protection laws and regulations may be found in our Securities and Exchange Commission 10Q and 10K filings, located at <https://www.wellsfargo.com/about/investor-relations>.

2. Does the financial institution have policies to prevent the use of illegal predatory consumer adverse sales goals as the bases for evaluation, promotion, discipline or compensation of employees?

WFBNA Response: As noted in the response to Question #1, Wells Fargo Bank, N.A. (“Bank”) seeks to comply with all applicable laws and regulations, including consumer protection laws and regulations. Further, the Bank maintains risk management systems designed to prevent or detect non-compliance with applicable laws and regulations, as well as internal processes to remediate customers impacted from potential non-compliance. Any material disclosures relating to the Bank’s compliance with consumer protection laws and regulations may be found in our Securities and Exchange Commission 10Q and 10K filings, located at <https://www.wellsfargo.com/about/investorrelations>. In addition, the Bank has internal risk management processes and controls designed to prevent or detect inappropriate use of sales goals as the bases for evaluation, promotion, discipline or compensation of its employees.