

U.S. Bancorp Political and Legislative Activities Policy

U.S. Bancorp believes that an important part of responsible corporate citizenship is participation in the political and public policy process. The focus of these efforts is on issues that affect the company, our operations, employees, customers, shareholders and local communities. Our business is subject to extensive laws and regulations at the federal, state and local levels, and changes to these laws can significantly affect how we serve our customers and the costs we incur. It is important for U.S. Bancorp to engage in the political process to advance the interests of our company.

The U.S. Bancorp Government Relations Department (Government Relations) works closely with all of our lines of business to manage our legislative and political activities in a manner consistent with good corporate governance practices and in compliance with all legal requirements.

This U.S. Bancorp Political and Legislative Activities Policy (Policy) defines the framework for U.S. Bancorp's political contributions and expenditures, its political action committee (PAC) program, and its industry initiatives and advocacy, including key roles and responsibilities, oversight and governance. This Policy applies to U.S. Bancorp, its subsidiaries and affiliates (collectively, the Company).

Corporate Political Contributions

The Company is prohibited by law from making direct or indirect contributions to candidates in any federal and many state elections, including without limitation contributions to political parties. Even where legally permitted, the Company's policy is not to make contributions to any candidates for political office, political parties, political action committees, or independent expenditure committees, within or outside of the United States, nor does the Company use corporate funds to make independent political expenditures. Furthermore, the Company does not make contributions to political entities organized under Section 527 of the Internal Revenue Code to support election-related activities, even when legally permissible. However, consistent with its contribution priorities, the Company may support the following organizations through contributions to their general operating accounts exclusively for non-election-related purposes: the Republican Governors Association, the Democratic Governors Association, the Republican Attorneys General Association, the Democratic Attorneys General Association, the Republican State Leadership Committee, and the Democratic Legislative Campaign Committee.

Where legally permitted, the Company makes corporate contributions in connection with state and local ballot initiatives and referenda on important policy issues that are likely to impact its business and its stakeholders. The Company supports ballot initiatives that are consistent with its contribution priorities, which include initiatives that would make a positive impact on its ability to do business, spur economic growth and enhance the quality of life in its local communities. Corporate political contributions and expenditures relating to ballot initiatives are made based on requests from employees. Those requests are approved

or denied by the Director of Government Relations with input from local market presidents of the Company.

The Company may occasionally support groups organized under Section 501(c)(4) of the Internal Revenue Code on public policy matters, but the Company does not support 501(c)(4) groups for electoral purposes (unless related exclusively to support of or opposition to a particular ballot measure in which the Company has an interest). Information on corporate contributions to 501(c)(4) groups will be disclosed pursuant to the Compliance and Reporting Practices detailed in this Policy.

Government Relations reviews each proposed contribution to ensure that it is consistent with the Company's contribution priorities, and contribution decisions are made without regard to the private political preferences of the Company's executives. Although the Company does not have a standard maximum amount for any single corporate contribution, it complies with all applicable state and local laws pertaining to contribution limits. Moreover, all corporate contributions are disclosed to state and local campaign finance agencies as required.

The U.S. Bancorp Political Action Committees (PACs)

U.S. Bancorp sponsors two PACs, the U.S. Bancorp Political Participation Program Political Action Committee and the U.S. Bancorp Federal Political Action Committee. These PACs are non-partisan committees that provide an opportunity for Company employees to participate in the political process. The PACs collect voluntary contributions from eligible employees of the Company, and use those funds to support candidates running for elective office, political parties, and other political action committees that are supportive of the Company's public policy goals. The PACs do not make contributions to political entities organized under Section 527 of the Internal Revenue Code to support election-related activities. However, the Political Participation Program PAC may support the following Section 527 organizations through contributions to their general operating accounts exclusively for non-election-related purposes: the Republican Governors Association, the Democratic Governors Association, the Republican Attorneys General Association, the Democratic Attorneys General Association, the Republican State Leadership Committee, and the Democratic Legislative Campaign Committee.

The PACs do not make any contributions in support of or opposition to initiatives or referenda. PAC contributions are reported to the Federal Election Commission, as well as any state and local campaign finance agencies, as required by applicable law.

Government Relations is responsible for day-to-day management and compliance for the U.S. Bancorp PACs. PAC oversight is provided by either a PAC Board of Directors or a committee of the U.S. Bancorp Board of Directors. The PACs are audited by the Company's internal audit function. PAC administration and oversight adhere to established governance and compliance procedures that ensure appropriate oversight, consistent funding decisions and compliance with all campaign finance regulations, including the Federal Election Campaign Act and other applicable federal, state and local regulations.

Consideration is given to a candidate's voting record, leadership positions, committee assignments, general support of the financial services industry and other factors in making contribution decisions consistent with the Company's contribution priorities. Consideration is also given to requests by employee contributors to the PACs made in compliance with applicable PAC bylaws. Contribution decisions are made without regard to the private political preferences of Company executives.

Industry Initiatives and Advocacy

The Company, through the efforts of Government Relations and others, monitors current legislation, analyzes trends, and supports and promotes the advancement of public policies to benefit the Company, customers, communities and shareholders. As part of its involvement in the political process, the Company regularly expresses its views to public officials on public policy issues important to the Company and the financial services industry. Government Relations staff members actively engage with public officials on issues that impact the Company's ability to manage its business, and the Company also retains lobbyists to advocate on its behalf, as needed.

The Company complies with all legislative lobbying and disclosure laws, including the Federal Lobbying Disclosure Act, and submits semi-annual reports to the United States Senate and House of Representatives. Copies of these filings can be found at lobbyingdisclosure.house.gov/index.html and senate.gov/legislative/Public_Disclosure/LDA_reports.htm.

The Company is also a member of numerous industry trade associations at the national, state and local levels. The Company's public policy positions are often communicated through the lobbying efforts of these organizations, which enables the Company to reach its audience more efficiently and in concert with peers in the financial services industry. The Company's participation as a member of these associations comes with the understanding that we may not always agree with all the positions of an organization or its other members.

Compliance and Reporting Practices

To ensure compliance with this Policy and all applicable laws, each corporate political contribution or expenditure and each PAC contribution must go through a legal review and approval process. The Company complies with its reporting obligations under applicable federal, state and local laws by filing reports with the appropriate public agencies disclosing the Company's political contributions and expenditures and the contributions made by the U.S. Bancorp PACs, as required.

In addition, in semi-annual reports posted for public viewing on its corporate website, the Company discloses all contributions made by the U.S. Bancorp PACs and all contributions and expenditures, if any, made from the Company's corporate funds to:

- political candidates or their committees;*

* Pursuant to the *Corporate Political Contributions* section of this Policy, the Company is not permitted to make such contributions.

- political parties or their committees;*
- political action committees;*
- independent expenditure committees;*
- ballot measure committees;
- §527 groups;
- §501(c)(4) groups and similar tax-exempt organizations whose primary purpose includes political activities;
- that portion of its dues payment, for each trade association and other tax-exempt organization to which the Company pays \$50,000 or more in annual dues, that the trade association or other tax-exempt organization has used for non-deductible lobbying and political expenditures;** and
- direct independent expenditures.*

Finally, a copy of this Policy is also posted for public viewing on the Company's corporate website. This information can be found at www.usbank.com under "About U.S. Bancorp," in the Corporate Governance section.

* Pursuant to the *Corporate Political Contributions* section of this Policy, the Company is not permitted to make such contributions.

** When the Company makes payments to these organizations, it restricts them from using the funds for any election-related activity at the federal, state, or local level, including contributions and expenditures (independent or otherwise) that support or oppose candidates, ballot initiatives, political parties or PACs.