

Trump Vance 2025 Transition Team Ethics Plan

The Trump Vance 2025 Transition Team agrees that it will implement and enforce an ethics plan to guide the conduct of the Transition. The Plan aims to ensure that Transition team members abide by the highest ethical standards, act solely in furtherance of the public interest, and base all policy and personnel decisions on merit, free from individual conflicts of interest.

As part of the Trump-Vance Transition Team Ethics Plan:

1. Transition team members will avoid both actual and apparent conflicts of interest. Transition Team members with conflicts of interest similar to those applicable to Federal employees under section 2635.402(a) and section 2635.502(a) of title 5, Code of Federal Regulations, related to current or former employment, affiliations, clients, or investments, are prohibited from working on particular matters involving specific parties that affect the interests of such member. More specifically, Transition team members may not participate in any particular Transition matter which to their knowledge may directly conflict with a financial interest of theirs, their spouse, minor child, partner, client or other individual or organization with which they have a business or close personal relationship. Where there is no such direct conflict, but there may be an appearance of a conflict, they will address this issue for resolution to the Transition General Counsel.

2. The Transition will safeguard classified information, as defined in 50 U.S.C § 834, and only persons with the requisite security clearances will have access to classified information.

3. The Transition also will safeguard non-public information and other information that is not readily available to the public. Accordingly, Transition team members must receive advance authorization from the Transition's Co-Chairs or their designee before seeking access, on behalf of the Transition, to any non-public information. Transition team members must hold all non-public Transition information in confidence, and use it exclusively for Transition purposes. Transition team members will not use or permit to be used any non-public information provided to them in the course of their duties with the Transition, in any manner, for any private gain for themselves or any other party, at any time during or after the Transition.

4. Transition team members shall disqualify themselves from involvement in any particular Transition matter if they have engaged in regulated lobbying activities with respect to such matter, as defined by the Lobbying Disclosure Act, within the previous twelve months. During their service with the Transition, Transition Team members will not, on behalf of any person or entity, communicate with or appear before, for compensation, any federal department or agency seeking official action for such person or entity with respect to a particular matter for which they have direct and substantial responsibility as part of the Transition .

5. No registered lobbyist, as defined by the Lobbying Disclosure Act may serve as a member of the Transition Team. Anyone who has been a registered lobbyist must affirmatively delist themselves under the Lobbying Disclosure Act prior to joining the Transition Team.

6. For a period of 6 months following the end of a Transition Team member's service to the Transition, they will not on behalf of any other person or entity communicate with or appear before, for

compensation, any federal department or agency seeking official action for such person or entity with respect to a particular matter for which they had direct and substantial responsibility during their service with the Transition.

7. Transition Team members will not represent, aid, or advise a foreign government or foreign political party, as defined under the Foreign Agents Registration Act, for the duration of their service to the Transition. Persons registered under the Foreign Agents Registration Act must file to terminate their registration prior to beginning work with the Transition Team.

8. Transition team members may not misuse their positions. In all Transition-related activities, team members may not make any representations on behalf of President Trump or Senator Vance, their designees, or a Transition team official without authorization. Transition team members may only identify themselves as acting on behalf of the Transition in Transition-related matters, and may only use any property entrusted to them by the Transition for Transition-related activities.

9. Transition team members (and their immediate family) may not accept or solicit a gift (money or anything of value) that is, or may reasonably appear to be, given to influence or reward the Transition's operations, decisions, advice, recommendations, or actions.

10. Transition team members will sign the Trump Vance 2025 Transition Team Code of Ethical Conduct that incorporates the content of this Plan, and is attached hereto.

TRUMP VANCE 2025 TRANSITION, INC.
CODE OF ETHICAL CONDUCT

As a condition of being permitted to serve as a member of the Trump Vance 2025 Transition, Inc. (the “Transition”), I agree to abide by the following requirements:

1. In all my activities related to my role and work with the Transition I will abide by the highest ethical standards.
2. I will disqualify myself from involvement in any particular Transition matter which to my knowledge may directly conflict with a financial interest of mine, my spouse, minor child, partner, client or other individual or organization with which I have a business or close personal relationship. Where there is no such direct conflict, but there may be an appearance of a conflict, I will address this issue for resolution to the Transition General Counsel. I currently have no knowledge of any such conflicts.
3. I will disqualify myself from involvement in any particular Transition matter if I have engaged in regulated lobbying activities with respect to such matter, as defined by the Lobbying Disclosure Act, within the previous twelve months.
4. I will not accept or solicit any money or thing of value in exchange for a promise to support or use influence on behalf of any person who is a potential candidate for any appointive office or place in the United States Government or advocate for or advance any policy or action.
5. I understand that in my Transition-related activities, unless given specific authorization, I am not permitted to make any representation on behalf of Donald J. Trump, JD Vance, his campaign, his designees, or any official of the Transition.
6. I understand that authorization is required from the Transition Co-Presidents or a designee of one of them before seeking, on behalf of the Transition, access to any non-public information.
7. I will keep confidential any non-public information provided to me in the course of my duties with the Transition and will use such information exclusively for purposes of the Transition.
8. I will not use or permit to be used any non-public information provided to me in the course of my duties with the Transition, in any manner, for any private gain for myself or any other party, at any time during or after the Transition.
9. During my service with the Transition, I will not, on behalf of any person or entity, communicate with or appear before, for compensation, any federal department or agency seeking official action for such person or entity with respect to a particular matter for which I have direct and substantial responsibility as part of the Transition.
10. If Donald J. Trump wins the election and I continue working with the Transition, for 6 months after I leave, I will not on behalf of any other person or entity communicate with or appear before, for compensation, any federal department or agency seeking official action for such person or

entity with respect to a particular matter for which I had direct and substantial responsibility during my service with the Transition.

11. I will conserve and protect any federal or Transition property entrusted to me and shall not use such property, including, but not limited to, equipment and supplies, other than for purposes directly related to Transition activities.

12. I understand that my commitment to abide by these requirements may be made public and that this document will be made available to any department or agency to which I may be assigned. I will seek guidance from the Transition General Counsel, or the designated agency ethics official, as appropriate, to ensure compliance with these standards of conduct. I furthermore acknowledge that failure to comply with the above provisions may result in my dismissal from the Transition and that other sanctions may be imposed as appropriate.

13. I and my immediate family members will not accept a gift from:

- a. Anyone seeking a job with the federal government or the Transition. The Code of Ethical Conduct and federal law specifically prohibit you from receiving anything of value in return for a promise to support or use influence in obtaining an appointive office for any person.
- b. Anyone who seeks action by the Transition or a Trump administration.
- c. A federal employee in any department or agency within the scope of my Transition responsibilities.
- d. Any person or organization that conducts activities regulated by, or has a matter pending before, a department or agency within the scope of my Transition responsibilities.
- e. Any person or organization under circumstances where it may appear that the gift is being given to influence the performance or nonperformance of my duties with the Transition.

14. I will not represent, aid, or advise a foreign government or foreign political party for the duration of my service to the Transition or for twelve months thereafter.

I, _____, hereby acknowledge that I have read, understand, and will abide by this Code of Ethical Conduct and further acknowledge that failure to comply with the provisions of this Code of Ethical Conduct may result in my dismissal.

Signature
