



Code of Ethics for Senior Financial Officers

State Street promotes honest and ethical conduct in the practice of financial management throughout the Corporation. Senior Financial Officers hold an important and elevated role in corporate governance designed to ensure that all stakeholders' interests are appropriately balanced, protected and preserved. This Code applies to the Chief Executive Officer, Chief Financial Officer, Chief Accounting Officer and Corporate Controller and provides principles that Senior Financial Officers are expected to adhere to and advocate. It embodies rules regarding individual and peer responsibilities as well as responsibilities to shareholders, employees, the public and other stakeholders. This Code does not replace, but rather complements, State Street's Standard of Conduct which applies to all employees. Violations of this Code can have severe consequences, including termination of employment, and violations of business standards that are required by law can result in civil or criminal liability of the individual.

All of State Street's Senior Financial Officers will:

- Act with honesty and integrity, in an ethical manner including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
- Disclose any material transactions or relationships that reasonably could be expected to give rise to a conflict of interest to the Chief Legal Officer or the General Counsel.
- Provide full, fair, accurate, timely and understandable disclosure in the reports and documents of the Corporation filed with, or submitted to, the Securities and Exchange Commission and bank regulators and in other public communications made by the Corporation.
- In conducting the Corporation's business, comply with laws, rules and regulations of federal, state and local governments, and other appropriate regulatory agencies.
- Act responsibly, in good faith, with due care, competence and diligence.

- Respect the confidentiality of information acquired in the course of one's work except when authorized or otherwise legally obligated to disclose. Confidential information acquired in the course of one's work will not be used for personal advantage.¹
- Report promptly any apparent or suspected violations of this Code of Ethics for Senior Financial Officers to the Chief Legal Officer or the General Counsel.

¹ State Street recognizes that certain disclosures of confidential information to appropriate government and self-regulatory authorities are protected by "whistleblower" and other laws. Nothing in this Code of Ethics is intended to or should be understood to prohibit or otherwise discourage such disclosures. State Street will not tolerate any discipline or other retaliation against employees who properly make such legally-protected disclosures.