

Date: June 30, 2021

Mr. Richard C. Visek
Principal Deputy Legal Adviser and
Designated Agency Ethics Official
Office of the Legal Adviser
Department of State

Re: Ethics Undertakings

Dear Mr. Visek:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of U.S. Representative to the Office of the United Nations and Other International Organizations in Geneva, with rank of Ambassador. It is my responsibility to understand and comply with commitments outlined in this agreement.

SECTION 1 – GENERAL COMMITMENTS

I am committed to the highest standards of ethical conduct for government officials. If confirmed as U.S. Representative to the Office of the United Nations and Other International Organizations in Geneva, as required by the criminal conflicts of interest law at 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the particular matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me:

- Any spouse or minor child of mine;
- Any general partner of a partnership in which I am a limited or general partner;
- Any organization in which I serve as an officer, director, trustee, general partner, or employee; and
- Any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

In addition, I will recuse myself from participation on a case-by-case basis in any particular matter involving specific parties in which I determine that a reasonable person with knowledge of the relevant facts would question my impartiality in that matter, unless I am first authorized to participate, pursuant to the impartiality regulations at 5 C.F.R. Part 2635, Subpart E.

In the event that an actual or potential conflict of interest arises during my appointment, I will consult with an agency ethics official and take the measures necessary to resolve the conflict, such as recusal from the particular matter or divestiture of an asset.

I have a managed account, and I will direct the account manager to obtain my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the regulatory exemption for diversified mutual funds and unit investment trusts at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds. I will monitor whether the account manager is following this direction regarding prior approval.

I will receive a live ethics briefing from a member of the ethics office after my confirmation but not later than 15 days after my appointment pursuant to the ethics program regulation at 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will submit my Certification of Ethics Agreement Compliance which documents my compliance with this ethics agreement.

I understand that as an appointee I must continue to abide by the Ethics Pledge (Exec. Order No. 13989) that I previously signed and that I will continue to be bound by it. Among other obligations, I will be required to recuse from particular matters involving specific parties involving my former employer or former clients for a period of two years after I am appointed, with the exception of federal, state and local government.

I will not modify this ethics agreement without your approval and the approval of the U.S. Office of Government Ethics pursuant to the ethics agreement requirements contained in the financial disclosure regulation at 5 C.F.R. § 2634.803(a)(4).

SECTION 2 – RESIGNATIONS

I resigned from my positions with Care USA and PT Fund, Inc. in January 2021. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which I know either Care USA or PT Fund, Inc. is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

SECTION 3 – DIVESTITURES

As soon as practicable but not later than 90 days after my confirmation, I will divest my interests in the two accounts identified in my U.S. Office of Government Ethics (OGE) 278 Nominee Report as “Crocker IRA” and “Spouse’s IRA #1,” which are listed in Appendix A. I will also divest my interests in the following entities as soon as practicable but not later than 90 days after my confirmation:

- Altria
- Apple Inc.
- Berkshire Hathaway Inc.
- Bristol Myers Squibb Co.

With regard to each of these entities, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial

interests of the entity until I have divested it, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I have verified that I will be able to carry out the divestitures within the timeframe described above.

I (including my spouse and dependent children) will not repurchase any asset I was required to divest without consulting with my agency ethics official and the U.S. Office of Government Ethics.

If I rely on a *de minimis* exemption under 5 C.F.R. § 2640.201(b) with regard to any of my financial interests in sector mutual funds, I will monitor the value of those interests. If the aggregate value of my interests in sector mutual funds that concentrate in any one sector exceeds \$50,000, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of any holdings of the funds that are in the specific sector in which the funds concentrate, unless I first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1).

SECTION 4 – SPOUSE EMPLOYMENT

My spouse is an employee of Georgetown University and of the Carnegie Endowment for International Peace. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for as long as my spouse continues to work for these entities, I will not participate personally and substantially in any particular matter involving specific parties in which I know that entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

SECTION 5 – PUBLIC POSTING

I have been advised that this ethics agreement and the Certification of Ethics Agreement Compliance will be posted publicly, consistent with the public information law at 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bathsheba Crocker", followed by a long horizontal flourish line.

Bathsheba Crocker

APPENDIX A

Crocker IRA

ABB LTD ADS (ABB) (Electrical equipment)
ABBOTT LABORATORIES
ACCENTURE PLC IRELAND CL A
ACTIVISION BLIZZARD INC
AIA GROUP LTD ADR (AAGIY) (Insurance)
AIRBUS SE UNSPONSORED ADR (EADSY) (Aerospace & Defense)
ALLEGION PUB LTD CO
ALPHABET INC CL C
AMAZON COM INC
AMERICAN TOWER REIT COM
AMETEK INC NEW
AMPHENOL CORP NEW CL A
ANHEUSER BUSCH INBEV SA SPON ADS (BUD) (Beverages)
ANSYS INC
AON PLC CL A
APPLE INC
APPLIED MATERIALS INC
APTIV PLC
ASAHI KAISEI CORP ADR (AHKSY) (Chemicals)
ASML HOLDING NV NY REG NEW (ASML) (Semiconductors & Semiconductor Equipment)
ASPEN TECHNOLOGY INC
ASTRAZENECA PLC ADR (AZN) (Pharmaceuticals)
AUTOMATIC DATA PROCESSING INC
B&M EUROPEAN VALUE RET SA ADR (BMRRY) (Multiline Retail)
BENTLEY SYS INC COM CL B
BERKLEY W R CORP
BERKSHIRE HATHAWAY CL-B NEW
BOSTON SCIENTIFIC CORP
BRIGHT HORIZONS FAMILY SOLUT
BRITISH AMER TOB SPON ADR (BTI) (Tobacco)
BROADCOM INC
CALAMOS MARKET NEUTRAL INC I
CAPITAL ONE FINANCIAL CORP
CARLSBERG AS (B) ADR (CABGY) (Beverages)
CARRIER GLOBAL CORPORATION
CDW CORPORATION
CHARLES RIVER LABS INTL INC
CHARLES SCHWAB NEW
CHEMED CORPORATION
CHEVRON CORP
CHUBB LTD
CIGNA CORP

CITIGROUP INC NEW
CITIZENS FINANCIAL GROUP INC
CME GROUP INC
COLGATE PALMOLIVE CO
COMCAST CORP (NEW) CLASS A
COMPAGNIE FIN RICHEMONTAG ADR (CFRUY) (Textiles, Apparel & Luxury Goods)
CONOCOPHILLIPS
COOPER CO INC NEW
CROWN CASTLE INTL CORP
CSX CORP
DANAHER CORPORATION
DIAGEO PLC SPON ADR NEW (DEO) (Beverages)
DISCOVER FINCL SVCS
DNB ASA SPONSORED ADR (DNHBY) (Bank Products)
DUCK CREEK TECHNOLOGIES INC
DUKE ENERGY CORPORATION
EATON VANCE FLOATING RATE I
EATON CORP PLC SHS
ELANCO ANIMAL HEALTH INC
ENEL SOCIETA PER AZIONI ADR (ENLAY) (Electric Utilities)
ENGIE SPONS ADR (ENGIY) (Multi-Utilities & Unregulated Power)
EQUIFAX INC
EQUINIX INC
ESSILORLUXOTTICA ADR (ESLOY) (Textiles, Apparel & Luxury Goods)
EXPONENT INC
FACEBOOK INC CL-A
FAIR ISAAC & CO INC
FERGUSON PLC
FIDELITY NATL INFORMATION SE
FISERV INC COM
FLIR SYSTEMS INC
GATEWAY FUND Y
GENMAB A S ADR (GMAB) (Biotechnology)
GILEAD SCIENCE
GODADDY INC.
HILTON WORLDWIDE HLDGS INC
HONEYWELL INTERNATIONAL INC
HUMANA INC
IAC INTERACTIVECORP NEW
ILL TOOL WORKS INC
INDUSTRIA DE DISENO TEXTIL IND ADR (IDEXY) (Specialty Retail)
INTEL CORP
INTERACTIVE BROKERS GROUP CL A
INTERCONTINENTAL EXCHANGE INC
INTERNATIONAL FLAVORS&FRAGRANC
IQVIA HOLDINGS INC

JACK HENRY & ASSOC INC
JOHNSON & JOHNSON
JOHNSON CTLS INTL PLC
JPMORGAN CHASE & CO
KERING S A ADR NEW (PPRUY) (Textiles, Apparel & Luxury Goods)
KEYENCE CORP ADR (KYCCF) (Electronic Equipment & Instruments)
KIMBERLY CLARK CORP
KLA CORPORATION
KONINKLIJKE PHIL EL SP ADR NEW (PHG) (Health Care Equipment & Supplies)
L OREAL CO ADR (LRLCY) (Personal Products)
LENNOX INTL INC
Legg Mason MARTIN CURRIE EMERGING MARKETS FUND
LOCKHEED MARTIN CORP
LONDON STK EXCHANGE GROUP ADR (LNSTY) (Capital Markets)
LORD ABBETT CONVERTIBLE F
LOWES COMPANIES INC
LPL FINL HLDGS INC COM
LVMH MOET HENNESSY LOUIS VUITT ADR (LVMUY) (Textiles, Apparel & Luxury Goods)
MARKEL CORP (HOLDING CO)
MARSH & MCLENNAN COS INC
MASTERCARD INC CL A
MCKESSON CORP
MEDTRONIC PLC SHS
MERCK & CO INC NEW COM
MICROSOFT CORP
MOODYS CORP
MORGAN STANLEY
MORGAN STANLEY BANK N.A.
MSCI INC COM
NASDAQ INC COM
NESTLE SPON ADR REP REG SHR (NSRGY) (Food Products)
NIKE INC B
NORDSON CP
NORTHROP GRUMMAN CP (HLDG CO)
NOVO NORDISK A/S ADR (NVO) (Pharmaceuticals)
NXP SEMICONDUCTORS NV
ORACLE CORP
OWENS CORNING INC
PEPSICO INC NC
PHILIP MORRIS INTL INC
PIMCO INCOME I2
PNC FINL SVCS GP
POOL CORP
PPG INDUSTRIES INC
PROGRESSIVE CORP OHIO

QUEST DIAGNOSTICS INC
QUOTIENT TECHNOLOGY INC
RAYTHEON TECHNOLOGIES CORP
RECKITT BENCKISER PLC SPNS ADR (RBGLY) (Household Products)
ROCHE HOLDINGS ADR (RHHBY) (Pharmaceuticals)
ROLLINS INC
ROYAL CARIBBEAN GROUP COM
ROYAL KPN NV SPONS ADR (KKPNY) (Diversified Telecommunication Services)
RYANAIR HLDGS PLC ADR (RYAAY) (Airlines)
SAFRAN SA ADR (SAFRY) (Aerospace & Defense)
SAP AG ADS (SAP) (Software)
SEAGEN INC
SHIN ETSU CHEM CO LTD ADR (SHECY) (Chemicals)
SITEONE LANDSCAPE SUPPLY INC
SMC CORP COMMON ADR (SMECF) (Machinery)
SOUTHERN CO
STANLEY BLACK & DECKER INC
STERICYCLE INC
TAIWAN SMCNDCTR MFG CO LTD ADR (TSM) (Semiconductors & Semiconductor
Equipment)
TENCENT HLDGS LTD UNSPON ADR (TCEHY) (Interactive Media & Services)
TERADYNE INC
TEXAS INSTRUMENTS
THE SCOTTS MIRACLE-GRO COMPANY
THERMO FISHER SCIENTIFIC
THOR INDUSTRIES INC
TJX COS INC NEW
TOTAL S A ADR (TOT) (Oil, Gas & Consumable Fuels)
TRANE TECHNOLOGIES PLC
U S BANCORP COM NEW
UBS GROUP AG SHS
UNION PACIFIC CORP
UNITEDHEALTH GP INC
VALE S.A ADR (VALE) (Metals & Mining)
VERISK ANALYTICS INC COM
VIATRIS INC
VISA INC CL A
WELLS FARGO & CO NEW
YUM BRANDS INC
ZEBRA TECH CL-A
ZOETIS INC CLASS-A
Copart, Inc. (CPRT)
COSTCO WHOLESALE CORP NEW
DANONE SPONSORED ADR (DANOY) (Food products)
DOMINION ENERGY INC

Spouse's IRA #1

3M COMPANY

AIA GROUP LTD SPON ADR (AAGIY) (Insurance)

AIRBUS SE UNSPONSORED ADR (EADSY) (Aerospace & Defense)

ALIBABA GROUP HLDG LTD ADR (BABA) (Internet & Direct Marketing Retail)

ALIGN TECHNOLOGY

ALPHABET INC CL A

AMERICAN EXPRESS CO

APPLE INC

ASML HOLDING NV NY REG NEW (ASML) (Semiconductors & Semiconductor Equipment)

BAXTER INTL INC

BIOGEN INC COM

BURLINGTON STORES INC

CAPGEMINI S E UNSPONSORED ADR (CGEMY) (IT Services)

CHARLES SCHWAB NEW

CHUBB LTD

CME GROUP INC

COLGATE PALMOLIVE CO

CORTEVA INC

DANONE SPONSORED ADR (DANOY) (Food products)

DBS GROUP HOLDINGS LTD SP ADR (DBSDY) (Banks products)

DEERE & CO

DEUTSCHE BOERSE AG UNSPON ADR (DBOEY) (Capital Markets)

EBAY INC

ENEL SOCIETA PER AZIONI ADR (ENLAY) (Electric Utilities)

EPAM SYSTEMS

ETSY INC COM

EXPEDITORS INTL WASH INC

FACEBOOK INC CL-A

FIRST REP BK SAN FRANCISCO CAL

FISERV INC COM

HDFC BANK LTD ADR (HDB) (Banks Products)

ILLUMINA INC

INCYTE CORP

INTUITIVE SURGICAL INC

JPMORGAN CHASE & CO

KBC GROUP NV UNSPONS ADR (KBCSY) (Banks Products)

KKR & CO INC CL A

KONINKLIJKE PHIL EL SP ADR NEW (PHG) (Health Care Equipment & Supplies)

L3HARRIS TECHNOLOGIES INC

MARVELL TECHNOLOGY GROUP LTD

MASTERCARD INC CL A

MEDTRONIC PLC SHS

MERCK KGAA SPD ADR (MKKGY) (Pharmaceuticals)
MICROSOFT CORP
MORGAN STANLEY BANK N.A.
MOTOROLA SOLUTIONS INC
NIKE INC B
NVIDIA CORPORATION
PAYPAL HLDGS INC COM
PERNOD RICARD SA UNSPONS ADR (PDRDY) (Beverages)
PROSUS N V SPONSORED ADR (PROSY) (Internet & Direct Marketing Retail)
RECKITT BENCKISER PLC SPNS ADR(RBGLY) (Household Products)
ROCHE HOLDINGS ADR (RHHBY) (Pharmaceuticals)
SANDS CHINA LTD UNSPONSORE ADR (SCHYY) (Hotels Restaurants & Leisure)
SAP AG ADR (SAP) (Software)
SMITH & NEPHEW PLC ADR (SNN) (Health Care Equipment & Supplies)
SVB FNCL GRP
SYSCO CORP
TAIWAN SMCNDCTR MFG CO LTD ADR (TSM) (Semiconductors & Semiconductor
Equipment)
TEAMVIEWER AG ADR (TMVWY) (Software)
TENCENT HLDGS LTD UNSPON ADR (TCEHY) (Interactive Media & Services)
THERMO FISHER SCIENTIFIC
UBER TECHNOLOGIES INC
UCB SA UNSPON ADR (UCBJY) (Pharmaceuticals)
ULTA BEAUTY INC
UNION PACIFIC CORP
VERTEX PHARMACEUTICALS
VIPSHOP HLDGS LTD ADS (VIPS) (Internet & Direct Marketing Retail)
WUXI BIOLOGICS CAYMAN INC ADR (WXXWY) (Life Sciences Tools & Services)
YUM CHINA HLDNGS
ACCENTURE PLC IRELAND CL A
AMETEK INC NEW
DANAHER CORPORATION
GENMAB A S ADR (GMAB) (Biotechnology)
IQVIA Holdings, Inc. (IQV)
L OREAL CO ADR (LRLCY) (Personal products)
UNITED HEALTH GP INC
VERISK ANALYTICS INC COM
DEUTSCHE POST AG SPONSORED ADR (DPSGY) (Air Freight & Logistics)