



March 12, 2026

U.S. Office of Government Ethics
250 E Street, SW
Suite 750
Washington DC, 20024

To the U.S. Office of Government Ethics:

The purpose of this letter is to forward the attached amendment to Assistant Secretary Harry Kumar's ("A/S Kumar") Ethics Agreement dated June 4, 2025, and to amend his Public Financial Disclosure Report (278e) dated April 24, 2025. A/S Kumar explains in his letter dated March 12, 2026, the reasons for the amendment are as follows:

In my ethics agreement, I agreed to divest my vested restricted stock awards in Li-Cycle Holdings Corporation (Li-Cycle). Subsequent to the time that I signed my ethics agreement, Li-Cycle filed for bankruptcy and was acquired by Glencore Plc. The shares of my Li-Cycle vested restricted stock are held in an account with a financial services company that Li-Cycle used in connection with its employee equity compensation. The financial services company informed me that there has been an effective termination of services between the financial services company and Li-Cycle; and due to the termination of services, I am not permitted to remove my shares of Li-Cycle from the account in which they are held. The current value of my Li-Cycle vested restricted stock is 49 cents.

As the Alternate Designated Agency Ethics Official of the U.S. Department of Commerce, I have reviewed the updated information contained in the amendments and based upon my review of these and the prior commitments made by A/S Kumar in his previously transmitted Ethics Agreement, I continue to believe that A/S Kumar is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,

**MONICA
TRUCCO**

Monica Trucco
Deputy Chief
Acting Assistant General Counsel for
Ethics Law and Program

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March 12, 2026

Monica Trucco
Alternate Designated Agency Ethics Official
U.S. Department of Commerce
1401 Constitution Avenue, N.W.
Washington, D.C. 20230

Dear Ms. Trucco,

The purpose of this letter is to amend my ethics agreement signed on June 4, 2025. In my ethics agreement, I agreed to divest my vested restricted stock awards in Li-Cycle Holdings Corporation (Li-Cycle). Subsequent to the time that I signed my ethics agreement, Li-Cycle filed for bankruptcy and was acquired by Glencore Plc. The shares of my Li-Cycle vested restricted stock are held in an account with a financial services company that Li-Cycle used in connection with its employee equity compensation. The financial services company informed me that there has been an effective termination of services between the financial services company and Li-Cycle; and due to the termination of services, I am not permitted to remove my shares of Li-Cycle from the account in which they are held. The current value of my Li-Cycle vested restricted stock is 49 cents. I am amending Section 2 to address my retention of the Li-Cycle vested restricted stock. I am also amending the heading for Section 3 since Section 2 no longer contains a divestiture. The amendments to Section 2 and the amendment to the heading of Section 3 are as follows:

SECTION 2 – LI-CYCLE HOLDINGS CORPORATION

I previously resigned from my position with Li-Cycle Holdings Corporation. I own vested restricted stock awards from Li-Cycle Holdings Corporation. I do not hold stock options, restricted stock units, unvested restricted stock, or any other equity interests in this entity. Li-Cycle Holdings Corporation has been acquired by Glencore Plc. Because I will continue to own vested restricted stock awards in Li-Cycle Holdings Corporation, 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 Li-Cycle Holdings Corporation, including any particular matter that to my knowledge has a direct and predictable effect on Glencore Plc, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

SECTION 3 – DIVESTITURES

In a separate document, I also am amending my financial disclosure report to address my retention of the vested restricted stock from Li-Cycle.

I have been advised that this amendment to my ethics agreement 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,

HARRY KUMAR

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KUMAR
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Harry Kumar
Assistant Secretary for Legislative and
Intergovernmental Affairs

June 3, 2025

Monica Trucco
Alternate Designated Agency Ethics Official
U.S. Department of Commerce
1401 Constitution Avenue, N.W.
Washington, D.C. 20230

Dear Ms. Trucco,

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 Assistant Secretary for Legislative and Intergovernmental Affairs of the U.S. Department of Commerce. It is my responsibility to understand and comply with commitments outlined in this agreement.

SECTION 1 – GENERAL COMMITMENTS

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, even if uncompensated; and
- Any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

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.

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains 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), or obligations of the United States.

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

SECTION 2 – LI-CYCLE HOLDINGS CORPORATION

I previously resigned from my position with Li-Cycle Holdings Corporation. I own vested restricted stock awards from Li-Cycle Holdings Corporation. I do not hold stock options, restricted stock units, unvested restricted stock, or any other equity interests in this entity. I will divest my vested restricted stock awards in Li-Cycle Holdings Corporation, as soon as practicable but not later than 90 days after my confirmation. 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 this entity until I have divested it, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). I have verified that I will be able to carry out the divestiture within the timeframe described above. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which I know Li-Cycle Holdings Corporation 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 – ADDITIONAL DIVESTITURES

As soon as practicable but not later than 90 days after my confirmation, I will divest my interests in the following entities:

- Applied Materials, Inc.
- Broadcom Inc.
- Amdocs LTD
- Alphabet Inc.
- Incyte Corporation
- Vistra Corporation
- Salesforce Inc
- SoFi Technologies Inc.
- Dominion Energy Inc.
- InMode LTD
- Freeport-McMoRan Inc.
- DraftKings Inc.
- Aramark

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 will divest my interest in the Vanguard Financials Index Fund ETF as soon as practicable but not later than 90 days after my confirmation. Until I have completed this divestiture, 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 fund that are in the specific sector in which the fund concentrates, 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 divestiture within the timeframe described above.

I understand that I may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will ensure that all divestitures discussed in this agreement occur within the agreed upon timeframes and that all proceeds are invested in non-conflicting assets. I understand that I must submit my request for a Certificate of Divestiture to allow for adequate time for OGE to process the Certificate of Divestiture and in order to divest assets within the agreed upon timeframe.

I (including my spouse and minor children if applicable) 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.

SECTION 4 – 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,



Harry Kumar

Date: 6/4/2025