

March 4, 2025

Vanessa J. Myers
Alternate Designated Agency Ethics Official
Department of Labor
200 Constitution Ave., NW,
Rm. N2700 Washington, DC 20210

Dear Ms. Myers:

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 Occupational Safety and Health, of the Department of Labor. 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), obligations of the United States, or municipal bonds.

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 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 – RESIGNATIONS

Upon confirmation I will resign from my positions with the following entities:

- Coleman Research Group, Inc.
- Gerson Lehrman Group, Inc.
- Guidepoint Global LLC

In addition, I previously resigned from my position with Bailey & Greer PLLC in August 2024. 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 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 3 – KEELING LIVING TRUST

I will retain my position as a trustee of the Keeling Living Trust. I will not receive any fees for the services that I provide as a trustee during my appointment to the position of Assistant Secretary. 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 Keeling Living Trust, 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).

SECTION 4 – DIVESTITURES

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

- AbbVie, Inc
- Accenture
- Adobe, Inc
- Air Products and Chemicals
- Alphabet, Inc
- Altria Group, Inc
- Amazon.com, Inc
- American Express Co
- Amgen, Inc
- Apple, Inc

- AutoZone, Inc
- BlackRock, Inc
- Broadcom, Inc
- Cadence Design Systems, Inc
- Cardinal Health, Inc
- Caterpillar, Inc
- Chevron Corp
- Cigna Corp
- Cisco Systems, Inc
- Citizens Financial Group, Inc
- Coca-Cola Co
- Comcast Corp
- Constellation Brands, Inc
- Deere and Co
- Duke Energy Co
- Eastman Chemical Co
- Edison International
- Eli Lilly
- Fortinet, Inc
- General Dynamics Corp
- Home Depot
- International Business Machines Corp (IBM)
- Johnson and Johnson
- JPMorgan and Chase
- Kimberly-Clark Corp
- L3 Harris Technologies
- Laboratory Corp of America
- Lam Research Corp
- Lockheed Martin
- LyondellBasell Industries
- M&T Bank Corp
- Meta Bonds
- McDonald's
- McKesson Corp
- Merck and Co, Inc
- MetLife, Inc
- Microsoft Corp
- Northrup Grumman Corp
- NVIDIA
- Palo Alto Networks
- PepsiCo
- Pfizer Inc
- Phillip Morris International
- Procter and Gamble Co

- Prudential Financial, Inc
- Ross Stores, Inc
- Raytheon Technologies Corporation
- Salesforce.com, Inc
- Seagate Technology
- Sempra Energy
- ServiceNow, Inc
- State Street Corp
- Sysco Corp
- T-Mobile US
- Taiwan Semiconductor Manufacturing
- Truist Financial Corporation
- United Health Group
- Valero Energy Corp
- Verizon Communications, Inc
- Visa, Inc
- Walmart, Inc
- Walt Disney Co
- Waste Connections, Inc
- Western Digital Corp

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 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 my consultation with my agency ethics official and the U.S. Office of Government Ethics.

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,

David Keeling 