

February 24, 2025

Christopher Harris
Deputy General Counsel
Designated Agency Ethics Official
Social Security Administration
4th Floor Altmeyer Building
6401 Security Boulevard
Woodlawn, MD 21235

Dear Mr. Harris:

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 Commissioner of the Social Security Administration. It is my responsibility to understand and comply with commitments outlined in this agreement.

SECTION I – 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. Other than for the divestiture of Fiserv, Inc. stock, I will submit my Certification of Ethics Agreement Compliance, which documents my compliance with this ethics agreement, within 90 days of my confirmation. With respect to Fiserv, Inc. stock, I will submit my Certification of Ethics Agreement Compliance, which documents my compliance with this ethics agreement, within 120 days of my confirmation.

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 – FISERV, INC.

Upon confirmation, I will resign from all of my positions with Fiserv, Inc. (Fiserv). I will not receive a severance, any cash bonus, or an equity bonus for calendar year 2025. I own stock, vested stock options, and unvested restricted stock units. I do not hold vested restricted stock units or unvested stock options. I also received Performance Equity Grants in 2023 and 2024 that vest in 2026 and 2027, respectively. I have not and will not receive a Performance Equity Grant in 2025. Following my resignation from Fiserv but prior to assuming the duties of the position of Commissioner, Fiserv will vest the restricted stock and a portion of the Performance Equity Grant in proportion with the amount of time I worked at Fiserv during the three-year performance period by paying them out in common stock, in accordance with the terms set by the Talent and Compensation Committee of Fiserv's Board of Directors, or I will forfeit them. As soon as practicable but not later than 120 days after my confirmation, I and trusts in which I have a financial interest will divest the common stock, and all of my vested stock options in Fiserv. If I divest the stock options by exercising them, I will divest the resulting stock as soon as practicable but not later than 120 days after my confirmation. Until I have divested all of these financial interests, 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 Fiserv, 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. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.503, for a period of two years from the date of this payment, I will not participate personally and substantially in any particular matter involving specific parties in which Fiserv, is a party or represents a party, unless I first receive a written waiver, pursuant to 5 C.F.R. § 2635.503(c).

SECTION 3 – GRANTOR TRUSTS

I am the trustee of Remainder Trust 1, Remainder Trust 2, and Remainder Trust 3. As trustee, I will divest the Fiserv stock held in the trusts as soon as practicable but not later than 120 days after my confirmation. Once the Fiserv stock is divested from the trusts, I will resign from my position as trustee of the trusts. 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 Fiserv until I have divested Fiserv, 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). In addition, 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 of these trusts, 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 – OTHER RESIGNATIONS

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

- The National September 11 Memorial & Museum
- Perelman Performing Arts Center
- The Battery Conservancy
- Mt. Sinai Health System
- Metro Atlanta Chamber
- The American Society of the Italian Legion of Merit
- The Institute for Veterans and Military Families - Syracuse University
- Partnership for New York City

I previously resigned from my position with Sagent M&C, LLC. 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).

In addition, I previously resigned by position with MAH Realty Management LLC. I have no financial interest in this entity, however, this entity manages several rental properties owned by me through various entities. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for as long as MAH Realty Management LLC continues to manage the rental properties, 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 – RETENTION OF POSITIONS RELATED TO THE CATHEDRAL OF ST. PATRICK

I will retain my unpaid positions as a member of the Board of Trustees for the Cathedral of St. Patrick and as a member of the board of directors of the St. Patrick's Cathedral Landmark Foundation. During my Federal appointment, I will not fundraise for either the Cathedral or the Foundation. In addition, I will not serve on any Board committee or in any Board role in which I would oversee the investments of either organization. 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 either entity, 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 6 – RETENTION OF POSITIONS RELATED TO FAMILY ASSETS

I will retain my unpaid positions as managing member of MAHA at Watchung, LLC and MAHA at Bachelor Gulch, LLC. I will not at any time receive compensation for services that I perform during my Federal appointment. With regard to 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, or its underlying holdings, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

I will retain my position as a trustee of the Family Trust #2. I will not receive any fees for the services that I provide as a trustee during my appointment to the position of Commissioner. 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 Family Trust #2, 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 7 – INTERACTIVE AUDIENCE PARTICIPATION, LLC

I am the sole owner and managing member of Interactive Audience Participation, LLC, an entity created to hold my patents. 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 Interactive Audience Participation, LLC, unless I first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1). In addition for the duration of my appointment to the position of Commissioner, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on my patent or my royalty and/or other rights under the patent, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

SECTION 8 – DIVESTITURES

I have an equity interest in and capital commitments to KKR Global Impact Fund SBS (Unlev) LP, and ICONIQ Strategic Partners VI, LP. As soon as practicable but not later than 90 days after my confirmation, I will divest my interests in KKR Global Impact Fund SBS (Unlev) LP, and ICONIQ Strategic Partners VI, LP including my capital commitments. With regard to each of these funds, 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 fund or its underlying holdings until I have divested it and any capital commitment, 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 have an equity interest in KKR NGT Growth Fund II SBS (Unlev) LP. As soon as practicable but not later than 90 days after my confirmation, I will divest my interests in KKR NGT Growth Fund II SBS (Unlev) LP. With regard to this fund, 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 fund or its underlying holdings 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.

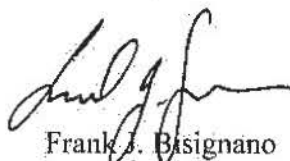
I understand that I may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will ensure that all divestitures discussed in this 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 consulting with my agency ethics official and the U.S. Office of Government Ethics.

SECTION 9 – 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,



Frank J. Bisignano