City of Los Angeles
Responsible Banking & Investment Monitoring Program
For Investment Banks

Investment banks providing City investment banking services or seeking City investment banking business must complete and submit this form no later than July 1st of each year to the City Administrative Officer to comply with Chapter 5.1, Section 20.95.1 of the Los Angeles Administrative Code.

Contact Information:
FHN Financial Capital Markets, a division of First Horizon Bank

Name of Financial Institution
845 Crossover Lane, Suite 150
Memphis TN 38117

Street Address City State Zip Code

Ajay, Thomas, Senior Managing Director, Head of Public Finance

Contact Person Name and Title
512-840-4250 ajay.thomas@fhnfinancial.com

Telephone No. Email Address

SOCIAL RESPONSIBILITY

Please answer the following questions for the preceding calendar year.

1. Did your firm make monetary donations to charitable programs within the City limits?
   
   Yes ___ No X

   If yes, please complete the attached form, labeled at Exhibit 1.

2. Did your firm provide any scholarship awards to residents of the City of Los Angeles?
   
   Yes ___ No X

   a. How many scholarships were awarded? N/A
   b. What was the total value of the awarded scholarships? N/A

3. Does your firm have internal policies regarding utilization of subcontractors which are designated as “women owned,” “minority owned,” or “disabled” business enterprises? Yes X No 

   If yes, please provide a copy of your policies, labeled as Exhibit 2
CONSUMER PROTECTION

1. Is the financial institution currently in compliance with all applicable consumer financial protection laws?
   Yes X No __
   If no, please briefly explain: ______________________________________________________

2. Does the financial institution have policies to prevent the use of illegal predatory consumer adverse sales goals as the bases for evaluation, promotion, discipline or compensation of employees?
   Yes X No __
   If no, please briefly explain: ______________________________________________________

3. Does the financial institution encourage and maintain whistleblower protection policies for its employees and/or customers to report suspected illegal practices, including predatory sales goals?
   Yes X No __
   If no, please briefly explain: ______________________________________________________

4. In the last five years, has the financial institution been subject to any disciplinary actions such as fines, suspensions, or settlements, undertaken by the Securities and Exchange Commission, the Consumer Financial Protection Bureau, the Municipal Securities Regulation Board, the Financial Industry Regulatory Agency and/or any State regulatory agency?
   Yes ___ No X

5. If the answer to question no. 4 is yes, please provide in separate attachment labeled Exhibit 3, what the violation(s) are, the reason for the enforcement action, what government agencies are involved, the date of the enforcement action, what is the current status, and how were or will the issues be resolved?

   N/A
CERTIFICATION UNDER PENALTY OF PERJURY (*)

I certify under penalty of perjury that I have read and understand the questions contained in this form and the responses contained in the form and on all the attachments. I further certify that I have provided full and complete answers to each question, and that all information provided in response to this form is true and accurate to the best of my knowledge and belief.

Ajay Thomas
Senior Managing Director, Head of Public Finance

Print Name: Ajay Thomas
Title: Senior Managing Director, Head of Public Finance
Signature: 
Date: 6/10/2022

(*) Signature must be that of the Head of Public Finance or equivalent corporate executive.

PLEASE SEND THE ORIGINAL SIGNED FORM TO THE ADDRESS BELOW AND EMAIL A COPY TO CAO.DEBT@LACITY.ORG.

Office of the City Administrative Officer
200 North Main St. Room 1500
Los Angeles, CA 90012
Attention: Debt Management Group
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Exhibit 2

FHN Financial Capital Markets is a division of First Horizon Bank, whose parent company is publicly traded First Horizon Corporation (“First Horizon.”) While FHN Financial Capital Markets is not a women or minority-owned firm, we are deeply committed to diversity and inclusion in policies, practices, and programs. The overarching goal for diversity and inclusion at First Horizon is to promote, maintain, and sustain an inclusive work environment where every employee is valued, respected, empowered and enabled to use their skills and abilities for the betterment of our employees, our company, our customers and our communities.

Our company is firmly committed to equal opportunity, non-discrimination, and being intentional that our employees, customers, and suppliers are reflective of the communities we serve. As part of our Community Benefit Plan, we committed to invest $4 billion to broaden access to financial resources in underserved and low-to-moderate income communities in the Southeast region of the United States. The community benefits plan is designed to strengthen community, economic and small business development. We promote business opportunities and are investing 3-6% of our supplier spending with Minority, Women or Disabled Veteran-Owned Business Enterprises.

First Horizon’s workplace initiatives include the Diversity Council, the Diversity Networking Association, Employee Resource Groups, the Emerging Leaders program, and a mentoring program. Our “Women and Wealth” initiative helps to engage, empower and enrich our female customers. Our regional bank’s partnership with Operation HOPE offers free financial literacy education and resources in low- to moderate-income communities. We also invest in future generations through our initiative called “Banking on Our Future.” Our employees are trained to teach financial wellness to our youth in classrooms and schools.

We are proud to share that our company has received multiple recognitions and honors for such initiatives. First Horizon has been named as a top diversity employer by Professional Woman’s Multicultural. The list recognizes the nation’s “Best of the Best” corporations and government agencies that promote inclusion and diversity. Other awards include Top 50 Companies for Executive Women from the National Association for Female Executive, Diversity Leader Award from Profiles of Diversity Journal, and Top LBGT-inclusive business for the Human Rights Campaign Foundation, Bloomberg Gender-Equality index, and Fortune Magazine’s Best Workplaces for Women and Diversity. First Horizon has also been recognized as one of the nation’s best employers by Forbes and American Banker magazines.

Sincerely,

[Signature]

Ajay Thomas
FHN Financial Capital Markets
Senior Managing Director and Head of Public Finance