

**Nuveen Funds
Policies and Procedures on**

Senior Financial Officer Code of Conduct

I. Introduction

The reputation and integrity of the Nuveen-sponsored registered investment companies (the “Funds”) are valuable assets that are vital to the Funds’ success. Each officer of the Funds, and officers and employees of the investment advisers to the Funds who work on Fund matters, including each of the Fund’s senior financial officers (“SFOs”), is responsible for conducting each Fund’s business in a manner that demonstrates a commitment to the highest standards of integrity.

SFOs include the Chief Administrative Officer (who is the principal executive officer. There is one Chief Administrative Officer responsible for open-end funds, a separate Chief Administrative Officer for the exchange traded funds, and a separate Chief Administrative Officer responsible for closed-end funds), the Controller (who is the principal accounting and the principal financial officer), and any person who performs a similar function.

The Funds, along with several Nuveen entities, have adopted a Code of Ethics under Rule 17j-1 under the Investment Company Act of 1940 (the “Rule 17j-1 Code”). The Funds’ Rule 17j-1 Code is designed to prevent certain conflicts of interest that may arise when officers, employees, or directors of the Funds and those Nuveen entities know about present or future Fund transactions and/or have the power to influence those transactions, and engage in transactions with respect to those same securities in their personal account(s) or otherwise take advantage of their position and knowledge with respect to the Funds’ transactions in those securities. In an effort to prevent these conflicts and in accordance with Rule 17j-1, the Funds adopted their Rule 17j-1 Code to prohibit transactions and conduct that create conflicts of interest, and to establish reporting requirements and enforcement procedures. Certain Funds have also adopted as their codes of ethics the codes of their non-Nuveen sub-advisers, for purposes of serving as the Rule 17j-1 code with respect to those respective sub-advisers’ activities on behalf of the applicable Funds.

The Sarbanes-Oxley Act of 2002 was designed to address corporate malfeasance and to help assure investors that the companies in which they invest are accurately and completely disclosing financial information. Under Section 406 of the Act, all public companies (including the Funds) must either have a code of ethics for their SFOs, or disclose why they do not. The Act was intended to prevent future situations (such as occurred in well-reported situations involving such companies as Enron and WorldCom in 2001-02) where a company creates an environment in which employees are afraid to express their opinions or to question unethical and potentially illegal business practices.

The Funds have chosen to adopt a senior financial officer Code of Conduct to encourage its SFOs, and other Fund officers and Nuveen employees, to act ethically and to question potentially unethical or illegal practices, and to strive to ensure that the Funds’ financial disclosures are

complete, accurate, and understandable. This Code of Conduct is different and separate from, and complementary to, the Rule 17j-1 Code.

II. Purposes of this Code of Conduct

The purposes of this Code are:

- A. To promote honest and ethical conduct among the Fund's SFOs, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- B. To assist the SFOs to recognize and avoid conflicts of interest, including disclosure to an appropriate person of any material transaction or relationship that reasonably could be expected to give rise to such a conflict;
- C. To promote full, fair, accurate, timely, and understandable disclosure in reports and documents that the Fund files with, or submits to, the SEC and in other public communications the Fund makes;
- D. To promote compliance with applicable laws, rules and regulations;
- E. To encourage the prompt internal reporting to an appropriate person of violations of the Code; and
- F. To establish accountability for adherence to the Code.

III. Oversight of and Questions about this Code

The Funds' Board of Trustees has designated the Funds' Chief Compliance Officer to be the Compliance Officer for the implementation and administration of the Code.

IV. Handling of Financial Information

The Funds have adopted guidelines under which its SFOs perform their duties. However, the Funds expect that *all* officers or employees of the adviser or distributor who participate in the preparation of any part of any Fund's financial statements follow these guidelines with respect to each Fund:

- A. Act with honesty and integrity and avoid violations of this Code, including actual or apparent conflicts of interest with the Fund in personal and professional relationships.
- B. Disclose to the Fund's Compliance Officer any material transaction or relationship that reasonably could be expected to give rise to any violations of the Code, including actual or apparent conflicts of interest with the Fund. A "conflict of interest" occurs when a SFO's private interest interferes with the interests of, or his/her service to, the Fund. You should disclose these

transactions or relationships whether you are involved or have only observed the transaction or relationship. If it is not possible to disclose the matter to the Compliance Officer, it should be disclosed to the Fund's Chief Financial Officer or Chief Executive Officer.

- C. Provide information to the Fund's other officers and appropriate employees of service providers (adviser, administrator, outside auditor, outside counsel, custodian, *etc.*) that is accurate, complete, objective, relevant, timely, and understandable.
- D. Endeavor to ensure full, fair, timely, accurate, and understandable disclosure in the Fund's periodic reports.
- E. Comply with the federal securities laws and other applicable laws and rules, such as the Internal Revenue Code.
- F. Act in good faith, responsibly, and with due care, competence and diligence, without misrepresenting material facts or allowing your independent judgment to be subordinated.
- G. Respect the confidentiality of information acquired in the course of your work except when you have Fund approval to disclose it or where disclosure is otherwise legally mandated. You may not use confidential information acquired in the course of your work for personal advantage.
- H. Share and maintain skills important and relevant to the Fund's needs.
- I. Proactively promote ethical behavior among peers in your work environment.
- J. Responsibly use and control all assets and resources employed or entrusted to you.
- K. Record or participate in the recording of entries in the Fund's books and records that are accurate to the best of your knowledge.

V. Interpretations of, and Waivers Under, this Code

- A. Whether conduct of the type covered by this Code is or is not "honest and ethical", whether a person has acted with "integrity", and whether a potential conflict of interest is "actual" or merely "apparent", are not susceptible of precise definitions or determinations, and are ultimately matters of interpretation and judgment. It is important that interpretations and judgments with respect to conduct that might be considered as violative of this Code are made by persons who are not directly involved in the possible violation, who are qualified to exercise that judgment, and who are in a position to exercise independence when exercising their judgment. Generally, interpretations of the Code should be made by a combination of (a) one

or more SFO(s) who is (are) not involved in the possible violation, and/or the Funds' Compliance Officer, and (b) counsel to the Independent Trustees of the Funds. Therefore, once a person has fully disclosed the facts surrounding a possible conflict or violation to the SFOs, the Compliance Officer, and Independent Trustees' counsel, those persons should meet, in person, by phone, or via e-mail, to exchange views about the possible violation and to make a determination whether the conduct in question violates the Code or presents an actual, material conflict of interest.

- B. SFOs and other parties subject to this Code may request a waiver of a provision of this Code (or the Fund's Rule 17j-1 Code) by submitting their request in writing to the Compliance Officer for appropriate review. The Compliance Officer, an executive officer of the Fund (other than the person whose conduct is in question) or the Audit Committee will decide whether to grant a waiver. All waivers of this Code must be disclosed to the Audit Committee, and to the Fund's shareholders to the extent required by SEC rules.

VI. Certification

Each SFO will be asked to certify, both initially and then on an annual basis, that he/she is in full compliance with the Financial Code and any related policy statements. The form of such certifications are attached hereto as Exhibits A and B.

VII. Reporting Suspected Violations

- A. SFOs or other officers of the Funds or employees of the Nuveen group who work on Fund matters who observe, learn of, or, in good faith, suspect a violation of the Code must immediately report the violation to the Compliance Officer, another member of the Funds' or Nuveen's senior management, or to the Audit Committee of the Fund Board. An example of a possible Code violation is the preparation and filing of financial disclosure that omits material facts, or that is accurate but is written in a way that significantly obscures its meaning.
- B. Because service providers such as the administrator, outside accounting firm, and custodian provide much of the work relating to the Funds' financial statements, the SFOs, should be alert for actions by service providers that may be illegal, or that could be viewed as dishonest or unethical conduct. SFOs should report these actions to the Compliance Officer even if he or she knows, or thinks, that the service provider has its own code of ethics for its SFOs or employees.
- C. SFOs or other officers or employees who report violations or suspected violations in good faith will not be subject to retaliation of any kind. Reported violations will be investigated and addressed promptly and will be treated confidentially to the extent possible.

VIII. Violations of the Code

- A. Dishonest, unethical or illegal conduct will constitute a violation of this Code, regardless of whether this Code specifically refers to that particular conduct. A variety of laws apply to the Funds and their operations, including the Securities Act of 1933, the Investment Company Act of 1940, state laws relating to duties owed by Fund directors and officers, and criminal laws. The federal securities laws generally prohibit a Fund from making material misstatements in its prospectus and other documents filed with the SEC, or from omitting to state a material fact. These material misstatements and omissions include financial statements that are misleading or omit materials facts.
- B. Examples of criminal violations of the law include stealing, embezzling, misapplying corporate or bank funds, making a payment for an expressed purpose on a Fund's behalf to an individual who intends to use it for a different purpose; or making payments, whether corporate or personal, of cash or other items of value that are intended to influence the judgment or actions of political candidates, government officials or businesses in connection with any of the Funds' activities. The Funds must and will report all suspected criminal violations to the appropriate authorities for possible prosecution, and will investigate, address and report, as appropriate, non-criminal violations.
- C. The Compliance Officer or other appropriate person to whom a potential violation is reported ("investigating officer") will take all appropriate action to investigate any potential violations reported to him/her. If, after such investigation, the investigating officer believes that no material violation has occurred, the investigating officer is not required to take any further action. Any matter that the investigating officer believes is a material violation will be reported to the Fund's Audit Committee. If the Audit Committee concurs that a material violation has occurred, it will inform and make a recommendation to the Board of Trustees, which will consider appropriate action, which may include review of, and appropriate modifications to, applicable policies and procedures; notification to appropriate personnel of the investment adviser or its board; or a recommendation to dismiss the affected individual as an officer of the Fund or Funds.
- D. The Audit Committee will be responsible for granting waivers, as appropriate.

IX. Amendments

Any amendments to this Code must be approved or ratified by a majority vote of the Board of Trustees, including a majority of independent directors.

X. Confidentiality

All reports and records prepared or maintained pursuant to this Code will be considered confidential and shall be maintained and protected accordingly. Except as otherwise required by law or this Code, such matters shall not be disclosed to anyone other than the Board of Trustees, counsel to the independent Trustees thereof, and the Funds' investment adviser.

XI. Internal Use

The Code is intended solely for the internal use by the Funds and does not constitute an admission, by or on behalf of any Company, as to any fact, circumstance, or legal conclusion.

XII. Recordkeeping Requirements

These procedures, and all Certificates hereunder, will be retained for at least seven years by Fund Compliance.

XII. Responsible Parties

Fund Chief Administrative Officers (Principal Executive Officers)

Fund Controller (Principal Financial Officer)

Nuveen Fund Chief Compliance Officer

First adopted May 2003

Amended: August 6, 2020

Exhibit A

NUVEEN FUNDS

SENIOR FINANCIAL OFFICER CODE OF CONDUCT

Initial Certification

As required by Section 406 of the Sarbanes-Oxley Act of 2002, the Nuveen Funds (the “Funds”) have adopted the Senior Financial Officer Code of Conduct (the “Code of Conduct”) to encourage its Chief Administrative Officer and its Controller (each a “Senior Financial Officer”) to act ethically and to question potentially unethical or illegal practices and to strive to ensure that the Funds’ financial disclosures are complete, accurate and understandable.

In this connection, the undersigned Senior Financial Officer certifies that he has received, read and understands the Code of Conduct and agrees to comply with its provisions.

IN WITNESS WHEREOF, the undersigned has executed this Certification as of

_____.

Name: _____

Title: _____

Exhibit B

NUVEEN FUNDS

SENIOR FINANCIAL OFFICER CODE OF CONDUCT

Annual Certification

As required by Section 406 of the Sarbanes-Oxley Act of 2002, the Nuveen Funds (the “Funds”) have adopted the Senior Financial Officer Code of Conduct (the “Code of Conduct”) to encourage its Chief Administrative Officer and its Controller (each a “Senior Financial Officer”) to act ethically and to question potentially unethical or illegal practices and to strive to ensure that the Funds’ financial disclosures are complete, accurate and understandable.

In this connection, the undersigned Senior Financial Officer hereby certifies to the Board of Directors of the Funds as follows:

- 1 During the calendar year ended December 31, _____, I have acted in accordance with the guidelines set forth in Section IV of the Code of Conduct relating to the handling of financial information;
- 2 During the calendar year ended December 31, _____, I have reported any suspected violations of the Code of Conduct as required by Section VII of the Code of Conduct; and
- 3 During the calendar year ended December 31, _____, I was in full compliance with the requirements of the Code of Conduct.

IN WITNESS WHEREOF, the undersigned has executed this Certification as of

_____.

Name: _____

Title: _____

Appendix

Policy Governance

Approval Date: See Policy

Approver: NFAL Compliance Committee

Review Date: 6/29/20

Effective Date: See Policy

Policy Leader: Fund Compliance

Policy Owner: See Responsible Party Section of Policy