

# **Vendor Code of Conduct**

Horace Mann's reputation is built on transparency and customer trust. In order to uphold its reputation, Horace Mann conducts its business affairs in accordance with applicable laws and regulations and with honesty and integrity. Horace Mann expects the entities (including individuals) that provide Horace Mann with goods and/or services (collectively, "vendors") to have the same values as and adhere to the same standards as Horace Mann. This Vendor Code of Conduct ("code") communicates Horace Mann's expectations regarding vendor conduct. Horace Mann expects its vendors, along with their employees, agents and subcontractors, to comply with this code.

# **Compliance with laws**

All vendors are expected to conduct business in accordance with all applicable laws and regulations. It is the responsibility of each vendor to ensure its employees, agents, and subcontractors comply with all applicable laws.

#### **Human rights and labor standards**

Horace Mann expects its vendors to treat people with respect and dignity, encourage diversity, promote equal opportunity, and foster an inclusive culture.

- Non-discrimination in employment. Vendors are expected to maintain a workplace free of all forms of discrimination, including discrimination based on race, creed, color, religion, gender, sexual orientation, gender identity, national origin, age, disability, pregnancy, genetic information, marital status, military status, veteran status, or any other characteristic protected by applicable law. Vendors are expected to uphold an employee's right to work in an environment free from intimidation and harassment.
- **Equal opportunity**. Vendors are expected to adhere to equal opportunity principles in the recruiting, hiring, advancement, training, compensation, and retention of employees.
- **Retaliation.** Vendors may not retaliate against their employees for raising issues and concerns.
- **Freedom of association.** Horace Mann expects its vendors to adhere to applicable laws regarding the right of their employees to affiliate with lawful organizations without interference.
- Wages and benefits. Vendors are expected to comply with all applicable wage and compensation related laws pertaining to wages or hour requirements.

- **Forced labor and human trafficking.** The use of forced labor, whether in the form of indentured, bonded, or prison labor, is prohibited.
- **Child labor.** The use of child labor is prohibited, and vendors must comply with applicable laws regulating the employment of minors.

# Confidentiality and information protection

At Horace Mann, data privacy and confidentiality are taken very seriously, and Horace Mann expects its vendors to do so as well.

- Confidentiality. In some instances, vendors may be provided with or given access to Horace Mann's or a Horace Mann third party's confidential, proprietary, trade secret or personal information, as the term is defined in state and/or federal data privacy related laws and regulations (collectively, "information"). Vendors are expected to comply with all applicable laws and regulations regarding the information. A vendor may not use or disclose the information except as expressly authorized in the agreement between the vendor and Horace Mann.
- Information protection. Vendors are responsible for establishing reasonable and appropriate
  administrative and technical safeguards to prevent unauthorized use, access or disclosure of
  information. Notice should be provided to Horace Mann in the event of any information
  breach.

### Anti-corruption, anti-trust, insider trading and fair business practices

Horace Mann strives to conduct all dealings with customers, employees, shareholders and suppliers with honesty and fairness, and it expects the same from its vendors.

- Anti-corruption. Vendors are prohibited from engaging in any form of corruption, including without limitation, extortion, fraud, impersonation, false declarations, bribery, and money laundering.
- Anti-trust. Vendors must comply with applicable anti-trust and fair competition laws and regulations. Vendors should not enter into arrangements that unlawfully restrain competition, improperly exchange competitive information or engage in price fixing, bid rigging or improper market allocation.
- Insider trading. Horace Mann expects its vendors to comply with insider trading laws and have
  processes in place to prevent their employees from trading in Horace Mann's securities or the
  securities of another company while in possession of material nonpublic information. Nonpublic
  information is material if it can be reasonably expected to affect a company's stock price or an
  investor's decision to buy, sell, or hold a company's stock.

Fair business practices. Vendors are expected to utilize fair business practices. For example, vendors may not: (i) misrepresent the benefits, advantages and features of their products and services, (ii) misrepresent their financial condition, (iii) fail to maintain complaint handling procedures as required by state or federal regulatory authorities, or (iv) utilize untruthful or inaccurate advertising.

# Intellectual property infringement

Vendors should not infringe the patent, copyright, trademark or other intellectual property rights of Horace Mann or a third party.

#### Gifts, favors and entertainment

Unless permitted by Horace Mann's policies, Code of Ethics, and Code of Conduct, Horace Mann employees may not accept business-related gifts, invitations to social or recreational events, entertainment, and other favors from vendors. Horace Mann employees will not be influenced or obligated by the offer of such business courtesies.

#### **Conflicts of interest**

Horace Mann expects its vendors to exercise reasonable care and diligence to prevent any actions or conditions that could result in a real or perceived conflict with Horace Mann's interests. A conflict of interest arises when a vendor's interests or activities influence (or appear to influence) their ability to act in the best interest of Horace Mann.

#### **Environment**

Horace Mann recognizes the importance of minimizing its environmental footprint. Vendors are expected to comply with all applicable environmental laws and regulations. Vendors are also encouraged to employ solutions (when feasible) that reduce their carbon footprint, are sustainable and aim to protect the environment.

# Accuracy, completeness and truthfulness of information

Horace Mann expects its vendors to truthfully, completely and accurately disclose and report information to Horace Mann regarding their business activities, organization, financial situation and performance. Vendors should refer any external requests about Horace Mann's activities, results, plans, or position on any issue to their primary business contact at Horace Mann.

# Management system

Horace Mann encourages its vendors to establish and maintain a management system that ensures compliance with this code and applicable laws, identifies and mitigates related operational risks, and facilitates continuous improvement and prompt corrective action. Vendors should appropriately communicate this code to all of its officers, directors, employees, representatives, agents and contractors.

# **Reporting Violations**

If anyone suspects violations of this code, Horace Mann's policies, or any laws and regulations, they are obligated to report it to either the Horace Mann Compliance Helpline at 1-888-518-9894 (anonymous) or their primary Horace Mann business contact.

Retaliation against an individual for reporting possible non-compliance with this code is prohibited. All reported violations will be reviewed and if merited, addressed.