



UNUM SUPPLIER CODE OF CONDUCT

FINANCE – STRATEGIC SOURCING

Purpose

The purpose of this policy is to establish requirements and expectations of suppliers working with and representing Unum. Every Unum supplier is expected to uphold the ethical standards of Unum's Supplier Code of Conduct as well as act in full compliance with the laws, rules and regulations of the countries, states and localities in which it operates. Should violations of this Supplier Code of Conduct occur, offenses will be taken seriously, and may be grounds for termination of contracts in accordance with applicable law.

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1 POLICY STATEMENT

Unum has established company standards that include ethical business practices and regulatory compliance. These standards apply to all third parties and suppliers that conduct business with Unum. It is expected that Suppliers embrace this commitment to integrity and ethical practices by complying with and training its employees on Unum’s Supplier Code of Conduct.

2 SCOPE

Third Parties, Suppliers of Unum Group and Subsidiaries

3 RESPONSIBLE BUSINESS PRACTICES

It’s about doing the right things.

Suppliers must follow prescribed policies, procedures and business practices and ensure compliance with all applicable laws and regulations.

Confidentiality, Privacy and Information Security

Suppliers must protect personal, confidential or proprietary information in accordance with the Health Insurance Portability and Accountability Act (HIPAA), General Data Protection Regulation (GDPR), Data Protection Act 2018 (DPA), and other applicable state laws. Information may not be misused or disclosed to unauthorized parties. Suppliers are responsible for compliance with applicable non-disclosure agreements and contractual confidentiality requirements regarding information belonging to or provided by Unum. Notify Unum of any alleged potential, suspected or actual breach via the [Ethics Hotline](#) – information provided within Reporting Issues and Concerns section below.



Reporting Issues and Concerns

Suppliers must immediately report to Unum any issue that could be a violation of law/regulation, be a conflict of interest, negatively affect the quality of goods or services provided or the timeliness of their delivery, or negatively affect the public perception of Unum or Unum products. If behaviors, actions or decisions are witnessed that violate the Code or any policies listed within your contract, it is expected that the issue will be raised promptly. As a first step, seek guidance from your Unum business partner. If you can't discuss the issue with your business partner, reach out to:

- Unum Strategic Sourcing Team
- Unum Ethics team at <http://www.unum.ethicspoint.com/> or at 800.454.9316.

In the UK, you may report issues under the UK Whistleblowing Policy. In addition, you may report violations or concerns anonymously and confidentially to our Ethics Hotline in one of the following ways:

- Toll-free (U.S.): 800.454.9316
- Toll-free (U.K.): 0800.085.0478
- Toll-free (IRE): 9.0044.0800.085.0478
- Online: <http://www.unum.ethicspoint.com/>

If you report a concern of non-compliance to any member of Unum management and are told to "keep quiet", you should immediately contact the Unum Ethics Office with the link above.

Responsible Treatment of Individuals:

Unum is committed to becoming the most inclusive, diverse, and welcoming company in employee benefits and beyond. Unum strives to achieve a culture of inclusion and diversity where every person can be who they are, feel they belong, be comfortable sharing ideas and reach their full potential. We value diversity in the workplace which speaks to the different backgrounds, perspectives, experiences and worldviews of our people. We believe we reap the many benefits of diversity by creating an inclusive environment

With regards to the responsible treatment of individuals, we seek to work with Suppliers who:

- Mirror our commitment to retain and develop highly qualified, diverse and dedicated individuals at all levels of our organization.
- Believe, as Unum does, that all employees deserve to be in a work environment that is free from any kind of discrimination or harassment. It is expected that Suppliers we partner with also maintain strict policies that prohibit discrimination and harassment.

- Provide a safe and healthy workplace and comply with applicable safety and health laws, regulations, and internal requirements.
- Compensate employees competitively relative to the industry and local labor market.
- Prohibit the use of all forms of slavery, forced labor, and human trafficking.
- Follow all applicable minimum age requirements for employment everywhere it operates.

4 COMPLIANCE, MONITORING, AND REVIEW

Suppliers and their employees, agents, and subcontractors (collectively referred to as “Suppliers”) must adhere to this Supplier Code of Conduct while conducting business with or on behalf of Unum. Suppliers must promptly inform their Unum contact (or a member of Unum management or Strategic Sourcing) when any situation develops that causes the Supplier to be in violation of this Code. While Unum Suppliers are expected to self-monitor and demonstrate their compliance with these guidelines, Unum may audit Suppliers or inspect Suppliers’ facilities to confirm compliance. Unum may require the immediate removal of any Supplier representative(s) or personnel who behave in a manner that is unlawful or inconsistent with this Code of Conduct or any Unum policy.

5 HUMAN RIGHTS AND FAIR LABOR PRACTICES

Unum expects its Suppliers to (1) comply fully with all employment laws, (2) share its commitment to respect all human rights and to provide equal opportunity in the workplace as set forth in the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the UN Global Compact Principles, and the ILO Core Labor Standards, and (3) take effective measures to remedy any adverse human rights and fair labor impacts, including the disclosure of all potential violations and cooperating fully in subsequent investigations into such violations.

Further Unum expects all suppliers to comply without limitation to the following:

- **Unum Public Labor Policy:** All Unum Suppliers must comply with Unum’s public labor policy.
- **Disclosure:** Suppliers must disclose the priority non-conformance rate and associated corrective action rate for suppliers’ compliance with labor rights policies.
- **Certification:** At Unum’s discretion Suppliers may be required to complete a labor rights certification program.
- **Not discriminate and not harass.** Suppliers must commit to a workforce and workplace free of harassment, unlawful discrimination, and retaliation.

Suppliers should ensure their business practices respect the rights of different demographic groups, including women, and migrant workers. While we recognize and respect cultural differences, Suppliers must provide equal opportunity in the workplace and reasonable accommodation, and not engage in harassment or discrimination in employment on the basis of age, ancestry, citizenship, color, family or medical care leave, gender identity or expression, genetic information, immigration status, marital or family status, medical condition, national origin, physical or mental disability, political affiliation, union membership, protected veteran status, race, religion, sex (including pregnancy), sexual orientation, or any other characteristic protected by applicable local, state or federal laws, regulations, and ordinances.

- **Supplier shall not require** workers or potential workers to undergo medical tests including pregnancy tests, except where required by applicable laws or regulations or required for workplace safety and shall not improperly discriminate based on test results. Suppliers must accommodate all disabilities to the extent required by law.
- **Prohibit the use of child labor.** Child labor must not be used under any circumstance. Suppliers must not employ anyone under the age of 15, under the age for completing compulsory education, or under the legal minimum working age for employment, whichever requirement is most restrictive. Suppliers are required to have a remediation plan in place to ensure that, in the event of any child labor found, Suppliers must follow international standards, local legal requirements, or Unum's child labor remediation requirements. Unum supports all forms of legal youth employment, including the development of legitimate workplace apprenticeship programs for the educational benefit of young people. Unum will not do business with any Supplier that uses such programs in a fraudulent or deceptive manner. Suppliers must prohibit workers who are under the age of 18 from performing work that is likely to jeopardize their health or safety such as night work, overtime, heavy lifting and working with toxic or hazardous materials.
- **Prohibit the use of Forced Labor, Prison Labor, and Trafficking in Persons.** All Suppliers, including recruiters, employment agencies, sub-agencies, and recruitment firms, are prohibited from using forced labor and prison labor, trafficking in persons, and the procurement of commercial sex acts. All forms of forced labor are prohibited, including indentured labor, bonded labor (including debt bondage, trafficked or slave) or any other form of forced labor. All forms of prison labor are prohibited. Support for or engagement in any form of human trafficking or involuntary labor through threat, force, fraudulent claims, or other coercion is prohibited. Suppliers must have a voluntary labor compliance plan in place that (1) provides provisions for training Supplier personnel and raising their awareness of issues related to forced labor, and (2) details what remediation the Supplier will provide in case of any violations. All

Suppliers must inform employees, agents, sub-agencies, recruiters, contractors, and subcontractors about Suppliers' policies that prohibit human trafficking, prison labor, forced labor, and other forms of slavery and provide training and programs to promote awareness, risk identification, employee reporting, corrective action, and potential penalties for violations.

- **Ensure workers have access to identity-related and personal documents.** Suppliers, agents, and sub-agents are prohibited from requiring workers to lodge "deposits," withholding employee identity or immigration papers (including but not limited to passports, drivers' licenses, or work permits (regardless of the issuing authority), or destroying, concealing, confiscating, or otherwise restricting or denying workers' access of such documents. Workers must be free to resign their employment in accordance with local and national laws or regulations without unlawful penalty.
- **Provide safe housing when the Supplier intends to provide accommodations.** If Suppliers will provide housing or hotel accommodations for employees working in the country where work will be performed, all accommodations provided must be in compliance with the host country's housing and safety standards.
- **Provide return transportation for foreign migrant workers.** When hiring foreign workers who are not nationals of the country in which the work is taking place and who are recruited and who migrate from their home country to another country for the specific purpose of working for Suppliers, Suppliers must provide return transportation for such workers or reimburse the workers for the cost of such trip upon the end of their employment. This requirement does not apply to workers with permanent residency or professional employees who are on short-term or long-term assignments.
- **Use appropriately trained recruiters to support compliance.** Suppliers must use recruiters, employment agencies, and recruiting companies that are trained and which comply with international standards, local labor laws of the countries in which the recruitment takes place, or Unum requirements, whichever are stricter. Recruitment fees or other similar fees charged to workers and payable to the employer, recruiting agent, or sub-agent are strictly prohibited. If such fees are found to have been paid by workers, Suppliers will be required to repay such fees to the workers.
- **Make conditions of employment clear when hiring.** Suppliers must prohibit the use of misleading or fraudulent practices during the recruitment or employment process. Suppliers must disclose, in a format and language accessible to the worker, basic information regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, living conditions, housing and associated costs (if any), any other costs to be charged to the worker, and any hazards involved in the work. Such disclosures must be made before the worker enters employment and as needed throughout their term of employment. All contracts and employee

handbooks (where applicable) must (1) clearly convey the conditions of employment in a language understood by the worker, and (2) reflect applicable laws and regulations.

- **Provide written employment contracts or agreements when necessary.** If required by law or contract, Suppliers must provide an employment contract, recruitment agreement or other work document in writing, in a language that the employee understands, that includes details about work descriptions, wages, prohibitions on charging recruitment fees, work locations, living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance processes, and the content of applicable laws and regulations that prohibit trafficking in persons. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five days prior to that relocation. Foreign migrant workers must receive the employment contract prior to the worker departing from his or her country of origin and there shall be no substitutions or changes to the employment contract upon arrival in the receiving country unless changes are made to meet applicable law and/or provide equal or better employment terms.
- **Provide fair compensation.** Suppliers must provide fair compensation for all employees and workers, including employees who are permanent, temporary, or dispatched, migrant workers, apprentices, and contract workers. Such compensation must meet the legal minimum standards as required by local law. Workers with disabilities whose wages are governed by section 14(c) of the Fair Labor Standards Act must receive no less than the full minimum wage rate as defined by Executive Order 13658. All employees and workers shall be provided with a clear, timely, and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. Suppliers may not use deductions from wages as a disciplinary measure. Any deductions from wages not provided for by national law or local law are permitted only with proof of express, written, and freely given permission of the worker concerned. All disciplinary measures must be recorded. Wages and benefits paid for a standard work week must meet local and national legal standards. Suppliers must provide benefits to employees that meet legal standards and at the levels expected in the industry and in accordance with Unum requirements.
- **Treat employees with dignity and respect.** Suppliers must not engage in any harsh or inhumane treatment, including violence, gender-based violence, sexual or other harassment including psychological harassments or threats, sexual abuse, corporal punishment, mental or physical coercion, bullying, or public shaming. Verbal abuse or other forms of intimidation are prohibited. Suppliers shall have a humane treatment policy and monitor supervisors to ensure appropriate conduct. Disciplinary policies and procedures in support of

these requirements shall be clearly defined and communicated to workers.

- **Meet working hours and rest day requirements.** Suppliers are prohibited from requiring workers to work more than the maximum hours as set by international standards, including the International Labor Organization, around standard working hours (Conventions 1, 14, & 106), local and national laws, Unum requirements, or in the freely negotiated and legitimate collective agreement, whichever are most restrictive. Suppliers must ensure overtime is voluntary and paid in accordance with local and national laws or regulations. A work week must not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers must be allowed at least one day off per seven-day work week. Suppliers must keep employee working hours and pay records in accordance with local and national laws or regulations and provide such records to Unum upon request.
- **Ensure freedom of association and right to collective bargaining.** Suppliers must respect workers' rights to freedom of association, collective bargaining, and peaceful assembly (including the right to refrain from such activities) in accordance with local legal requirements and responsibilities, international standards such as International, Labor Organization standards or Unum requirements, whichever are stricter. Workers should not be intimidated, harassed or face reprisal for exercising this right. When local laws or circumstances restrict this right, Suppliers should pursue other ways of engaging in meaningful dialogue with their workers on employment issues and workplace concerns.
- **Provide effective grievance procedures.** Suppliers must provide employees with effective grievance procedures for raising workplace concerns, including concerns involving harassment and discrimination, to the attention of management for appropriate resolution. Workers must be given a safe environment to provide their grievances and feedback. Suppliers must review these reporting procedures periodically. The grievance procedures provided must be accessible, culturally appropriate, and include the option to report anonymously where appropriate. Workers and/or their representatives must be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment. Suppliers must periodically provide workers with information and training on all grievance procedures. All forms of retaliation against workers for raising a workplace concern are strictly prohibited. Suppliers shall not retaliate through use of personal attacks, intimidation, or other threats against workers who act to raise workplace concerns, including infringement of worker rights under local legal requirements or international standards.

For Suppliers with employees physically located in the U.S. who are performing work as part of any contract with Unum that requires access to Unum facilities or network:

- Any person staffed on a Unum project by Supplier must be an employee of Supplier or employee of an approved subcontractor of Supplier.
- Supplier must ensure that U.S.-based employees who work 30 or more hours per week for the Supplier (or for any subcontractor of the Supplier) are provided with employee health benefits that comply with the Patient Protection and Affordable Care Act of 2010 (the "ACA") and its related statutes and regulations, as amended from time to time. Such health coverage must be "affordable" and "minimum value" as those terms are defined in the ACA, and Supplier must provide this coverage to any employee staffed on a Unum project even if Supplier is not otherwise required to offer this coverage under the ACA. If Supplier receives notice from a government agency that this health coverage is not compliant with the ACA or that a penalty will be assessed related to this health coverage under the ACA, Supplier must provide written notice to Unum within 30 days.
- If a Supplier has more than 50 employees in the U.S., the Supplier must provide the certain minimum benefits to Eligible Supplier Employees. "Eligible Supplier Employee" is defined as any U.S.-based Employee of Supplier who has worked for Supplier for at least 1500 hours in the prior 12 months.

6 BUSINESS INTEGRITY

It's about doing things the right way. Unum's reputation depends on all interactions being conducted with integrity. Suppliers' actions effect the perception of Unum and will impact their partnership with Unum.

No PO / No Pay

Unum has a strict "No Purchase Order (PO) / No pay" policy. Suppliers must verify they have received a proper PO prior to the start of any project or engagement, regardless of who requested the work. Failure to comply could result in nonpayment for work completed prior to the proper issue of the associated PO

Recordkeeping

Suppliers must create and maintain documents and records (including financial information) that are accurate, honest, and submitted timely.

Compliance with Laws

Unum expects its suppliers to follow all applicable laws – local, state, federal – when transacting business with and for Unum. Illegal actions will not be tolerated and will be reported to the appropriate authorities/agencies.

Conflicts of interest

Suppliers must avoid engaging in any business activity that could create a conflict of interest relating to their partnership with Unum. Conflict of interest applies to any circumstance that could cast doubt on the Suppliers' ability to act objectively regarding the supply of services/goods to Unum. If a Supplier believes a conflict of interest exists, they must report all pertinent details immediately to either their Unum business partner or the [Ethics Hotline](#).

Gifts and entertainment

Avoid gifts to all Unum employees. Even a well-intentioned gift might constitute a bribe under certain circumstances or create conflicts of interest. Do not offer anything of value to obtain or retain a benefit or advantage for the giver, and do not offer anything that might appear to influence, compromise judgment, or obligate the Unum employee. Suppliers are not permitted to give gifts of any value to members of the Global Strategic Sourcing Team or its representatives.

Anti-bribery and Anti-corruption

Unum has a strategy for the prevention and detection of financial crime, and this Code of Conduct supports our efforts to ensure that our exposure is kept to a minimum. Unum expects its Suppliers to uphold fair business standards in all business dealings and must compete fairly for Unum's business. Suppliers must not engage in bribes, kickbacks, offering unlawful rebates, or giving anything of value to any domestic or foreign government official. Unum has full authority to refuse payment where these procedures and rules are not followed. Where the perpetration of a financial crime is detected, Unum maintains a zero-tolerance approach and will consider prosecution. Unum will report matters, as appropriate, to relevant authorities



7 APPROVAL AND REVIEW DETAILS

Approval and Revision History			
Date	Revision Action	Approved By	Edited By
6/8/2020	From T.Causey, 6/8/2020: This policy is owned by my Sourcing team. It was updated less than 1 year ago. There is no change in the language now and I do not plan to update this annually. Each time we update, we have to have contractual approval. This policy ties back to the contract that our suppliers sign. The revision date does not need to change.	T.Causey	N/A
5/20/2022	Human Rights and Fair Labor Practices language added	T. Causey	M. Corns

Should you have any questions or feedback regarding this policy, please email Sourcing@unum.com

