

# Supplier Code of Conduct

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# Assurant Supplier Code of Conduct

Assurant is committed to the highest standards of business integrity, ethical conduct, environmental practices and conducting business in ways that align with our social responsibility strategic framework. Assurant's supplier partners ("Suppliers") are expected to operate in ways that embrace similar standards and shall:

- provide safe working conditions for workers,
- treat workers with respect and dignity,
- ensure that products and services provided to Assurant use environmentally and socially responsible practices,
- conduct all activities ethically and in full compliance with the laws, rules and regulations of the country or countries in which the Supplier operates its business.

Assurant requires its Suppliers to operate in accordance with the principles in the Assurant Supplier Code of Conduct ("the Code") and in full compliance with all applicable laws and regulations.

Assurant has the right to assess Suppliers' compliance with this Code prior to and during the contract period. Failure to adhere to this Code may affect Suppliers' future and existing business relationships with Assurant. This Code applies to Suppliers and their subsidiaries, affiliates and subcontractors providing goods or services to Assurant.

Assurant or its third-party auditors may contact and visit Suppliers to evaluate compliance with the Code.

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## Labor and Human Rights

Suppliers must recognize and be committed to upholding the human rights of workers, and to treat them with dignity and respect as understood by the international community. The labor standards are:

### Involuntary Labor and Human Trafficking

All work must be voluntary. Suppliers shall not use forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons. This includes transporting, harboring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud, or payments to any person having control over another person for the purpose of exploitation.

Suppliers' workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment. Suppliers or labor dispatch agencies shall not receive deposits or fees (e.g. recruitment or hiring fees) from workers. Suppliers' workers' contracts shall clearly convey the conditions of employment in a language understood by the workers. Third-party recruitment agencies used by Suppliers shall be compliant with the provisions of this Code and applicable laws and regulations.

### Underage Labor

Suppliers shall employ only workers who are at least 15 years of age or the applicable minimum legal age, whichever is higher. If any underage labor is detected, the Supplier shall immediately stop such underage labor and ensure the worker recruitment process includes robust safeguards adequate to detect and prevent underage labor from being employed in the future. The use of legitimate student intern programs, which comply with all applicable laws, regulations, and applicable International Labor Organization ("ILO") conventions, is supported.

Young workers over the legal minimum age for employment may be hired, however, young workers under the age of 18 shall not perform work that could jeopardize the health or safety of young workers, including night shifts and overtime, or work longer hours than is permitted by local law and consistent with applicable ILO conventions.

### Working Hours

Supplier workweeks are not to exceed the maximum set by local law. Suppliers shall follow all applicable laws and regulations with respect to working hours and days of rest, and all overtime must be voluntary.

### Wages and Benefits

Suppliers must compensate workers in accordance with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, Suppliers must compensate workers for overtime at pay rates greater than regular hourly rates.

Suppliers shall pay accurate wages in a timely manner and shall not permit deductions from wages as a disciplinary measure. Suppliers shall offer vacation time, leave periods, and time off for legally recognized holidays.

### Humane Treatment

Suppliers shall not engage in or threaten harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers. Suppliers shall clearly define and communicate disciplinary policies and procedures in support of these requirements to workers.

### Non-Discrimination

Suppliers shall be committed to a diverse and equal opportunity workforce free of harassment and unlawful discrimination. Suppliers shall not engage in discrimination based on race, color, age, gender, gender-identity, sexual orientation, ethnicity, disability,

pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices, such as wages, promotions, rewards, and access to training.

### **Freedom of Association**

In conformance with local law, Suppliers shall respect the right of all workers to form and join worker council or trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities.

Workers and/or their representatives shall 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.

### **Health and Safety**

Suppliers shall make proper provision for the health, safety and welfare of their workers, visitors, contractors and anyone affected by their activities. Suppliers shall maintain safe and healthy working conditions according to the local laws and regulations and integrate sound health and safety management practices into their business. Suppliers shall provide workers the right and means to refuse unsafe work and to report unhealthy working conditions.

### **Occupational Health, Safety and Hazard Prevention**

Suppliers shall conduct hazard assessments that identify and evaluate occupational health and safety hazards and shall manage these hazards through a prioritized process of hazard elimination, engineering controls and/or administrative controls. Suppliers shall provide workers with job-related, appropriately maintained personal protective equipment and instruction on its proper use. Suppliers shall provide Safety Data Sheets (Globally Harmonized System of classification and labelling of chemicals) to communicate the hazards of hazardous chemical products. Suppliers are encouraged to implement a health and safety management system such as Occupational Health and Safety Assessment Series (OHSAS) 18001 or equivalent.

## Ergonomics

Suppliers shall identify, evaluate, and control worker exposure to tasks that pose ergonomic risk, such as excessive force, improper lifting positions, or repetitiveness. Suppliers shall integrate this process into the qualification of all new or modified production lines, equipment, tools, and workstations.

## Working and Living Conditions

Suppliers shall provide workers with reasonably accessible and clean toilet facilities and potable water. Supplier-provided dining, food preparation and storage facilities shall be sanitary. Worker dormitories provided by Suppliers or a third party shall be clean, safe and provide reasonable living space.

## Health and Safety Training and Communication

Suppliers shall provide workers with appropriate workplace health and safety requirements and training in their primary language. Suppliers shall clearly post in their facilities health and safety related information.

## Worker Health & Safety Committees

Suppliers are encouraged to initiate and support worker health and safety committees to enhance ongoing health and safety education and to encourage worker input on, and participation in, health and safety issues in the workplace.

## Environment

Suppliers shall develop, implement, and maintain environmentally responsible business practices and use their best efforts to reduce environmental impact when providing products and services to Assurant. Suppliers shall adhere to applicable laws and regulations related to chemicals, waste management, recycling, water, and air emissions.

Suppliers shall implement an appropriate environmental management system comparable with the requirements of ISO 14001-2015 and are encouraged to gain third party certification of compliance.

Assurant suppliers throughout our global supply chain also are encouraged to participate in the annual CDP Climate survey. CDP participation enhances transparency and provides global environmental data reporting standards for companies, investors, and various governmental entities to follow. To learn more, go to [www.cdp.net](http://www.cdp.net).

### **Environmental Permits and Reporting**

Suppliers shall obtain, maintain, and keep current all required environmental permits (e.g., discharge monitoring), approvals and registrations and follow applicable operational and reporting requirements.

### **Pollution Prevention and Resource Reduction**

Suppliers shall reduce or eliminate waste of all types, including water and energy at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials according to local laws and regulations.

### **Hazardous Substance Management and Restriction**

Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle hazardous substances, in accordance with applicable laws and regulations.

### **Non-Hazardous Waste Management**

Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle non-hazardous waste.

## Ethics

Suppliers are to adhere to all applicable laws and regulations in their business activities. Suppliers shall be ethical in every aspect of their business, including relationships, practices, sourcing, and operations.

### Business Integrity

Suppliers shall uphold the highest standards of integrity in all business interactions. Suppliers shall not engage in corruption, extortion, embezzlement, or bribery to obtain an unfair or improper advantage. Suppliers shall abide by all applicable anti-corruption laws and regulations of the countries in which they operate, including the Foreign Corrupt Practices Act, UK Bribery Act and applicable international anti-corruption conventions.

Suppliers must avoid even the appearance of conflicts of interest in their work with us and must immediately disclose any known family or other close personal relationships with our staff who have an influence over their engagements with us.

In any business relationship, third-party business partners are expected to ensure that the offering or receipt of all gifts and entertainment (or anything of value) is permitted by law and regulation; does not violate the rules and standards of the recipient's organization; is consistent with reasonable marketplace customs; and will not adversely impact Assurant's reputation. Assurant staff are not allowed to accept (1) lavish, frequent, or extravagant gifts or entertainment or (2) gifts or entertainment that could be considered or perceived to be quid pro quo for past, pending or anticipated business. Additionally, gifts received by Assurant staff may not be in the form of cash or cash equivalent (e.g. AMEX, Visa, Mastercard gift card).

### Disclosure of Information

Suppliers shall accurately record information regarding their business activities, labor, health and safety and environmental practices and shall disclose such information, without falsification or misrepresentation, to all appropriate parties.

## Intellectual Property & Proprietary Information

Intellectual property rights include all rights related to patents, copyrights, trademarks, trade secrets, and other proprietary and/or confidential know-how or information. Suppliers shall safeguard and respect intellectual property rights of others. Supplier warrants and represents to Assurant that it does not and will not infringe the intellectual property rights of others. Suppliers shall safeguard Assurant's intellectual property and other proprietary information and keep any information, commercial or technical, received from Assurant confidential. Suppliers must use confidentiality agreements to protect Assurant's proprietary information. [Refer to the Assurant terms of business or existing non-disclosure agreements for details on obligations relating to proprietary and confidential information.]

## Protection of Identity and Non-Retaliation

Suppliers shall provide an anonymous complaint mechanism for managers and workers to report workplace grievances. Suppliers shall protect whistle-blower confidentiality and prohibit retaliation.

## Privacy

Suppliers shall protect the personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers shall comply with applicable privacy and information security laws and regulatory requirements, such as the GDPR, when personal information is collected, stored, processed, transmitted, and shared.

## Responsible Sourcing of Minerals

Suppliers shall exercise due diligence, in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, on their entire supply chain with respect to the sourcing of all tin, tantalum, tungsten and gold contained in products, to determine whether those metals are from the Democratic Republic of the Congo ("DRC") or any adjoining country and, if so, to

determine whether those metals directly or indirectly financed or benefited armed groups that are perpetrators of serious human rights abuses in the DRC or an adjoining country.

## Risk Management System

Suppliers shall establish processes, controls and accountabilities that facilitate compliance with this Code and applicable laws and regulations. Suppliers shall establish an effective risk management system to identify, prioritize and mitigate risks.

### Risk Assessment and Risk Management

Suppliers shall establish and continue to operate at all times a process to identify the risks associated with its business (including but not limited to, legal, compliance, ethics, environmental, health, safety, and labor practices) and based on the relative Supplier's exposure to each risk, implement appropriate mitigation plans.

### Training

Suppliers shall establish and continue to operate at all times programs for training managers and workers to implement Supplier's policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements. Suppliers shall have an ongoing process to evaluate practices and conditions covered by this Code and to foster continuous improvement.

### Communication

Suppliers shall establish and continue to operate at all times a process for communicating clear and accurate information about Supplier's policies, practices, expectations and performance to workers, suppliers and customers. The sharing of Suppliers' social responsibility commitment, standards and related reports with key internal and external stakeholders is encouraged.

## Audits and Assessments

Suppliers shall perform periodic evaluations of the effectiveness of their controls and those of any subcontractors or next-tier suppliers, and whether they can be relied upon to ensure compliance with this Code, local, regional, country and global laws, rules, standards and regulations.

## Corrective Action Process

Suppliers shall have an ongoing process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews. Suppliers shall take reasonable steps to prevent the re-occurrence of deficiencies by ensuring remediation plans address the root causes of the deficiencies going forward.

## Documentation and Record Keeping

Suppliers shall create and maintain documents and records to ensure regulatory compliance along with appropriate confidentiality to protect privacy.

Supplier's adoption of and compliance with this Code must be documented, and relevant information must be promptly shared with Assurant upon its request.

Assurant supplier partners are expected to report any actual or suspected violations of this Code or any applicable law or policy in connection with work done for Assurant. Supplier partners can report concerns through Assurant's Ethics and Compliance Helpline at <http://helpline.assurant.com>. It is available 24 hours a day, seven days a week, online and by phone. Reports may be submitted anonymously, where permitted by law. Supplier partners are also expected to provide their employees with access to an adequate internal avenue of raising issues or concerns without fear of retaliation. Assurant reserves the right at any time to review a supplier partner's adherence to this Code and to investigate any complaints or violation of policy.

## Declaration of Compliance

### Part 1: Declaration of Compliance (Choose one of the three options)

- ☐ I hereby declare that I have read and that I understand the principles set forth in the Assurant Supplier Code of Conduct, updated as of March 2021, and my company will fully comply with these principles.

OR

- ☐ I hereby declare that my company has an internal Code of Conduct of which the principles and practices matches the ones described in the Assurant Supplier Code of Conduct. I hereby attach a copy of our company's internal Code of Conduct.

OR

- ☐ I hereby declare that my company does not yet comply with the principles set forth in the Assurant Supplier Code of Conduct, as detailed below, but I take full responsibility to comply with these principles by developing a corrective action plan no later than \_\_\_\_\_.

Non-compliance issue(s):

Explanation of non-compliance:

### Part 2: Declaration regarding your own Supplier Code of Conduct (Choose one of the two options)

- ☐ I hereby declare that my company has developed and implemented a Supplier Code of Conduct for our own suppliers. I hereby attach a copy of my company's Supplier Code of Conduct.

OR

- ☐ I hereby declare that my company has not yet developed and implemented a Supplier Code of Conduct for our own suppliers.

<Part 3 on next page>

# Supplier Code of Conduct



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## Part 3: Declaration regarding your own Employee Code of Conduct (Choose one of the two options)

☐ I hereby declare that my company has developed and implemented an employee Code of Conduct for our own employees. I hereby attach a copy of my company's Employee Code of Conduct.

OR

☐ I hereby declare that my company has not yet developed and implemented an employee Code of Conduct for our own employees.

## Signature

Company name of the Supplier:

Name of signatory (print):

Position in Company:

Signature:

Date:

Please send signed Declaration of Compliance electronically to [VendorRisk@Assurant.com](mailto:VendorRisk@Assurant.com).