



Code of Ethics



Asking Questions or Reporting Concerns

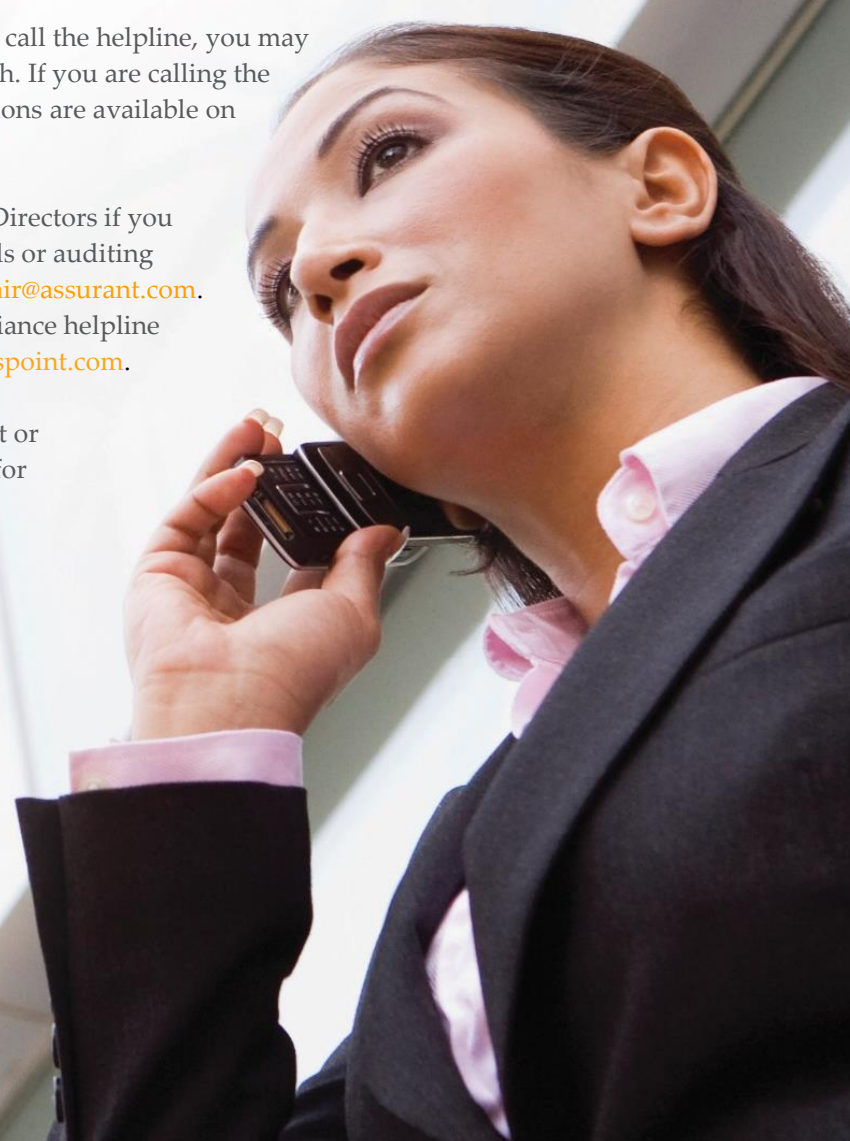
At Assurant, we want you to ask questions whenever you are in doubt about the right course of action. Additionally, we expect you to report all known or suspected violations of the Code of Ethics, compliance violations or other concerns that you have.

You can seek guidance or raise concerns in several ways:

- Talk to your manager
- Reach out to Human Resources or a member of the Legal department.
- Call the compliance team:
Doris Vigo, Chief Compliance Officer, at 305.252.6903
Kim Swackhammer, VP, Compliance, at 305.253.2244 ext. 33199
Melonie Jones, VP, Compliance, at 770.763.2905
Julia Hix-Royer, VP, Compliance, at 305.252.7176
Andy Mills, VP, Compliance, at +44(0) 789.460.7995
- Send a report using the web reporting system at www.assurant.ethicspoint.com to report illegal or unethical activities in the work place. When you submit a report using the web reporting system, you will be asked to complete the screens of the web report form. You may (where permitted by law) remain anonymous if you wish. You will be able to select the language of your choice and the translated report will be forwarded to Assurant within two business days of the report date.
- Call the Compliance helpline at 888.427.2542. When you call the helpline, you may remain anonymous (where permitted by law) if you wish. If you are calling the helpline from outside the United States, dialing instructions are available on page 9 of the Code.
- Contact the Audit Committee of the Assurant Board of Directors if you wish to raise concerns about accounting, internal controls or auditing matters. You can do so by sending an email to: boardchair@assurant.com. If you wish to remain anonymous, please call the compliance helpline or use our web reporting system at www.assurant.ethicspoint.com.
- For employment-related concerns (including harassment or discrimination issues), follow the reporting procedures for your business, as outlined in [MyHR](#).

“The companies that survive longest are the ones that work out what they uniquely can give to the world—not just growth or money but their excellence, their respect for others, or their ability to make people happy. Some call those things a soul.”

- Charles Handy



A Message From Our President and CEO



Dear Colleagues:

There are many reasons to be proud to work at Assurant. One big reason is our strong reputation as an ethical, fair and honest company. Assurant's reputation reflects a promise to our customers, shareholders and to one another. Every day it is our responsibility to uphold our promise. We always must act with honesty, integrity and uphold the highest legal and ethical standards. This unflinching commitment to ethics and integrity is so critical to our success that I have embedded this commitment in the charter for Assurant's leadership team.

Our Assurant Code of Ethics helps to guide our actions and reinforces Assurant's commitment to integrity and ethical business conduct. Our Code of Ethics is especially important as we uphold our purpose to *help people protect what matters most to them*. The trust and confidence consumers place in us is invaluable. In everything we do, we always should remember that people count on us.

Together, our actions each day ensure Assurant will continue to stand out among our peers -- as a company dedicated to excellence in both performance and integrity. Yes, our reputation reflects all of us and starts with you!

Sincerely,

Alan Colberg
President and
Chief Executive Officer



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What We Say and Do

At Assurant, everything we say and do must reflect our values and ethical standards. This Code of Ethics provides you with practical guidance to apply these values and ethical standards in your everyday activities, and with resources to call upon when you have questions or concerns.

Our Mission

To be the premier provider of specialized protection products and related services in North America, Latin America, Europe and other select worldwide markets.

Our Vision

To be the best at helping customers and clients manage risk, the best place for employees to learn and work, and the best stock for investors to own.

Our Purpose

To help customers protect what matters most to them.

Our Values

Common Sense, Common Decency, Uncommon Thinking and Uncommon Results help us accomplish this Mission and achieve our Vision. They extend to our relationships not only with our customers but with one another. Our products and services touch people's lives in sickness and health, life and death, disability and rehabilitation. In everything we do, we remember that people count on us.

Our Ethical Standards

Our ethical standards help ensure that all our decisions and actions are consistent with our values. In the process, we provide outstanding service to our customers, maintain our leadership position, improve employee satisfaction and provide superior value to our shareholders. The highest standards of ethics and integrity are essential to our success as an organization and as individuals.

What are Assurant's ethical standards?

Our ethical standards require that we:

- Engage in and promote honest and ethical conduct, including the ethical handling of actual or potential conflicts of interest involving personal and professional relationships.
- Comply with applicable laws, rules, regulations and company policies, including the standards in this Code.
- Provide full, fair, accurate, timely and understandable information in reports and documents that we file with the government or issue to the public.
- Promptly report any possible violations of ethical standards, using the tools described in this Code.

What are the consequences of violating these ethical standards?

Each of us is accountable for adhering to the values, standards and policies in this Code. Acting in any way that does not fit our culture of integrity, responsibility and ethics could damage your personal reputation, as well as the reputation of your team, department or business. When you violate laws, regulations, ethical standards, or company policies, Assurant will take disciplinary action, which could include termination of employment. In some cases, your actions could even result in civil liability or criminal prosecution.

This Code of Ethics is not a contract of employment and does not alter the at-will employment relationship between Assurant and employees of Assurant. This Code is not intended to cover all the specific legal requirements of each country in which Assurant does business. These guidelines apply through Assurant's business worldwide. Requirements may differ between jurisdictions and, in that regard, it is important that you read these guidelines in conjunction with your business's local policies, which deal more specifically with the legal requirements of the jurisdiction in which you work.



Commitment to Stakeholders

We have a long-standing commitment to operate according to our values, which extends to our customers, employees, business partners, shareholders and communities (“Stakeholders”). Each of these Stakeholders plays a vital role in our success.

Our Customers

We are committed to operating with the highest ethical standards and integrity, and dedicated to dealing honestly with our customers and providing them with quality products and services.

Our Employees

We are committed to open, honest communication with our employees. We are devoted to treating our employees fairly and maintaining employment practices based on equal opportunity for all.

Our employees must treat each other with dignity and respect regardless of age, sex, color, race, religion, national origin, marital status, sexual orientation, gender expression, gender identity, pregnancy, veteran status, disability or any other category protected by all applicable federal, state and local laws prohibiting discrimination.

Our Business Partners

We are committed to dealing with our business partners fairly while promoting fair competition. All of our business partners, while dealing with us, should act in accordance with standards and principles consistent with our Assurant Code of Ethics.

Our Shareholders

We are committed to providing long term value to our shareholders. This will be accomplished by observing the highest standards of business practices and ethical conduct in all of our business dealings.

We are distinguished by our leading positions in the specialty insurance business. Although each of our businesses is unique and diverse, they share three things in common: risk management expertise, strong distribution partnerships and complex administrative skills. Each of our businesses leverages these core capabilities to gain a competitive advantage in their selected markets.

Our Communities

We are committed to being responsible corporate citizens by taking an active leadership role in the communities where we do business. We encourage and promote employee volunteerism and corporate philanthropy. We act responsibly toward the environment. We minimize, reuse and recycle waste at our facilities wherever possible, and dispose of remaining waste responsibly. We strive to improve energy efficiency in all facilities.



Asking Questions and Raising Concerns

If you are unsure of the right course of action, do not guess. Remember – if you have any doubt, reach out to the available resources and ask before you act.

If you become aware of a possible violation of this Code or of any applicable law, regulation or policy, you must report it.

Ask Before Acting

What should I do when faced with a difficult ethical decision or a situation that might be improper?

If you become aware of a possible violation of our ethical standards, or if you are concerned that a course of conduct may be unethical, ask yourself the following questions:

- Might the action in question conflict with any of the standards to which Assurant holds its employees, officers and directors?
- Am I compromising my own ethics in any way?
- How would I or the company feel if the action were reported on the front page of the newspaper?
- Would Assurant lose customers, employees or shareholders – if they knew that some of our employees did this?
- Does the action conflict with our values and commitments to our customers?
- Will my actions have the appearance of impropriety?

If you answer “yes” to any of these questions, or if you are not certain of the answer, you should seek guidance BEFORE ACTING by reaching out to your local management or using the reporting tools and reaching out to the resources described under “Asking Questions or Reporting Concerns.”

Reporting Illegal or Unethical Behavior

What should I do if I see something or am asked to do something that may violate the law or Assurant’s ethical standards?

It is up to each of us to ensure that Assurant operates according to our ethical standards at all times. In addition to making sure that your own actions live up to our ethical and legal commitments, it is your responsibility to report any possible violation of the law or our ethical standards.



Compliance Resources and Reporting Tools

This Code is more than just a description of our standards. It is the centerpiece of a company-wide compliance and ethics program supported by the board of directors and senior leaders. The program is led by Assurant's Chief Compliance Officer, Doris Vigo, who is assisted by dedicated compliance resources at the corporate level and in each of our businesses. The compliance team and the Assurant Legal department are available to advise and assist you in dealing with laws, regulations, company policies and other compliance issues that affect your work.

Assurant promotes open communication throughout our company to resolve problems, complaints or concerns. We want you to come forward so we have provided several ways for you to ask questions or report concerns:

- First, talk to your manager or another supervisor in your business.
- Reach out to Human Resources or a member of the Legal department.
- Call the Compliance team.



Name	Title	Telephone
Doris Vigo	Compliance Officer	305.252.6903
Kim Swackhammer	VP, Compliance	305.253.2244 ext. 33199
Melonie Jones	VP, Compliance	770.763.2905
Julia Hix-Royer	VP, Compliance	305.252.7176
Andy Mills	VP, Compliance	+44(0) 789.460.7995

- Send a report using the web reporting system at: www.assurant.ethicspoint.com
You will be able to select the language of your choice and the translated report will be forwarded to Assurant within two business days.
- Call the compliance helpline at [888.427.2542](tel:888.427.2542).



Compliance Helpline Dialing Instructions:

1. Find your country and telephone provider in the chart below.
2. Dial the country-specific access code to reach AT&T.
3. When prompted, dial the toll-free number to connect to the Assurant Compliance Helpline.
4. A recorded message in your language will provide information to prepare you for the call, then an English-speaking interview specialist will come on the line, with an interpreter who speaks your language.



Country	Access Code	Toll Free Number
Argentina - Telecom	0-800-555-4288	800-913-4988
Argentina - Telefónica	0-800-222-1288	800-913-4988
Brazil	0-800-890-0288	800-913-4988
Brazil	0-800-888-8288	800-913-4988
Chile (Telmex)	800-225-288	800-913-4988
Chile (Isla de Pascua)	800-800-311	800-913-4988
Chile (Isla de Pascua, en español)	800-800-312	800-913-4988
Chile (ENTEL)	800-360-311	800-913-4988
Chile (ENTEL, en español)	800-360-312	800-913-4988
Chile (Telefónica)	800-800-288	800-913-4988
China - Telecom	10-811	800-913-4988
China - Unicom	108-888	800-913-4988
France		0800-91-0218
Germany	0-800-225-5288	800-913-4988
Italy	800-172-444	800-913-4988
Ireland	0-800-225-5288	800-913-4988
Ireland	1-800-550-000	800-913-4988
México (Spanish)	001-800-658-5454	800-913-4988
México	01-800 288-2872	800-913-4988
México	001-800-462-4240	800-913-4988
México (Por Cobrar)	01-800-112-2020	800-913-4988
Spain	900-99-0011	800-913-4988
UK - British Telecom	0-800-89-0011	800-913-4988



The compliance helpline and the web reporting system are staffed by an independent company and are available 24 hours a day, seven days a week. You can report anonymously if you prefer, where permitted by law although in some cases this may limit our ability to investigate your concerns.

If you want to contact the non-management members of the board of directors for any reason, including reporting a concern involving accounting, internal controls or an auditing matter, you may e-mail the Assurant board of directors at boardchair@assurant.com.

For employment-related concerns (including possible harassment and discrimination issues), follow the reporting procedures for your business, as outlined in [MyHR](#).

No Retaliation

Assurant takes all reports of misconduct seriously, and we will promptly and fairly investigate reports made through any of our reporting tools. If you wish to remain anonymous, you may do so by reporting your concern on the compliance helpline on a no-name basis.

Even if you identify yourself or report your concern by email, you need not fear retaliation. We will not tolerate any retaliation against anyone who makes a report in “good faith” (meaning that the person reporting has made a genuine effort to provide honest and accurate information even if the information later is proven to be mistaken). Keep in mind that making malicious or purposely false reports violates our Code.

Anyone engaging in retaliation is subject to disciplinary action including possible termination of employment. If you believe that you have been the subject of retaliation, please contact the Assurant Compliance team or use one of the reporting tools. Please see the Non-Retaliation Policy on the [Law enterprise site](#) for more information.

QUESTION

Suppose I am asked by a colleague or supervisor to do something I think is wrong. What should I do?

ANSWER

Assurant relies on you to bring your best ethical judgment to bear on the actions you take for us. Therefore, before doing something that you believe is wrong, reach out and ask about the right course of action. The first step may be to express your concerns to a supervisor or colleague, but you may also make use of the reporting tools and resources described in this section of the Code. Remember, we want you to ASK BEFORE ACTING if you have any concerns about the proper course of action.



Fellow Employees

Respect For Each Other

At Assurant, we are committed to maintaining a supportive work environment and to help employees thrive. Our policies reflect and reinforce our values, and help ensure that each one of us abides by all applicable federal, state and local laws prohibiting discrimination.

How does Assurant promote diversity?

At Assurant, we want to have a diverse workforce of capable employees. We make all employment and personnel decisions based on the basis of merit, competence and qualifications without regard to age, sex, color, race, religion, national origin, marital status, sexual orientation, gender expression, gender identity, pregnancy, veteran status, disability or any other category protected by all applicable federal, state and local laws prohibiting discrimination.

What measures does Assurant take to prevent harassment?

Assurant prohibits harassment of employees, in any form. Harassment is any form of inappropriate conduct toward another person that creates an intimidating, hostile or offensive work environment. Sexual harassment is a form of workplace harassment that involves unwelcome sexual advances, requests for sexual favors, unwelcome physical conduct, or other physical or verbal conduct of a sexual nature.

Harassment will not be tolerated at Assurant, regardless of whether it happens on company premises, at off-hours or at off-site business-related functions such as holiday parties or business travel. For further information on this subject, please see the Anti-Harassment Policy section of [MyHR](#).

What should I do if someone associated with the company has harassed me?

If you believe that you have been harassed, you should report the matter immediately to your manager or to your business's human resources department. You may also contact the head of human resources for Assurant in New York. Managers who receive these complaints must immediately report them to human resources. You can also use any of the reporting tools described in this Code.

In all cases, reports will be investigated promptly, in as confidential a manner as possible under the law. Retaliation against an employee for a harassment complaint made in good faith will not be tolerated.

LEARNING POINT

Teresa works with and occasionally entertains Assurant's clients. Recently, a client has started complimenting her appearance and making other unwanted advances. His comments make Teresa feel uncomfortable. What should she do?

- ☒ Teresa should report the client's behavior. Harassment from outside third parties is still harassment and should be brought to Assurant's attention.
- ☐ Teresa shouldn't mention the harassment to anyone. She may end up angering the client, which means less business for Assurant in the long run.
- ☐ Teresa should handle the issue on her own by confronting the client and threatening to end the business deal.

Correct! Teresa should report the situation to her supervisor or manager, Human resources or the Compliance team. She can also call the Compliance helpline, or report her concerns at www.assurant.ethicspoint.com. Harassment can include actions by both employees and non-employees that create a hostile, intimidating or uncomfortable work environment. Assurant takes all reports of harassment seriously and treats each report as discreetly and confidentially as possible.



QUESTION

I am uncomfortable with my boss' flirtations, but I do not want to say anything for fear of losing my job. What should I do?

ANSWER

You should speak to someone in your Human Resources department or reach out to the head of Human Resources. We will conduct investigations as confidentially as possible, consistent with the need to conduct a thorough inquiry. In addition, we never tolerate retaliation for a "good faith" report.

Health and Safety

Assurant is committed to maintaining the highest level of safety and security for our employees and visitors who conduct business within our offices. You can support this commitment by observing all health and safety rules and laws that apply to your job. It is your responsibility to promptly report accidents, injuries, or occupational illnesses and unsafe practices or conditions to your manager.

Further information and guidance on this subject, can be found in the Safety and Security Policy section of [MyHR](#).

Violence in the Workplace

Assurant does not tolerate acts of violence, threats, harassment, intimidation or other disruptive behavior. All threats (even in jest) are considered serious and may result in termination of employment. If you witness, are the subject of or have knowledge of threatening behavior, you should immediately report it to your manager or the Human Resources department.

Alcohol and Drug-free Work Environment

Assurant is committed to providing a safe and productive work environment for all its employees which is free from the influence of alcohol and illegal drugs. Assurant prohibits the use, possession, distribution, purchase, manufacture and sale of alcohol or illegal drugs on all premises owned or leased by it.

Responsibilities of Managers

Managers, by virtue of their positions of authority and responsibility, must be ethical role models for other employees. Managers must set an example and demonstrate what it means to act with ethics and integrity. An important part of a manager's responsibility is to exhibit the highest standards of integrity in all dealings with fellow employees, customers, suppliers and the community at large. An equally important responsibility is to obtain team members' commitment – and develop their ability – to make sound ethical judgments. Managers should look for opportunities to routinely communicate and discuss ethical conduct, difficult decisions or other challenging situations with team members. Create an open working environment that encourages team members to come to you, without fear of retaliation, with any questions or reports. When they approach you, make sure you respond promptly. If you are unsure of the answer to a question, refer the question to your human resources department, the compliance team or utilize any of our reporting tools.



Assurant and Its Resources

Conflicts of Interest

Assurant expects all employees, officers and directors to do their best to advance the company's interests and to use objective, unbiased standards when making decisions that affect our company. Business decisions should be made on the basis of quality, suitability, service, price, qualifications and other appropriate factors, without the influence of personal bias or conflicts of interest.

What is a conflict of interest?

You should recognize your responsibility to avoid any conflict between your personal interests and those of Assurant. A conflict of interest occurs when your personal interests interfere - or appear to interfere - with your ability to make sound business decisions on behalf of Assurant.

Here are some examples of the types of activities that may create conflicts of interest:

- Outside business interests or employment, including employment by a current or potential competitor while employed by Assurant
- Doing business with, hiring or supervising family members
- Taking personal advantage of corporate opportunities
- Accepting a gift, payment, or service from anyone seeking to do business with Assurant
- Placement of business with a firm owned or controlled by an Assurant employee or their family
- Having a close, personal relationship with a subordinate employee
- Ownership of, or substantial financial interest in a company that is or is reasonably likely to be an Assurant client, customer, supplier, competitor, or target for acquisition by Assurant

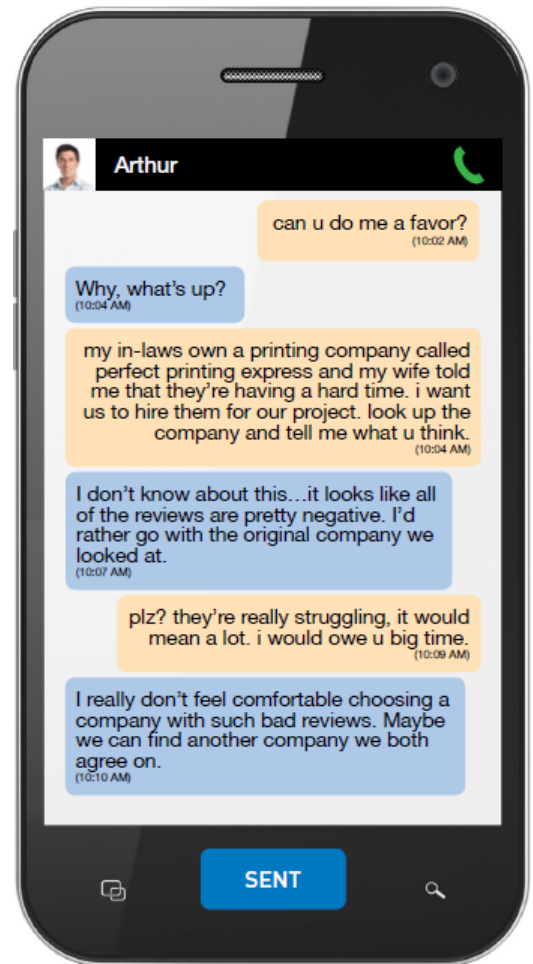
Outside business interests or employment

Sometimes, taking outside employment can create a potential conflict of interest. You may not take another job – full-time or part-time – that interferes with your ability to do your job at Assurant, conduct outside business activities during your Assurant working hours, or use company property, equipment, information or other assets for non-Assurant activities.

If you are thinking about taking an outside job or business interest that could create a conflict of interest, or serving on the board of directors of a company, you must first get your manager's approval and the approval of a Compliance team representative, or call the Compliance helpline. This rule does not apply to charitable civic, religious, educational, public, political or social organizations whose activities do not conflict with the interests of Assurant and do not interfere with your ability to do your job at Assurant. If there is any question as to whether a conflict of interest exists, you should discuss it with your manager and the compliance team.

Check This Out!

Read the text conversation and see Liam's response to his co-worker Arthur.



Correct!

Liam should express his concerns to Arthur and suggest alternative approaches. If he persists, Liam should consult with the Compliance team for guidance.



In her free time, Sharon is a member of a soccer team. She has been asked to print 500 flyers for an upcoming game. It would be easier for her to do this at work, since the office has all the supplies she needs. Is this permissible?

- ☒ No, she should not use company supplies for her personal needs.
- ☐ Yes—the soccer team isn't going to profit off of Assurant's supplies, so it's okay. There would only be a conflict of interest if Sharon was doing this for another company.
- ☐ No, 500 flyers is a gratuitous amount. Sharon should cut it down to 100 flyers instead. That way she's using a reasonable amount of supplies for personal use.

Correct! This is a conflict of interest because she would be using company assets—including supplies and her time at work—to benefit an outside organization.

Doing business with, hiring or supervising family members

A conflict of interest can occur if someone who is closely related to an Assurant employee – such as a spouse, parent, sibling, child, domestic partner, grandparent, or in-law – has a personal stake in a company that is a supplier, competitor, business partner, customer, or potential customer or supplier of Assurant. If you are involved in or become aware of such a situation, you must notify your manager. You may not attempt to influence Assurant's business relationships for someone who is closely related to you.

A conflict of interest can also arise under certain circumstances if a closely related person is seeking employment at Assurant or is already working here. You must not be involved in any decisions regarding the hiring of a person who is closely related to you. In addition, no one should be placed in a position of direct decision-making authority over a closely related person, such as the direct power to reward, supervise, appoint, remove or discipline the other. The key is disclosure. You should disclose any such relationships to your manager. Your manager will consult with Human Resources or the Legal department to decide the best course of action.

Remember – it is important to avoid even the appearance of a conflict. If any of these situations has occurred – or may arise – notify your manager immediately.

Taking personal advantage of corporate opportunities

In some cases, through your work and contacts at Assurant, you can become aware of business opportunities that our company may be interested in – such as purchases, investments, new markets, or the development of new products and services. You must notify the CEO or CFO of your business of this opportunity, and refrain from personally pursuing the matter until Assurant has had the chance to evaluate it. At no time can you use any company property, information or other assets for personal gain or to compete with Assurant.

Additional rules for directors, executive officers and other designated individuals

Assurant has additional rules that address loans to directors, executive officers and employees and any related-party transactions, which are certain business transactions between Assurant and designated individuals.

Reporting conflicts of interest

Each year, we ask all Assurant directors, officers or employees with purchasing authority to complete a conflict of interest questionnaire.

Whether or not you complete this questionnaire, you must promptly report any relationship, transaction or other situation that creates – or has the potential to create – a conflict of interest to your manager or to the Assurant compliance team using one of the compliance reporting tools.



Business Gifts and Entertainment

Business gifts and entertainment are designed to build good working relationships and goodwill in the marketplace. Under the right circumstances and within limits, these courtesies are an acceptable way to do business. We do not give or receive gifts that could improperly influence – or appear to improperly influence – a business decision.

General Principles and Requirements

In all matters related to gifts or entertainment, we at Assurant exercise good judgment. We understand that under no circumstance may we or our family members:

- Offer, solicit or accept bribes
- Accept or offer gifts, meals or entertainment, travel or lodging as an improper business inducement or in return for a particular action
- Accept or offer gifts, meals or entertainment, travel or lodging for the purpose of inappropriately influencing good business judgment, impartiality, the fiduciary duties or loyalty of those being entertained in any business dealing or transactions involving Assurant, or any employee of Assurant
- Accept or offer gifts, meals or entertainment, travel or lodging of any value if doing so would reasonably present - or appear to present - a conflict of interest in light of customary industry practices
- Offer or accept travel or lodging of any value unless such offer or acceptance is in accordance with this Code, as outlined below

To assist in upholding these principles, we adhere to the following requirements with regard to any of the gifts or entertainment described in this section of the Code. A business gift or entertainment can only be offered to – or accepted from – any non-Assurant employees, officers and directors if it is:

- Consistent with good business practices and local law
- Has a business purpose
- Is not an improper business inducement
- Would not embarrass Assurant if disclosed publicly
- Is not in poor taste or involving a venue that would reflect poorly on Assurant
- Does not recur frequently enough to suggest an improper motive
- Is reasonable in value and not extravagant or excessive in light of customary and appropriate business practices

You must also adhere to the following additional requirements for these categories of business gifts and entertainment:

Gifts

As employees, officers and directors of Assurant, we may not seek, accept or offer the following gifts:

- Cash or cash equivalents, (except gift certificates or gifts cards of a nominal amount)
- Any items with a value in excess of \$250 (or the equivalent in local currency) in the aggregate during a calendar year given by, or to, any individual.



Meals, entertainment, awards, promotional items or recognition provided to Assurant employees by Assurant are not considered gifts subject to these conflict of interest restrictions.

In rare instances when refusal, reimbursement or return of gifts would cause offense or embarrassment to the giver or would otherwise adversely affect the relationship between Assurant and the giver, we may accept items worth more than \$250 or the equivalent in local currency on behalf of Assurant, and we acknowledge that the gift becomes the property of Assurant. We must advise the giver in an appropriate manner that the items were accepted on behalf of Assurant, and we must report these gifts to the Compliance team within 30 days. There may be limited exceptions where Assurant may give gifts totaling more than \$250 during a calendar year to an individual, but these exceptions must be approved in advance by senior management and the chief compliance officer.



QUESTION

What types of gifts may I accept on behalf of Assurant?

ANSWER

In most cases, it is not the type of gift that matters—it is the value of the gift. An Assurant employee may not accept a gift worth more than \$250 without the approval of a member of senior management and the chief compliance officer. Exceptions to this rule should be approved only in rare circumstances.

QUESTION

Is it unethical to accept money, a vacation, or anything of value to improperly help a vendor secure a contract or other benefit from Assurant?

ANSWER

Yes. An employee who receives bribes or kickbacks will be immediately terminated and reported to the appropriate law enforcement authorities, as warranted. A kickback or bribe includes any item intended to improperly obtain favorable treatment. Under no circumstances should you offer or accept gifts during the bidding or contracting process, unless they are of nominal value.

Meals and Entertainment

As employees, officers and directors of Assurant, we may accept or offer meals and entertainment from business associates (i.e. non-Assurant employees, officers or directors) or prospective business associates as long as the business associates accompany us. We may accept meals or tickets to sporting events, the theater and other recreational events (e.g. golf outings), provided that the purpose is for us to discuss business matters with non-Assurant business associates, and provided that these events comply with the general principles and requirements described above.

Travel and Lodging

Any travel or lodging that is offered to or accepted from a third party must adhere to all of the general principles and requirements for business gifts and entertainment set forth in this Code.

In addition, it is a generally accepted practice within the industry to host, and attend, business conferences, special presentations or recreational events for the purpose of business discussions and brand-building. By their nature, such events may include the provision of lodging and/or transportation to attendees. If so, Assurant employees may offer or accept travel and lodging for these kinds of events provided that the travel and lodging are reasonable under the circumstances, meet all of the General Principles and Requirements and also provided that they submit details to the business segment chief executive officer and to the Assurant compliance officer in advance of the event for review and approval.

Government Officials

Gifts and entertainment may never be given or offered as a bribe or an incentive to improperly obtain business or referrals. In this regard, we do not make any payments or provide anything of value to government officials or employees to improperly obtain or retain business or improperly gain an advantage in the marketplace. Additional information about our policies and procedures for gifts and entertainment involving foreign government officials is in the section below titled “Anti-corruption Laws,” including the Foreign Corrupt Practices Act.



Charitable Contributions

Our company and the employees of Assurant play a strong role in support of the communities where we work and live. Charitable contributions must never be given as a condition of or in order to improperly influence a business decision, in return for a particular action or for the benefit of any one individual. If a request for a charitable contribution presents or appears to present a conflict of interest, it will not be made. Employees cannot make charitable contributions as a business expense at any time. All charitable donations must be coordinated through the Assurant Foundation to ensure proper due diligence and adherence to established standards and guidelines for contributions on behalf of Assurant.

Use of Assurant's Assets

Assurant's assets must be protected. These include tangible assets such as computers and intangible assets like confidential business information. The following guidelines will assist you in meeting this responsibility:

- Our assets are to be used only by authorized employees, officers and directors.
- You may not take or use the assets of Assurant or of any customer for your own private purposes, or for an improper or illegal purpose. These assets include proprietary and confidential information as these terms are defined in the following section titled, "Protecting Information About Assurant, Our Customers and Our Employees."
- You may not remove, destroy or dispose of anything belonging to Assurant without the consent of management.
- When your employment with Assurant ends, you must return all tangible and intangible assets – including electronic records, paper and electronic files, equipment, supplies, proprietary and confidential information, and other materials that belong to Assurant. You may take only your personal belongings.
- Assurant realizes that minor, incidental and infrequent personal use of company assets is sometimes inevitable. Personal use is not acceptable if it significantly depletes the value of a company asset, adds significant costs to the company, interferes with productivity of the employee or places the company at risk of liability. The use of Assurant's computers, the internet, and telephones for personal matters must be kept to a minimum.

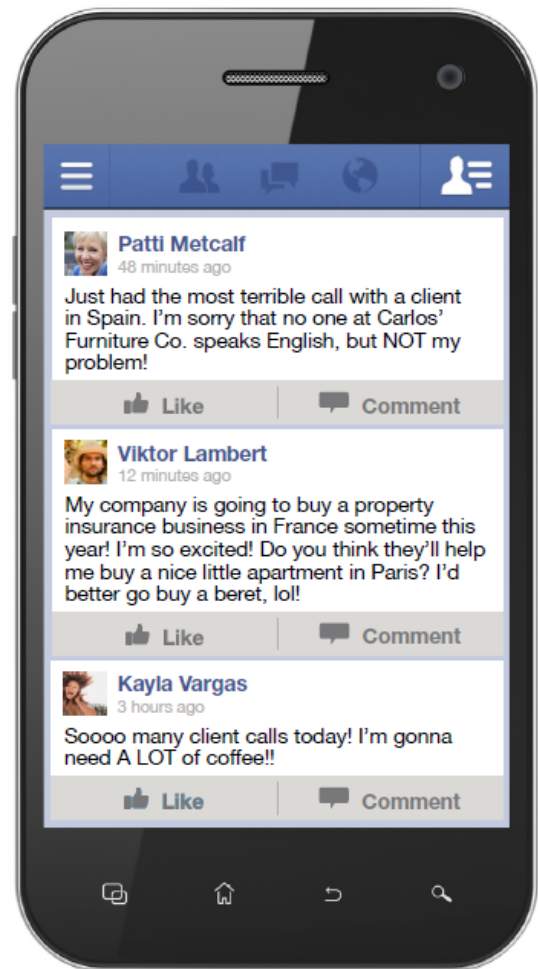


Social Media

At Assurant, we encourage communication among our employees, customers, business partners and others. When used appropriately, social media can help improve productivity and facilitate these discussions. The Assurant Social Media Policy, located in [MyHR](#), sets forth the requirements for employee participation in social media. It is particularly important to remember that all Assurant policies and procedures – including the Assurant Code of Ethics, Privacy Policies and Insider Trading Policy – apply to your interactions using social media.

Check This Out!


The social media post that is acceptable to share has the “Like” button clicked.



Correct!

It's okay to share general information about your workload or workplace challenges on social media, as long as you don't give out privileged information or put anyone down.





“Keep true, never be ashamed of doing
right, decide on what you think is right
and stick to it.”

- *George Eliot*

QUESTION

I spend considerable time each day surfing the web, planning my vacation, and sending personal emails. I still get all of my work done. Is this allowed?

ANSWER

No, this is not permitted since it involves the use of company assets—including your paid work time—for non-business purposes. Assurant does permit incidental or minor use of assets for personal reasons, but this goes well beyond that.

For further information on this subject, see the Use of Technology Resources policy in [MyHR](#).

Protecting Information About Assurant, Our Customers and Our Employees

Assurant employees, officers and directors must respect the confidentiality of all information concerning the company's finances, products, services, systems, business processes, employees, and customers.

In addition, Assurant employees must take particular care of all confidential financial, health and other information that our customers share with us. For further information, please refer to [MyHR](#) and the following policies: Assurant Employee Privacy Policy, Clean Desk Policy, and External Communication.

What information is considered confidential and proprietary?

Proprietary information is confidential information about Assurant's products, processes and services. It helps us to differentiate ourselves in the marketplace and to develop and retain a competitive edge. Proprietary information must not be disclosed to anyone outside the company without prior authorization from a senior Assurant official. Such information is for business purposes only and should never be used for personal gain. All proprietary information is confidential, but there is also other confidential information (such as customer information) that may not be proprietary to Assurant. In either case, all proprietary and confidential information must be kept strictly confidential and treated with great care.

Even within Assurant and in the course of your employment responsibilities, all employees, officers and directors must safeguard such information.

QUESTION

I'm attending a seminar and have been asked to make a presentation. In my talk, I am thinking about mentioning the possibility of a new vendor contract that has not yet been publicly announced. Is it ok to share this information?

ANSWER

No. Although sharing information and best practices with other organizations is important and encouraged under the right circumstances, we cannot share information about Assurant's business practices, sales and activities if that information is not public.

If you have any questions or doubts about what you may or may not communicate, either within the company or to outsiders, be sure to consult with the appropriate privacy officer, the Legal department, your manager, or your business's Communications department.

Privacy Officers



Name	Title	Telephone
Melonie Jones	Chief Privacy Officer	770.763.2905
Pamela Garay	International Privacy Officer	770.763.1320

For further information on this subject, see the [Assurant Information Security Policies](#).



What are the consequences of the improper disclosure of proprietary or confidential information? Unauthorized disclosure or misuse of confidential or proprietary information can severely damage our business. Your obligation to protect this information continues even when your employment with Assurant ends. You must never share confidential or proprietary information with any third party without the express permission of Assurant.

Insider Trading

Insider trading is the purchase or sale of a company's securities by someone who has important information that is not available to the public. Insider trading can occur if individuals with such information use it themselves or if they pass it along to others – such as family members or friends – who then purchase or sell the company's securities.

All Assurant employees, officers and directors must be aware of and comply with the rules against insider trading. Here is how these rules apply to you and your work at Assurant:

The laws against insider trading deal with “material” information that is not available to people outside Assurant. Information is “material” if it would influence someone to buy, sell or hold stock in the company to which the information relates. Any information that could reasonably be expected to cause a company's stock price to move up or down is material.

In general, it is illegal for any person with material, non-public information about a company to buy or sell securities (such as shares or stock options) of that company. You may not:

- Buy or sell Assurant stock (or stock options or bonds) if you have material, non-public information
- Provide material non-public information to anyone outside the company who might use it to decide to buy or sell Assurant stock, stock options or bonds
- Disclose material, non-public information to family members or friends

These rules apply to each of us at Assurant – not just executives, managers and directors – and can even apply to the purchase or sale of company stock in your 401(k) plan and the Employee Stock Purchase Plan.

QUESTION

Because of my job responsibilities, I have some information regarding Assurant's financial performance for the quarter. I've been thinking about changing my investment allocation in my retirement fund. This fund includes stock in Assurant, and making the change would mean purchasing more Assurant stock. Do I need pre-approval to make this change?

ANSWER

Yes. If you have material, non-public information about Assurant, U.S. securities laws prohibit you from buying or selling Assurant securities and from making certain elections and transactions under our plans. Directors, executive officers and non-executive officers are also subject to additional restrictions on their ability to engage in transactions in Assurant securities. If you are in this situation, you should consult the **Assurant w** or contact Jessica Olich of the Assurant Legal department.



Assurant's Insider Trading Policy provides you with additional guidance including:

- Examples of material information
- The blackout periods and other rules that apply to designated persons called "covered persons"
- The rules that apply to your trading in Assurant stock in a company plan

The [Insider Trading Policy](#) can be found on the [Law enterprise site](#) and on your business' intranet site. Before engaging in any trading, please refer to the policy for additional instructions and details about the rules against insider trading.

LEARNING POINT

Tyrone learned that Assurant may be acquiring another company. This information is not available to the public. He wants to recommend to his sister that she purchase stock in the other company in advance of the acquisition. Is this allowed?

- ☐ Yes, as long as it's another company's stock and not Assurant's, it's fine.
- ☐ Yes, as long as the information will be available to the public soon, it won't pose a problem.
- ☒ No, it would be illegal for Tyrone to give out this information.

Correct! This would involve illegal "tipping," or passing material non-public information to another person, even if the information is not about Assurant.

Accurate Books, Records and Public Disclosures

We make business decisions each day based on information recorded by our employees at every level of the organization. Our recorded information is used to advise investors about our financial results, to make required legal filings and support new products and services. Incomplete or inaccurate information can lead to poor decisions and to serious problems for Assurant and the individuals involved. For example, improper recording or reporting of revenues and expenses can lead to misrepresentation of our business and finances, which can be illegal.

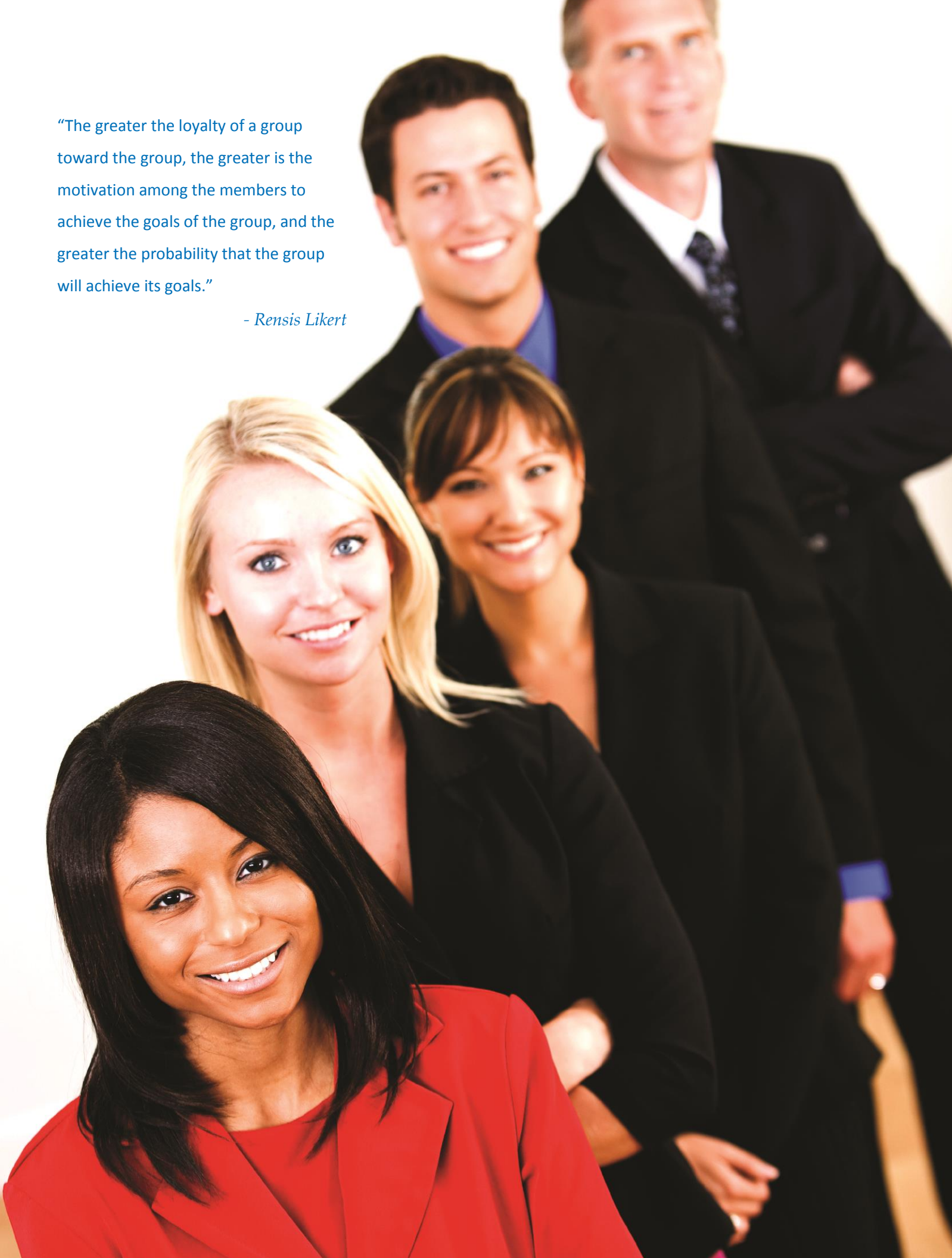
Every one of us, regardless of our position at Assurant, must make sure the information we report and record about our work here is accurate and complete. This includes information we submit on expense reports, sales data, production data, contracts, monthly and quarterly reports and other corporate records. These rules apply no matter where we work, anywhere around the world, and in every unit of the company.

If you have questions or concerns about any aspect of our business records, financial reports or public disclosures, you should discuss them with your manager, our finance and accounting personnel, the legal department or the compliance team. If you have reason to believe that information is being deliberately misreported or concealed, you should call the Compliance helpline, talk to one of our compliance or legal department personnel, or email the Assurant board of directors at boardchair@assurant.com.



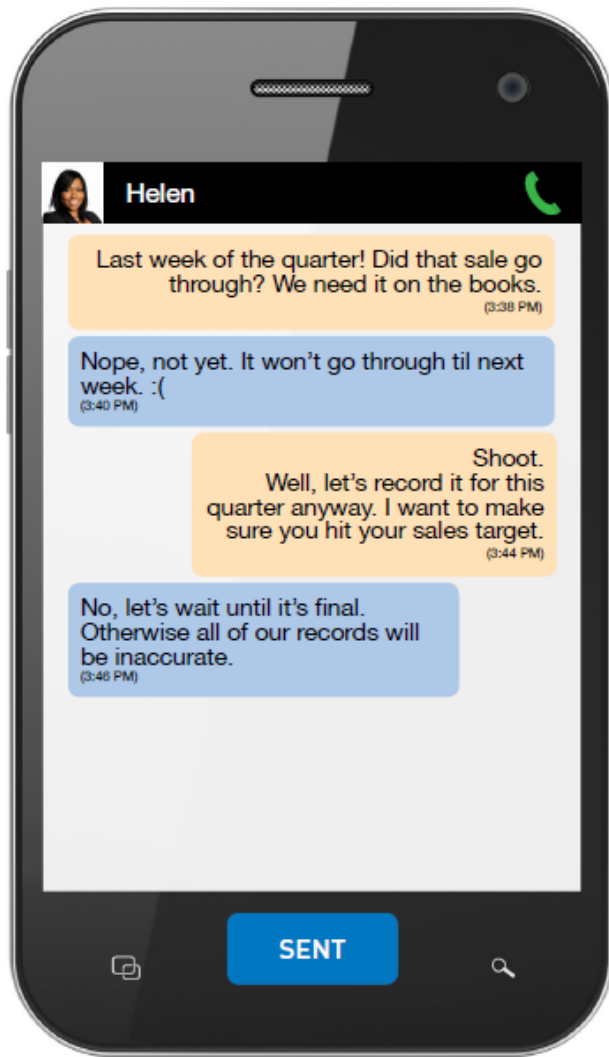
“The greater the loyalty of a group toward the group, the greater is the motivation among the members to achieve the goals of the group, and the greater the probability that the group will achieve its goals.”

- Rensis Likert



Check This Out!

Read the text conversation and see Naomi's response to her manager, Helen.



Correct!

Costs and revenues, including new sales, must be recorded in the period in which they are incurred or earned. This sale is not earned until it is finalized and may not be recorded until then.

Records and Information Management

Assurant is responsible for ensuring that its business records, in any medium, including hard copy and electronic records, are created, managed, and disposed of properly. An effective, efficient records and information management program allows Assurant to meet its business needs as well as comply with all legal and regulatory obligations. Assurant employees must familiarize themselves with and abide by the Assurant Records and Information management policy and its procedures. For further information on this subject, see [the Assurant Records and Information Management policy on the Law enterprise site](#).

Political Activity

Assurant encourages employees to be involved in civic affairs and the political process. This includes making personal contributions to civic organizations, political candidates and political parties.

However, employees are prohibited from contributing Assurant's funds, property, services or employee time to any political party, committee or candidate – for any office at any level of government – without prior approval by the chief compliance officer. Prohibitions include:

- Use of company email or mailing lists to promote a candidate
- Use of company time to work or volunteer for a candidate
- Pressuring any colleague, supplier, customer, vendor or partner to make any political contribution or support any candidates
- Asking subordinates to purchase tickets to political fund-raisers or otherwise contribute to candidates or campaigns

Political activity is highly regulated. If you have any question about what is or is not permitted, please consult with a member of the Compliance team before agreeing to do anything that could be viewed as involving Assurant in any political activity at the federal, state or local government level.



The Marketplace

Ethical Business Practices

At Assurant, our mission is to “be the premier provider of targeted specialized insurance products and related services” in the markets in which we operate.

Behaving ethically is not only the right thing to do, it is fundamental for business success and essential for us to achieve our mission. Our reputation depends on the honest and ethical behavior of each of us in every transaction and business dealing, every day.

Here are some guidelines to apply this in practice:

- You should never do anything that would undermine the trust our customers have in us.
- You should never deceive, defraud or misrepresent the company or its products and services.
- You should never mislead, manipulate or take unfair advantage of a customer, member, provider or supplier, or help anyone else do any of these things.
- You should never misrepresent facts, contractual terms or company policies to a customer, member, provider, supplier or regulator. If you do so, even inadvertently, you must correct the misrepresentation as soon as possible after consulting your manager and the Legal department.
- You should not violate any law or regulations, including unfair trade or insurance practice laws.

Business and Trade Practices

Assurant conducts business in a highly regulated environment. Each business unit plays a role in assuring that we meet our legal and regulatory obligations as well as the commitments we make to our customers. You must make yourself aware of and abide by the rules that apply to your job responsibilities.

Business Agreements

Assurant prohibits employees from entering into any oral agreement or oral contract for a transaction or business relationship involving the exchange of money for goods or services between Assurant or any of its businesses and a third party. Additionally, any business agreement with an agent, broker, representative, consultant or contractor must be in writing and must clearly state the services to be performed, the basis for earning the commission or fee, and the rate or fee.

Training

We have a responsibility to act honestly, with integrity and according to the highest legal and ethical standards at all times. Assurant has developed training programs in many subject areas to provide employees with information to ensure an appropriate understanding of the requirements related to this Code and Assurant policies. Assurant expects all directors, officers and employees to complete training programs as assigned.

QUESTION

A reinsurer has suggested that we have a “handshake agreement” under which reinsurance capacity will continue to be available to us as long as the reinsurer’s experience on our account has been profitable. Is this ok?

ANSWER

No. All agreements must be in writing. This does not preclude authorized officers, employees or agents from making oral agreements in the normal course of negotiations—as long as such agreements are promptly followed by preparation and execution of appropriate documentation.



“Moral principle is the
foundation of law.”



Doing Business with the Government

If you work in a business unit contracting with the U.S. or any state government or agency, you must comply with the applicable statutory, regulatory and program requirements related to the contract.

All Assurant employees working on government contracts have a responsibility to report any known or suspected violations of applicable statutory, regulatory or program requirements. There are strict rules about what may be offered to government employees, especially if the government employee is a contract officer for a contract we have or are seeking. In that case very little, if anything, can be offered to the person. In some cases, you may not even be able to offer beverages or food during a meeting.

If you are unsure of the requirements related to a government contract, ask your manager.

Sales and Marketing

One of Assurant's ethical standards is to provide outstanding customer service. We must treat customers with honesty, integrity, fairness and respect at all times. We must not create misleading impressions, omit important facts or make false claims about our competitor's offerings. Assurant is committed to complying with all "truth in advertising" laws.

Antitrust and Competition

We compete fairly, in accordance with our values, and in compliance with all applicable antitrust and competition laws in every jurisdiction in which we operate. These laws are very complex. They are intended to provide customers with a variety of products at competitive prices unrestricted by artificial constraints such as price fixing, illegal cartels, boycotts, and tie-ins. Violations of these laws can result in significant penalties for Assurant and the individuals involved, as well as loss of reputation and standing in the marketplace.

We have developed a comprehensive [Antitrust Policy](#) for all of our businesses, to help you ensure that the conduct of our organization is in full compliance with these laws at all times. You can find this policy on the [Law enterprise site](#).

The Antitrust Policy is a general guide to compliance with the antitrust and competition laws. The legal department should always be consulted before you engage in any business practice that could have antitrust implications. In general, these laws prohibit monopolies, price-fixing, bid-rigging and other practices that limit trade and fair competition.

It is illegal under these laws to enter into any agreement with a competitor that unreasonably restricts competition. Illegal agreements do not have to be formal or written; they can be as simple as an oral understanding among the parties.

Trade associations and other circumstances in which you come into contact with representatives of our competitors can pose particular concerns under the antitrust and competition laws. During such activities, including all informal and social activities, it is important that you refrain from discussing or exchanging any information with competitors regarding prices, discounts, products and services, markets, margins, terms of coverage, customers, providers, reimbursement levels and methodologies, or any similar information. Even casual remarks can raise significant concerns.

If you perceive that a possible antitrust violation is occurring – or is about to occur – you should immediately leave the meeting. All actual or potential violations must be immediately reported to the legal department.



QUESTION

At a trade association meeting, I met with employees of competing companies for drinks after dinner. The conversation turned to the prices Assurant charges certain customers in some of our markets. This did not seem right to me, but I was not sure what to do. I remained there, but I did not say anything. Did I do the right thing?

ANSWER

No—employees must make clear to others that they cannot and will not participate in or even be present for conversation about prices, products, markets or similar issues. If such talks continue, you must leave. You should then report the matter to the Legal department as soon as possible.

Anti-corruption Laws

Assurant is committed to conducting its business in compliance with all applicable anti-corruption and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act. Assurant's anti-corruption policy sets forth our commitment against corruption and helps ensure that all Assurant directors, officers and employees understand their individual responsibility for compliance.

The basic tenets of Assurant's anti-corruption policy are:

- Assurant does not pay bribes to government officials, private company executives or to anyone to obtain or maintain business, induce or reward improper performance or to gain an unfair advantage. (Government officials are defined as country, province or local government officials, including regulators or business, tax, customs or other government authorities, political parties, party officials and candidates for political office. Government officials also include employees of government-controlled or affiliated entities.)
- Assurant does not pay bribes directly or indirectly through brokers, agents, consultants or other associated persons or third parties. We exercise care and due diligence in selecting these third parties.
- Assurant carefully manages expenditures for meals, entertainment, gifts and travel to ensure compliance with our anti-corruption policy.
- Assurant maintains detailed and accurate books and records and internal controls; Assurant does not conceal bribes or other improper payments by "off books" arrangements or by falsifying its books and records.

The prohibition against paying bribes includes offers to pay bribes. Our policy specifically prohibits "facilitating payments" (improper payments made to expedite or secure performance of a routine governmental action) to government officials.

All Assurant directors, officers and employees are charged with the responsibility of knowing what their brokers, agents, consultants and other third party representatives are doing and ensuring that such entities are not paying bribes on Assurant's behalf. Willful ignorance is no excuse and all Assurant directors, officers and employees are expected to follow both the spirit and letter of Assurant's anticorruption policy.



Assurant's anti-corruption policy can be found on the [Law enterprise site](#). Employees involved in the conduct and supervision of our overseas business activities must familiarize themselves with our [Anti-Corruption Policy](#), and direct any questions or concerns to Andy Mills, VP, Compliance, at +44(0) 789.460.7995.

LEARNING POINT

Jennifer is trying to establish a business relationship with a state-owned bank in a country with a high risk of corruption. Sergei, a local consultant, tells Jennifer that he has a special relationship with the bank. Although Sergei does not seem to be qualified to provide the services he's promising, he says that he could get a deal done quickly. Sergei says that he would insist upon conducting all negotiations alone, without Jennifer's involvement. In exchange for his unique skills, he asks for a commission much higher than other consultants'. What should Jennifer do?

- ☐ Jennifer should let Sergei handle the deal and provide him with the commission he requires to get the job done.
- ☒ Jennifer should not agree to anything and should speak with the Compliance team instead.
- ☐ Jennifer should agree to let Sergei handle the deal, but should try to get him to lower the price of his commission since other consultants ask for less. If she pays him more than other consultants require, it could be seen as a bribe.

Correct! Intermediaries pose risks to Assurant. Our anti-corruption policy includes a thorough process for performing background due diligence investigations on intermediaries before they are allowed to act on our behalf. Given the country's reputation for corruption and the numerous "red flags" in this situation, Jennifer should bring this matter to the attention of Compliance immediately.

Intellectual Property of Third-Parties

It is Assurant's policy not to infringe upon the intellectual property rights of others. Whether preparing advertising or promotional materials using the name or printed materials of another company, or operating a software program on an Assurant personal computer, you must ensure that the trademarks, copyrighted materials and other intellectual property of others are used properly and only with permission, and you can only copy documents and materials with permission or when those materials are not copyrighted. If you need guidance in this area, please contact the legal department.

Anti-money Laundering Compliance

Assurant complies with all applicable laws and regulations to detect and deter money laundering activities. Potentially severe civil and criminal penalties exist for violations of anti-money laundering laws. Be sure to report all suspicious transactions discreetly to your management and the anti-money laundering office or to the Assurant anti-money laundering compliance officer, Kim Swackhammer.

QUESTION

I work overseas and have become friendly with some foreign government officials. I want to give one official a watch to thank him for being so hospitable. He has never promised to do anything in return. Can I offer him this gift?

ANSWER

You must follow the reporting and approval procedure for providing gifts to foreign government officials **BEFORE** making this gift. This will assure that we remain in compliance with the FCPA and any relevant local laws. This procedure can be found in the anti-corruption policy on the [Law enterprise site](#).



Audits and Investigations

From time to time, Assurant will be subject to audits, investigations and examinations by regulators. Also, audits are routinely conducted by Internal Audit Services (IAS) and by our external auditors, and internal investigations can be conducted by the Legal, Compliance, IAS, or the Human Resources department. You must cooperate fully and honestly with these inquiries, and you may not do anything to mislead or improperly influence the review. If you receive a request for information or notice of an investigation from a government agency, you must immediately notify the Legal department.

Waivers of the Code

Waivers or exceptions to the Code will be granted only under exceptional circumstances. All waivers or exceptions require prior, written approval by your manager and the chief compliance officer.

Only the Assurant board of directors may grant waivers of compliance with the Code to the CEO, CFO, principal accounting officer, controller or persons performing similar functions. Any such waivers that are granted will be disclosed promptly and in accordance with all applicable laws and regulations, including those of the Securities and Exchange Commission and the New York Stock Exchange.

Supplemental Standards for Chief Executive Officers and other Senior Financial Officers of Assurant.

In addition to complying with all policies included in the Assurant Code of Ethics, the chief executive officer, principal financial officer and controller or principal accounting officer, or persons performing similar functions (the “Financial Officers”) of Assurant, Inc., Union Security Life Insurance Company of New York and Union Security Insurance Company must comply with the following supplemental ethical standards:

Integrity and Accuracy of Public Disclosures

The financial officers shall take all reasonable steps to provide full, fair, accurate, timely and understandable disclosures in the reports and documents that Assurant, Inc., Union Security Life Insurance Company of New York and Union Security Insurance Company file with or submit to the Securities and Exchange Commission and in other public communications made by these businesses. In the event that a financial officer learns that any such report, document or communication does not meet this standard and the deviation is material, then such officer shall review and investigate such deviation, advise the board of directors of Assurant, Inc. or the audit committee of the board of directors regarding the deviation and, where necessary, revise the relevant report, document or communication.



Our Personal Commitment

Once a year, we will ask each Assurant employee, officer and director to record an individual commitment to compliance with this Code. You will be asked to certify your understanding of and compliance with the Code.

As you work on behalf of Assurant throughout the year, we urge you to discuss any questions and concerns before you take an action that may be inconsistent with our values, ethical standards, this Code, and other Assurant policies and procedures. You are always free to discuss our values and ethical standards with management at all levels of the organization, and to contact the Compliance team at any time.

Your actions make a difference – it is due to the honesty and integrity of our employees that give Assurant its excellent reputation for having the highest ethical standards and business practices. We thank each of you for living the Assurant values and continuing our commitment to excellence.

A Final Thought

Our reputation starts with you. Strong company performance has its roots in the ethical behavior of every member of the Assurant community; it is up to each and every one of us to ensure that Assurant operates according to our ethical standards at all times. If you ever have any doubt about what the right decision is or are concerned that a possible violation is occurring, immediately ask for help. Asking for help is a leadership strength.

If you ever feel pressured to act in a way that conflicts with the Code, talk with your manager, Human Resources, the Compliance team, or report your concern through any of our reporting tools. You need not fear retaliation. We will not tolerate any retaliation against anyone who makes a report in good faith.

Thank you for your personal commitment to maintain and build our reputation.



"Motivation is what gets you started.
Habit is what keeps you going."

- Jim Rohn





ASSURANT®

Assurant
One Chase Manhattan Plaza
New York, NY 10005

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