

# Vendor Code of Conduct

## ABOUT CNO FINANCIAL GROUP

CNO Financial Group, Inc. (NYSE: CNO) secures the future of middle-income America. CNO provides life and health insurance, annuities, financial services and workforce benefits solutions through our family of brands, including Bankers Life, Colonial Penn, Optavise and Washington National. To learn more, visit [CNOinc.com](https://www.cnoinc.com).

## OUR VALUES

- **Diversity, Equity and Inclusion.** We embrace diversity, actively pursue equity and foster an inclusive environment.
- **Integrity.** We're honest and ethical, operating within the letter and spirit of the law.
- **Customer Focus.** We care deeply about our customers' financial well-being. We work together to meet their needs and deliver on our promises.
- **Excellence.** We strive for excellence in our products, services and business processes. We are passionate about winning in the marketplace.
- **Teamwork.** We work—and win—as a team, exemplifying commitment, participation and collaboration.

## USING OUR VENDOR CODE OF CONDUCT

CNO is committed to conducting business in a legal, ethical and responsible manner and requires that our approved vendors meet the same high level of standards. This Vendor Code of Conduct sets forth the expectations of CNO Financial Group and our affiliates (CNO) for all third parties providing business goods, services, functions or activities for CNO ("Vendors").

The obligations set forth in this Code of Conduct are in addition to any obligations set forth in agreements between CNO and the Vendor. Where the Code of Conduct may conflict with the terms of a Vendor contract, the contract terms prevail.

## **APPLICABILITY**

This Code of Conduct applies globally to the engagement and execution of activities with all Vendors providing goods or services to CNO. This Code of Conduct sets forth the principles, guidelines and expectations for our Vendors in conducting business responsibly, with integrity, and in compliance with the laws and regulations of the countries in which they operate and provide products or services to CNO. Vendors are directed to comply with the principles set forth in this Code of Conduct. Further, Vendors are responsible for ensuring that their own Vendors involved in providing goods or services to CNO adhere to this same Code of Conduct.

CNO requires its Vendors to extend principles of fair and honest dealing to all others with whom they do business, including employees, Vendors and other third parties. CNO reserves the right to conduct a supply chain audit to evaluate a Vendor's business practices.

## **LEGAL COMPLIANCE**

All business activities of a Vendor shall comply with all applicable laws, rules and regulations at the local, state, federal, national and international levels, including laws relating to employment standards, workplace environment and business integrity, as well as environmental and social responsibility.

## **BUSINESS INTEGRITY AND ETHICS**

CNO's reputation depends on maintaining the highest standards of conduct in all our business endeavors, including the Vendors we engage. CNO expects Vendors to engage in fair and ethical business practices and refrain from all forms of illegal or improper activity. Vendors should disclose any potential conflicts of interest prior to initiating their relationship with CNO, or as soon as a Vendor becomes aware of a potential conflict. Vendors should not engage in any activities that would jeopardize their ability to provide products and services to CNO in a fair and objective manner.

Our policies prohibit CNO associates from accepting meal purchases, travel reimbursement or entertainment gifts or reimbursements from any third party, including any current or prospective vendors of the Company, without prior review and approval.

## **BUSINESS AND FINANCIAL RECORDS**

CNO must maintain strict compliance with all laws and regulations governing disclosure, financial reporting and records. CNO expects Vendors to exercise responsible use of any financial records to which they have access. Vendors must have appropriate internal controls to assure compliance with applicable laws, regulations, internal policies and the Code of Conduct. This includes, but is not limited to, the proper, complete and accurate recording of all expenses and payments being charged to or received from CNO entities.

## **DATA PRIVACY AND SECURITY**

Vendors must maintain and enforce strong privacy policies and data security controls and comply with all applicable data protection laws and regulations, as well as contractual obligations to CNO. Vendors must take special precautions when storing, processing or transmitting confidential or proprietary information of CNO, including information pertaining to any customer or employee of CNO.

## **EMPLOYMENT STANDARDS**

CNO is committed to recognizing and upholding the human rights of all workers involved in providing goods or services to CNO. Treating others with honor, dignity and respect is integral to the way CNO conducts its own business, and CNO extends this principle to its Vendors and all their employees and business partners.

### **Non-Discrimination**

CNO maintains a culture that is fair and inclusive, with a wide range of unique backgrounds, perspectives, talents and experiences. We expect our Vendors to conduct their business in accordance with acceptable and ethical worker treatment, which includes not engaging in any form of harassment, physical or mental punishment, or other forms of abuse. Employment decisions should be based on merit. Vendors should not discriminate based on race, color, religion, gender, gender identification, sexual orientation, marital status, citizenship status, ancestry or national origin, age, disability, military or veteran status or other occupationally irrelevant characteristics protected under federal, state or local law.

### **Voluntary Labor**

CNO does not condone or use any form of slavery, forced, bonded, indentured, prison or other involuntary labor, and CNO expects its Vendors to uphold the same standards. Vendors shall not require workers to surrender government-issued identification or work permits as a condition of employment. Vendors shall not engage in or support human trafficking or exploitation and shall not use goods tainted by such.

### **Child Labor**

Vendors shall ensure their employees (and all employees of their business partners) are of a legal age to work in the applicable jurisdiction prior to employment. Further, workers under the age of 18 should not perform any type of work likely to jeopardize their health or safety, and Vendors shall comply, and shall ensure their business partners comply, with all child labor laws applicable to their workforce.

### **Freedom of Association**

Vendors shall respect the rights of workers to associate freely with any group, to join or not join labor unions, and to communicate openly with management regarding working conditions and management practices.

### **Compensation and Working Hours**

Vendors must comply with all applicable wage laws, including those related to minimum wages, premium pay for overtime hours and non-discrimination in pay.

### **Harassment**

Vendors should treat employees fairly and create a workplace culture where employees feel comfortable and safe. Inhumane treatment is prohibited, including any form of physical, sexual, psychological or verbal harassment or abuse. This includes the threat of any such treatment.

### **Workplace Health and Safety**

Vendors must provide a clean and safe workplace for employees. This includes implementing appropriate controls to prevent accidents and injury, and to minimize exposure to health risks. Vendors must have systems to prevent, detect and respond to situations threatening the security and safety of all employees. Vendors must provide workers with training on emergency planning and safe work practices.

## SUSTAINABILITY AND ENVIRONMENTAL STEWARDSHIP

CNO expects Vendors to steward and protect the environment through such practices as sustainable agriculture, waste management, recycling and reduction of energy use, greenhouse gas emissions, carbon emissions and water use. Vendors must obtain and observe all required environmental permits and approvals. Vendors must also ensure that potential impacts to community health, safety and security, such as accidents, spills, impacts on natural resources, exposure to pollution or other community issues that may arise from business operations, are appropriately mitigated and managed.

## ENFORCEMENT

CNO may take appropriate actions against any Vendor that violates, or is suspected of violating, the Code of Conduct, including the termination of business relationships with the Vendor if necessary, at CNO's sole discretion. Vendors that violate the requirements of this Code of Conduct are required to inform us immediately or as soon as is practicable and remedy any such violation in a timely and sensitive manner. Failure to do so may lead to review or termination of the relationship. The failure or omission by CNO to enforce any of the provisions of this Code of Conduct at any time shall not constitute a waiver of CNO's contractual rights.

## HOW TO REPORT A CONCERN

We rely on our Vendors to report issues or concerns related to unethical or illegal conduct, including but not limited to employment practices, work environment concerns, fraud, financial or accounting practices, and violations of policies. Vendors should report known or suspected violations of this Code of Conduct or applicable law to the Ethics Hotline below. Questions regarding this Code of Conduct should also be brought to the Ethics Hotline.

Ethics Hotline for reporting ethical concerns, misconduct, violations of laws, regulations or company policy or abuse of CNO's resources:

- (855) TELL-CNO
- [TellCNO@GetInTouch.com](mailto:TellCNO@GetInTouch.com)