



## Supplier Code of Business Conduct and Ethics

Everlake is committed to conducting business in an honest and ethical manner and with the highest standards of integrity and accountability wherever we operate.

Everlake expects all contractors, consultants, suppliers, and vendors (Suppliers) doing business with Everlake US Holdings Company, its subsidiaries, and affiliates to conduct themselves with this same level of honesty and integrity in the provision of all goods, services, and business activities undertaken for Everlake. This document outlines Everlake's expectations for all Suppliers doing business with us.



### Our Core Values

Integrity, honesty, and sound judgement are fundamental to the reputation and success of Everlake. How we conduct our business is just as important as what we do. Our Values guide us in having our customers trust us when it matters most.

#### **Customer Focus**

Servicing excellence is always a priority.

#### **Professionalism & Integrity**

We will interact professionally and collegially with everyone – policyholders, investors, third parties, and each other.

#### **Entrepreneurial**

We will challenge how we do things, embrace change, seek creative solutions, and leverage automation and technology to create a resilient organization.

#### **Collaboration**

Teamwork is how we will be successful.

#### **People**

We will invest in people as our greatest asset and value diversity in people and thought.

#### **Ownership Mindset**

As we make decisions, we will act like owners with a view towards long-term success and sustainability.

At Everlake, we are committed to operating with absolute integrity in every aspect of our dealings with our employees, the business community, customers, Suppliers, and government authorities. That's why we deal only with Suppliers who follow the Code of Ethics and adhere to the following expectations:

#### ✓ **Compliance**

Everlake is committed to compliance with all laws and regulations, and we require the same of our Suppliers.

#### ✓ **Reciprocity**

Everlake believes in providing any Supplier with a fair opportunity to conduct business with us. We do not require or expect any Supplier to purchase or lease Everlake products or services to compete for our business.

#### ✓ **Conflicts of Interest**

Everlake employees agree not to be influenced by what best serves their personal interests over those of Everlake. Therefore, Suppliers may not offer any Everlake employee anything that may create the risk or perception of undue influence or call Everlake's objectivity into question.

#### ✓ **Personal Relationships**

Everlake's decision-making and actions will not be influenced by close personal or family relationships. Close personal relationships with Everlake employees should be disclosed and will not be a basis of consideration in the competition for business.

#### ✓ **Gifts and Gratuities**

Everlake encourages good supplier relations. However, Suppliers must not offer or accept any gift to obtain improper advantages or influence for the Supplier or Everlake. Gifts include any entertainment, benefit, favor, or service

#### ✓ **Illegal / Improper Payments**

Everlake is committed to conducting business with unquestioned integrity and in full compliance with the law. Bribes, kickbacks, and other similar payments are strictly prohibited.

✓ **Economic & Trade Sanctions**

Many countries, including the United States, have economic and trade sanctions programs which restrict or prohibit dealings with certain countries, individuals, or businesses. The U.S. Office of Foreign Assets Control (OFAC), which is part of the U.S. Treasury Department, administers and enforces economic and trade sanctions programs. Everlake’s operations, as well as Everlake’s Suppliers, must comply with applicable U.S. sanctions and the economic and trade sanctions in the countries in which they operate.

✓ **Discrimination**

Everlake supports diversity and equal opportunity in employment. We expect our Suppliers to uphold the same commitment by complying with all applicable laws, rules, and regulations concerning discrimination.

✓ **Harassment and Abuse**

Everlake’s commitment to a workplace free from harassment and abuse applies to all people, regardless of whether they are Everlake employees. Unwanted or unwelcome verbal, visual, written, physical or sexual behavior that creates an offensive, hostile, or intimidating work environment is not tolerated. We expect our Suppliers to provide a similar work environment.

✓ **Health and Safety**

Everlake is committed to a safe and healthy work environment. We expect our Suppliers to comply with all applicable safety and health laws and regulations and Everlake’s internal guidelines. To ensure that a safe environment is maintained, Suppliers are prohibited from:

- Possessing, consuming, or acting under the influence of unauthorized intoxicants or any controlled substance not prescribed by a licensed physician while conducting Everlake business or while on Everlake property.
- Bringing firearms or other weapons onto Everlake premises, except as permitted under applicable laws or regulations.
- Assigning Everlake work to any personnel whom a Supplier knows, or should have reasonably known, to have been convicted of a felony involving dishonesty or breach of trust.
- Bringing any personnel onto Everlake premises whom a Supplier knows, or should have reasonably known, may pose a significant risk to the health or safety of others.

✓ **Environmental Stewardship**

Everlake is committed to operating responsibly to support solutions that improve sustainability and protect our natural environment. We expect Suppliers to conduct their operations in a similar manner.

✓ **Data Privacy & Security**

Everlake is strongly committed to protecting confidential Information, whether generated within Everlake or obtained from some other source. Suppliers are required to uphold the same level of relevant information security controls as required by Everlake. This includes a requirement for the Supplier to comply with all applicable data privacy and security laws and regulations and the Security Standards for Everlake Vendors (Information Security Requirements [IRS] or comparable regulatory standards. Suppliers must maintain appropriate procedures, safeguards, and controls to secure and protect the confidentiality, integrity, and availability of confidential information, including personal information, received from, processed on behalf of or disclosed by Everlake. Suppliers must promptly notify Everlake of any suspected or actual compromise or risk of compromise of such confidential information. In addition, Suppliers must notify Everlake of any complaints or requests received from individuals relating to personal information received from, processed on behalf of, or disclosed by Everlake.

✓ **Asset Protection**

Everlake’s assets are critical to its success. Suppliers engaged in business with Everlake must protect and preserve Everlake’s assets, whether tangible or intangible.

✓ **Human Rights**

Everlake believes in the appropriate treatment of its workforce. Suppliers are expected to provide safe and sanitary work environments, including rest and eating facilities. No Supplier should permit any form of forced or involuntary labor.

✓ **Compensation**

Everlake provides competitive pay to its employees. Suppliers must comply with all applicable laws, rules and regulations concerning compensation.

✓ **Child Labor**

Everlake does not engage in the use of child labor and expects its Suppliers to employ only workers who meet minimum age requirements in any locations.

✓ **Brand Name Usage**

Everlake’s branding reflects our position as a trusted and respected company. Use of the Everlake name, slogan, logos and other trademarks and service marks is prohibited without prior written consent.

✓ **Professionalism**

Everlake supports an environment of professionalism. Suppliers are expected to conduct business in a professional manner.

✓ **Diverse Ideas and Perspectives**

Everlake values and leverages diversity in ideas and perspectives to create stronger and more effective business outcomes.

✓ **Fair Competition and Antitrust**

Everlake seeks to outperform competitors fairly and honestly, achieving competitive advantages through superior performance. Suppliers are expected to foster fair competition without restraining or inhibiting competitors or abusing a dominant market position.

**Reporting**

Everlake expects our employees and business partners to report any illegal or unethical conduct and any regulatory compliance concerns. This may be done by calling the Insperty 24/7 Hotline at: 844-677-3030. You may provide your name or report your concerns anonymously.