

Code of Third-Party conduct

TruStage™ believes in building and maintaining business relationships with third-party partners, distributors, suppliers, and contractors (collectively, "Third-Parties") based on unwavering ethics and integrity.

We understand Third-Parties are independent entities with their own policies and standards. However, we expect our Third-Parties to operate in accordance with the principles and expectations outlined in this Code of Third-Party Conduct ("Code") and with the contractual obligations set by their contracts with us.

Decisions to work with Third-Parties are based on their ability to perform and contribute to our collective success. We expect Third-Parties to conduct business ethically while complying with all applicable laws and regulations as well as our Code of Conduct, policies and procedures.

While this Code doesn't outline every situation Third-Parties may face, it does illustrate important requirements and expectations we have of them. Our success depends on the success of our Third-Parties, so as we commit to doing business with integrity, we expect our Third-Parties to do the same by following the principles and expectations set forth in this Code of Third-Party Conduct.

Speaking up

We value speaking up and reporting any conduct that's inconsistent with our Code of Conduct, Corporate Policies or applicable laws and regulations experienced or witnessed while conducting business at, with or on behalf of TruStage.

This includes actions that:

- Try to cover-up inappropriate or unlawful behaviors, including past behaviors.
- Are based on unlawful considerations such as an individual's protected characteristics.
- Threaten someone or are likely to result in physical harm.

Anyone witnessing conduct not consistent with our Code of Conduct, policies or applicable laws or regulations should promptly report any such activity to our Speak Freely Line.

Provided by a third-party, it's available at www.speakfreely.ethicspoint.com or by calling 866-879-0265. Individuals can remain anonymous if they so choose. The Speak Freely Line is available 24/7 to report ethics or compliance issues.

Third-Party conduct principles and expectations

We expect Third-Parties to properly handle and protect our information against improper disclosure or unauthorized access. Third-Parties should only collect relevant information necessary to conduct business and must ensure its confidentiality while in their care. Our Third-Parties should also respect TruStage's and others' intellectual property rights including copyrights, patents, trade secrets, trademarks, logos and brands while in use for contractual business acts.

We expect Third-Parties to care for the wellbeing of the communities where they do business. We value social responsibility, environmental sustainability and support of the communities we serve. We expect our Third-Parties to share these goals and comply with all applicable environmental laws and regulations.

We expect Third-Parties to share our commitment to providing a respectful, professional, safe work environment. Acts of workplace harassment, sexual harassment, bullying and violence are unacceptable and will not be tolerated. Acts of retaliation after reports of harassment or prohibited behavior are also unacceptable.

We expect Third-Parties to share in our commitment to diversity equity and inclusion. Diversity and inclusiveness are critical parts of our business strategy, and we encourage external Third-Parties to represent and support us.

We expect Third-Parties to be transparent and honest in every business interaction with us. Third-Parties should ensure all information created and shared while working with us is complete, accurate, authentic, timely and clear. We expect Third-Parties to embrace fair business practices and abide by all applicable anti-corruption laws. Any engagement in corruption, embezzlement, bribery or fraudulent behavior of any kind is strictly prohibited.

We expect Third-Parties to avoid actual or perceived conflicts of interest which can cloud the judgment of business decisions. Third-Party relationships are essential to our success, so relationships between our employees and Suppliers must be based on sound business considerations and fair competition. Our employees may not accept gifts such as:

- Business meals or entertainment not attended by the host
- Travel and lodging expenses
- Cash or cash equivalents
- Technology (e.g., computers, health monitors, etc.)

We expect Third-Parties to mitigate the risk of human trafficking and forced labor in all aspects of our business. We strictly prohibit all forms of trafficking in individuals, even if lawful in the governing jurisdiction.

We expect our Third-Parties not to offer or accept any gifts or business endeavors that could be perceived as an attempt to influence a business decision.

Questions? At TruStage, we value the hard work and dedication of our Third-Parties as we strive to help others achieve a bright financial future. Please don't hesitate to contact the Vice President, Enterprise Procurement if you have questions about the Code of Third-Party Conduct.