



ASSURANT®

# Assurant Code of Business Conduct and Ethics



## INTRODUCTION

Assurant is a global company with a presence in 21 countries. We speak many different languages and have over 14,000 employees that come from every walk of life.

We all have one thing in common: We're on a journey to be the best that we can be. Every day, we strive to raise the bar on what it means to do business honestly and ethically.

*This ethical journey starts with a few commitments.*

# Who should use the code and what should I know about exceptions and violations?



- This code is applicable to all employees, officers and directors of Assurant, its affiliates, and subsidiaries.
- Assurant will endeavor to select vendors, representatives and other business partners that embrace values similar to those included in this code.
- The board of directors or a committee thereof must approve any exceptions to this code for Assurant's executive officers or directors. The chief compliance officer must approve any exceptions for all other employees.
- Breaches of this code will not be tolerated and can lead to disciplinary action up to and including termination of employment. In some cases, breaches could result in civil liability or criminal penalties.



Our values of **common sense**, **common decency**, **uncommon thinking** and **uncommon results** guide our behavior and shape the way we approach each working day and each person we come in contact with.

## OUR COMMITMENTS: *How We Work*

- We believe that an ethical company starts with ethical leadership (including self-leadership) at all levels of the organization.
- We strive to maintain a safe, secure and respectful work environment.
- We communicate honestly, transparently and accurately.
- We commit to complying with all applicable laws, rules and regulations in all jurisdictions where we do business and deal with potential violations decisively.
- We are committed to protecting the environment and take our social responsibility seriously.
- We document our commitments through contractual agreements with other parties to ensure fair treatment and clear expectations.
- We do not offer or accept bribes of any kind.



## OUR COMMITMENTS: *How We Work* (Continued)

- We protect the company's assets and ensure their efficient use for legitimate business purposes.
- We proactively manage conflicts of interest and require their disclosure under the Assurant Conflict of Interest Policy.
- We advance Assurant's interests and don't compete with the company. We don't take its opportunities, property or information, nor our position with Assurant, for personal gain.
- We do the right thing and we speak up when we see or suspect illegal, unethical or other behavior that could harm Assurant or those we serve. We don't tolerate retaliation for reports made in good faith.
- We provide full, fair, accurate, timely and understandable disclosure in the reports and documents we file with or submit to the U.S. Securities and Exchange Commission and in our other public communications.

*We do the right thing.*

## Conflict of Interest



A conflict of interest can occur when an individual's personal interest

interferes in any way or even appears to interfere with the interests of Assurant. A conflict situation can arise when an employee, officer or director takes actions or has interests that may make it difficult to perform his or her company work objectively and effectively. Conflicts of interest also arise when an employee, officer, director, or a closely related person, receives improper personal benefits as a result of his or her position in the company. Loans to, or guarantees of obligations to, such persons are of special concern. When a potential conflict arises, we are required to immediately disclose the situation per the process highlighted in the conflict of interest policy.



## OUR COMMITMENTS: *How We Treat Others*

- We're dedicated to protecting what matters most to our customers, our clients and the company.
- We embrace fair competition and require fair dealing with our customers, suppliers, competitors, employees and others.
- We protect our employees', customers' and business partners' confidential, personal and other nonpublic information.
- We deal with regulators in an open, transparent and proactive way.
- We strive for regulatory excellence and incorporate regulatory requirements into business strategies and processes.
- We're fair in our employment practices and prioritize doing right by our employees.

We protect what matters most.

# What do I do when I don't know what to do?



We've made a promise to act with honesty and integrity in everything we do. We uphold that promise by doing the right thing and speaking up when the path is not clear or when we see behavior that falls short of our promise. But, sometimes, it's hard to know what the "right" thing is.



## What to do when in doubt

If you're unsure of what the right thing is, consider:

- Would the action conflict with any policies or procedures of Assurant, including this code? See Connect Enterprise Site.
- How would I or Assurant feel if the action was reported in the media?
- Would Assurant lose customers, business partners, employees or shareholders if they knew of the action?
- Does this conflict with my personal sense of right and wrong? If I were treated this way, how would I feel?
- Does this conflict with our values or commitment to our customers?
- Will this look improper or unethical?

## Still have doubts?

If you still have doubts or concerns, **speak up** in whatever way you feel comfortable. If something doesn't feel or seem right, talk with your manager. They are often in the best position to understand the situation you face.

If your manager is unable to help or if you are uncomfortable discussing your concern with them or another member of your management team, you have several resources available to you. To ask a question or share a concern, contact any of the following: HR, Legal, Compliance, the Ethics Office, or the [Ethics & Compliance Hotline](#) by either phone or web (and you may remain anonymous where permitted by law).

We all play a role in honoring our commitment to ethics and integrity. We'll hold all accountable for complying with this code and acting honestly and ethically. We'll promptly and fairly investigate all reports of misconduct. We won't tolerate retaliation against anyone who makes a genuine effort to provide honest and accurate information, even if it later turns out to be incorrect. Please refer to the [Policy on Raising and Reporting Concerns](#) and the [Non-Retaliation Policy](#).







# How do policies fit into ethical behavior?

A key aspect of ethical behavior is following Assurant's policies and procedures. Employees can find Assurant's policies on the Connect Enterprise Site.

Key policies that all employees should be aware of include:

- [Anti-Corruption Policy](#)
- [Human Resources policies](#)
- [Records and Information Management Policy](#)
- [Privacy Policies](#)
- [Information security policies](#)
- [Finance policies](#) (such as travel and expense policies)
- [Policy for Raising and Reporting Concerns](#)
- [Conflict of Interest Policy](#)