

# Code of Conduct

***Integrity.  
Commitment.  
Accountability.***

## Letter from Rick McKenney

Dear Unum employees,

We play a critical role in helping to protect the financial futures of individuals and their families, and the need for what we do has never been greater. Our business is, essentially, a promise to be there for people during some of the most difficult times of their lives, and our commitment gives millions of people the peace of mind that comes with protecting themselves and their loved ones.



Living up to that commitment means delivering on the promises we make to customers, sales partners, investors, regulators and coworkers – that we'll operate consistently, fairly and professionally in everything we do. As our values reflect, we have a responsibility to conduct our business with the highest standards of honesty, integrity and respect. And maintaining a culture of ethics throughout our company is not only the right thing to do, it's essential for any company — particularly a publicly held one — in today's environment.

Our Code of Conduct is a roadmap to do the right thing every time for our customers, our fellow employees and in all of our business dealings. The Code includes examples, commonly asked questions, links to more detailed policies and contacts for help with specific situations.

Unum has long been recognized not only as a leader in our industry but also as a great place to work. For nearly 170 years, we've worked hard to build a company based on openness and accountability that can be trusted to do the right thing.

I am confident you will continue to support the values of our company, help protect our good name and keep this the company we are all proud to represent.

Thank you all in advance for your commitment to living up to our Code.



Rick McKenney  
President and CEO  
Unum

### Our Vision and Values



We believe strongly in the positive impact we have on the businesses we help protect and the lives we touch - a conviction embodied in our corporate vision and values.

#### Integrity

We are an organization built on openness, trust, professionalism, respect for others and, above all, integrity.

#### Commitment

We have obligations to our key stakeholders, including claimants, brokers, employers, employees, regulators and shareholders, and we strive to deliver on those commitments.

#### Accountability

We are proud of what we do, we accept responsibility for our actions, and we learn from our experiences.



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# PRINCIPLE 1:

## Make choices that reflect our values and protect our good name

**At Unum, we are committed to the highest standards of ethics and personal conduct. It's a commitment we make to all of our customers and stakeholders, and it's critical to our success and our future.**

### The Code applies to everyone

The Code applies to everyone at Unum. This includes our board of directors, senior leaders, officers, and all employees of the company. It includes all of our subsidiaries and business locations.

Managers have additional responsibilities: to lead by example, to educate and encourage employees to conduct themselves with integrity, to create an environment in which employees can raise concerns without fear of retaliation, to identify and address ethical or compliance concerns that may surface, and to know where to go for help. In the U.K., this includes line managers at all levels.

This Code doesn't try to address every issue or anticipate every possible scenario, nor is it intended to replace your own common sense and thoughtful behavior. Instead, it's meant to provide guidance when you have questions or are faced with certain decisions. It also includes practical examples and contact information if you find yourself struggling with a tough situation.

### It's about doing the right thing

Our reputation is our greatest asset. We build it with integrity — delivering on our promises, hiring the best people, providing the best products and services, and upholding the highest standard of business and personal conduct.

We also know that our benefits can impact the lives of others in many profound ways, and that places special responsibilities on all of us to ensure we are always "doing the right thing."

Every decision you make and every conversation you have, whether in person, on the phone, by mail, e-mail, or the Internet, can ultimately affect how people perceive Unum.

### Comply with the Code and the law

All employees contribute to Unum's culture of ethics and compliance by understanding the Code and complying with it at all times. We must also obey the applicable laws and regulations governing our business conduct.

But we should go beyond simply obeying the law. We should act with integrity and honesty at all times and avoid even the appearance of improper behavior.

There are consequences for violating the Code as well as for retaliating against someone who reported a violation in good faith. Those consequences may include disciplinary actions and even termination of employment.



### I have a question about the Code. Where do I get help?

Start by asking your manager. Throughout the Code, you will find links to policies, helpful resources and contacts. This may help you or your manager answer your questions.

If your manager doesn't resolve it for you, you may ask our [Ethics Office](#) or contact someone listed in the Resources section at the end of the Code.

### When considering an action or situation, ask yourself these questions:

- Does it make you feel uneasy or just not right?
- Does it conflict with your core values of honesty, respect, responsibility, fairness or compassion?
- Would you be uncomfortable seeing it on the Internet or in the news?
- Does it go against this Code or the company's policies?
- Does it violate the law or any regulations?

If you answered "yes" to any of the above, rethink your approach or ask for help.

## PRINCIPLE 2:

### Speak up and report issues or concerns

Unum is committed to speaking up because it is the best way to foster trust in our culture and to detect instances of non-compliance that may harm the reputation and the continued success of our company. By speaking up you will be protecting yourself, your coworkers, and Unum as well as allowing Unum to resolve problems.

#### Reporting concerns

All Unum employees have an obligation to speak up. If you see behaviors, actions, or decisions that may be a violation of the Code or any company policy, it's up to you to raise the issue promptly. Doing so allows us to resolve the issue quickly and minimize the impact to our stakeholders.

Unum offers several channels for speaking up and reporting issues or concerns. We encourage you to use the channel with which you are most comfortable. As a first step, we recommend you seek guidance from your manager. If you can't discuss the issue with your manager, you may use other reporting channels available to you, including:

- Another manager or supervisor
- Human Resources
- Beth Simon, Chief Compliance and Ethics Officer
- The Ethics Office
- In the U.K., you may also report issues under the U.K. Whistleblowing Policy.

In addition, you may report violations or concerns anonymously and confidentially through the Ethics/Whistleblowing Hotline in one of the following ways:

- Toll-free (U.S.): 800.454.9316
- Toll-free (U.K.): 0800.085.0478
- Toll-free (IRE): 9.0044.0800.085.0478
- Toll-free (Poland): 0.0.800.111.1815
- Online (all countries): <http://www.unum.ethicspoint.com>



#### Examples of what to report

Violations or suspected instances of violations of the law, company policy and the company Code of Conduct include, but are not limited to the following:

- Fraud
- Bribery
- Inappropriate giving or receiving of gifts
- Inappropriate financial and accounting records
- Discrimination
- Harassment
- Retaliation of any kind
- Health and/or safety violations

#### Does the Hotline actually do any good?

*Yes, absolutely. Not only do Hotline calls enable Unum to guard against ethical problems that could damage our reputation and business, the call also helps individual employees resolve problems in their unit or location and makes Unum a better place to work for all of us.*

#### How can I be sure my Hotline call is anonymous?

*The Hotline provider does not use caller ID or record any calls. If you wish to remain anonymous just inform the Hotline at the beginning of the call and don't give your name or other personal identifying information. Neither the Hotline nor the company will try to identify you. Of course, if you choose to provide your name, the call is not anonymous.*

## PRINCIPLE 2:

### Speak up and report issues or concerns (cont.)

If you report a concern of non-compliance to your manager or any member of management and are told to “keep quiet”, you should immediately contact the Chief Compliance Officer, the Ethics Office, or the Ethics Hotline to report the concern as well as the manager’s response.

You should also speak up and ask questions when you don’t understand a policy or you are unsure about the proper course of action.

#### Unum will not tolerate retaliation of any kind

If you raise a good faith concern, you will not be at risk of losing your job or suffering any form of retribution as a result. Good faith does not mean you have to be right; but, it does mean you believe you are providing truthful and accurate information. Any employee who believes retaliation has occurred should notify the Chief Compliance Officer, the Ethics Office, or the Ethics Hotline immediately.

#### What to expect when you report a concern

When a concern is reported Unum will investigate the facts to determine objectively what has happened and will take action to address any possible violation of our Code, policies, or the law.

Unum takes all reports of non-compliance seriously. The identity of the reporting employee will be shared only on a “need to know” basis with individuals responsible for investigating and resolving the concern. It is possible that the reporting employee may not be involved in the investigation after bringing his or her concern forward.

Once the investigation is concluded, the reporting employee will receive as much detail as possible regarding the outcome of the investigation. However, due to confidentiality obligations, we may not be able to provide complete details regarding the outcome.

In rare situations, it may be appropriate to waive a Code requirement, such as for minor conflicts of interest. Any waiver must be approved, in advance when practical by the Chief Compliance Officer, and in the case of an executive officer or director, by the Board of Directors (or a Board Committee). Waivers will be disclosed promptly to the extent required by law.

#### Policy links:



##### All Employees

[Anti-Retaliation Policy](#)

##### US and Ireland Employees

[Anti-Fraud](#)

[Whistleblowing](#)

##### UK Employees

[Anti-Fraud](#)

[Whistleblowing](#)

#### **Ethical Scenario:**

**I was copied on messages going around making fun of an employee. I didn’t reply to these messages and wasn’t a participant, I only read the comments. Should I report this?**

*Answer: Yes, all Unum employees have an obligation to speak up if you see behaviors, actions or decisions that may be a violation of the Code or any company policy.*

## PRINCIPLE 3:

### Be honest, fair and trustworthy in all that you do

Each of us is an ambassador for Unum, and that means it is vital that we always act with integrity. Our behavior at work, and sometimes even outside of work, can reflect on the company, and our actions can positively and negatively affect Unum's reputation.

#### Keep accurate and truthful business records

Our customers, employees and shareholders trust Unum to keep accurate business records. We must prepare business documents honestly, accurately and completely — whether that includes sales data, production information, quality reports, claim files, expense reports, time sheets, or financial and accounting records.

Also remember these key points:

- Be sure all financial entries accurately reflect the truth of the event or transaction.
- Support entries with appropriate and auditable documentation and your best judgment.
- Don't delay or accelerate recording revenue or expenses to meet budgets, goals or certifications to customers, regulators or auditors.
- Ensure that all reporting to regulatory authorities is fair, clear and complete.
- Submit accurate time sheets and expense reports.
- Never falsify any documents or records including documentation in systems.
- Comply with our records retention guidelines, including information hold orders related to pending or anticipated litigation or governmental investigations.
- Sign documents or contracts only if you have authority to do so and believe the document is accurate and truthful.

#### Policy links



##### US Employees

Corporate Travel and Expense Reimbursement Policy  
Fraud, Embezzlement and Theft  
Time Away from Work for Non-Exempt Employees  
Travel Time Policy — Non-Exempt Employees  
Policy on Information Governance Compliance  
Information Protection Orders

##### UK Employees Expenses

##### Ireland Employees

Time Reporting Information  
Fraud, Embezzlement and Theft

#### **Ethical Scenarios:**

**I'm concerned that the financial reporting in my area shows two payments from a customer when I know there is just one. What should I do?**

*Answer:* Any time you think something looks wrong in a financial or accounting record or any other documentation, report it to your manager or the [Ethics Office](#). It is against company policy to falsify records.

**I'm a non-exempt employee in the U.S. and have been working extra hours. I'm happy to do it and don't want to report the time. Is that OK?**

*Answer:* No, you must report all the time you work. It's our policy and the law.

**My team works off of a shared worklist, with the expectation that you must work on the next available item on the list to ensure that the level of difficulty is equally distributed amongst the team. However, I typically go in and cherry pick work items that are easy and less time-consuming. Is this unethical?**

*Answer:* Yes. Avoiding work or intentionally violating a policy or process is a violation of the Code.



## PRINCIPLE 3:

### Be honest, fair and trustworthy in all that you do (cont.)

#### Compete fairly

We will compete fairly and honestly. Our marketplace advantages come from superior performance, outstanding employees and ethical business practices.

#### Fair competition

We respect our competitors and want to compete with them fairly. To maintain our reputation:

- Be truthful about our business, products and services.
- Follow our pricing, quoting, insurance and market conduct rules.
- Provide complete information.
- Don't misrepresent or hide facts.
- Be sure what you are recommending is suitable for the customer.
- Don't disparage or spread false information about competitors, their financial strength or their products.

We will only use information that we get fairly and legally. We do not want our competitor's confidential information. Don't obtain or use another company's trade secrets, intellectual property or confidential information unless we have permission. Inappropriate use of others' intellectual property may expose our Company to fines and penalties.

#### Avoid improper agreements or payments

We will not have any agreements with competitors to fix prices, divide markets, and allocate customers or any other unlawful practice under antitrust or fair competition laws. We will not make any payments to gain advantage or influence in a situation, such as a bribe, kickback, back-hander or illegal customer rebate. And, we will comply with anti-money laundering and anti-terrorist laws.

#### Policy links:



#### US Employees

[Antitrust Compliance Guidelines](#)  
[Policy on Financial Crimes](#)

#### UK Employees

[Anti-Financial Crime Charter](#)  
[Anti-Money Laundering](#)

#### **Ethical Scenarios:**

##### **Did you know that bid rigging or price fixing is illegal?**

*Answer: It's illegal and unethical to manipulate a customer's decision with false information. If you are aware that a broker or business partner is improperly marketing our products or services, report it to your manager, the Chief Compliance Officer or the Ethics Office.*

##### **I work in Business Technology and my cousin works for a software company that is in the running for a contract with Unum. Can I put in a good word for him?**

*Answer: Don't do it, unless you are familiar with the company's goods or services and you disclose the relationship. We make purchasing decisions based on the best value to the company and not on things such as personal or family relationships.*



## PRINCIPLE 3:

### Be honest, fair and trustworthy in all that you do (cont.)

#### Fairly and objectively evaluate all claims

We are committed to helping our customers during difficult times in their lives. As part of this commitment, we will:

- Make appropriate decisions through a thorough, fair and objective evaluation of all claims.
- Pay all valid claims in a timely manner.
- Provide excellent customer service.
- Partner with our customers and support claimants in their efforts to return to work or to independent living.

Our business is governed by laws, regulations and policies that apply to claims for our benefits. If required by your role at the company, be sure you know and understand all applicable laws, regulations and claims related policies and follow those requirements.

#### Select the best external partners fairly

We have a long history of working with various types of third parties. Whether it is with brokers, agents, enrollment partners, technology providers, or traditional suppliers, our business model and strategy continues to rely on these key relationships. When making a decision to buy goods or services, we look for external partners who can give us the best combination of quality, efficiency and value. A proactive risk management effort through proper vetting, contracting and ongoing monitoring helps ensure that the right partners are selected.

We offer a competitive environment for all of our external partners to do business. This includes a commitment that businesses owned by women, minorities and disabled veterans have an opportunity to compete on an equal basis with other bidders. And, we will include environmental considerations in making our purchasing decisions.

We require our suppliers to operate in compliance with applicable laws and regulations. They must also safeguard confidential, proprietary and private information.

We require employees to follow appropriate protocols around selecting suppliers and managing all third parties but for specific supplier (or external partner) sourcing, please contact [Strategic Sourcing](#).

#### Policy links:



#### Helpful Resources:

##### US Employees

Benefits Center  
Colonial Life Claims

##### UK Employees

Customer Care  
Contracts Policy

##### All Employees

Global Procurement Policy  
Enterprise Third Party Risk  
Management Policy

#### ***Ethical Scenario:***

**In order to get my work list current before going out on PTO, I'd like to mark work items complete, even though I haven't completed them yet. I will make sure I complete them when I return from PTO. Is that okay?**

*Answer: No. The claim file is a legal document and therefore it must be accurate in terms of the activity performed and the actual date the activity is performed.*

## PRINCIPLE 4:

### Treat others with respect

We want to keep Unum a professional place to work — one that is free of harassment or other unlawful behavior.

#### Be courteous and professional

All employees and those with whom they work have the right and responsibility to work in an environment free from harassing behavior or discrimination. All employees can expect to be treated with dignity and respect. It's your responsibility to be courteous, respectful and professional with each other and our customers. This includes your manager, vendors, coworkers, and leadership. Avoid rude, demeaning, insensitive, or sexually inappropriate behavior. At all times, keep our work environment free from harassing, bullying and abusive behavior or discrimination, victimization and retaliation.

Harassment related to a person's race, color, religion, national origin, age, disability, genetic information, military or protected veteran status, gender, gender identity or expression, or sexual orientation is prohibited.

Bullying or abusive behavior of any kind, whether on company property or off-site at a business function, is not allowed and will not be tolerated. Bullying and abusive behavior can include words, actions or any behavior that creates an offensive, abusive, intimidating or hostile workplace. Harassment or bullying can include behavior with our business partners or customers.

Examples of harassment include:

- Conduct of a sexual, racial or other nature, even subtle, that creates an intimidating, hostile or offensive work environment or interferes with someone's work performance
- Unwanted physical contact
- Threats of termination or lost opportunity because you have reported harassment, victimization or discrimination, or have raised a concern or grievance
- Threatened or actual violence

Additional information and examples of harassment can be found in our U.S. and U.K. harassment policies. If you witness or are a target of harassment or any situation that makes you uncomfortable, immediately report it to your manager or [Human Resources](#) in US and Ireland or [HR Business Partners](#) in UK. If you are a manager, you should immediately report such complaints or allegations to [Human Resources](#) in US and Ireland or [HR Business Partners](#) in UK.

**Be mindful** about how you use humor in the workplace.



What's funny to you may be insulting or offensive to someone else. Anything with profane language, sexual overtones or that makes fun of someone's race, gender, gender identity or expression, sexual orientation or religion is never appropriate.

If you or someone you know is being harassed or bullied, first talk to your manager.

If that's not appropriate or comfortable, discuss the issue with another manager or contact your [Employee Relations Consultants](#) (U.S.). In the UK, follow the process in the policy and if needed, contact the [HR Business Partners](#).

**Insubordination will not be tolerated.**



Insubordination may involve different factual scenarios, but is generally defined as a willful or intentional failure to obey a lawful and reasonable request of a manager or supervisor.

## PRINCIPLE 4:

### Treat others with respect (cont.)

#### Inclusion and diversity

Fostering workplace diversity and inclusiveness enriches our corporate environment, drives innovation, and maximizes our ability to serve our customers. We strive to build diverse teams that are reflective of the customers we serve and to create an inclusive work environment where every employee is valued and respected. Having a workforce with different perspectives, backgrounds and experiences gives us the competitive advantage to succeed in a multicultural world.

Unum is an equal opportunity employer. We do not tolerate unlawful discrimination in the workplace or harassment of any kind, including discrimination or harassment on the basis of race, age, color, national origin, ancestry, mental or physical disability, religion or belief, gender, gender identity or expression, marital status, veteran or military status, sexual orientation, labor or trade union membership or any other characteristics protected by law. We also make all reasonable accommodations to meet our obligations under laws protecting the rights of the disabled.

#### Policy links:



#### US Employees

Performance Improvement/  
Disciplinary Policy  
Health & Wellbeing Policies  
Equal Employment Opportunity  
Anti-Harassment and Bullying  
Policy  
Nepotism and Personal  
Relationships at Work

#### UK Employees

Fair Employment  
Harassment, Bullying and  
Victimisation  
Personal Relationships at Work

#### Ireland Employees

Equal Employment Opportunity  
Harassment Prohibition

#### ***Ethical Scenario:***

**Sometimes I feel like my manager is making fun of me and it makes me feel bad. It isn't sexual or violent but it is very uncomfortable. What can I do?**

*Answer: Our values and treatment of employees go beyond legal issues and are based on respect and dignity of every employee. Discuss the matter with the appropriate manager, contact your Employee Relations Consultant or call the Ethics Hotline.*

***EVERYONE is responsible*** for helping to keep our workplace free from discrimination. Only by maintaining a safe, fair and appropriate workplace can we continue to attract and retain top-quality employees.

## PRINCIPLE 5:

### Keep private and confidential information confidential

We rely on you to maintain the confidentiality of sensitive information provided to you by Unum or its customers.

#### Handle confidential information appropriately

Always manage personal data responsibly and in compliance with privacy laws and our company policies. Never disclose any private, sensitive, secret or confidential information outside of the company or inside the company to the wrong person. This obligation continues even if your employment ends.

#### Key Consideration and accountabilities:

- **Privacy and security by design:** Consider privacy and security impacts when new business processes or systems are implemented, and when changes are made.
- **Simplify:** Only collect, use and disclose the minimum amount of personal data necessary to accomplish the business purpose.
- **Retention and deletion:** Securely discard information when retention has been met or information is stored elsewhere.
- **Data Protection:** Use appropriate physical, electronic, and procedural safeguards to protect personal and business confidential information. It is against company policy to store any company confidential information on your laptop and/or an external device.
- **Third Parties:** Share personal and business confidential information only with authorized parties and only for legitimate and specified purposes.
- **Individual Accountability:** Various training and communications on privacy and information security are distributed to employees on a routine basis by Corporate Communications or through other channels within your department. Familiarize yourself with the content, and have conversations with your peers and managers on how to best incorporate these guidelines into your everyday actions.



**Personally identifiable information is anything that could be used to steal your identity such as:**

- Name
- Date of birth
- Social Security Number
- National Insurance Number
- Passport
- Individual Taxpayer Identification Number
- Policy/Claim number
- Salary
- Medical information
- Financial information
- Home mailing address
- Email address
- Password

**DO NOT send any business email to OR from your personal email account.**

#### **Ethical Scenarios:**

**It is Sunday and I need to print a document from home for a client meeting on Monday. Can I email the document to my personal email address or upload it to an encrypted USB to be able to print the document from my personal computer?**

*Answer: No. Any time information is sent outside of Unum's servers, the data is no longer protected or secure. Company policy prohibits sending confidential information to an external device or email account.*

**I am an engineer and have developed systems software in connection with a company project. The software is now being used throughout the company. Because I developed the software, may I try and market it?**

*Answer: No. Because you developed the software as part of your Unum responsibilities, it is company property and may not be sold or disclosed without appropriate authorization.*

## PRINCIPLE 5:

### Keep private and confidential information confidential (cont.)

#### Key Consideration and accountabilities (cont):

- **Report Incidents:** If you know or reasonably suspect that a Privacy or Information Security incident that potentially compromises confidential information has occurred, for US and Ireland employees immediately report the incident through the [RADAR](#) web form and for UK Employees immediately report the incident through the [Risk Event Form](#), or through the appropriate channels in your area. Here are some examples of confidential information or material:
  - Details about the company's business that are not known publicly
  - Non-public information that might be of use to competitors or harmful to the company if disclosed, such as product development or new technology
  - Information that suppliers, customers, members and claimants have entrusted to us
  - Personal data of our customers, business partners and employees

#### Policy links:



#### All Employees

[Data Protection Risk Appetite Statement](#)

#### US Employees

[Policy on Workstation and Laptop Security](#)  
[Policy-Mobile Device Security](#)  
[Internet Use & Security](#)  
[Confidentiality & Non-Disclosure](#)  
[Privacy Policy & Procedures](#)

#### UK Employees

[Information Security](#)  
[Data Protection \(Customer Data\)](#)  
[Data Protection \(Employee Data\)](#)

#### **Ethical Scenarios:**

**A new hire recently joined my team and is undergoing training. He mentioned that he is sending customer documents to his home e-mail address so that he can continue working from home at night. I know that this is not an acceptable protocol, what should I do?**

*Answer: You should report this issue to your manager or the Ethics Office.*

**A new co-worker does not have computer access yet. Can she borrow my user ID and password?**

*Answer: No, she must wait for her own user ID and password. Your user ID and password is the key to your legally binding electronic signature and you are responsible for any user activity processed under these credentials. By each of us keeping tight control over our passwords and changing them periodically, we protect our data from unauthorized users.*

## PRINCIPLE 6:

### Avoid conflicts of interest – real or perceived

**Nothing you do should conflict with your responsibilities to the company, or hurt our reputation or good name. Avoid situations where your personal interests (financial interests, outside business activity, or other personal considerations) could interfere, or even appear to interfere, with the company's interests. Disclose any conflicts that do arise to your manager and the Ethics Office.**

Examples of conflicts covered by the Code include:

- Working for a competitor
- Hiring, managing, reporting to or working closely with someone whom you are in a personal relationship with (including closely related family members or romantic partners)
- Having a personal financial interest in a business transaction involving the company
- Accepting personal benefits like gifts or favors from vendors you help select for Unum; accepting or giving gifts or business entertainment outside of the limits set within our Gifts and Entertainment policy
- Having substantial ownership interests in competitors, customers or suppliers
- Using your position at the company to help a friend or family member get an advantage from the company

#### Personal and business conflicts

##### Personal relationships at work

Personal relationships at work may create a conflict of interest or the appearance of favoritism. Personal relationships can include your close family members (spouse/domestic partner, you/your spouse's parent/child/sibling (including step-relationships), in-laws, aunts/uncles or nieces/nephews and first cousins) or your romantic partners.

#### Did you know?



Operating a small business from your home is likely not a conflict as long as it does not compete with the company for business or interfere with your work at the company. Talk to your manager to be sure.

#### Close personal relationships

It's not uncommon in companies our size for people to become personal friends and even date. However, a close personal relationship between people at work may be a conflict of interest, especially if they work closely together or on the same team or project. If you have a question about a personal relationship at work, talk to your manager or HR for guidance. And remember, it's never OK for such a relationship to exist between a manager and employee.

#### **Ethical Scenarios:**

**My sister has been a nurse for years and wants to change jobs. I think she would be a good claims specialist. May I hire her?**

*Answer: No, you may not. However, you can refer her to [Human Resources](#). Both you and your sister should disclose your personal relationship to Human Resources. She may be considered for jobs outside of your team or reporting chain.*

**A supplier who I have worked closely with over the years offered me the use of his condo in the mountains for the weekend. He says he owns the place and it costs him nothing to let me stay there. Can I go?**

*Answer: You should contact the Ethics Office to review this offer. Even though the supplier is not paying directly for your stay, this is likely to be considered a "lavish" gift offer, which would violate Unum's Gift and Entertainment Policy.*

**Our department is going to use a vendor for some consulting work. My brother is a well-known consultant in the area and will probably be considered for the work. What should I do?**

*Answer: Tell your manager about your relationship. Then you or your manager should contact the [Ethics Office](#) to review the relationship and selection process for possible conflicts.*



## PRINCIPLE 6:

### Avoid conflicts of interest – real or perceived (cont.)

#### Personal relationships at work (cont.)

You may not hire, manage, report to, or even work closely with someone with whom you are in a personal relationship. Check the policy so you know what to do.

For Board members and senior management, no family member or romantic partner may work at Unum.

#### Outside employment and board memberships

You may hold an outside job or serve on the board of an organization if it doesn't interfere with your schedule or performance at your Unum job or doesn't present a conflict of interest. It is always a conflict of interest for you to work, serve as a consultant, or serve as a board member for a competitor. It may be a conflict of interest to work for a broker, customer or supplier or to sell products on your own that compete with ours.

The best approach is to avoid any direct or indirect business connection with our competitors, except on behalf of the company. Use good judgment in dealing with our customers, business partners and suppliers.

#### Outside business interests (related party transactions)

You may have a conflict if you have an ownership or financial interest in a competitor, broker, customer, supplier, or any company or organization that seeks to do business with Unum. Specifically, if you or family members have a financial interest in a proposed transaction with the company, you must comply with the Related Party Transaction Policy, including disclosure to the [Ethics Office](#) or [General Counsel](#).

Even loans to, or guarantees of obligations of, employees and their family members may create conflicts of interest. Federal law prohibits loans to directors and executive officers.

#### Other possible conflicts

A conflict of interest may also arise if you or a family member receives improper personal benefits because of your position in the company.



#### Gifts and Entertainment Policy Best Practices (US):

- If you receive a perishable gift that exceeds our gifting limits or is otherwise impractical to return to the provider, it may be shared with your team or department or donated to charity.

- These rules don't generally apply to personal gifts given between employees; however, consider using Unum's established recognition programs to recognize the good work of your colleagues.

- Accepting business entertainment and/or gifts more than twice a year from the same source may give rise to the appearance of favoritism and should be avoided.

- Report any concerns or questions you have to the [Ethics Office](#).

#### Ethical Scenarios:

**My husband and I own stock in a company that is about to become a large customer and I may be assigned to work on their dedicated claims team. Is that a problem?**

*Answer: Talk to your manager and the [Ethics Office](#) to review the situation for any potential conflict.*

**A customer with whom I have been working closely recently presented me with \$300 cash and a plaque for outstanding service. Can I keep it?**

*Answer. Thank the customer and keep the plaque, however, it is against Unum's Gifts and Entertainment Policy to accept cash, or cash equivalents (such as gift certificates or gift cards) from customers.*



## PRINCIPLE 6:

### Avoid conflicts of interest – real or perceived (cont.)

If you're not sure whether an outside job, business interest or personal benefit poses a conflict of interest, contact the [Ethics Office](#). You should disclose any potential conflict of interest to your manager and to the [Ethics Office](#).

#### Minimize or avoid gifts and entertainment

Gifts cover a wide range of items — from a coffee mug to tickets to a sporting event or a golfing trip. Occasional, nominal, appropriate gifts, invitations or entertainment can help build business relationships but should never influence decisions. We don't accept gifts, invitations or entertainment from third parties unless they are modest and consistent with customary business practices and comply with our company policies. These same standards apply to any gifts, invitations or entertainment you would want to offer any third party.

We will never accept cash gifts, gift certificates or gift cards regardless of their value.

#### Insider trading or dealing, "stock tipping" and corporate opportunities

You may not buy or sell the company's stock when you have access to material information that has not been publicly disclosed. It is against the law. Information is "material" when a reasonable investor would consider it important when deciding to buy, sell, or hold stock.

Information that is both material and not publicly available is "inside information." If you have inside information, you also may not recommend or suggest to others that they buy, sell or hold the stock (known as "stock tipping"). It is also illegal to use information you have to buy or sell another company's stock if you have material information that is not available to the public, regardless of how you obtained that information.

Additionally, you may not take a business opportunity that you find out about through work unless the company has already been offered the opportunity and turned it down. And it's never OK to use Unum property or information for personal gain or to compete with the company.

#### Policy links:



##### All Employees

Related Party Transaction  
Conflict of Interest Policy  
Insider Trading

##### US Employees

Neptism and Personal  
Relationships at Work  
Outside Employment  
Gifts and Entertainment Policy

##### UK Employees

Personal Relationships at Work  
Anti-Bribery and Corruption  
Personal Expense  
Disciplinary Policy  
Anti-Market Abuse

##### Ireland Employees

Outside Employment  
Disciplinary Policy

#### Did you Know?

Did you know that you don't have to be a senior executive to be careful about insider trading. For example, you might:

- See confidential information about the company's stock on the copy machine or through a misdirected e-mail
- Overhear that an executive at a competitor is about to join our company and it hasn't been announced
- Know about significant acquisitions, quarterly earnings information (before it is public), or similar information about other companies because of your role

Just remember, if the information is material and is unavailable to the public, and you buy or sell stock (or tell others to buy or sell stock), it is called insider trading and is illegal, even if you don't gain anything personally. It could also lead to your personal criminal liability.

# PRINCIPLE 7:

## Respect company property

**Protecting Unum assets and using them efficiently just makes good business sense. Theft, waste and carelessness have a direct, negative impact on the bottom line.**

### Protect company assets

Company equipment and assets such as computers (laptops), phones, business cell phones, copiers, messaging systems and software should be used for business, although occasional personal use may be permitted. Company equipment and assets should not be used for your personal or a friend's business.

Protect company assets by keeping your laptops secure (a) at work by practicing the clean desk policy and securing your laptop in a locked drawer or locker at the end of the day, and (b) when traveling such as placing a laptop in the trunk of a vehicle so that it is not visible. If any company asset is stolen or lost, report the incident immediately as follows: US and Ireland Employees contact Security Office @ 1-877-482-2948; UK Employees contact Security Office @ 01306 87 3333.

### Protect company systems and networks

Help us secure our systems and networks by only using strong passwords and company-approved software. Avoid public wireless hotspots when conducting company business. To guard against theft, secure your laptops and other mobile devices.

Report any unauthorized access or hacking to your manager or [Information Security](#).

### Protect our proprietary information

We must protect Unum's proprietary information which may include intellectual property, business records, financial results, sales figures, personnel records, and all other business information from loss, theft or damage. We also must carefully protect our trademarks, copyrights and patents by keeping the information confidential and secure.

Report any potential theft of intellectual property to your manager or [Information Security](#).

### **Ethical Scenarios:**

**Is it OK for me to send personal e-mail from my Unum e-mail address?**

*Answer: Occasional personal use of company e-mail is OK, but it should not take you away from effectively doing your job.*

**I would like to work over the weekend but do not want to come into the office. Would it be OK for me to send the information I need to my home e-mail address?**

*Answer. No, company policy prohibits sending any business e-mail to or from your personal e-mail account.*

### Policy Links



#### US Employees

[Data Classification and Security](#)  
[Electronic Communications](#)  
[Fraud, Embezzlement and Theft](#)  
[Enterprise Information Security and Risk Management \(EISRM\)](#)

#### UK Employees

[Information Security](#)  
[Anti-Fraud](#)  
[System & Services Acceptable Use](#)

## PRINCIPLE 8:

### Maintain a safe and healthy workplace

**We are committed to providing a safe and healthy work environment for all employees.**

#### Promote safety

We want you to be safe. Whether you're walking across the parking lot or sitting at your desk, your safety is a top priority here at Unum. This includes following all COVID-19 safety protocols to ensure the safety and well-being of you and other employees while working in our Unum office settings and while attending meetings or traveling on behalf of Unum. Each of us must be familiar with emergency procedures and safety regulations, and know how to report unsafe situations. This includes everything from violence or threats to hazardous conditions or workplace accidents.

You can find Unum's policy on firearms in the Workplace Violence and Threat policy as well as guidance regarding threats of suicide.

#### Substance abuse

While at work, you may not use or be under the influence of alcohol or any substance that could compromise your safety or hinder your ability to do your job. The only exception is when alcohol is served at work-related events, in which case you should always use good judgment and exercise moderation. We don't allow the possession, use, sale, distribution or purchase of illegal drugs — or abuse of legally prescribed drugs — on our premises or while working off-site on company business.

Unum offers an [employee assistance program](#) for those who want help with substance abuse problems.

#### Policy Links



##### All Employees

[COVID-19 Inside Unum Hub](#)

##### US Employees

[Alcohol and Substance Abuse](#)  
[Workplace Violence and Threat](#)  
[Drug testing \(Aviation Staff only\)](#)

##### UK Employees

[Health and Safety](#)  
[Drugs, Alcohol and Other Substance Abuse](#)

##### Ireland Employees

[Alcohol Use](#)  
[Substance Abuse](#)

#### **Ethical Scenarios:**

##### **How do I report an accident or something dangerous?**

*Answer. Tell your manager or contact [Corporate Safety and Security](#). In the U.K., you should contact the [Facilities Manager](#). If you overhear someone making threatening remarks about another employee, report the behavior immediately to your manager or [Corporate Safety and Security](#) or [Facilities Manager](#).*

**John and Maria were discussing an upcoming Unum event where alcohol will be served. This is Maria's first Unum event where alcohol has been served and asked John about what the rules were around drinking alcohol at the event. John's advice was 'do what you want and enjoy the night.'**

*Answer: Maria should enjoy herself, however, any consumption of alcohol at an Unum sponsored event or at an event sponsored by another company at which employees are acting or could be construed as acting as representatives of Unum should be done in moderation and in a responsible manner. Employees should review and understand Unum's Alcohol and Substance Abuse Policy for additional guidance.*

## PRINCIPLE 9:

### Be responsible in your communications

**Our good reputation depends on you being careful when creating e-mail, voice mail, instant or text messages, and other written communications to avoid errors, misunderstandings or offensive language or content. Remember, your communications reflect not only on you, but on the company.**

#### Speaking or responding on behalf of the company

To ensure we have a consistent message, only certain people are authorized to speak on behalf of Unum to the media, regulatory agencies or in litigation situations. If you receive a question about the company from a reporter, financial analyst, or shareholder, direct them to [Corporate Communications](#). Corporate Communications is also a good resource if you need help responding to questions about the company from customers, broker or agents.

#### Be responsible with messaging, the Internet and social media

##### Messaging and using the Internet

Electronic messaging tools and the Internet are powerful communication resources that can have an immediate impact on our reputation. Be mindful when you are creating e-mail, leaving voice mail, or writing instant and text messages. Be clear and brief in voice messages and carefully review e-mail or text messages before sending to avoid misunderstandings.

It's never OK to use offensive language or send inappropriate content. Under no circumstances should you forward confidential, non-public company information to a personal e-mail account.

**Personal e-mail can contain frivolous or even dangerous attachments.**



Employees should never forward chain e-mail or large attachments. It's a waste of technology assets and a distraction to others. Sending personal e-mail occasionally is OK, but never abuse the privilege by sending or forwarding potentially offensive or harmful messages.

Employees are responsible adults, so **occasional personal use of the Internet is fine**. But it shouldn't interfere with your job, and employees should never visit inappropriate or sexually oriented websites. You should know that the company reserves the right to monitor, and, when needed, does monitor company e-mail and Internet use.



**Many employees are on Facebook, and choose to identify themselves as company employees in their profiles.**

*Doing this is fine; however, make it clear in your posting that you are not representing the company.*

**Employees may see critical or even nasty posts about the company in blogs or elsewhere.**

*Do not respond. Only authorized employees are allowed to speak on behalf of the company. Refer the blog or post to [Corporate Communications](#) immediately.*

## PRINCIPLE 9:

### Be responsible in your communications (cont.)

#### Social media

What you post on social media sites can travel far and last a long time, and your online activity can affect the company's reputation.

When using social media, remember these guidelines:

- Be mindful about how you present yourself.
- If you identify yourself as a company employee or discuss anything about us, use the disclaimer in the Social Media policy.
- Conduct your social media activities consistently with our company policy and the law, including copyright, trademark, privacy, insider trading and financial disclosure laws.
- Never disclose information related to our customers, business operations, suppliers or employees, including their names, medical or financial records, Social Security numbers, addresses or other identifying information.
- Be professional and respectful in communications with fellow employees, customers and business partners.
- Avoid communications that would not be permitted in the workplace, such as inappropriate, harassing, abusive, threatening or intimidating language, or any communication that is sexual in nature.

You must seek approval from [Corporate Communications](#) before setting up external Unum-related or branded blogs or social media sites. Additionally, you may not link from a personal blog or social networking site to Unum's internal website.

#### Use approved advertising and marketing materials

All advertising and marketing materials must always comply with both legal and regulatory requirements. In many cases, these materials must follow specific requirements and go through our approval process.

To keep our message consistent and compliant, only authorized employees may create advertising or marketing materials such as mailings, fliers, e-mail, websites, videos, podcasts or blogs. Request for company logos should be sent to [Logo Request](#).

For the company's protection as well as your own, all employees must ensure they have permission to use or reproduce logos, photos, videos or other material that may be copyrighted or trademarked by others as outlined in the company's Policy on Copyright. If you are unsure, contact the [Corporate Communications](#) department.

#### Policy Links



#### US Employees

[Policy on Copyright](#)  
[Data Security and Classification](#)  
[Social Media](#)  
[Media Relations](#)  
[Cellular Phones & Electronic Devices](#)  
[Internet Use & Security](#)

#### UK Employees

[Media Relations Policy](#)  
[Managing Reputational Risk Procedures](#)  
[Social Media](#)  
[Systems and Services Acceptable Use](#)

#### Ireland Employees

[Social Media](#)

# PRINCIPLE 9:

## Be responsible in your communications (cont.)

### Government contact and political activity

#### Contacting government agencies or officials

In the U.S., the company contacts government and regulatory officials only through Government Affairs or Regulatory Affairs staff and through our sales and service staff for our government customers. If you are outside those roles and have a reason to contact government or regulatory staff on behalf of the company, you must always get approval from either [Government Affairs](#) or [Regulatory Affairs](#) before doing so, in order to comply with lobbying and tax rules, unless you are contacting a governmental agency to report whistleblowing activities.

In the U.K., only the [Compliance](#) or [Public Affairs](#) staff may contact government or regulatory officials.

Governments in both the U.S. and U.K. have laws and regulations regarding business gratuities and government personnel. Our policy prohibits providing gifts or entertainment to regulators or government personnel. If you have any questions for U.S. contact Government Affairs or Regulatory Affairs and for U.K. and Ireland contact Compliance or Public Affairs.

#### Engaging in political activity

We encourage employees to participate in the political process. However, whether it's donating to a political campaign, campaigning for a candidate, or running for office, you must always be clear that you are doing so as an individual. *To avoid any conflict, you should not endorse candidates on behalf of Unum.*

You may receive requests for Unum to hold an event on behalf of a state or local elected official, such as a political fund-raiser. In the U.S., you must get approval from [Government Affairs](#) or [Regulatory Affairs](#) before hosting such an event. In the U.K. and Ireland, you should refer such requests to [Compliance](#) or [Public Affairs](#).

#### Policy Links



#### US Employees

[Policy Statement on Political Contributions Regulation FD](#)



*You are free to volunteer your time to help a political candidate or donate money to a campaign as long as you are acting as an individual and not trying to influence company or industry business. But, there may be restrictions based on your position in the company. If you need more information, contact [Government Affairs](#).*



*While U.S. law prohibits companies from contributing to political parties or to any candidate for federal office, Unum's political action committee, UnumPAC, is funded through voluntary contributions and is a legal and effective way for the company to be involved in the political process at the state and federal level.*





## Resources

**Got a question? In this section, you'll find details for contacting our key resources at Unum.**

### Ethics Hotline

For anonymous and confidential reporting or questions:

Toll-free (U.S.): 800 454 9316  
Toll-free (U.K.): 0800 085 0478  
Toll-free (IRE): 9 0044 0800 085 0478  
Toll-free (Poland): 0 0 0800 111 1815  
Online website: <http://www.unum.ethicspoint.com>

### General Counsel

Lisa Iglesias, Executive Vice President  
Telephone: +1 423 294 1600  
E-mail: [LIglesias@unum.com](mailto:LIglesias@unum.com)

### Chief Compliance and Ethics Officer

Beth Simon, Vice President  
Telephone: +1 423 294 8058  
E-mail: [ESimon@unum.com](mailto:ESimon@unum.com)

### Ethics Contact

Beth Pizzo  
Enterprise Compliance Officer  
Telephone: +1 207 575 5447  
E-mail: [Epizzo@unum.com](mailto:Epizzo@unum.com) or  
[ethicsoffice@unum.com](mailto:ethicsoffice@unum.com)

### Privacy Contacts

Timothy D. Smith  
US Chief Privacy Officer  
Telephone: +1 207 575 2308  
E-mail: [tdsmith@unum.com](mailto:tdsmith@unum.com)

Tom Wetherill  
UK Data Protection Officer  
Telephone: +44 1306 644723  
E-mail: [tom.wetherill@unum.co.uk](mailto:tom.wetherill@unum.co.uk)

Tomasz Brozek  
Poland Data Protection Officer  
Telephone: +48 22 329 3195  
Email: [tomasz.brozek@pramerica.pl](mailto:tomasz.brozek@pramerica.pl)

U.S. and Ireland Incidents:  
Call 1-877-PRIVACY4U (877-482-2948)

U.K. Breaches: [Contact the Data Protection Officer](#)

### Compliance Contacts

Tamara Hoehle  
Enterprise Compliance Officer  
Telephone: +1 207 575 8122  
E-mail: [thoehle@unum.com](mailto:thoehle@unum.com)

Claire Stockhausen  
UK Chief Risk Officer  
Telephone: +44 1306 874342  
E-mail: [claire.stockhausen@unum.co.uk](mailto:claire.stockhausen@unum.co.uk)

Lukasz Swierczek  
Poland Chief Legal and Compliance Officer  
Telephone: +48 22 329 3284  
E-mail: [lukasz.swierczek@pramerica.pl](mailto:lukasz.swierczek@pramerica.pl)

### Human Resources Contacts

Hyapatia Payne - US  
Telephone: +1 423 294 8511  
E-mail: [HPayne2@unum.com](mailto:HPayne2@unum.com)

Natalie Rogers - UK  
Telephone: +44 7866 977251  
E-mail: [Natalie.Rogers@unum.co.uk](mailto:Natalie.Rogers@unum.co.uk)

Edel Spillane - Ireland  
Telephone: +353 086 0613487  
E-mail: [ESpillane@unum.com](mailto:ESpillane@unum.com)

Piotr Lipa - Poland  
Telephone: +48 22 329 3239  
E-mail: [piotr.lipa@pramerica.pl](mailto:piotr.lipa@pramerica.pl)





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unum.com

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