

CODE OF SUPPLIER CONDUCT

At CUNA Mutual Group, we believe in building and maintaining business relationships with third-party suppliers, vendors and contractors (collectively, “Suppliers”) based on unwavering ethics and integrity.

We understand that our Suppliers are their own independent entities with their own policies and standards; however, CUNA Mutual Group expects our Suppliers to also operate in accordance with the following values and principles as outlined in this Code of Supplier Conduct (“Code”) and with the contractual obligations set by their contract with CUNA Mutual Group. We expect Suppliers to always conduct business in an ethical way and in compliance with all applicable laws and regulations.

At CUNA Mutual Group, diversity and inclusiveness are critical parts of our business strategy and we encourage external Suppliers and vendors to represent and support this strategy. Decisions to hire Suppliers are based on their ability to perform their work and contribute to our collective success.

While this Code may not outline every situation Suppliers may face when working on our behalf, it does illustrate the important concepts and expectations that should be kept in mind while conducting business with CUNA Mutual Group. We know that our success greatly depends on the success of our Suppliers, so we commit to doing business with integrity as we hope they commit to practicing ethical business behaviors through abiding by the guidelines and principles set forth by CUNA Mutual Group and our Code.

Speaking Up

Our company culture values speaking up and reporting any misconduct experienced or witnessed while conducting business on behalf of CUNA Mutual Group.

Examples of misconduct include actions that:

- Contradict specific laws, policies or the Code of Supplier Conduct.
- Try to cover-up inappropriate or unlawful behaviors, including past behaviors.
- Are based on unlawful considerations such as a person’s protected characteristics.
- Threaten someone or are likely to result in physical harm.

You have the obligation to promptly report suspected misconduct to our Speak Freely Line.

The Speak Freely Line, at www.speakfreely.ethicspoint.com or at 866-879-0265, is provided by a third party and you can remain anonymous if you so choose. It can be reached 24 hours every day to report an ethics or compliance related question or issue.

Supplier Conduct Principles & Expectations

We expect Suppliers to make every effort to properly handle and protect CUNA Mutual Group information against improper disclosure or unauthorized access. Suppliers should only collect information that is relevant and necessary to conduct business and ensure its confidentiality while in their care. Our Suppliers should also make every effort to respect CUNA Mutual Group's intellectual property including copyrights, patents, trade secrets, trademarks, logos and brands while in use for contractual business acts.

We expect Suppliers to care for the well-being of the communities in which they do business. This includes efforts to conserve and protect the environments where their employees live and work and to help foster social development and economic sustainability. Our Suppliers should comply with all applicable environmental laws and regulations.

We expect Suppliers to share in our commitment to providing a respectful and professional work environment. CUNA Mutual Group believes in creating and maintaining a safe work environment. Acts of workplace harassment, sexual harassment, bullying and violence are unacceptable and will not be tolerated while working with CUNA Mutual Group. Any acts of retaliation after reports of harassment or prohibited behavior are also considered unacceptable.

We expect Suppliers to be transparent and honest in every business action they are a part of while working with CUNA Mutual Group. Suppliers should place a high priority on ensuring all information created and shared while working with CUNA Mutual Group is complete, accurate, authentic, timely and clear. We expect Suppliers to participate in fair-dealing, which allows for all business actions to be dealt with in a fair way. Suppliers shall abide by all applicable anti-corruption laws. Any engagement in corruption, embezzlement, bribery or fraudulent behavior of any kind is strictly prohibited.

We expect Suppliers to avoid actual or perceived conflicts of interest so as not to cloud judgment of business decisions. Supplier relationships are essential to CUNA Mutual Group's success, so it is required that relationships between CUNA Mutual Group employees and our Suppliers be based solely on sound business considerations and fair competition. Our employees are instructed to not accept gifts such as:

- Extravagant entertainment (e.g., tickets to events).
- Cash or cash equivalents (e.g., gift cards).
- Technology (e.g., computers, health monitors, etc.).

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

Any questions regarding the Code of Supplier Conduct should be directed to the [Governance Department](#).

Inclusion Courage Passion Focus Innovation Collaboration Integrity