

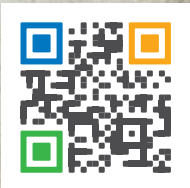


Ethics
Office

Code of Business Conduct and Ethics



Code of Ethics
Online



A Message From Our President and CEO



Code of Business Conduct and Ethics

Assurant is a global company made up of over 15,000 diverse voices that live true to Assurant's values. We do the right thing, even when it's hard.

Every day, we strive to raise the bar on what it means to do business honestly and ethically, and it's our responsibility to do so with each other, our business partners, and our customers. Our Code of Business Conduct and Ethics provides a framework to make that happen. It's our shared responsibility to operate with integrity and act ethically.

Dear colleagues,

We have high standards at Assurant. Nowhere is this more evident than our expectations for ethical conduct by our employees throughout our company. Consistent with The Assurant Way, our conduct is a reflection of our culture, built on the foundation of our uncompromising values: **COMMON SENSE, COMMON DECENCY, UNCOMMON THINKING, UNCOMMON RESULTS.** By living these values, we're building a culture based on trust and respect, and solving tough challenges with integrity — all because we want to help people thrive in a connected world.

To be the leading global business services company that supports, protects, and connects major consumer purchases, we have to earn the trust of our stakeholders. Our customers, employees, shareholders, and anyone else who interacts with Assurant must be able to trust that we'll always operate with the highest ethical standards — that we'll do the right thing every time. Our Code of Business Conduct and Ethics ("Code") unites us. It guides our decision-making and how we treat one another and our customers.

There's no one better positioned to help us stay consistent and true to our values than you. This Code will help you become familiar with the policies and principles that define how we do business and help you make decisions consistent with them. Every employee is expected to read and understand our Code to ensure that your day-to-day actions and decisions proudly reflect the values of Assurant. You must seek out answers to questions when you have them and speak up when you've observed potential violations of our Code and our policies.

I ask each of you to join me in making a personal commitment to live our values and abide by our Code in everything we do. This will not only promote the success of our company, but also allow us to share a sense of pride every day in working for Assurant.

Keith Demmings
President and Chief Executive Officer



Code of Ethics Online

Visit: ethics.assurant.com

or scan QR code

Ethics and Compliance Helpline

Web: helpline.assurant.com

Visit the helpline online for phone number options.

Anonymous SMS: **786-755-1030** (U.S. only at this time)

Our Core PRINCIPLES



The Assurant Way, Our Values, and Code Purpose

- Know and comply with the Code of Business Conduct and Ethics and speak up if we have concerns or suspect violations.
- Comply with all applicable laws, rules and regulations, and policies in all jurisdictions where we do business and deal with potential violations decisively.

Responsibility to Do the Right Thing

- Practice sound ethical decision-making and take actions that will maintain an ethical workplace.
- Be fair in our employment practices and prioritize doing right by our employees.
- Communicate honestly, transparently, accurately, and with positive intent.
- Always speak up when we see or have knowledge of conduct that's not aligned with Assurant values and policies.

Responsibility to Our People

- Treat others with dignity. Respect our diversity of cultures, backgrounds, experiences, and thought.
- Maintain a safe, secure, and respectful work environment. Speak up about any activity that can pose a threat to or harm others.

Responsibility to Assurant and Our Shareholders

- Protect all company assets — our physical assets, financial assets, technology and information assets, intellectual property, business relationships, and the Assurant brand in the marketplace.
- Maintain integrity in personal investment activities, ensuring they don't conflict with Assurant or client interests and aren't made with knowledge of material nonpublic information relating to the investment.

- Recognize that offering, giving, soliciting, or receiving anything of value that's intended to give, or appears to give, an improper business advantage or benefit isn't allowed.
- Avoid conflicts of interest or, in some cases, even the appearance of a conflict of interest inside and outside the workplace.
- Communicate responsibly. Seek authorization to speak on behalf of the company and use good judgment on social media.

Responsibility to Our Partners and Customers

- Ensure ethical business practices. Always deal fairly and in good faith; never take unfair advantage of anyone through manipulation, concealment, or the receiving or taking of gratuities, or engage in the mishandling or abuse of any privileged and confidential information.
- Maintain customer privacy by safeguarding their information and only using it in the manner permitted.
- Take care not to offer, promise, make, or authorize the giving of anything of value to a government official directly or indirectly or through a third party.
- Provide fair, accurate, timely, and understandable disclosure in the reports and documents we file with or submit to regulators, government officials and auditors, and in our other public communications.

Responsibility for Sustainability

- Recognize our responsibility as a global citizen. Strive to give back to the communities where we work and live, and do our part to reduce the environmental impact of our business decisions and operations.
- Make sure political activities and charitable contributions comply with applicable laws, regulations, and Assurant policies.

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The Assurant Way, Our Values, and Code Purpose



At Assurant, our culture is the secret of our success. We do things differently here. We call it The Assurant Way. The four dimensions of The Assurant Way describe the things that make our company culture unique: **our purpose**. **Our values**. **Our commitments**. And **our vision**.



Our Uncompromising Values

Our values guide the way we support our customers and work with one another. They're the lasting principles that we use to do business with integrity and win trust every day.

- **COMMON SENSE** - We seek practical solutions to keep life running smoothly for the clients and consumers we serve.
- **COMMON DECENCY** - We treat others with empathy and respect. We're honest and transparent. We act with the utmost integrity and are committed to doing the right thing.
- **UNCOMMON THINKING** - We're never satisfied with the status quo. We seek diverse perspectives and thrive on challenge. We believe there's always a way to build upon our successes.
- **UNCOMMON RESULTS** - We approach each opportunity with a sense of urgency and act decisively to deliver results that exceed expectations.

About the Code

All who work for, or on behalf of, Assurant, Inc. and/or its subsidiaries (collectively "Assurant") as well as Assurant's officers and directors have a duty to demonstrate the highest standards of business conduct and integrity. Our Code of Business Conduct and Ethics, also known as our "Code," "Code of Conduct," or "Code of Ethics" applies to Assurant's employees, officers, and directors. All employees, officers, and directors are required to certify at hire and annually thereafter that they've reviewed, understand, and will comply with the Code as well as complete Code training. In general, consultants, local representatives, agents, and contract or temporary workers are expected to follow the underlying principles of the Code as well as Assurant's Supplier Code of Conduct.

Throughout the Code, you'll find information, definitions of key terms, Q&As, and references to related policies to guide you in making ethical decisions. What you won't find is the answer to every question you may face at work or every related

policy. In the absence of a specific policy, you have a responsibility to use good judgment, comply with the spirit of the Code, and seek help from your manager, a member of the People Organization, or the Ethics Office if you have any questions or concerns.

Administration of the Code of Business Conduct and Ethics

Our Code, which is administered by the Ethics Office (a unit of the Ethics and Compliance department), is a living document that should serve as our first-line resource for ethical decision-making. Note that the Code and some related documents have been translated into those languages applicable to Assurant's operations.

Waivers Granted in Exceptional Circumstances

The Ethics Office may provide interpretations of the Code, in consultation with the Global Chief Ethics and Compliance Officer or the Chief Legal Officer, where appropriate. Waivers or exceptions to the Code will be granted only under exceptional circumstances. All waivers or exceptions require prior written approval by your manager and the Global Chief Ethics and Compliance Officer. Only the Assurant Board of Directors or a committee of the Board of Directors may grant waivers of compliance with the Code to the directors or executive officers. Any such waivers that are granted will be disclosed promptly and in accordance with all applicable laws and regulations, including those of the Securities and Exchange Commission and the New York Stock Exchange. The Code doesn't create any rights to continued employment and isn't an employment contract.

Compliance With the Law and Treating Customers Fairly

Assurant operates in a highly regulated environment. The Code applies to all countries where the company does business to the extent permissible by laws and regulations. Being aware of, and complying with, the laws and regulations under which we operate

is not only a critical part of our business, but also fundamental to who we are. Remember that it's important to comply with not just the letter, but also the spirit and intent of the law. Violating the law or engaging in unfair, deceptive, and abusive acts or practices may weaken customer or general public confidence and put our reputation at risk, and can result in regulator criticism, legal action, fines and penalties, and other negative repercussions for Assurant.

Q&A

Q: The different laws are so complicated and cover so many different areas. How can I be sure that I won't violate some little technicality? How am I supposed to understand it all? I'm not a lawyer.

A: Don't abandon your own judgment. If something seems intuitively wrong to you, ask before acting. You also have an obligation to understand the finer points of the rules governing your job. Don't hesitate to contact the Ethics Office or the Compliance or Legal departments if you need clarification of the laws or of our standards and policies.



If any portion of the Code or Assurant policies are inconsistent with any law and/or regulation, such law and/or regulation shall prevail. As an employee, officer, or director, you're expected to know and comply with the laws and regulations that apply to you and, if you ever have questions, contact your Compliance Officer, the Ethics Office, or a member of the People Organization for help. Violations of Assurant policy, this Code, or the law may result in appropriate disciplinary action, up to and including termination.

As a manager:

You have responsibility.

You play a critical role in ensuring that Assurant is a great place to work and in protecting our culture, our reputation, and our brand.

You have help.

If you're unsure of what to do in a situation, you have resources available to you, including your manager, Assurant policies, the People Organization, the Code of Conduct, and the Ethics and Compliance Helpline.

You have a voice.

When you believe something isn't right, you can speak up and share your concerns, knowing that Assurant wants to hear them and doesn't tolerate retaliation against employees.



Responsibility to do the **RIGHT THING**



Our success depends on the quality of the decisions that we make every day. Before each decision that we make as employees, officers, and directors of Assurant, we should consider the impact that our actions will have on each other, our customers, our business partners, the broader society, and Assurant.

Making Good Decisions

Not all situations you encounter are straightforward — how do you make the best choice when facing difficult or unclear circumstances? How do you navigate ethical dilemmas? While the Code won't tell you exactly what to do in every situation, it serves as a guide to help you make good decisions and navigate complex situations where the answer might not always be clear.

Ask yourself the following questions:

- Is the potential decision consistent with Assurant values and our Code?
- Do I have enough information to make a decision?
- Would I feel comfortable explaining my decision to my family? Am I willing to be held accountable for it?

If the answer to any of these questions is “no,” or you’re not sure, seek guidance before taking action.

Speak Up: Asking Questions and Sharing Concerns

You have the power to make a difference. There may be times when you see or hear something that doesn't align with who we are as a company, our values, and The Assurant Way. In those situations, you must speak up. Whether it's asking a question for guidance or reporting a concern, know that you have resources, and people, to help from the start. We're committed to providing a prompt, reliable, and fair process for identifying and appropriately addressing any misconduct by our employees or others acting on our behalf.

Contact the Assurant Ethics and Compliance Helpline at helpline.assurant.com.

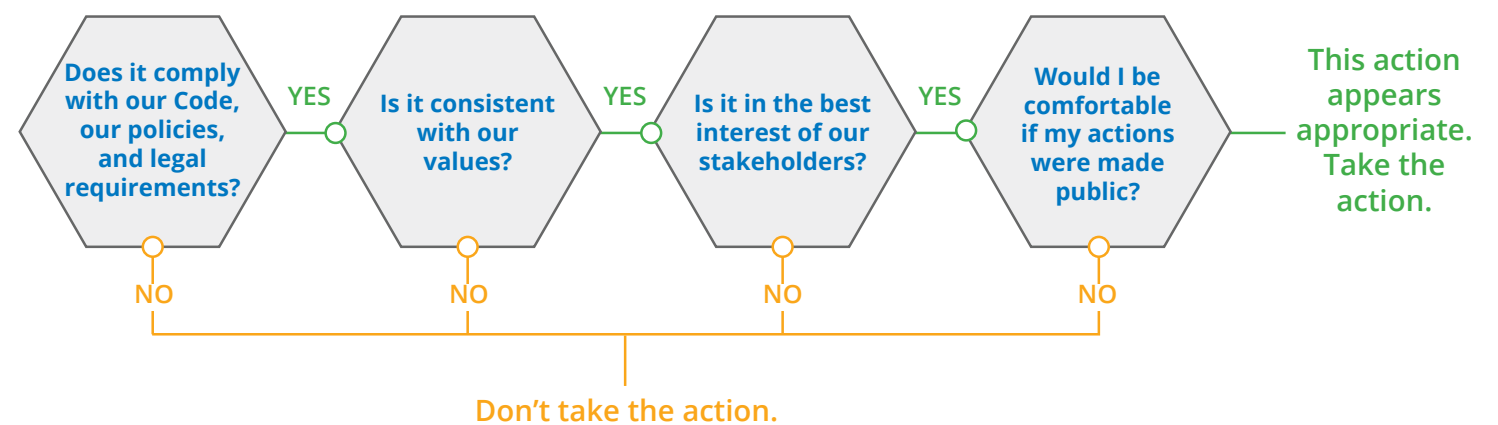
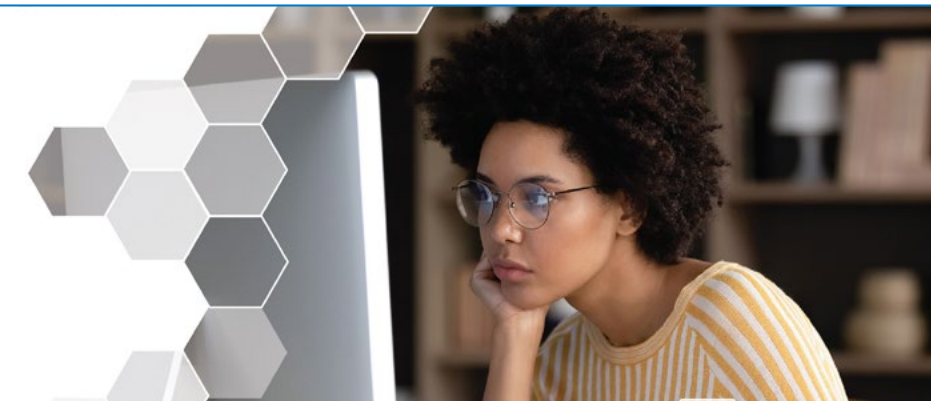


The Code and helpful resources are available online at ethics.assurant.com.



If you're ever unsure about what to do, ask yourself the following questions to help determine the best way to proceed.

Not sure? Ask for help.



We each have a responsibility to speak up if we see or know of any actions that might violate our Code, internal policies, or any law or regulation. Nothing in this Code prevents you from reporting potential violations of law to relevant government officials.

ETHICS AND COMPLIANCE CONTACT OPTIONS

Web: helpline.assurant.com

Visit the helpline online for phone number options.

Email: ethics@assurant.com

Translators are available so you can report in your preferred language. Concerns reported to the helpline are documented and forwarded to the Ethics Office for review and investigation as appropriate.

Regardless of how a report is made, Assurant prohibits retaliation against anyone who, in good faith, reports a possible violation or who participates in an investigation, even if sufficient evidence isn't found to substantiate the concern.

How to Speak Up:

- **Your Manager:** In many cases, the best place to start is with your manager, as they're often best equipped to understand and address your issue.
- **People Organization:** This team is your partner in navigating HR/work-related concerns.
- **Ethics Office:** If you have any questions or concerns, you have several options to reach out for a confidential conversation:
 - Contact your Regional Compliance Officer.
 - Email the Ethics Office mailbox at ethics@assurant.com.
- Ask a question or report a concern using the Ethics and Compliance Helpline web portal (can remain anonymous where permissible by local law): helpline.assurant.com
 - Regional phone numbers for contacting the Helpline can be found on the web portal.
 - Text the Helpline anonymously at 786-755-1030 (U.S. only at this time).

What Happens When You Bring a Concern to The Ethics Office?

- We listen.
- Your concern is kept confidential to the extent possible consistent with a thorough investigation.
- We will take the appropriate action to address your concern, then we'll follow up with you.
- Some concerns, like process or HR-related, will be a collaborative approach with the People Organization and/or other internal partners, while other concerns may result in a confidential investigation conducted by Ethics and Compliance. Rest assured, retaliation has no place at Assurant.

Investigations

We take all reports of misconduct seriously and will promptly review and, where appropriate, investigate all concerns. Investigations are conducted with integrity, discretion, and impartiality, ensuring fairness and confidentiality to the extent possible consistent with a thorough investigation. You're expected to cooperate fully and candidly in any investigation.

Q&A

Q: What does reporting a concern in "good faith" mean?

A: When you report a concern in "good faith," it means that you believe the information you're reporting is accurate and truthful (even if that belief turns out to be mistaken). It's a violation of our Code to make an allegation that you know or suspect is untrue. We protect employees who raise their concerns honestly and openly.

Depending on the kind of question you have or concern you wish to share, there are others you may contact, too. Refer to the Raising and Reporting Concerns policy for more information.

Manager Responsibilities

As a leader, you have a special responsibility in setting our culture, The Assurant Way, and the work environment for your team. Your team looks to you to lead with integrity. The way you make decisions

and handle concerns, different opinions, and even bad news will set the foundation for trust with your team(s), customers and stakeholders. Your success and the success of your team depends on the trust you build together.

- Familiarize yourself with the Code.
- Help employees with questions or direct them to someone who can.
- Escalate actual or suspected violations of the Code or law for review and/or investigation.
- Make sure the reporting employee is protected from any form of retaliation.

Q&A

Q: As a manager, how can I promote ethical behavior?

A: First and foremost, lead by example. Include discussions about workplace ethics in team meetings. Make team members feel comfortable asking questions when they have concerns. Remind employees that they won't be retaliated against for reporting information in good faith and in accordance with this Code. [Find helpful manager resources on the online Code of Ethics site and the People Manager Resources site on Teams.](#)

Q: As a manager, am I expected to discuss compliance issues with the team members I supervise?

A: Yes. As a supervisor, you're the most important compliance resource your team members have. You're both the conduit for valuable information about the risks we face as an organization and a channel that team members can use to ask questions and report any concerns. You should not only act ethically, but also explain to your team what you're doing and why.

If someone comes to you with a concern, you have a special responsibility to **listen** and **act**. Handling concerns appropriately is critical to preserving trust and protecting Assurant.



Responsibility to **OUR PEOPLE**



We maintain a work environment that empowers everyone to do their best work. A safe workplace inspires trust and allows us all to contribute and succeed. Discrimination, harassment, and unsafe working conditions are in conflict with our values and have no place within Assurant.



Assurant strictly prohibits harassment, including, but not limited to, sexual harassment, bullying, and intimidation by or against any individuals involved in our operations, including employees, applicants, vendors, contractors, clients, and any other third party involved in or working with Assurant.

Diversity, Equity, and Inclusion

We work better together because of our differences, not despite them. We each share responsibility for fostering an inclusive and respectful workplace. We build and empower diverse winning teams.

Our responsibilities:

- We value the contributions of every employee and celebrate each other's diverse identities, abilities, strengths, differences, and experiences.
- We're committed to creating and maintaining a safe, supportive and respectful work environment that is free from harassment of any form, and any other inappropriate behavior.
- We make employment decisions based on job qualifications, merit, and company needs.
- We avoid and prevent any type of discrimination, including those based on protected characteristics or protected activities.
- We treat our colleagues, customers, and third parties fairly and with respect; this is critical to who we are and how we do business.
- We're committed to hiring people with disabilities and provide reasonable accommodations to qualified employees.

Q&A

Q: I believe a co-worker may have been the victim of harassment. What happens after I report it?

A: Each of us should conduct ourselves professionally and report discrimination, harassment, or retaliation concerns to management, the People Organization, or the Ethics and Compliance Helpline. Your concern will be investigated. Employees found to have engaged in discrimination or harassment will be subject to disciplinary action up to and including termination of employment. Threats or retaliation

against individuals for reporting discrimination or harassment or participating in any related investigation is prohibited.

Workplace Health and Safety

We're committed to the highest standards of safety to care for and protect each other, our business partners and our communities. We each share the responsibility of maintaining a safe, secure, and healthy workplace, and of protecting our people and our operations.

Our responsibilities:

- We immediately report any unsafe conditions or threats of violence to a manager, People Organization Partner, and/or [Global Security](#).
- We regularly review the Emergency Action Plan for our work location.
- We don't bring any weapons into the Assurant workplace or to any off-site events or activities while representing Assurant.
- We follow the alcohol and drug policy and recognize that, when representing or acting on behalf of Assurant, we're a reflection of Assurant and its brand.
- We display and swipe our company badge where required. We don't allow others to enter without proper authorization.
- We help contingent workers and others we work with to understand and follow our safety and security procedures.
- We report to the People Organization all criminal convictions involving breach of trust.

For additional guidance, see the Assurant ISO 11 Secure Facilities Policy.

Assurant doesn't tolerate threats or acts of violence in the workplace or while in the course of work, regardless of work location. Contact Global Security for information regarding reporting any threat or act of violence.

Responsibility to Assurant and **OUR SHAREHOLDERS**



As a publicly traded global company, we have a duty to protect Assurant assets, systems, records, information, interests, and our company name to maintain the trust our shareholders have placed in us and keep our company strong and thriving.

Protecting Intellectual Property

Innovative ideas and solutions are a central factor in Assurant's success. We respect and protect the copyrights, patents, trademarks, confidential information, and intellectual property of Assurant, as well as those of our clients, business partners, competitors, suppliers, and customers, consistent with contractual terms and regulatory and legal requirements.

Our responsibilities:

- We only use our intellectual property for Assurant's benefit, never for personal gain or for others outside of Assurant.
- We only use or share Assurant's intellectual property with people outside Assurant when proper controls are in place.
- We ensure we have the appropriate rights and permissions before using third-party materials.
- We protect Assurant's brand and logo and use them with the Information Security Policy and Brand Guide in mind.

Q&A

Q: What are the intellectual property rules at Assurant?

A: Generally, Assurant will own the intellectual property created by its employees in the course of their employment.

Q: What does it mean to respect the intellectual property rights of others?

A: Assurant will obtain permission before using patents, trademarks, trade secrets, and copyrights that belong to others. Assurant won't unlawfully use intellectual property that it doesn't own in any of its products, services, or advertising.



Company records include:

- Customer information
- Sales information
- Payroll
- Contracts
- Travel and expense reports
- Project files
- Accounting and financial data
- Measurement and performance records
- Policies
- All other records maintained in the ordinary course of our business

We each have the legal responsibility to demonstrate the proper care and management of Assurant records.

- Maintain the integrity and authenticity of all records.
- Keep records for the appropriate amount of time (the retention period).
- Safeguard records in such a way that they're not damaged or destroyed, and preserved if subject to a legal hold.
- Keep records so that you can find them, open them and read them for the full retention period.
- Dispose of records promptly and in an appropriate manner once the retention period has expired.

Protecting Confidential Information

Customers, suppliers, and companies with whom we do business trust us to be good stewards of their confidential information, whether that information relates to financial, personal, or business matters. We respect and protect this data with care and diligence.

Our responsibilities:

- We handle our confidential information with care and avoid discussions in public places or with others who don't need to know.
- We maintain confidentiality even if we stop working for Assurant and return confidential information before leaving.
- We respect the confidentiality of our business partners, customers, suppliers, and former employers and don't use their information without prior legal approval. We understand that nothing in the Code prevents us from reporting possible legal or regulatory violations to relevant government officials.

Q&A

Q: Confidential information comes in what forms?

A: It can be written, verbal, telephonic, or electronic. Confidential information may pertain to our company itself or to the customers, suppliers, or companies with whom we do business.

Q: How do you know what information is confidential information?

A: A best practice is to assume that all information about our company and its business (including information concerning past, present, and prospective customers, business partners, suppliers, directors, and employees) is confidential unless the contrary is clear.

Q: I have access to useful information from a prior employer. Can I use it at Assurant?

A: No. Sharing confidential information from a former employer is unethical and can also expose you and Assurant to legal liabilities.

Don't disclose any confidential information of a prior employer unless it's already been made public through no action of your own.



Before disclosing confidential information:

- Be sure you're permitted to do so under applicable law, regulations, and company policies or procedures.
- Disclose it only to those who are authorized to receive it and who need to know it to do their job.
- Limit the amount of information shared to what's required to achieve the stated business purpose.
- Obtain an Assurant-approved Confidentiality Agreement, Nondisclosure Agreement, or other agreement with appropriate company-approved privacy clauses (if required) when sharing it with someone outside Assurant.
- Make sure the recipient knows that the information is confidential, and any restrictions related to its use or dissemination. If the information is received or shared in consultation with Assurant's legal representatives, seek guidance from Legal before sharing it with others.

Information Technology and Cybersecurity

We're responsible stewards of Assurant's technology resources. Our information technology is critical to our operations and allows us to work more effectively to meet our business objectives. These resources belong to Assurant, and we use them responsibly and securely to protect against cybersecurity threats and vulnerabilities.

Our responsibilities:

- We only use Assurant-authorized hardware, software, and other IT services.
- We protect and secure the data on our laptops and other devices when traveling on business or working remotely.
- We exercise good judgment when using company-provided technology resources and prevent unauthorized access to Assurant information.
- We don't use Assurant resources to engage in inappropriate communications or access sites that are offensive, illegal, or obscene.
- We follow the guidelines in the Acceptable Use and Information Security policies including reporting security incidents promptly.

Q&A

Q: I received an email from an unknown sender on my Assurant email account and, while using my company-issued computer, I may have clicked on a file that was attached to the message. I don't think the file downloaded, and I have since deleted it. Is there anything else I should do?

A: Yes. Immediately report the incident to the Assurant Information Security Team as the laptop and the network may be compromised. Use the "Manage Unwanted" function in Outlook to notify the Assurant Security Team.

Safeguarding Our Assets

Whether it's financial, records and information, technology, or physical property, our assets are a valuable aspect of delivering on our promises to our customers. We each have the responsibility to

safeguard them against fraud, theft, loss, and abuse.

Our responsibilities:

- We honestly and accurately document and report financial transactions, consistent with internal controls, applicable laws, regulations, and accounting practices.
- We protect Assurant resources from fraud, waste, and abuse as well as report any suspect activities immediately.
- We protect company assets (e.g., Assurant-owned computer, corporate credit card) from misuse, loss, damage, cybersecurity threats, or theft.
- We're committed to maintaining accurate company Records and accounts. Review the Records and Information Management policies for additional information.
- We follow the Raising and Reporting Concerns Policy and immediately report any suspected fraud or embezzlement, or any form of dishonesty by an employee, client, customer, and/or other third party.

Insider Trading

We recognize that, through the course of our work, we may become aware of material, nonpublic information about Assurant or another company with whom we do business. We maintain trust with our investors and the public by complying with securities laws, including insider trading laws, which means we don't trade in the securities of Assurant or such other company if we are aware of material, nonpublic information about that company.

We guard this sensitive data and don't use it for financial and other benefit, and strictly forbid the sharing of this information. Employees and others who are subject to the company's Insider Trading Policy should refer to the policy for more information.

Our responsibilities:

- We follow our Insider Trading policy and laws
- We never buy or sell stocks based on material, nonpublic information (inside information) about Assurant or other companies through the course of our work with Assurant.

- We protect the confidentiality of Assurant's nonpublic information and only share with other Assurant employees on a need-to-know basis.
- We don't give someone else a tip to buy or sell securities of any company while having material, nonpublic information.
- We don't share material, nonpublic information outside Assurant unless legal protections, such as a Confidentiality Agreement, are in place.
- We follow preclearance and blackout procedures as applicable.
- We recognize that any employee, officer, director, consultant, or other independent contractor of Assurant who violates insider trading laws or our Insider Trading policy will be subject to appropriate disciplinary action up to and including termination, and may also be subject to criminal, civil, or other penalties.

Before engaging in any transaction that could be deemed insider trading, you should carefully consider how enforcement authorities and others might view the transaction. If you have any questions about the propriety of any transaction in the company's or any other company's stock, bonds or other securities, consult with a Securities Officer identified in the company's Insider Trading Policy or the Chief Legal Officer before undertaking the transaction.

Q&A

Q: How do I know whether I'm aware of material, nonpublic information about our company?

A: Information is material if it's important to an investor making a decision about buying or selling Assurant's stock. This information includes financial results, business acquisitions or sales, senior management changes, government investigations, changes in significant customers and product launches. If you're unsure whether you have material information, refrain from trading, and consult your manager or the legal department.

Avoiding Conflicts of Interest

We're each responsible for objective and unbiased decision-making in our work on behalf of Assurant. A conflict of interest can arise when our personal interest interferes — or even appears to interfere — with the interests of Assurant and may make it difficult to perform our work objectively and effectively.

Our responsibilities:

- We avoid actions and decisions that create, or even appear to create, a conflict of interest with Assurant.
- We never use our position at Assurant for improper personal gain.
- We don't improperly use Assurant resources or influence because even the perception of a conflict of interest may have negative consequences.
- We consult the Conflict of Interest policy for additional guidance.
- When potential conflicts of interest arise, we disclose them promptly through the [Conflict of Interest Disclosure](#) process.

Q&A

Q: I would like to work part time on the weekends at a local department store to make extra money for the holidays. Is this a conflict?

A: Before starting a second job, you must obtain your manager's approval. Additional approval and reporting may also be required. For additional information and guidance, please visit the Conflict of Interest policy. The second job must not interfere in any way with your job performance at Assurant.

Q: I've been asked to serve on the board of a local nonprofit organization. Do I need to report this?

A: Prior to agreeing to serve on the board of directors of an organization (other than an Assurant-owned company), discuss it with your manager, and seek approval by the Ethics Office to understand expectations that may come with serving in such capacity and to determine if that service will create any actual or perceived conflict of interest or interfere with your job duties.

Q: My team is hiring for an open position and I've been asked to interview the candidates. One of the candidates is related to me. Should I tell my manager?

A: Yes. You must disclose you're related to a job candidate the company is considering hiring if you're involved in the hiring process or the candidate will be working with you.

Gifts, Travel, and Entertainment

We're committed to winning business on the quality of our products and service. Business gratuities, which include anything of value, such as gifts, meals, or entertainment, can strengthen working relationships with our business partners. But gifts, meals, or trips that are extravagant or lack transparency or a legitimate purpose may be viewed as bribes or as simply inappropriate and erode trust and harm our business.

Our responsibilities:

- We don't give or ask for business gratuities to influence the other person or organization to do something in return.
- We limit giving or receiving business gratuities to what is reasonable and appropriate under the circumstances and avoid frequent gifts to or from the same person or organization.
- We obtain approval and follow the Gifts, Travel, and/or Entertainment Disclosure process as required.
- We don't offer, promise, make, or authorize the giving of anything of value to a government official that's inconsistent with our Code and Anti-Bribery and Corruption policy.
- If we make charitable donations, we do so in accordance with Assurant policy to support legitimate charitable causes. See the [Assurant Cares](#) site on Connect for additional information including how to donate any gift to the Assurant Foundation.
- Gifts given or received must be [disclosed](#) and approved prior to giving or accepting, per our Anti-Bribery and Corruption policy.
- Subject to local restrictions, it's permissible to give and receive retail, food establishment, or similar reputable business gift cards (including e-gift cards or



Potential Conflict of Interest Situations to Disclose

- Working with a relative at Assurant
- Having a relative work for an Assurant vendor or client
- Working with, or for, a competitor of Assurant
- Starting a business that competes with Assurant
- Working or consulting outside Assurant
- Owning a financial interest in an Assurant vendor or client
- Dating or having a romantic relationship with a supervisor or subordinate
- Serving on a board or trade association (see charitable organizations section for more information)

Additional conflict of interest procedures may apply in certain jurisdictions. See the Conflict of Interest policy for more information.

Gift Guidelines

In your capacity as an employee, officer, or director, you may accept a noncash gift, including a meal or entertainment, that:

- Is reasonable in value
- Is a part of the normal business process
- Is lawful
- Is given or accepted infrequently

- Cannot be construed as a bribe or payoff, or as an attempt to influence you
- Reflects good taste and judgment

Please see the Anti-Bribery and Corruption Policy/Gifts Procedure for additional information including how to donate any gift to the Assurant Foundation.

gift certificates) valued at \$25 or less, per recipient. Under no circumstance may we accept or offer gifts of cash or cash equivalents such as general-purpose gift cards (e.g., Visa, Mastercard, American Express) from or to anyone who does or may seek to do business with Assurant.

Social Media and Communicating Externally

Our communications externally influence how Assurant is perceived in the markets and regions we operate in and by the consumers and communities we serve. We provide clear and accurate information and are careful not to disclose confidential information.

Our responsibilities:

- We embrace the open exchange of ideas, discussion, learning, and collaboration, and do it respectfully and in line with our values.
- We're each responsible and accountable for how we engage with social media.
- We don't speak for Assurant on social media unless authorized to do so, and we clearly state when we're sharing our personal views.
- We never disclose Assurant confidential or proprietary information, and we comply with our Social Media policy for employees.
- We communicate with regulators in an open, transparent and proactive way.

- We refer media contacts to the Assurant External Communications team, and investor and analyst contacts to Investor Relations.
- Assurant employees, officers, and directors who engage in social media on behalf of the company in an official capacity are required to also comply with the Assurant Social Media Guidelines, Assurant Brand Guidelines and additional processes and practices.

Q&A

Q: I enjoy using social media like Twitter and Facebook to communicate about Assurant and my job. Does Assurant have rules regarding this?

A: A general rule to remember when using social media is to think about the impact of statements that you make. Keep in mind that these transmissions are permanent and easily transferrable, and can affect our company's reputation and relationships with coworkers and customers. When using social media, don't make comments on behalf of Assurant without proper authorization. Also, you must not disclose Assurant's confidential or proprietary information about our business, suppliers, or customers.



If you're unsure of how these policies may apply to your social media activities, contact the Social Business team: social@assurant.com.

Responsibility to Our **PARTNERS AND CUSTOMERS**



Trust is the foundation of every customer, partner, and company relationship. To build long-lasting business relationships, we follow the law and treat our customers the way we would want to be treated ourselves — in an open, honest, and respectful manner. We empower our customers and partners to make informed decisions about the products and services we offer and to select what best meets their needs and circumstances.

Business Partners

We value the trusted relationships we have with our business partners who share our commitment to ethics and compliance, diversity and inclusion, human rights, environmental sustainability, and fair dealing.

Our responsibilities:

- We're committed to maintaining our reputation and only work with suppliers, customers, and other business partners committed to doing business ethically.
- We conduct each business relationship with honesty, fairness, mutual respect, and nondiscrimination.
- We never take advantage of our business partners through manipulation, concealment, misuse of confidential information, misrepresentation of facts, or any other unfair dealing or practice.
- We never collude with business partners to take advantage of others.
- We select business partners based on objective criteria and the value they bring to Assurant, not due to personal relationships or friendships. We also ensure that they understand our standards for high performance in ethics and compliance in addition to their contractual obligations.
- We're alert to any signs that a business partner is violating applicable laws or regulations.
- We promptly disclose any situation that may appear to involve a conflict of interest.
- We protect the confidential and proprietary information of our business partners.
- We complete applicable due diligence on prospective suppliers and customers before entering into contracts, and we follow our

Procurement, Anti-Corruption, and Third-Party policies.

- We seek to understand and follow all relevant conflict minerals regulations in any country in which we do business.

Privacy and Data Protection

We're successful when our customers trust us to protect their privacy and use their data in the ways that they permit us. We protect and respect the privacy of our employees, customers, clients, partners, and other third parties who entrust us with their personal information.

Our responsibilities:

- We follow applicable data protection and privacy laws.
- We properly secure personal data.
- We only collect and use personal data for legitimate business purposes and follow our Privacy Policy.
- We only share personal data within Assurant on a need-to-know basis.
- We ensure our third parties follow Assurant's data protection and security standards.
- We keep personal data according to our Global Records Retention Schedule and Information Management Policy and then destroy it securely.
- We promptly report suspected privacy incidents and data breaches.



Money Laundering, Terrorist Financing, and Economic Sanctions

We're committed to preventing criminals from abusing our business systems and processes to further unlawful activities. Assurant employees must always follow appropriate due diligence procedures designed to prevent someone from using our company to disguise criminal transactions or engage in any type of money laundering activity. Further, Assurant screens third parties to ensure we don't transact with individuals or entities on applicable sanctions and/or terrorist watchlists. If you're concerned about the reputation of any third party seeking to do business or doing business with Assurant, contact the Compliance or the Ethics Office.

We all have a role to play in helping to prevent criminals from using Assurant's products and services. This includes an obligation to know our customers, identify and escalate suspicious activity, maintain required documentation throughout a business relationship, and escalate transactions with sanctioned countries, people, or businesses.

Fair Competition and Antitrust

We seek competitive advantage through superior performance, never through illegal or unethical business practices. We comply with all applicable fair competition and antitrust laws everywhere we operate.

Our responsibilities:

- We don't suggest or engage in any actions, understandings, or agreements that try to or could limit competition.
- We avoid any kind of contact or discussion with competitors that could create the appearance of impropriety and never share or discuss competitively sensitive information. If we come across these situations, we promptly end them and notify Legal immediately.
- We don't take advantage of our market position.
- We only use, obtain, accept, or receive information about competitors, customers, and suppliers to which Assurant is entitled.

Q&A

Q: What is competitive intelligence and how does it apply to me and my job?

A: Generally, competitive intelligence refers to the ability to gather, analyze, and use information collected on competitors, customers, and other market factors that contribute to a business's competitive advantage. Please contact your Compliance Officer or Legal for assistance in determining whether the competitive intelligence you have is appropriate to use.

Anti-Bribery and Anti-Corruption

Assurant is committed to conducting its business fairly, honorably, with integrity, and in compliance with the law in all jurisdictions where it operates, including all applicable anti-corruption and anti-bribery laws. Assurant has a zero-tolerance policy approach to any form of bribery and corruption. Our success depends on the superiority of our products and services, and never as a result of bribery or other means of corruption. Our values don't permit corrupt acts or payments as a means to gain or retain business for or on our behalf — even if that means losing or walking away from a business transaction.

Our responsibilities:

We never offer, promise to provide, or give anything of value to anyone in order to gain a business advantage as described in our Anti-Bribery and Corruption policy.

- We follow due diligence procedures before hiring a third party.
- We don't ask a third party to do something that we, ourselves, are prohibited from doing.
- We keep thorough and complete records of all transactions with third parties according to our Records and Information Management Policy.
- We don't enter into verbal contractual relationships with third parties unless in consultation with Legal.
- We don't provide business courtesies, including gifts, travel, and/or entertainment, to government officials or their families without complying with our Anti-Bribery and Corruption policy.



Q&A

Q: Is the risk of bribery and corruption a big deal at Assurant?

A: Bribery and corruption risks are a concern worldwide and such risks can undermine the health and viability of Assurant and the environments where we operate, can greatly damage our reputation, and can result in severe fines and criminal proceedings.

Interacting With Government Officials

Assurant follows the highest ethical standards when conducting business with government officials. Assurant strictly prohibits any promise, offer, or provision of anything of value to any government official for the purpose of improperly obtaining or retaining business, influencing action, or obtaining any form of improper benefit. We comply with federal, state, and local laws when involved in public policy matters and when developing and maintaining relationships with government officials.

Our responsibilities:

- We don't offer, promise, make, or authorize the giving of anything of value to a government official, directly or indirectly, through family members, close associates, brokers, agents, attorneys, contractors or other business partners that's inconsistent with our Code and Anti-Bribery and Corruption policy.
- We prohibit even small facilitation payments and, if requested by a government official to provide one, we immediately contact Compliance.
- We cooperate fully with all government and regulatory agency audits and investigations.
- Consistent with the company's Political Activities Policy Statement, we each have the right to participate in the political process on our own time and at our own expense but may not use Assurant resources for political purposes or contributions without prior approval from Legal. Additional rules may apply to your line of business or role with Assurant.

Import, Export, and Anti-Boycott Laws

As a global company, we're committed to complying with laws and regulations governing the import and export of Assurant products, services, technologies, and information everywhere we operate. To deliver on our commitments, we always know what we're importing and exporting, the parties in the transaction and the origin/destination of our goods.

Our responsibilities:

We comply with all applicable laws, regulations, and restrictions relating to import, export, boycotts, customs, and embargoes.

- We ensure that all imports and exports comply with these requirements.
- Before we engage in these activities, we consult with local import/export support or the Corporate Compliance team.
- We only use Assurant-approved third parties, including customs brokers and logistics providers.
- We ensure information provided to any Customs official or to any agent hired to facilitate Assurant imports and exports is accurate and truthful.

- We report any concerns about customs payments that seem suspicious or out of the ordinary.
- We maintain records of all import and export transactions according to our Record and Information Management policy.

Q&A

Q: I am involved with shipping cellphones out of the country. What should I know?

A: Some products or technologies may require an export or an import license before shipment, and certain technical information may not be posted on the internet or attached to an email. Local law might prohibit a sale altogether. These obligations can't be avoided by using a third party that would deliver the company's products to a forbidden destination, person, or entity.

Q: I've found a new supplier to provide cellphone parts at lower-than-market rates. What should I do?

A: Before purchasing parts, work with Procurement to get a contract in place. By engaging Procurement early, we can screen the supplier to ensure it's legitimate and its parts comply with chain of custody and conflict minerals regulations.

Ethics Office: If you have any questions or concerns, you have several options to reach out for a confidential conversation:

- Contact your Regional Compliance Officer.
- Email The Ethics Office mailbox at ethics@Assurant.com.

Ask a question or report a concern using the Ethics and Compliance Helpline web portal (can remain anonymous where permissible by local law):

helpline.assurant.com

- Regional phone numbers for contacting the Helpline can be found on the web portal.
- Text the Helpline anonymously to 786-755-1030 (U.S. only at this time).



Responsibility for **SUSTAINABILITY**



We have the responsibility to be a good global citizen, to be good stewards of the resources entrusted to us, and to leverage our success in order to strengthen the communities where we live and work.

Charitable Organizations

Assurant is committed to strengthening the communities where we operate for the businesses, families, and individuals within them. We encourage our employees to support and volunteer with charitable causes through our Engagement Champion teams and individually. To ensure coordination across our lines of business and geography, and to maximize Assurant's impact in our communities, employees should consult with the Assurant Cares team regarding all charitable contributions, matching gifts, and team-based volunteering events.

Our responsibilities:

- Prior to agreeing to serve on the board of directors of any company or organization (other than an Assurant-owned company), we discuss it with our manager, and seek approval from the Ethics Office to understand expectations that may come with serving in such capacity and to determine if that service will create any actual or perceived conflict of interest or interfere with our job duties.
- We excuse ourselves from participating in any discussions or decisions that could conflict with Assurant's interests.
- When engaged in non-Assurant-supported fundraising activities, we don't solicit anyone else for whom we have a responsibility to hire, engage, or supervise.
- We don't pressure other employees to contribute to or otherwise support specific charitable organizations.
- We direct solicitations for charitable contributions from customers or third parties to the Assurant Cares program before any commitments are made. We obtain prior written approval from the Assurant Cares team, Security, and/or Facilities before use of Assurant's property, facilities, or other assets (including logo) for nonprofit or pro bono events.

Human Rights

We're committed to respecting the human rights and dignity of everyone. We comply with and value our business partners who share a similar commitment to:

- Laws and international standards including the International Labour Organization (ILO) that promote safe working conditions and individual security.
- Laws prohibiting forced labor.
- Prohibitions on the employment of underage children.
- Prohibitions on human trafficking.
- Adhere to laws and relevant standards and frameworks that ensure freedom of association and the right to engage in collective bargaining.
- Monitor and remedy potential human rights impacts.
- Communicate our human rights commitments to internal and external stakeholders.

Climate

We're committed to operating with a meaningful environmental commitment that minimizes our carbon footprint and enhances sustainability.

We see the business value of taking a leadership position in addressing our own environmental footprint, encouraging employees to be environmentally conscious, finding innovative solutions to strengthen communities, and helping customers become more resilient. We focus on managing multiple environmental risks and integrating sustainable business practices across our supply chain, in our investment practices, and throughout our operations worldwide. We all do better when we make decisions that care for and improve the environment. For more information regarding Assurant's environmental commitment, see the Sustainability Report.

Additional RESOURCES



Key Definitions

Antitrust and Competition Laws:

Antitrust and competition laws serve to prevent anticompetitive business practices, such as price fixing or impairing the ability of others to compete in the market.

Anything of Value:

A broad concept that includes, without limitation, financial or other advantages, such as cash payments, loans, inappropriate gifts, travel, lodging, services, amenities, employment opportunities and internships, charitable donations, and tickets to sporting and other events.

Breach of Trust:

A criminal offense involving dishonesty, breach of trust or money laundering. Some examples include, but are not limited to, theft, misappropriation, embezzlement, forgery, false identification, false report to law enforcement, tax evasion, drug possession with intent to distribute, and writing of a bad check.

Bribery:

The intentional offer, promise or giving of anything of value, directly or indirectly, to or from any person to improperly influence that person as an inducement for that person to act improperly or refrain from acting properly, including in accordance with official or fiduciary duties or contractual or other obligations, or to gain any other improper advantage.

Bullying:

Typically a form of repeated, unreasonable, persistent, and aggressive behavior directed at an individual or individuals that's intended to cause fear, intimidation, humiliation, and distress, or harm to another person's body, feelings, self-esteem, or reputation.

Chain of Custody:

All steps in a supply chain that take possession of the product, including miners, transporters, exporters, processors, and manufacturers. It provides record of the sequence of entities that have custody of minerals as they move through a supply chain that traces a material back to its origin. Some examples of

a chain of custody regulation are verifying that slave labor wasn't used in any manufacturing process and that no parts used in production were obtained from sanctioned countries.

Company Record:

A record is any documented information (in any media like paper or digital) that's necessary to satisfy the needs of Assurant's business operations, legal and regulatory requirements, fiscal responsibilities, and historical needs.

Confidential Information:

Information that you acquire, receive, learn, create, develop, or have access to because of your employment at Assurant and that's not made readily available to the public.

Please refer to the [Assurant Information Classification Guide](#) for more information.

Conflict Minerals:

A natural resource in the global supply chain extracted from a geographical region of conflict and used to finance civil wars and perpetrate human rights violations in that region.

Conflict of Interest:

A conflict of interest may occur when your personal interests or the activities you perform on behalf of Assurant interfere (or appear to interfere) with the company's, a shareholder's, or a client's best interest. A conflict can arise when you take action or have interests that make it difficult to perform your company work objectively.

Discrimination:

In alignment with the International Labour Organization (ILO), any distinction, exclusion, or preference, especially in a worse way from the way in which you treat other people on the basis of actual or perceived race, color, religion, national origin, ancestry, physical or mental disability, medical condition, genetic information, marital status (including registered domestic partnership status), sex and gender (including pregnancy, childbirth, lactation, and related medical conditions), gender identity and expression,

age, sexual orientation, past or present military service, immigration status, or any other status protected by the laws or regulations in the locations where Assurant operates.

Diversity, Equity, and Inclusion (DEI):

- **Diversity:** It's who we are. Diversity encompasses the range of similarities and differences everyone brings to the workplace.
- **Equity:** It's how we're treated. Equity is the guarantee of fair treatment, access, opportunity, and advancement for everyone while striving to identify and eliminate barriers that have prevented the full participation of some groups.
- **Inclusion:** It's how we feel. An inclusive workplace recognizes, appreciates, and effectively utilizes the talents, skills, and perspectives of everyone.

Economic Sanctions:

Economic sanctions are foreign policy tools that impose strict limits on a range of activities, including providing financial services or conducting transactions. They're imposed by governments or international bodies to try to isolate or impede a specified individual, entity, or jurisdiction for some specified purpose or activity.

Facilitation Payments:

Payments to government officials to expedite an administrative action, such as securing a permit.

Fraud:

The use of deception with the intention of obtaining an advantage, avoiding an obligation, or causing loss to another party. Internal fraud includes any effort by an employee to deprive Assurant or its customers and partners of any assets by theft, deception, or other corrupt means.

Government Officials:

This term is defined broadly to include employees of government-controlled entities and public-international organizations, as well as elected officials and candidates for public office.

Harassment:

Unwelcome words, actions, or behaviors that denigrate, disrespect, or belittle an individual or create

a hostile, offensive, or intimidating work environment because of a protected category. Sometimes, a person's conduct may be considered harassment even if it wasn't intended to be offensive.

Human Trafficking:

Human trafficking includes, without limitation, recruiting, harboring, transporting, providing, or obtaining a person for labor or services through the use of force, coercion, fraud, or deception; the abuse of power or of a position of vulnerability; or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation. Exploitation includes, without limitation, involuntary servitude, peonage, debt bondage or slavery, the removal of organs, sex trafficking, or other forms of exploitation.

Inside Information:

Information about a business organization that isn't generally available to or known by the public (also called "nonpublic information").

Insider Trading:

Insider trading involves trading in a public company's stock by someone who has material, nonpublic information about that stock. Insider trading can be either illegal or legal depending on when the insider makes the trade. Generally, it's illegal when the material information is still nonpublic.

Intellectual Property (IP):

Knowledge, ideas, discoveries, formulas, inventions, and other intangible assets that have commercial value and are protected under copyright, patent, service mark, and trademark laws. Additional examples of intellectual property include technical inventories, brands and logos, software code, presentations, databases, customer lists, process documents, and product designs and roadmaps.

Legal Hold:

A legal hold suspends all document destruction procedures to preserve appropriate records or information under special circumstances, such as anticipated or actual litigation or government investigations. Legal identifies what types of records,

information, or documents are required to be placed under a legal hold.

Material, Nonpublic Information:

Information that a reasonable investor likely would consider important in deciding whether to buy, hold, or sell securities of a company.

Money Laundering:

Making money derived from unlawful activities "clean" by making it appear that the money came from legitimate sources or transactions.

Protected Activities:

Protected activities include reporting harassing conduct, discrimination, or retaliation; filing a claim of harassment; providing evidence in any investigation; or intervening to protect others who may have suffered harassing conduct, discrimination, or retaliation.

Protected Characteristics:

Protected characteristics are defined as age, ancestry, citizenship, color, creed, ethnicity, gender identity and expression, genetic information, marital status, mental or physical disability, national origin, pregnancy, race, religion, sex, sexual orientation, veteran status, or other categories defined by federal, state, or local law.

People (HR)/Work-Related Concerns:

Questions or concerns about benefits, conflict with a coworker or manager, workplace conduct, discrimination, performance, compensation, theft, or harassment.

Retaliation:

Taking adverse action against an employee in response to that employee's good faith report of an actual or suspected violation of our Code, company policies, or legal requirements.

It's against company policy to retaliate against any Assurant employee or representative who, in good faith, reported a violation or suspected violation of law, this Code, or other company policies. Additionally, retaliation against those who assist in an investigation into a reported violation is also prohibited. Any Assurant employee who retaliates against anyone who made a good faith complaint may be subject to

disciplinary action by the company up to and including termination of employment.

Sexual Harassment:

Sexual harassment is unwelcome verbal or physical behavior based upon a person's gender/sex and includes unwanted verbal or physical sexual advances; requests for sexual favors; or visual, verbal, or physical conduct of a sexual nature.

Social Media:

"Social media" and "social media activity" include all means of communicating or posting information and all content of any sort (such as text, images, videos, audio files or podcasts, presentations, or documents) on the internet and intranet.

Terrorist Financing:

Terrorist financing provides funds for terrorist activity. It may involve funds raised from legitimate sources, such as personal donations and profits from businesses and charitable organizations, as well as from criminal sources, such as the drug trade, the smuggling of weapons and other goods, fraud, kidnapping, and extortion.

Weapon:

The term weapon includes firearms, explosives, knives, and other weapons that might be considered dangerous or that could cause harm.

The Workplace:

The workplace includes actual worksites, any setting in which work-related business is being conducted (whether during or after normal business hours), online and electronic interactions with company employees and third parties involved in our operations, company-sponsored events, and company-owned/controlled property.

Code of Ethics
Online



Ethics and Compliance Helpline

Web: helpline.assurant.com

Visit the helpline online for phone number options.

Anonymous SMS: **786-755-1030**
(U.S. only at this time)



2022

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[Assurant.com](https://www.assurant.com)

Code of Business Conduct and Ethics Online: ethics.assurant.com

Assurant Ethics Office: ethics@Assurant.com

Ethics and Compliance Helpline: <http://helpline.assurant.com>