

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 operate in accordance with the principles and expectations as outlined in this Code of Supplier Conduct (“Code”) and with the contractual obligations set by their contracts with CUNA Mutual Group.

Decisions to work with Suppliers are based on their ability to perform and contribute to our collective success. We expect Suppliers to conduct business in an ethical way and in compliance with all applicable laws and regulations as well as CUNA Mutual Group’s Code of Conduct, policies and procedures.

While this Code does not outline every situation Suppliers may face, it does illustrate the important requirements and expectations we have of them when conducting business with CUNA Mutual Group. We know that our success greatly depends on the success of our Suppliers, so as we commit to doing business with integrity, we expect our Suppliers will also commit to these ethical business behaviors through abiding by the principles and expectations set forth in this Code of Supplier Conduct.

Speaking Up

Our company culture values speaking up and reporting any conduct that is not consistent with our values, Code of Conduct, Corporate Policies or applicable laws and regulations experienced or witnessed while conducting business at, with or on behalf of CUNA Mutual Group.

This includes actions that:

- Contradict our policies, Code of Conduct or a specific law or regulation.
- 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.

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

The Speak Freely Line, provided by a third-party, is available at <https://speakfreely.ethicspoint.com/> or 866-879-0265. Individuals can remain anonymous if they so choose. The Speak Freely Line can be reached 24 hours every day to report an ethics or compliance related questions or issues.

Supplier Conduct Principles & Expectations

We expect Suppliers 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 must ensure its confidentiality while in their care. Our Suppliers should also make every effort to respect CUNA Mutual Group's and others' intellectual property rights 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. We value social responsibility and environmental sustainability as well as the support of the communities where we live and work and expect the Suppliers we partner with to have similar goals. 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 share in our commitment to diversity equity and inclusion. At CUNA Mutual Group, diversity and inclusiveness are critical parts of our business strategy and we encourage external Suppliers to represent and support this strategy.

We expect Suppliers to be transparent and honest in every business interaction 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 embrace fair business practices. 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 relationships between CUNA Mutual Group employees and our Suppliers must be based on sound business considerations and fair competition. Our employees are instructed to not accept gifts such as:

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

We expect Suppliers to mitigate the risk of human trafficking and forced labor in all aspects of our business. CUNA Mutual Group strictly prohibits all forms of trafficking in persons, even if lawful in the governing jurisdiction.

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

Questions? Any questions regarding the Code of Supplier Conduct should be directed to the Director of Enterprise Procurement.