

VENDOR CODE OF CONDUCT

Vendor Code of Conduct (“VCC”)

Overview:

Kemper Corporation (together with its affiliates, “Kemper”) is committed to conducting business on an ethical basis in full accordance with the law, and it is our intention to select and retain vendors that share and embrace that commitment. While vendors are independent entities, their practices and actions may impact and/or reflect upon Kemper. As a result, any vendor who receives this VCC (a “Vendor”) from Kemper is expected to operate in accordance with the spirit of the standards of compliance and business conduct set forth in this VCC, and is responsible for ensuring that their employees, agents and subcontractors also operate in accordance with the spirit of these standards. Where this VCC may conflict with the terms of a Vendor’s contract with Kemper, the contract terms will prevail.

Compliance with Laws and Regulations:

Vendors shall comply with applicable laws and regulations of the countries, states, and localities in which they operate. Vendors shall have policies, procedures and programs in place which support compliance with applicable laws and regulations.

Employment Practices:

Kemper expects its Vendors to share its commitment to diversity, inclusion, equal employment opportunity, and a safe and harassment free workplace. All Vendor employment practices shall be in compliance with applicable laws and regulations, and shall not discriminate against any applicant or employee based on any legally-recognized basis, including, but not limited to: race, color, religion, sex (including pregnancy, lactation, childbirth or related medical conditions), sexual orientation, gender identity, age, national origin or ancestry, physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed servicemember status or any other status protected by federal, state or local law. Vendors shall comply with applicable wage and working hour laws and regulations, including those relating to minimum wages, overtime, maximum hours, and legally mandated benefits. Vendors shall prohibit harassment of any type, including, without limitation, threats of violence, verbal or psychological harassment or abuse, and/or sexual exploitation and abuse. Vendors shall not use any forced, compulsory, or involuntary labor, whether bonded, indentured, or imprisoned. Vendors shall not use child labor, defined as children below the local minimum working age or below the age of 15 years, whichever age is greater.

Ethical Dealings:

- In addition to complying with applicable laws and regulations, Vendors shall operate with integrity and in an ethical manner. We expect our Vendors to share our principles and uphold our standards and to have the appropriate policies, procedures and programs to ensure that their employees understand and adhere to these standards.
- Kemper is committed to being a responsible, impactful corporate citizen that respects human rights and the protection of those rights, and we expect our Vendors to share in that commitment. Kemper’s current policy with respect to human rights can be found under [“Kemper and ESG” at www.Kemper.com](http://www.Kemper.com), and Vendors shall act in a manner that is supportive of and consistent with that policy and Kemper’s related commitment to human rights.
- Vendors shall avoid conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with Kemper. Vendors shall promptly disclose to Kemper any actual or potential conflict of interest that arises in the course of business dealings with Kemper.
- Vendors shall not engage in bribery, corruption, embezzlement, extortion, kickbacks, unreasonable commission, inducements or fees and any other prohibited business practices.
- Vendors shall:
 - Comply with applicable trade laws, as well as applicable export/import laws and regulations.
 - Comply with applicable privacy and data laws, including data exportation/importation laws and regulations, and intellectual property rights.
 - Comply with antitrust and fair competition laws that govern the jurisdiction in which they conduct business.

- Not directly or indirectly engage in, or facilitate the engagement by others in, the deliberate and fraudulent diversion of funds from a tax authority.
- Not participate in international boycotts that are not sanctioned by the U.S. government or applicable laws.
- Not represent themselves as employees of Kemper.
- Not use Kemper's trademarks, brand assets, intellectual property or confidential information without prior authorization from Kemper.
- Not disclose its relationship with Kemper without prior authorization from Kemper, excluding cases where required by law, regulation or to comply with an active law enforcement investigation; and
- Not utilize social media in any way where the activity may adversely impact Kemper's reputation, analytic impartiality or create an actual or potential conflict of interest, or any appearance of a conflict, with Kemper.

Accurate Record Keeping:

Vendors shall accurately and securely capture, store, and retain, as appropriate, business records.

Personal, Confidential and Proprietary Information:

Vendors shall protect all sensitive information, including confidential, proprietary, and protected personal information. Information shall not be used for any purpose other than the business purpose for which it was provided without prior Kemper authorization. Where such information is hosted or transferred electronically, Vendors shall follow the NIST or ISO framework and maintain proper security controls. In addition, Vendors shall promptly notify Kemper of any suspected incidents or actual data breaches.

Quality, Health, Safety and Environment ("QHSE"):

Kemper expects a strong commitment to QHSE management. Vendors must provide a safe and healthy working environment that minimizes health and safety risks and supports accident prevention and ensures the health and safety of all personnel and all others affected by their activities. Vendors shall comply with applicable safety and health laws and regulations in the jurisdictions in which they operate and shall provide workers with access to appropriate personal protective equipment at no cost. Vendors shall comply with applicable laws and regulations regarding the environment, conduct their business in a manner that actively manages environmental risks and work with Kemper to track key environmental indicators.

Grievance Mechanism (Hotline):

Vendors shall have a process through which workers can raise workplace concerns without fear of retaliation. This grievance mechanism should be transparent and understandable to workers, and should ensure the protection of whistleblowers

Monitoring and Compliance:

Vendors are expected to self-monitor compliance with this VCC and shall conduct audits and inspections to ensure compliance with this VCC. Vendors must promptly inform their Kemper partner when any situation or circumstance develops that causes, or reasonably might be expected to cause, the Vendor (including, for the avoidance of doubt, any employee, agent or subcontractor) to be in violation of this VCC. Kemper reserves the right to audit compliance with this VCC. Kemper also reserves the right to require certification of compliance with this VCC. Failure to operate in accordance with the spirit of any of standards set forth in this VCC will be evaluated by Kemper and could result in the termination of the Vendor's relationship with Kemper or other adverse consequences.

At Kemper, we encourage Vendors to report any unethical or fraudulent behavior or breach/suspected breach of this VCC on the [Kemper Corporate Responsibility Hotline](#) website or through our phone line at 888.695.3359. You may choose to remain anonymous if you call the Hotline. All reports that include specific information will be investigated and appropriate action will be taken.