

Vendor Code of Conduct

Professional Conduct

Vendor representatives are required to conduct themselves in a professional, honorable and ethical manner when performing services. Vendors' behavior should never be detrimental to the interests or image of our employees or customers.

Conflict of Interest

Vendor representatives may not place their personal interests ahead of our interests when performing duties on behalf of us and must avoid a conflict of interest or an appearance of a conflict that might arise because of personal self-interest.

Gifts, Gratuities and Entertainment

Our employees are prohibited from accepting anything more than modest gifts, meals and entertainment from Vendors. Ordinary business meals and small tokens of appreciation such as gift baskets at holiday time generally are fine, but Vendors should avoid offering our employees frequent meals or expensive gifts. Gifts of cash or cash equivalents, such as gift cards, are never allowed.

Laws

Vendors and their representatives will be responsible for complying with any and all local, state and federal laws as they pertain to the performance of their duties, including, but not limited to, Anti-Money Laundering/OFAC, Anti-Discrimination, Anti-Trust and Consumer Privacy Protection.

Protecting Company Assets

Vendor representatives working on our behalf are trusted to behave responsibly and use good judgment when using Company assets. They have a responsibility to use Company equipment only for authorized business purposes.

Business and Financial Records

Vendor must keep accurate records of all matters related to the Vendor's business. This includes the proper recording of all expenses and payments. If we are being charged for a Vendor representative's time, time records must be complete and accurate. Vendors should not delay sending an invoice or otherwise enable the shifting of an expense to a different accounting period.

Licensing

Vendors are responsible to obtain all necessary business and producer licenses and state registrations that may be required of them or their staff.

Safeguarding Confidential and Proprietary Information

Vendors must maintain the confidentiality of all non-public information, except when disclosure is authorized or legally mandated. Confidential non-public information includes both the non-public personal information of customers and all information relating to our conduct of business that we do not disseminate to the public. This information must be secured and not accessible to the public. Further, Vendors may not use, share or disseminate any information gained in the course of conducting our business for any reason other than to further the legitimate purpose for which the information was obtained.

Information Security

All communications data and information sent or received using our technology/systems are our property. As such, they are not private communications between the senders/receivers and we may access them at any time. We reserves the right to know all passwords and security codes and retains ownership of access to all Company systems and information on those systems. Vendors must cooperate with us to provide access to information on those systems when and as needed. They will make no attempt directly or indirectly to access any our files or computer systems by using someone else's authorization, computer identification or circumventing access control.

Reporting

Vendors and their representatives are required to notify our Security & Investigations of any known or suspected violations of law, fraud or other misconduct affecting us. Reports can be made through our Fraud & Ethics Reporting Line. Calls to this reporting line may be made anonymously. This line may also be used to raise questions, issues or concerns related to any business conduct or ethical issue. No one will be penalized for reporting, in good faith, concerns related to misconduct or ethical violations of others.