



Protective Life Corporation

Supplier Code of Business Conduct

Our Values

Protective is on a mission to help more people achieve the sense of protection and security they deserve. We make the most of every opportunity to help more people —that will never change.

Four core values guide us in all that we do: Do the Right Thing, Serve People, Build Trust, and Aspire for Better. We serve with integrity and honesty, treating each of our customers the way we would like to be treated. We seek to partner with suppliers who also share these values.

Protective has created a Supplier Code of Conduct to reinforce our expectations of our suppliers and to serve as a guide in their dealings with us and our customers. We expect our suppliers to consistently demonstrate alignment to our expectations and cooperate with us in responding to external inquiries.

Suppliers who do not consistently demonstrate alignment to our expectations may jeopardize their future relationship with Protective.

If there is a conflict between the terms of a contract and the Supplier Code of Conduct, the contract terms will prevail. Questions regarding this Supplier Code of Conduct should be directed to Protective's Chief Compliance Officer: scott.creutzmann@protective.com.

Protective Life Corporation Supplier Code of Conduct

<p>Compliance</p>	<p>At Protective, we will deal fairly and honestly with all people. We treat each as we would expect each to treat us if the situation were reversed; and we expect the same from our Suppliers. Protective intends to conduct its business in a way that not only conforms to the letter of the law, but also promotes the spirit of fairness and honesty behind the laws. As our supplier, you are expected to only undertake those business activities that will withstand public ethical scrutiny and comply with all applicable laws, rules, and regulations.</p>
<p>Conflicts of Interest, Including Gifts and Entertainment</p>	<p>Our employees are expected to avoid situations where their personal interest(s) may conflict with the Company's interests. Equally, we expect our suppliers to avoid such conflicts, including those that could be perceived to improperly influence their employees, our employees or any third party, including giving/receiving improper gifts and/or entertainment.</p> <p>Suppliers are expected to disclose any personal relationships (friends and/or relatives) with Protective officers/directors and those relationships shall not be a consideration in our business dealings unless they pose a material conflict.</p>
<p>Discrimination and Harassment</p>	<p>Protective believes in respecting the dignity of every individual and expects our suppliers to show respect for our colleagues, customers, and employees. We are committed to providing a work environment that is free of unlawful discrimination and harassment. We expect our suppliers to share our commitment to respecting others and maintaining an environment free of discrimination and harassment.</p>
<p>Health and Safety</p>	<p>Protective is committed to maintaining a safe workplace and, as such, has implemented certain safety procedures and protocols. Our suppliers are expected to maintain a safe working environment and comply with all applicable health and safety laws and regulations.</p>
<p>Fair Competition and Antitrust</p>	<p>Antitrust laws are intended to preserve competition by prohibiting actions that could unreasonably restrain the functioning of a free and competitive marketplace. An agreement to limit fair competition is illegal. Protective seeks to compete fairly and honestly with its competitors.</p> <p>Protective suppliers will be considered based on factors such as their service/product quality, value, and capabilities. As our supplier, you are expected to compete fairly and honestly with and amongst others.</p>

Anti-Corruption	Suppliers may never engage in any kind of bribery or kickbacks, including promising, offering, providing, or authorizing anything of value to a government official or political entity to gain an unfair business advantage. We expect suppliers to be in full compliance with all applicable foreign and domestic anticorruption laws.
Protecting Confidential and Restricted Information	As a supplier, you may have access to Protective’s non-public, confidential and/or proprietary information or our customers’ personal information. Unless otherwise indicated, this information shall be treated as confidential. Protective’s property and may only be utilized within the terms and conditions of any current agreements with our supplier. Suppliers shall appropriately safeguard information so as to protect it from unauthorized access, use or disclosure.
Breaches	<p>Suppliers are expected to provide Protective with prompt notification of: (1) any privacy or information security breaches or (2) any material events or incidents that could lead to a breach or vulnerability.</p> <p>Our suppliers may not engage in industrial espionage or acquire information about other companies through improper means. You have a responsibility not to steal or misuse the intellectual property of Protective Life, its customers, business partners, or that of a competitor.</p>
Accessing and Using Information and Communications Systems Responsibly	Protective’s property includes its work product(s), trade secrets, technology and proprietary information, as well as physical property. Our suppliers share our responsibility for protecting Protective’s property.
Protecting Personal Data	In connection with your relationship with Protective, you may: (1) have access to and become knowledgeable about information that is confidential, private, or proprietary, or (2) develop or create information that is considered Protective’s confidential, private or propriety information. As our supplier, you must protect the confidentiality and privacy of that information.
Inclusion	At Protective, we are committed to providing an opportunity where all teammates can fully contribute and thrive. Our goal is to grow and develop our people and attract the best talent available. We focus on opportunity, success, and inclusion to strengthen our culture and enhance working at Protective. We expect our suppliers to have a similar focus.
Environmental Stewardship	Protective remains committed to protecting the world we live in. From pursuing efficiency within our operations and monitoring our carbon footprint to supporting green spaces in our communities and more, we explore ways to reduce our carbon footprint and improve the environment. We expect our suppliers to share the same commitment.

Social Media	Suppliers may not identify themselves as suppliers of Protective or refer to Protective or its business in their use of social media. Suppliers may not post items that would reflect adversely on Protective’s brand or reputation, such as comments, pictures, videos, or audio that could be viewed as inappropriate, obscene, threatening or disparaging.
Accurate Books and Records	We are committed to the integrity of our business records and ensuring that they are accurate and complete. We require suppliers to maintain up-to-date business and financial books, records, and statements to demonstrate compliance with applicable laws and regulations. Upon request, these records must promptly be made available.
Audits and Inspections	We reserve the right to audit our suppliers to ensure compliance with the terms and conditions of the Supplier agreement as well as the standards in this Supplier Code of Conduct. If a supplier refuses to cooperate with an audit, consequences up to or including termination of our agreement may occur.

By adhering to the Supplier Code of Conduct, we assure you share our vision and values that serve as our foundation in serving and protecting our customers. Since its inception, Protective has consistently required those who act on its behalf to do so with integrity. Our commitment to this fundamental principle remains central in all that we do.

You have a responsibility to report any suspected violations of this Supplier Code of Conduct. A suspected violation could be a situation that you observe or a situation that is brought to your attention by someone else.

Suspected violations must be reported promptly to:

- Protective’s Chief Compliance Officer, Scott Creutzmann, at
 - (205) 268-8797 or scott.creutzmann@protective.com or
 - Protective’s Vice President of Vendor Management, Austin Howard, at (205) 430-8937 or austin.howard@protective.com.
- The Code of Business Conduct telephone hotline at (205) 268-CODE (2633) or (800) 421-3564 (*you may communicate to the telephone hotlines anonymously*).
- The Code of Business Conduct [report form](#) (*you may communicate using the form anonymously*).