

Third Party Code of Conduct



Guardian's Values

We Do the Right Thing

We are fair and ethical. We put the customer first.
We offer the right solutions. We are true to our word.

People Count

Everyone has an opportunity to make a difference. We treat people with dignity and respect. We work effectively individually and together as a team. We encourage diversity.

We Hold Ourselves to Very High Standards

We strive to achieve superior results through high performance and execution excellence. We take calculated risks and exercise innovation. We move quickly, but not at the expense of results. We hold ourselves and one another accountable.



Third Party Code At a Glance

Living our values with each other

Raise concerns

At Guardian, it's *Safe to Say*. If something doesn't feel right, report the incident to your Guardian point of contact or through our third-party ethics line (anonymously, if you wish):

web: ethicspoint.com phone: 866 ETHICSP

Respect each other

Guardian is committed to providing an inclusive environment where opinions and attributes are treated with fairness and respect. Vendors must comply with laws that prohibit discrimination based on a person's race, color, religion, sex, national origin, disability, age, sexual orientation, gender identity, veteran status or other status protected by law.

Promote a safe workplace

Our workplace must be free from violence, harassment and discrimination. We do not allow weapons on our work premises. We do not tolerate threats, intimidation, or violent behavior of any kind. Vendors must conduct themselves so as not to interfere with our provision of a safe and healthy work environment that complies with safety and health regulations, and wage and hour laws.

Living our values in our company

Protect information, property & resources

Protect confidential information and intellectual property belonging to Guardian, its customers, employees and third parties. Comply with all laws and standards and promptly notify Guardian of any actual or potential data security breach or improper release of confidential or personal information.

Maintain accurate records

Maintain honest and accurate books and records of business information. Any required reports to Guardian must be complete and may not hide or disguise any pertinent information including accurate and timely billing to Guardian of work performed.

Living our values around the globe

Avoid corruption and bribery

Do not directly or indirectly offer, promise or authorize the giving of anything of value for an improper reason. Guardian also does not permit or sanction facilitating payments, regardless of local custom or practice.

Avoid conflicts

Avoid giving the appearance of or engaging in improper conduct and conflicts of interest. Don't negotiate or deal directly with a Guardian employee holding a financial interest in your company or whose relative, friend, romantic partner or household member holds a financial interest in your company.

Avoid lavish gifts and entertainment

Guardian limits the value and nature of gifts to and from its employees. Use good judgment, discretion, and moderation when offering gifts or entertainment to Guardian employees. Avoid gifts or entertainment that create a conflict or appear to influence our business judgment.

Compete fairly

Comply with laws related to antitrust, fair dealing and competition, including laws prohibiting price-fixing, restraint of trade, predatory pricing, trade secret theft, fraud, market allocation and kickbacks.

Comply with our Code and the law

You must comply with all applicable laws and the standards set forth in this Code.

Comply with our contract

You must comply with your written contract with us. This Code is intended to complement the written agreement, not replace it. Direct any questions to your Guardian point of contact.

A Message From Noreen Fierro



Dear Valued Partner,

Serving consumers how, when and where they prefer is our top priority here at Guardian, and your partnership allows us to do just that - thank you.

In order to maintain our legacy, we rely on you - our vendors, suppliers, contractors and consultants (together, our "third parties") to act ethically, responsibly and in compliance with the law.

This Third Party Code of Conduct outlines those expectations and our agreement that you will represent Guardian with the highest level of integrity.

I encourage you to consult this Code regularly, ask questions and raise any concerns you may have.

Thank you for your continued partnership and collaboration to deliver services and solutions that are rooted in our time-tested values.

Sincerely,

Noreen Fierro

Senior Vice President

Chief Ethics and Compliance Officer

The Guardian Life Insurance Company of America

Living Our Values with Each Other

What is expected of each of us

Safe to Say

This Third Party Code of Conduct can't address every situation you may face in your daily activities. If you become aware of or suspect a possible violation of law, rules, regulations or this Code, report your concerns immediately to your internal Guardian contact or report potential violations (anonymously, if you wish), visit ethicspoint.com or call 866 ETHICSP.

All reports are handled with discretion. We will not tolerate retaliation against any individual who, in good faith, reports actual or suspected violations or participates in an investigation. We will fully investigate all reports.

Respect Each Other

A Guardian core value, "People Count," is more than just words on paper. It is built into the way we run our business and the way we interact with each other. Guardian expects our third parties to share our commitment to diversity, inclusion, equal employment opportunity, and a safe and harassment-free workplace.

We are committed to providing an inclusive environment where opinions and attributes are treated with fairness and respect. We are committed to maintaining a diverse culture where individuals are empowered to succeed, where differences are celebrated and where unique perspectives work together to generate innovative solutions. We do not tolerate any unlawful discrimination and we expect our third parties to comply with laws that prohibit discrimination based on a person's race, color, religion, sex, national origin, disability, age, sexual orientation, gender identity, veteran status or other status protected by law.

Guardian expects its vendors to comply with wage and hour laws, including minimum wage, overtime and maximum hour rules as well as minimum working age laws and requirements. We will not partner with companies that engage in human trafficking or employ, either directly or indirectly, any child or forced labor, including indentured labor, bonded labor, or prison labor.

We are committed to providing a safe workplace free of health and safety hazards and violence. We do not allow weapons or explosives on our work premises. We do not tolerate threats, intimidation, or violent behavior of any kind. You are expected to promote a safe and healthy work environment that complies with safety and health regulations and practices.

Living Our Values in Our Company

How we deal with company records, assets and information

Confidential Information

Information security is a critical priority for Guardian. As our business partner, you may have access to information belonging to Guardian, its customers, employees or other third parties. You bear responsibility for protecting this information from unauthorized access, disclosure or loss. Never disclose Guardian's confidential information to anyone without Guardian's written consent.

If you have access to confidential information, you must protect it in accordance with data privacy and information security laws. You must maintain appropriate internal controls to ensure the appropriate handling of confidential information.

Guardian Property and Resources

You have a responsibility to protect and responsibly use both the physical and intellectual assets of Guardian, including Guardian-provided information technology, platforms and systems. Exercise care to avoid exposing Guardian's assets to loss, theft, or damage.

Respect the intellectual property of Guardian and third parties – such as patents, copyrights, trademarks, and trade secrets. These assets belong to Guardian (or another third party) and you must abide by any legal restrictions in using them in connection with your work for or on behalf of Guardian. Do not use Guardian's intellectual property except in compliance with the terms of your contract with Guardian or with Guardian's written consent.

Guardian maintains a secure system of technology resources and systems to conduct our business. As our business partner, you may be granted access to these resources to provide services to or on behalf of Guardian. Use Guardian information technology resources only for legitimate business-related purposes and abide by restrictions, including any listed in our contract.

If a Data Breach Occurs

A breach of data security can have far-reaching effects on our business. Unless your contract with Guardian provides a different protocol, follow this process to address a possible or actual security breach of Guardian data:

1. Notify Guardian immediately following the discovery of any suspected breach or compromise of the security, confidentiality, or integrity of Guardian's data by emailing gsos@glic.com.
2. Provide follow-up written notification within 48 hours to Guardian with a brief summary of the available facts and the potential number of consumers affected (the "Affected Persons") and the jurisdictions in which they reside.

Generally, Vendors must notify the Affected Persons about any security breach/privacy event in compliance with the applicable laws of the affected jurisdictions. Costs associated with a breach, including notices to and credit monitoring for Affected Persons, may be the sole responsibility of the vendor. Vendors must coordinate with Guardian with respect to any communication to any third party, including the media, vendors, consumers, and Affected Persons about any security breach or privacy event. Please refer to your contract with Guardian regarding your responsibilities for data breach.

Accuracy of Guardian Records

Guardian expects its third parties to help us maintain accurate and complete books and records. Our records are created in many different forms, including paper documents, email, electronic documents, voicemails and instant messages. Honest and accurate recording and reporting of information is critical to our ability to make responsible business decisions.

Ensure that Guardian's records do not contain false, misclassified, or misleading information. For example, all financial transactions must be supported by accurate documentation in reasonable detail, accurate and timely billing and recorded in the correct account and accounting period.

You are responsible for the integrity of any data and information, including reports and documents, under your control.

Living Our Values Around the Globe

How we operate in our world and industry

Guardian does business around the globe and is subject to many regulations. Compliance with both the letter and spirit of laws, rules and regulations is critical to our reputation and continued success. Be familiar with and comply with all applicable laws and avoid even the appearance of impropriety. Illegal or unethical conduct, despite potential local or cultural pressures, is never justified.

In addition, we must deal fairly with our customers, suppliers and competitors. That means not taking unfair advantage of anyone through illegal conduct, fraud, manipulation, concealment, abuse of privileged information, disparagement, misrepresentation of material facts, or any other type of unfair dealing.

Corruption & Bribery

Do not directly or indirectly offer, promise or authorize the giving of anything of value for an improper reason. Guardian also does not permit or sanction facilitating payments, regardless of local custom or practice. We expect that our third parties will not engage in embezzlement, money-laundering, extortion, bribes, kickbacks or reciprocity, or other forms of corruption in connection with their relationship with Guardian.



Conflicts of Interest

A conflict of interest occurs when an individual's private interests interfere, or even appear to interfere, with the interests of Guardian. A conflict of interest may make it difficult to perform your work objectively on Guardian's behalf.

You should avoid activities, interests or relationships that might interfere with your ability to act in the best interests of your contracted relationship with Guardian. Don't negotiate or deal directly with a Guardian employee holding a financial interest your company or whose relative, friend, romantic partner or household member holds a financial interest in your company.

Guardian relies on your good judgment and commitment to our values to avoid conflicts of interest and encourages you to seek advice when you need it. Since it is not always easy to determine whether a conflict of interest exists, report potential conflicts immediately to your Guardian contact.

Gifts and Entertainment

Guardian limits the value and nature of gifts to and from its employees. Use good judgment, discretion, and moderation when offering gifts or entertainment to Guardian employees. Avoid gifts or entertainment that create a conflict or appear to influence our business judgment.

Competitors and Anti-Trust Laws

Guardian believes in fair and open competition and adheres to the requirements of antitrust laws. We expect you to comply with all applicable antitrust and fair competition laws by avoiding any conduct that would unlawfully restrain competitors, including avoidance of price-fixing, collusion, predatory pricing, harassing competitors, and stealing trade secrets.

Ethics & Compliance Office Contacts

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