

August 2025

**Supplier**

# Code of Conduct



# Guardian's values



## We do the right thing

- We deliver on our promises.
- We are fair and ethical.
- We act with honesty and compassion.



## We believe people count

- We treat people with care and respect.
- We create an environment of continuous learning.
- We actively seek and listen to diverse perspectives.



## We courageously shape our future together

- We openly challenge assumptions.
- We move with a sense of urgency.
- We try new things, learn from failure, and welcome challenges.
- We act as one team.



## We go above and beyond for the people we serve

- We are committed to understanding our consumers' needs and dreams.
- We strive to deliver value that wows our consumers.
- We proactively identify ways to enhance well-being.





# Supplier code at a glance

## Living our values with each other

### Raise concerns

At Guardian, we courageously speak up. If something doesn't feel right, report the incident to your Guardian point of contact or through our Ethics line (anonymously, if you wish):

**web:** [ethicspoint.com](https://ethicspoint.com) **phone:** 866-ETHICSP

### Respect each other

Guardian is committed to providing and fostering an environment where opinions, attributes, and feelings are treated with fairness and respect. Suppliers 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. Suppliers must conduct themselves so as not to interfere with our provision of a safe and healthy work environment that complies with safety and regulations as well as wage and hour laws.

## Living our values in our company

### Protect information

Protect confidential information and intellectual property belonging to Guardian, its customers, employees, and Suppliers. 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.



### Comply with our Code and the law

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

### 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.

## 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.

### Corporate impact

Guided by our purpose, we make decisions to benefit our colleagues, consumers, and communities. From meeting our colleagues' unique needs and empowering them to reach their potential, to serving our consumers with compassion and empathy, supporting the communities where we live and work, and reducing our impact on the planet — we seek to always do what is right in how we operate. Your commitment and engagement in championing our purpose is central to our success.



# A message from Phil Pescatore



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, service providers, third parties, contractors, and consultants (together, our "Suppliers") — to act ethically, responsibly, and in compliance with the law.

This Supplier 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.

Best regards,

**Phil Pescatore**

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

### Speak up

This Supplier 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) by visiting [ethicspoint.com](#) or calling 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, We Believe 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 Suppliers to share our commitment to equity, 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 an inclusive 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 Suppliers 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 Suppliers 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 Suppliers. 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.

Upon termination of your agreement with Guardian, or at Guardian's request, you must return or permanently destroy all Guardian data. This includes shredding or otherwise destroying all paper and other hard copy media, as well as wiping any hard drive, tape, or other electronic medium on which Guardian data has been stored, to ensure that the information is unrecoverable.

### Use of artificial intelligence (AI)

Guardian has an established Model Risk Management Policy that aligns with Guardian's core values and focuses on the responsible use of AI. If you provide us with an AI solution or tool, we expect

that you have a risk management framework to oversee the development and deployment of such AI solutions and/or tools. Any AI solution you provide to us will be expected to align with Guardian's AI principles — the AI solution must be robust, explainable, transparent, fair, accountable, secure, and compliant with applicable laws and regulations.

### 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. Only use approved technology provided by Guardian and/or approved third parties for business purposes. You can expect that your activity on Guardian-managed technology will be monitored to the extent allowed under applicable laws and regulations. Exercise care to avoid exposing Guardian's assets to loss, theft, or damage. When traveling internationally, bringing Guardian devices to countries with targeted or comprehensive sanctions is strictly prohibited.

Respect the intellectual property of Guardian and Suppliers, such as patents, copyrights, trademarks, and trade secrets. These assets belong to Guardian (or another Supplier), 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.

Only use resources that you are authorized to use, namely Guardian Electronic Services - approved platforms for Guardian Business Communications. All communications must be used responsibly, only for business purposes, and maintain a high level of professionalism. Use all business resources in line with all Guardian policies, including but not limited to our confidentiality and privacy policies, as well as in compliance with the books and records provisions of the federal securities laws and the expectations of regulatory and law enforcement agencies.

Remember to safeguard all access credentials (e.g., passwords, PIN codes) and store confidential data (including privacy data) only in authorized physical or electronic locations. Return all Guardian assets and dispose of Guardian data in accordance with policies and standards upon ceasing your employment relationship with Guardian.

## If a data breach or security incident 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 or related systems:

- 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](mailto: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, Suppliers must notify the Affected Persons about any security breach or 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 Supplier. Suppliers must coordinate with Guardian with respect to any communications to any third party, including the media, Suppliers, consumers, and Affected Persons about any security breach or privacy event. Please refer to your contract with Guardian regarding your responsibilities for any data breach.

## Accuracy of Guardian records

Guardian expects its Suppliers 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 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. We expect that our Suppliers will not engage in embezzlement, money laundering, extortion, bribes, kickbacks, reciprocity, or other forms of corruption in connection with their relationship with Guardian.

### 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.

### 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 in 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.

## Competitors and antitrust 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, harassment, and trade secret theft.

## Responsible business practices

Responsible business practices are an opportunity to practice our purpose. Guardian's goal is to embed responsible business practices into our culture by going beyond stand-alone initiatives and creating a work environment that is conscious of environmental, financial, governance, and social issues. We recognize that the impact of our operations extends to our Suppliers. Your commitment to the same objective is critical.

Guardian is committed to fostering an inclusive environment. We believe organizations achieve optimal performance by embedding equity and inclusion in business practices, including in the workplace and with Suppliers.

Guardian is on the journey to ensure our Suppliers reflect who we are as a community and company. Suppliers are expected to incorporate inclusion policies and practices to strengthen their operations and supply chain while enriching our communities through economic advancement.

Guardian opposes all forms of discrimination with respect to employment and occupation, modern slavery, human trafficking, forced or compulsory labor, and child labor. In accordance with the United Nations Universal Declaration of Human Rights, we expect our Suppliers to share in our respect for human rights, employee health and safety, and a voluntary labor force. Suppliers are to comply with all relevant human rights laws and regulations.

Guardian is furthering its journey toward a sustainable supply chain. We seek to engage Suppliers who are environmentally conscious and demonstrate a holistic sustainability perspective. Guardian encourages and relies upon Suppliers to join us in this commitment by fostering a culture of internal programs and efforts to meet industry best practices and standards.



# Ethics and compliance office contacts

## **Philip Pescatore**

Chief Ethics and Compliance Officer

[Philip\\_Pescatore@glic.com](mailto:Philip_Pescatore@glic.com)

## **General inquiries**

[Corporate\\_Compliance@glic.com](mailto:Corporate_Compliance@glic.com)

## **Subsidiary contact**

### **India**

Deepa Baburaaj

Chief Legal, Risk Officer and Interim Country Head - Guardian India

[Deepa\\_Baburaaj@glic.com](mailto:Deepa_Baburaaj@glic.com)



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