



Supplier Code of Conduct

Introduction

At Liberty Mutual Insurance, our purpose is to help people embrace today and confidently pursue tomorrow. That's why we conduct business in an honest and ethical manner with integrity and accountability in all the countries we operate in.

We've created a Supplier Code of Conduct to reinforce our Values and share expectations of our Suppliers. We define "Suppliers" as contractors, consultants, agencies, vendors and any third parties that are held to the same expectations.

Our core Values include putting people first and acting responsibly. We expect our Suppliers to demonstrate their commitment to ethical, humane, socially responsible and legally compliant business practices by:

- Engaging with integrity and ethical business practices
- Avoiding actions that would improperly influence our employees' objectivity and decisions
- Complying with fair trade, antitrust, competition, anti-corruption, anti-bribery laws including the US Foreign Corrupt Practices Act
- Letting us know if any of these conflicts happen

Additionally, we expect our Suppliers to support and respond to inquiries from us about corporate actions pertaining to supplier diversity and environmental stewardship.

Those who do not consistently demonstrate alignment to these expectations may jeopardize their future relationship with Liberty Mutual.

If there is a conflict between the terms of a Supplier's contract and the Liberty Mutual Insurance Supplier Code of Conduct, the contract terms will prevail.

Any questions regarding the Supplier Code of Conduct should be directed to:

SupplierConduct@LibertyMutual.com

Liberty Mutual Insurance Supplier Code of Conduct

<p>Compliance</p>	<p>At Liberty Mutual, we act responsibly and honestly and do the right thing. We are committed to compliance with all laws, rules and regulations. As a Supplier, you are expected to comply with all federal, state, and local laws and regulations applicable to your business when providing services to Liberty Mutual.</p>
<p>Discrimination & Harassment</p>	<p>Liberty Mutual is committed to maintaining a workplace free from discrimination or harassment (including sexual harassment) because of any category or status protected under applicable law. Individuals who raise concerns in good faith or who assist, cooperate or testify in such an investigation or legal proceeding are protected from retaliation.</p> <p>Liberty Mutual expects our Suppliers, including when Suppliers are performing work on behalf of Liberty Mutual, to uphold these same principles by complying with all applicable laws, rules and regulations.</p> <p>To the extent that an individual raises a concern of misconduct, Liberty Mutual expects cooperation from its Suppliers to appropriately investigate and remediate the matter.</p>
<p>Environmental Stewardship</p>	<p>We are committed to environmentally responsible business practices and minimizing our environmental footprint by reducing our consumption of energy, water and waste. Liberty Mutual expects our Suppliers to conduct their operations in a similar manner and to comply with local, national and international regulations where they operate.</p>
<p>Diversity & Inclusion</p>	<p>Liberty Mutual serves customers from different cultures and backgrounds across 17 different countries. To succeed in this global environment, our workforce, Suppliers, and business partners should reflect the communities in which we live and work.</p> <p>Liberty Mutual actively supports recognized diverse business enterprises from all backgrounds and cultures and by doing so, we contribute to the overall economic success of the communities we serve and the expansion of our markets. We expect our Suppliers to support similar business practices.</p>

Liberty Mutual Insurance Supplier Code of Conduct (cont.)

<p>Conflicts of interest</p> <p><i>Personal relationships</i></p> <p><i>Gifts & Entertainment</i></p> <p><i>Illegal/Improper Payments</i></p>	<p>Liberty Mutual’s employees have a responsibility to act in Liberty Mutual’s best interest. We expect our Suppliers to avoid actions that would improperly influence our employees’ objectivity and decisions.</p> <p>Suppliers are expected to disclose personal relationships with Liberty Mutual employees, including relationships with friends or relatives.</p> <p>Suppliers may not give, offer, promise or accept anything of value when dealing with government officials or any other person, including Liberty Mutual employees, to gain an improper business advantage.</p> <p>Bribes, kickbacks and other similar payments are strictly prohibited.</p>
<p>Economic & Trade Sanctions</p>	<p>Many countries, including the United States, have economic and trade sanctions programs which restrict or prohibit dealings with certain countries, individuals or businesses. The U.S. Office of Foreign Assets Control (“OFAC”), which is part of the U.S. Treasury Department, administers and enforces economic and trade sanctions programs. Liberty Mutual’s operations around the world, as well as Liberty Mutual’s Suppliers, must comply with applicable U.S. sanctions and the economic and trade sanctions laws in the countries in which they operate.</p>
<p>Health & Safety</p>	<p>We are committed to a safe and healthy work environment. We expect our Suppliers to comply with all applicable safety and health laws and regulations in the countries in which they operate.</p>

Liberty Mutual Insurance Supplier Code of Conduct (cont.)

<p>Managing Liberty Mutual's Information</p>	<p>We respect the privacy of all individuals and expect our Suppliers to do likewise. Suppliers will protect the privacy of personal information of everyone with whom they do business, including suppliers, customers, consumers, and workers. While processing Personal Data, we expect our Suppliers to comply with applicable privacy, data protection laws, rules, regulations, orders, conventions and ordinances applicable to each Supplier and all representations made in Supplier's data privacy policies.</p> <p>We expect our Suppliers to promptly notify Liberty Mutual after becoming aware of personal data breach.</p>
<p>Media</p>	<p>We expect Suppliers to forward all media request/inquiries across all channels (print, broadcast, online, radio, social media, etc.) regarding Liberty Mutual, or work done by Supplier for Liberty Mutual, for review and approval to:</p> <p>mediarelations@libertymutual.com</p> <p>Suppliers should not speak about Liberty Mutual to media or in any public forum without consent from Liberty Mutual Public Relations department.</p>

Contact us

Any individuals with knowledge of an actual or potential violation of the terms and conditions of this Supplier Code of Conduct or any applicable laws and regulation in connection with work performed for Liberty Mutual must report this knowledge to their primary business contact, or, alternatively contact Procurement at:

SupplierConduct@LibertyMutual.com