

# Supplier Code of Conduct

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## Assurant Supplier Code of Conduct

Assurant is committed to the highest standards of business integrity, ethical conduct and social and environmental responsibility. Assurant's supplier partners ("suppliers") are expected to operate to similar standards and shall:

- ensure safe working conditions for workers,
- treat workers with respect and dignity,
- ensure that products and services provided to Assurant use environmentally and socially responsible practices and conduct all activities ethically and in full compliance with the laws, rules and regulations of the country or countries in which the supplier operates its business.

Assurant requires its suppliers to operate in accordance with the principles in the Assurant Supplier Code of Conduct ('the Code') and in full compliance with all applicable laws and regulations.

Assurant will assess suppliers' compliance with this Code prior to and during the period of appointment. Failure to adhere to this Code may affect suppliers' future and existing business relationships with Assurant. This Code applies to suppliers and their subsidiaries, affiliates and subcontractors providing goods or services to Assurant. Assurant or its third-party auditors may contact and visit suppliers to evaluate compliance with the Code.



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## Labor and Human Rights

Suppliers should recognize and be committed to upholding the human rights of workers, and to treat them with dignity and respect as understood by the international community. The labor standards are:

### **Involuntary Labor and Human Trafficking**

All work must be voluntary. Forced, bonded (including debt bondage) or indentured Labor, involuntary prison Labor, slavery or trafficking of persons shall not be used. This includes transporting, harbouring, recruiting, transferring or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud, or payments to any person having control over another person for the purpose of exploitation.

Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment. Suppliers or Labor dispatch agencies shall not receive deposits or fees (e.g. recruitment or hiring fees) from workers. Suppliers will ensure that worker's contracts clearly convey the conditions of employment in a language understood by the workers. Suppliers will ensure that the third-party recruitment agencies they use are compliant with the provisions of this Code and the Law.

### **Underage Labor**

Suppliers shall employ only workers who are at least 15 years of age or the applicable minimum legal age, whichever is higher. If any underage Labor is detected, the Supplier shall immediately stop such underage Labor and improve the reviewing process regarding the age of the worker during recruitment. The use of legitimate student intern programs, which comply with all laws, regulations and applicable ILO Conventions, is supported.

Young workers over the legal minimum age for employment may be hired, however, young workers under the age of 18 shall not perform work that is likely to jeopardize the health or safety of young workers, including night shifts and overtime, or work longer hours than is permitted by local law and consistent with applicable ILO Conventions.

## **Working Hours**

Workweeks are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days. A regular workweek shall not exceed 48 hours. Suppliers shall follow all applicable laws and regulations with respect to working hours and days of rest, and all overtime must be voluntary.

## **Wages and Benefits**

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates.

Suppliers shall pay accurate wages in a timely manner and deductions from wages as a disciplinary measure shall not be permitted. Suppliers shall offer vacation time, leave periods, and time off for legally recognized holidays.

## **Humane Treatment**

There is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

## **Non-Discrimination**

Suppliers should be committed to a diverse and equal opportunity workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, colour, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training.

## **Freedom of Association**

In conformance with local law, Suppliers shall respect the right of all workers to form and join worker council or trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities.

Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

## **Health and Safety**

Assurant's suppliers will make proper provision for the health, safety and welfare of their workers, visitors, contractors and anyone affected by their activities. Suppliers shall maintain safe and healthy working conditions according to the local laws and regulations and integrate sound health and safety management practices into their business. Workers shall have the right to refuse unsafe work and to report unhealthy working conditions.

## **Occupational Health, Safety and Hazard Prevention**

Suppliers shall conduct hazard assessments that identify and evaluate occupational health and safety hazards and shall manage these hazards through a prioritized process of hazard elimination, engineering controls, and / or administrative controls. Suppliers shall provide workers with job-related, appropriately maintained personal protective equipment and instruction on its proper use. Suppliers are encouraged to implement a

health and safety management system such as Occupational Health and Safety Assessment Series (OHSAS) 18001 or equivalent.

### **Ergonomics**

Suppliers shall identify, evaluate and control worker exposure to tasks that pose ergonomic risk such as excessive force, improper lifting positions, or repetitiveness. Suppliers shall integrate this process into the qualification of all new or modified production lines, equipment, tools and workstations.

### **Working and Living Conditions**

Suppliers shall provide workers with reasonably accessible and clean toilet facilities and potable water. Supplier-provided dining, food preparation and storage facilities shall be sanitary. Worker dormitories provided by Suppliers or a third party shall be clean, safe and provide reasonable living space.

### **Health and Safety Communication**

Suppliers shall provide workers with appropriate workplace health and safety requirements and training in their primary language. Health and safety related information shall be clearly posted in the facility.

### **Worker Health & Safety Committees**

Suppliers are encouraged to initiate and support worker health and safety committees to enhance ongoing health and safety education and to encourage worker input on, and participation in, health and safety issues in the workplace.

## **Environment**

Suppliers shall develop, implement and maintain environmentally responsible business practices and use their best efforts to reduce environmental impact when providing

products and services to Assurant. Suppliers shall adhere to laws and regulations related to chemical and waste management, recycling, wastewater and air emissions.

Suppliers are expected to implement an appropriate environmental management system comparable with the requirements of ISO 14001-2015 and are encouraged to gain third part certification of compliance.

### **Environmental Permits and Reporting**

All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

### **Pollution Prevention and Resource Reduction**

Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials according to local laws and regulations.

### **Hazardous Substance Management and Restriction**

Suppliers shall implement a systematic approach to identify, manage, reduce and responsibly dispose of or recycle hazardous substances.

### **Non-Hazardous Waste Management**

Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle non-hazardous waste.



## Ethics

Suppliers are to adhere to all applicable laws and regulations in their business activities. Suppliers shall always be ethical in every aspect of their business, including relationships, practices, sourcing and operations.

### **Business Integrity**

The highest standards of integrity are to be upheld in all business interactions. Suppliers shall not engage in corruption, extortion, embezzlement or bribery to obtain an unfair or improper advantage. Suppliers shall abide by all applicable anti-corruption laws and regulations of the countries in which they operate, including the Foreign Corrupt Practices Act, UK Bribery Act and applicable international anti-corruption conventions.

### **Disclosure of Information**

Suppliers shall accurately record information regarding their business activities, Labor, health and safety and environmental practices and shall disclose such information, without falsification or misrepresentation, to all appropriate parties.

### **Intellectual Property & Proprietary Information**

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and Assurant's proprietary information is to be safeguarded. Any information, commercial or technical, received by Suppliers must be kept confidential. Appropriate non-disclosure or confidentiality agreements are and will continue to be used to formalize the process of protecting proprietary information. Refer to the Assurant terms of business or existing non-disclosure agreements for details on obligations relating to proprietary and confidential information.

## Protection of Identity and Non-Retaliation

Suppliers shall provide an anonymous complaint mechanism for managers and workers to report workplace grievances. Suppliers shall protect whistle-blower confidentiality and prohibit retaliation.

## Responsible Sourcing of Minerals

Suppliers shall exercise due diligence, in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, on their entire supply chain with respect to the sourcing of all tin, tantalum, tungsten and gold contained in products, to determine whether those metals are from the Democratic Republic of the Congo (“DRC”) or any adjoining country and, if so, to determine whether those metals directly or indirectly financed or benefited armed groups that are perpetrators of serious human rights abuses in the DRC or an adjoining country.

## Privacy

Suppliers shall commit to protecting the reasonable privacy expectations for personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers are to comply with applicable privacy and information security laws and regulatory requirements, such as the GDPR, when personal information is collected, stored, processed, transmitted, and shared.

## Management System

The Supplier shall establish processes, controls and accountabilities that facilitate compliance with this Code and applicable laws and regulations. An effective Management System shall identify and mitigate related operational risks and facilitate continuous improvement actions.

## **Risk Assessment and Risk Management**

The Supplier shall establish and continue to operate at all times a process to identify the legal compliance, environmental, health and safety and Labor practice and ethics risks associated with supplier's operations, together with a determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to mitigate the identified risks and ensure regulatory compliance.

## **Training**

The Supplier shall establish and continue to operate at all times programs for training managers and workers to implement Supplier's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements. Suppliers shall have an ongoing process to evaluate practices and conditions covered by this Code and to foster continuous improvement.

## **Communication**

The Supplier shall establish and continue to operate at all times a process for communicating clear and accurate information about Supplier's policies, practices, expectations and performance to workers, Suppliers and customers.

## **Audits and Assessments**

The Supplier shall perform periodic evaluations of its facilities and operations, and those of any subcontractors or next-tier suppliers, to ensure compliance with this Code, Local, Regional, Country and Global laws, rules, standards and regulations.

## **Corrective Action Process**

The Supplier shall have an ongoing process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.



## Documentation and Record Keeping

The Supplier shall create and maintain documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy. The Supplier's adoption of and compliance with this Code must be documented, and relevant information must be promptly shared with Assurant upon its request.

<Declaration of Compliance on next page>

## Declaration of Compliance

**Part 1: Declaration of Compliance (Choose one of the three options)**

- I hereby declare that I have read and that I understand the principles set forth in the Assurant Supplier Code of Conduct December 2018 and my company will fully comply with these principles.

**OR**

- I hereby declare that my company has an internal Code of Conduct of which the principles and practices matches the ones described in the Assurant Supplier Code of Conduct. I hereby attach a copy of my company's internal Code of Conduct.

**OR**

- I hereby declare that my company does not yet comply with the principles set forth in the Assurant Supplier Code of Conduct, as detailed below, but I take full responsibility to comply with these principles by developing a corrective action plan no later than \_\_\_\_\_.

Non-compliance issue(s):

Explanation of non-compliance:

**Part 2: Declaration regarding your own Supplier Code of Conduct (Choose one of the two options)**

- I hereby declare that my company has developed and implemented a Supplier Code of Conduct to our own suppliers. I hereby attach a copy of my company's Supplier Code of Conduct.

**OR**

- I hereby declare that my company has not yet developed and implemented a Supplier Code of Conduct to our own suppliers.

<Part 3 on next page>

# Supplier Code of Conduct



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## Part 3: Declaration regarding your own Employee Code of Conduct (Choose one of the two options)

I hereby declare that my company has developed and implemented an employee Code of Conduct to our own employees. I hereby attach a copy of my company's Employee Code of Conduct.

**OR**

I hereby declare that my company has not yet developed and implemented an employee Code of Conduct to our own employees.

## Signature

Company name of the supplier:

Name of signatory (print):

Position in Company:

Signature:

Date:

Please send signed Declaration of Compliance electronically to [SCoC@Assurant.com](mailto:SCoC@Assurant.com).

## Rider A to Assurant's Supplier Code of Conduct

### Responsible Sourcing of Minerals

Suppliers shall exercise due diligence, in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, on their entire supply chain with respect to the sourcing of all tin, tantalum, tungsten and gold contained in products, to determine whether those metals are from the Democratic Republic of the Congo ("DRC") or any adjoining country and, if so, to determine whether those metals directly or indirectly financed or benefited armed groups that are perpetrators of serious human rights abuses in the DRC or an adjoining country.

#### Signature

Company name of the supplier:

Name of signatory (print):

Position in Company:

Signature:

Date:

Please send signed Declaration of Compliance electronically to [SCoC@Assurant.com](mailto:SCoC@Assurant.com).