



# Code of Conduct

Honorable and Straightforward

# A Message from CEO Gary C. Bhojwani



CNO Associates,

At CNO, our purpose to secure the future of middle-income America is a responsibility we all share. Every interaction and choice you make helps build the trust of our customers, shareholders and communities.

Our Code of Conduct is a reflection of our values: People Focused, Customer Driven, Integrity and Excellence. And it guides us to make decisions that honor the promises we've made. Whether you're serving a policyholder, supporting a colleague, or representing CNO in the community, your actions matter. Every decision you make contributes to our reputation and long-term success.

I ask each of you to take personal responsibility for upholding our Code. Lead by example and with integrity. Speak up when something doesn't feel right. Use the resources available to you, including your manager, the Human Resources and Law Departments, and the Ethics Hotline to ask questions and raise concerns.

Thank you for your dedication to CNO and our shared purpose. Together, we will continue to make a positive impact for our customers and each other.

Regards,

**Gary C. Bhojwani**  
Chief Executive Officer  
CNO Financial Group, Inc.

# Our Purpose, Mission and Values

Our purpose is to secure the future of middle-income America. Our mission is to secure the future of middle-income America by providing insurance and financial services that help protect their health, income and retirement needs, while building enduring value for all our stakeholders.

## OUR VALUES



### People Focused

We welcome, value and respect our associates who reflect the communities where we live and work.



### Customer Driven

We prioritize the well-being of our customers.



### Integrity

We are honest, ethical and do the right thing.



### Excellence

We are passionate about working as a team and winning in the marketplace.

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# Know Your Code

Our values—People Focused, Customer Driven, Integrity and Excellence—guide our actions.

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# Our Culture of Ethics and Integrity

Every organization has its own unique culture. At CNO, our culture is defined first and foremost by what we do: **we secure the future of middle-income America by providing insurance and financial services that help protect their health, income and retirement needs, while building enduring value for all our stakeholders.**

**How we do what we do** is equally important and also defines our culture—we work as a team, we are focused on the customer and we take personal responsibility for our actions.

We are also defined by **how others see us**. Our customers, their families, shareholders, business partners and others trust that we will do what we say and, above all else, we will work hard, be honest and straightforward.

**This is our culture.** It is defined by what we do, how we do it and how others see us. It is a culture of ethics and integrity.

Maintaining a culture of ethics and integrity is not always easy. For that reason, we have this Code of Conduct—**Honorable and Straightforward**. It is intended to help us put our Values into practice so that we can maintain our company culture each and every day.

## USING OUR CODE

Our Code sets our expectations and serves as a guide to help us apply our Values to situations we may face. Throughout the Code, links are provided to CNO policies and references. If you do not find the information you're looking for in the Code, talk to your supervisor or contact the Human Resources Department or the Law Department.



### Who Must Follow the Code?

All associates of CNO Financial Group and its subsidiaries are required to follow our Code, as well as related policies and procedures. This includes every member of our Board and every associate at every level.

## Understand Your Responsibilities

Each of us has a role to play in maintaining our culture of ethics and integrity and protecting CNO's reputation. Doing your part means you have the following responsibilities:

- Know and follow this Code, CNO policies, laws and regulations. You have a particular responsibility to understand the requirements that relate directly to your job.
- Complete all required ethics and compliance training.
- Handle every action and decision with integrity.
- Work as a team and treat others respectfully.
- When in doubt, speak up, ask questions and report concerns quickly.
- Cooperate and be truthful when responding to an investigation, inspection or audit.

# Leaders Have Additional Responsibilities

If you are a CNO leader or supervisor, you have additional responsibilities:

1. Be an example for others to follow.
2. Establish clear expectations for your work groups and help associates understand their responsibilities.
3. Be approachable and accessible. Maintain an environment where others can comfortably ask questions or raise concerns, either in a group setting or in a confidential manner.
4. Be consistent when enforcing our standards and holding people accountable.
5. Never ask or pressure anyone to do something you would feel uncomfortable doing or are prohibited from doing yourself.
6. If you supervise third parties such as vendors, contractors, etc., make sure they understand our expectations and their obligations.

**We lead by example.**

*We are accountable for our actions, successes and failures.*



# Making Good Decisions

The right decision is not always the easy one. At times, all of us need help to determine the best solution to a problem. If you are faced with a difficult decision, ask yourself the following questions:

01 Is it consistent with our Mission and Values?

02 Is it legal?

03 Would I be comfortable describing my conduct at a staff meeting?  
To my family? To the media?

04 Will this decision help CNO in the long run?

05 Am I willing to be held accountable for this action?



If the answer to all of these questions is **"Yes," then do it.**



If the answer is **"No"** to any of these questions or you're not sure, **stop and ask for help.**

## Watch Out for Warning Signs

When people are making decisions, listen for comments like these. They might mean the choice goes against our values, ethics or policies.

- *"Let's not put this in writing."*
- *"HR doesn't need to know about this."*
- *"Approve it quickly—we need to hit our numbers." or "Don't mention that preexisting condition; it'll make the application easier."*
- *"Everyone else does it. Why shouldn't we?"*
- *"Don't tell legal or compliance; they'll just slow us down."*
- *"Nobody audits this process anyway."*
- *"People from that area always file fake claims."*

*You may respectfully disagree with others—with anyone—with fear of consequences.*



# Asking Questions and Reporting Concerns

If you have a question or if you know or suspect that there has been a violation of our Code, policies or the law, you need to speak up. **Remember: An issue cannot be addressed unless it is brought to someone's attention.**

## GETTING HELP

If you're uncomfortable speaking with your supervisor, your supervisor is unable to answer your question, or you have already shared a concern and believe it's not being addressed, you have these additional options:

- Contact Human Resources by Opening a Case in Workday.
- Contact the Law Department.
- Use the Ethics Hotline
  - Email: [TellCNO@GetInTouch.com](mailto:TellCNO@GetInTouch.com)
  - Call: (855) TELL-CNO
  - Web Portal: Report.Syntrio.com/CNOinc
  - Bermuda Residents: (844) 820-2011



*When you ask questions or report problems, you help us continue to strive for the high levels of ethics and compliance that will sustain our success.*

## Our Open-Door Policy

Our open-door policy provides you with access to two-way, honest and respectful communications. The open-door policy is intended to create an atmosphere where associates can voice concerns, express doubts, discuss problems, ask questions, make observations and offer suggestions about workplace issues.

You should feel free to talk to your immediate supervisor, their manager, all Human Resources associates, corporate officers, members of the Law Department or any other company resource.

Q:

### What is the Ethics Hotline and how does it work?

A:

CNO's **Ethics Hotline** serves as our whistleblower hotline and is a tool you can use to **confidentially** report ethical concerns, misconduct, violations of laws, regulations or company policies or abuse of CNO's resources. It is hosted by an independent third party, Syntrio (a division of Mitratach), on a confidential basis, 24 hours a day, 7 days a week.

Call toll-free at (855) TELL-CNO or email [TellCNO@GetInTouch.com](mailto:TellCNO@GetInTouch.com) or access our web portal to submit an incident or check the status of an existing report.

When you call the Ethics Hotline, you will connect to a live operator who will guide you through documenting your concern. Your name, phone number and email address will not be included without your express permission. When you report your concerns, it is important to provide as many details as possible (e.g., who, what, when and where). When you set up a PIN, you are able to log into the web portal to check for messages and the status of your report.

## INVESTIGATIONS AND ACCOUNTABILITY

Any information provided through the Ethics Hotline or through another reporting channel will be treated confidentially to the extent permitted by law or the circumstances of the investigation. See the Ethics Hotline Contact and Resource Sheet. We will take all necessary steps to preserve confidentiality, but there may be circumstances in which we are required by law to report evidence of criminal acts or other serious actions or activities.

The Law Department and/or the Human Resources Department will take the lead to ensure an investigation is conducted if appropriate. Established procedures are followed when conducting investigations.

Violations of this Code, our policies, or laws or regulations can result in serious consequences for you, individually, and for CNO. Anyone violating this Code will be subject to appropriate disciplinary action, including possible termination of employment. In addition, the company will take other corrective action to help prevent any future recurrences.

### Reporting in “Good Faith”

Making a report in “good faith” means that you must provide all of the information you have and that you report honestly.

## NO RETALIATION

We will not tolerate retaliation, including harassment or change in employment status, against anyone who reports a concern in good faith. Claims of retaliation are taken seriously. Every claim will be investigated and, if substantiated, a retaliator will be disciplined up to and including termination.

If you believe you have been the target of retaliation, you should contact your supervisor, the Human Resources Department, the Law Department or the Ethics Hotline.

Q:

**I reported a concern last month and now I feel my manager is treating me differently. What should I do?**

A:

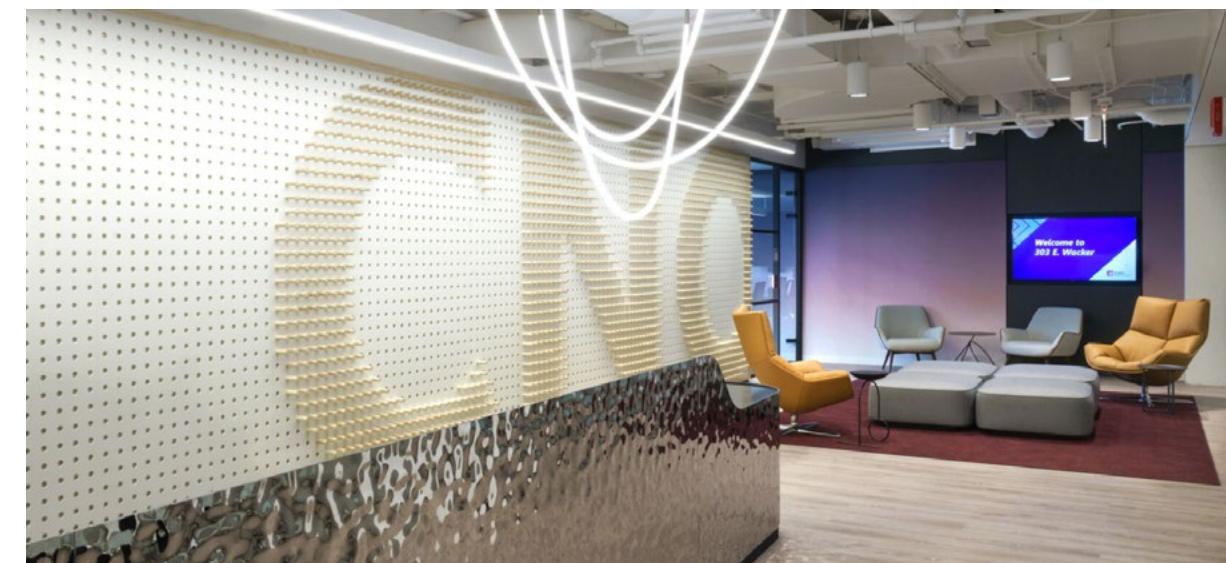
This could be a case of retaliation, which we do not tolerate. You should report this through Human Resources or the Ethics Hotline, so we can investigate your concerns.

Q:

**I overheard a manager telling someone to delay reporting a financial loss until next quarter to make numbers look better. Should I report it?**

A:

Yes, you should report it. Hiding or delaying financial information is a serious issue. Even if you’re not sure, it’s important to speak up. You can report it through the Ethics Hotline—confidentially and even anonymously.

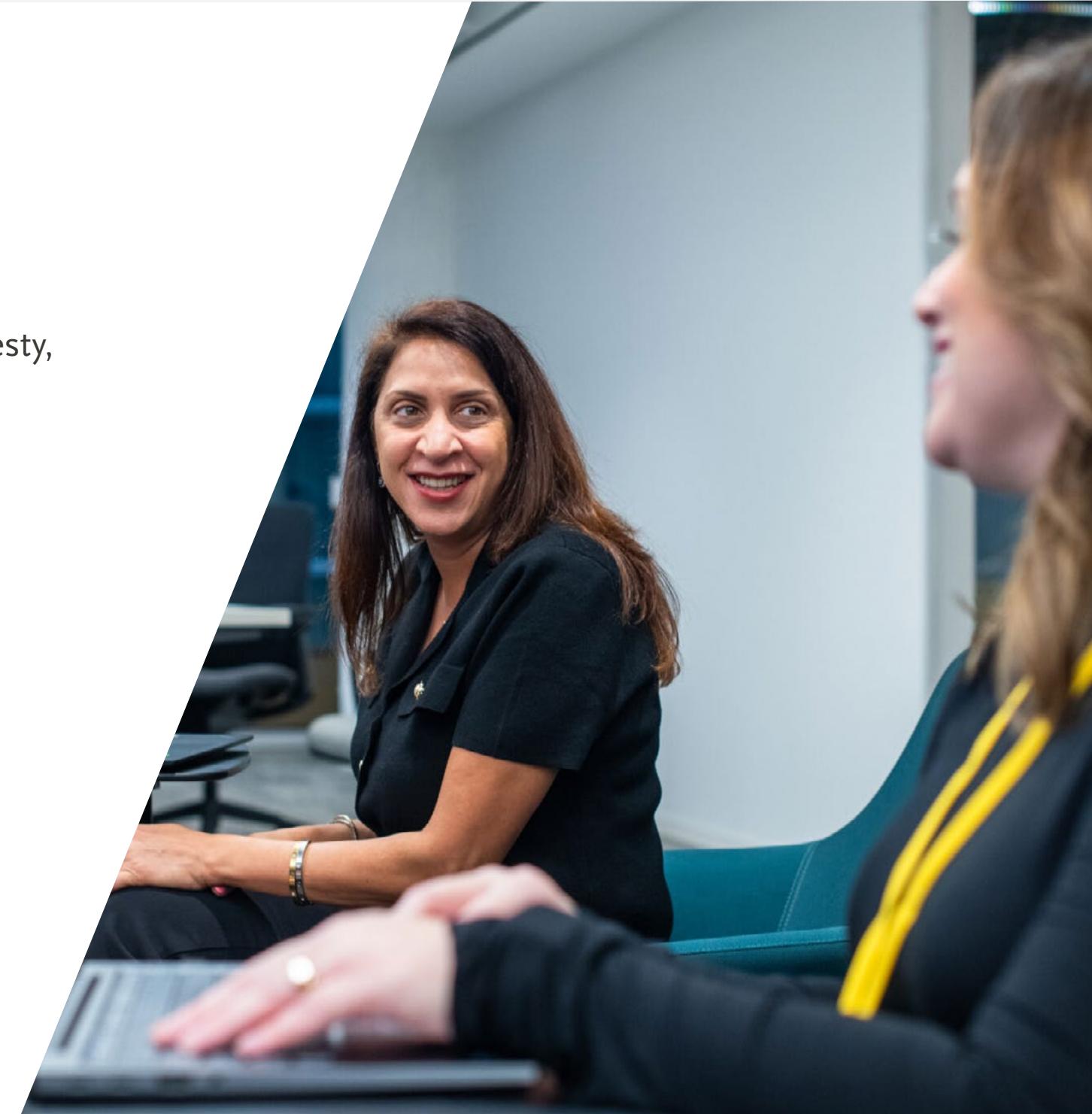


# Practice Fairness

Treat others the way you want to be treated—with honesty, respect and fairness. It's really just that simple.

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# Respect in the Workplace

We work best when we work together as a team, treat each other with respect and value the unique contributions of others. It is your responsibility to help create a positive work environment where everyone can contribute to the best of their abilities. Doing your part means you:

- Treat others with respect—our colleagues, our customers and everyone you interact with at work.
- Consider new ideas and listen in order to better understand and learn from different points of view.
- Understand that offensive messages, comments and inappropriate jokes are inconsistent with our company culture and are never acceptable.



## Every Person Matters

CNO and our customers benefit from the rich variety of ideas, skills and perspectives that emerge when we respect others and work together. Our collaboration fuels innovation, better solutions and a stronger sense of community. Creating a culture of teamwork and respect enables us to do more than we could possibly accomplish alone.

*At CNO, there's simply no room for discrimination or disrespect.*



**A coworker often stands very close to me or touches my arm when talking. It makes me uncomfortable. What should I do?**



Politely let your coworker know that you prefer more personal space. If the behavior continues, document the interactions and report the issue to HR or use the Ethics Hotline. Respect includes honoring personal boundaries.



**You disagree with a coworker's opinion during a discussion. How can you express your view respectfully?**



Share your perspective calmly and listen to theirs. You could say, "I see it differently, and here's why. I'd like to hear more about your point of view, too." Respectful disagreement helps build understanding.

## MORE INFORMATION

- Our Values and Behaviors
- Policy 2600 - Disciplinary Process

# Harassment

We all have a responsibility to maintain a workplace free from harassment. Do your part by being thoughtful and respectful as you interact with others and avoid behavior that may be viewed as threatening, bullying or abusive.

We take all forms of harassment seriously, including behavior that is sexual in nature. If you experience or witness harassment, speak up and report it immediately.

- Everyone has the right to a work environment that is free from harassment and inappropriate conduct.
- We hold ourselves and others accountable to report and address all forms of harassment, inappropriate conduct and bullying.
- We do not tolerate degrading or inappropriate jokes, slurs, bigotry, physical or verbal intimidation, unwelcome sexual advances or other disrespectful conduct.

The CNO companies' reporting procedure provides for an immediate, thorough and objective investigation of any harassment or discrimination claim; appropriate disciplinary action against one found to have engaged in prohibited harassment; and appropriate remedies to any associate subjected to harassment.

## Harassment Can Take Many Forms

Harassment can be verbal, physical or visual. It can include inappropriate jokes, unwelcome touching, rude gestures, offensive notes, emails or social media posts.

**Q:**

**My manager often loses his temper in meetings, raises his voice, and publicly criticizes team members in ways that feel humiliating. It's creating a lot of stress and low morale. Is this considered harassment?**

**A:**

Yes, it could be. The situation creates a poor work environment and violates CNO's policy and values. You should report the behavior to Human Resources or through any other designated reporting channel. CNO is committed to maintaining a respectful workplace, and concerns like this are taken seriously.

**Q:**

**At a company celebration, a colleague made repeated comments about my appearance and suggested we "continue the party privately." I felt uncomfortable, but I didn't want to cause a scene. Is this considered harassment?**

**A:**

Yes, it is. Unwanted comments about your appearance and suggestive remarks—especially in a work-related setting—can be considered sexual harassment, even if they happen during a celebration or after-hours event. You have the right to feel safe and respected at all company functions. You should report the behavior to your leadership, Human Resources or through any official reporting channel, including the Ethics Hotline.

## MORE INFORMATION

- Policy 2101 - Equal Employment Opportunity and Anti-Harassment
- Policy 2600 - Disciplinary Process
- Safety and Security

# People Focused

CNO maintains a culture that is fair for all associates. We build our best teams by seeking out a wide range of unique backgrounds, perspectives, talents and experiences. This allows us to attract talent that is as diverse as the customers we serve. Our culture requires your commitment to:

- Listen to various perspectives that represent our associates and our customers.
- Help create a work environment where different ideas can thrive and drive innovation.
- Never discriminate based on sex, sexual orientation, gender, gender identification or expression, race, color, religion, religious beliefs, religious creed, disability, national origin, marital or civil partnership status, genetic information or characterization or carrier status, citizen status or country of citizenship, uniformed service member, veteran status, ethnicity, medical condition, age, ancestry, mental or physical disability, labor or trade union membership, pregnancy or other occupationally irrelevant characteristics.

**Q:** **I noticed that my manager consistently gives younger team members more opportunities to lead projects, even though I have more experience. It feels like I'm being overlooked because of my age. What should I do?**

**A:** You should speak up. Discrimination based on age is not acceptable. If you feel you're being treated unfairly, talk to your manager or report the issue through the company's reporting channels. Every employee deserves equal access to opportunities, regardless of age.



*We're passionate about creating an inclusive culture that encourages, supports, celebrates and values the diverse voices of our associates and our customers.*

## ① MORE INFORMATION

- I am CNO homepage
- Policy 2401 - Hiring Process
- Policy 2101 - Equal Employment Opportunity and Anti-Harassment
- Policy 2901 - Workplace Lactation
- Policy 2903 - Gender Identity
- Policy 2600 - Disciplinary Process

# Fair Competition

We believe in a competitive marketplace. Fair competition helps keep the marketplace open, honest and working in the consumer's best interest. Antitrust laws can be complex and compliance requirements may vary depending on the situation. That's why it's important to understand the basics and know when to ask for guidance.

Avoid collaborating with competitors—or anything that might look like it. If your role involves contracts or agreements, you have a greater duty to understand and follow fair competition rules.

Be very careful when talking with competitors. Do not make any written, verbal, or informal agreements, or talk about marketing or competitive strategies with a competitor. Instead, reach out to the Law Department for guidance.



**I manage one of our sales territories, and a competitor suggested we each focus on different regions to avoid stepping on each other's toes. It sounds like a win-win—can I agree to that?**



No, you cannot agree to that. This is a form of **market allocation**, which is a serious antitrust violation. When competitors agree to divide up customers, territories or products, it limits competition and harms consumers. You must compete fairly in all markets CNO serves, and decisions about where to work should not be made with competitors.

## MORE INFORMATION

- Policy 7800 - Review of All Contracts and Agreements
- Policy 9500 - Sourcing and Purchasing

## Fair Competition and Antitrust Violations

The following actions break U.S. antitrust laws and go against company practice. If you do them—or help someone else do them—you could face disciplinary action. If you see or suspect any of these behaviors, report them right away to the Law Department or through other approved reporting channels.

**Limiting Consumer Choice:** Agreeing with competitors on what products to offer—like coverage features, exclusions or service levels.

**This also includes tying or bundling**, where unrelated products or services are packaged together in a way that limits choice or forces customers to buy something they may not want.

**Market Allocation:** Making deals with competitors to divide up customers, regions or products so you don't compete with each other.

**Reciprocal Dealing:** Buying from a vendor only if they agree to buy from your company in return.

**Bid Rigging:** Working with competitors to decide who will win a bid. This includes taking turns winning; giving fake or high bids; or holding back bids to help another company win.

**Price Fixing:** Agreeing with competitors to set or control prices, discounts, payment terms or minimum fees.

# Gathering Competitive Information

CNO obtains competitive information only through legal means and never through misrepresentation or any behavior that could be construed as corporate “espionage” or “spying.”

- When collecting business intelligence, you must live up to our standards of integrity —never engage in fraud, misrepresentation or deception to obtain information.
- When we hire former employees of competitors, you must respect their legal or contractual obligations not to use or disclose confidential information that is the property of their former employers.

**Q:** I will be attending a trade association meeting, and I'm worried that my discussions may violate antitrust laws. I'm not sure what I can and cannot discuss. What should I do?

**A:** You are right to be concerned, but the situation can be managed. Trade association meetings are an excellent way to stay informed and connected, but because these meetings bring competitors together, antitrust violations can occur. Before the meeting, discuss your concerns with the Law Department. You can review the agenda and discuss who might be there and what topics may come up. If you are at the meeting and an inappropriate discussion begins, stop participating in the conversation, break away and promptly inform the Law Department.

**Q:** A competitor accidentally emailed their new strategic plan to me. What should I do?

**A:** Although you received the information by accident, it is not ethical to take advantage of another's mistake. CNO competes fairly and does not gather competitive information except through acceptable channels. Contact the Law Department and do not share the email with others.

**Q:** We recently hired a new associate who previously worked for one of our vendors. She says she has confidential information about pricing from her previous job that can be useful to us. Is it OK for me to look at the information and use it to CNO's advantage?

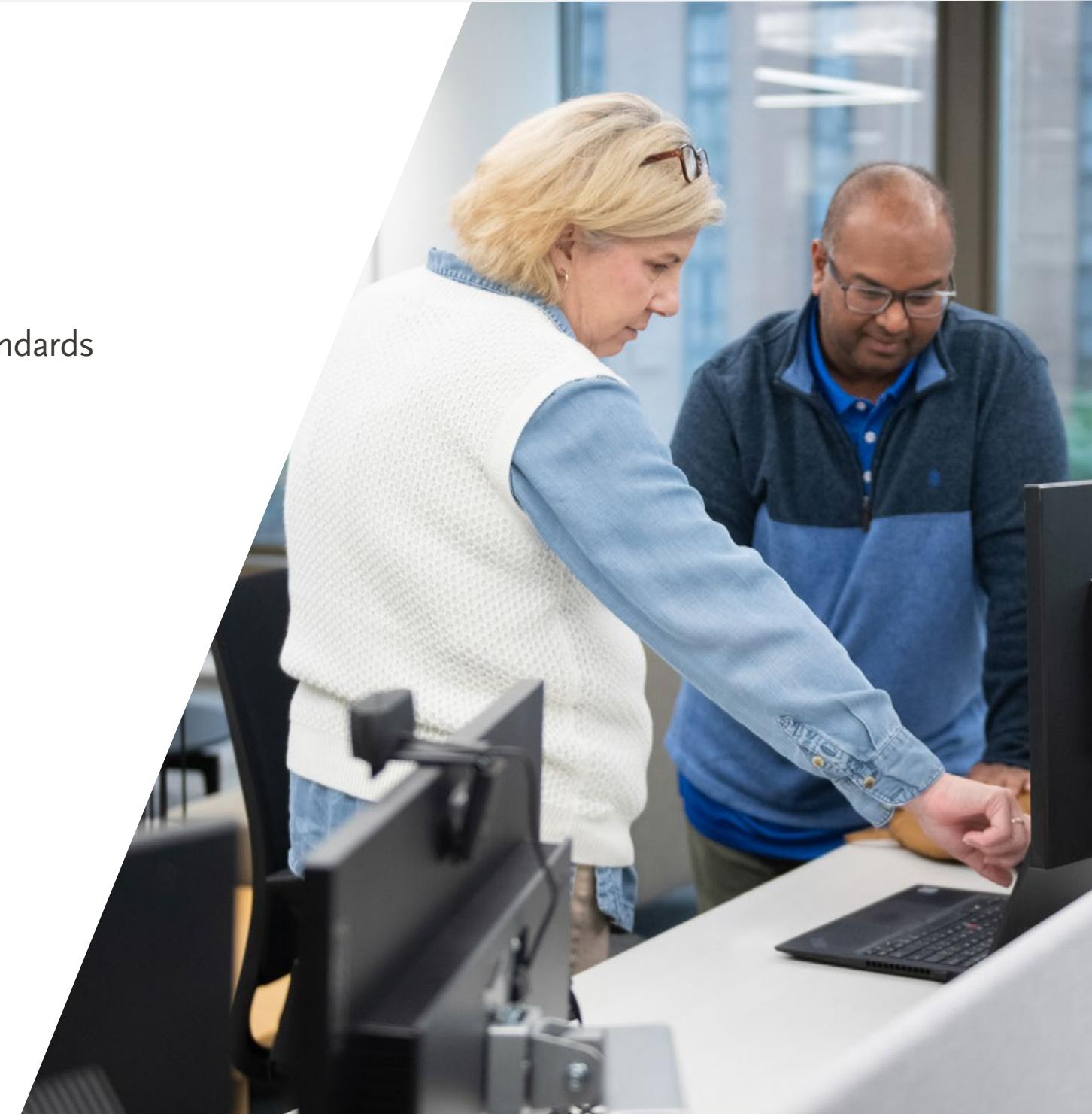
**A:** No. You must respect the confidential information of our business partners, third parties and vendors, just as we expect them to respect our confidential information. Explain to the new associate that, under our Code of Conduct, we are not permitted to use the information.

# Maintain Trust

It is important that we continue to have the highest standards for ethics, fairness and personal responsibility.

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# Personal Information of Our Customers and Associates

Our businesses require that we collect and keep personal information about our customers. Also, as an employer, CNO is required to collect and keep personal information about our associates. We have a duty to keep the personal information we hold secure and to comply with applicable data privacy laws. If the personal information we maintain is misused or wrongfully disclosed, it can cause harm, including putting the customer or associate at risk of identity theft or other illegal activity. In your daily work, please be mindful that:

- We should only be using personal information in the way we promised to, disclosing it only with proper authorization, and destroying it at the appropriate time.
- Privacy laws and contractual obligations restrict the way we can share personal information. If you are not sure if personal information may be shared, contact the Privacy Office or Law Department.
- When information may be shared, you must access and share only the minimum amount of information that is needed for legitimate business purposes.
- Before electronically sending personal customer or associate information, you must take all appropriate measures to safeguard or encrypt it.
- Any device or item—like a laptop, phone, printed document, physical files or badge—that holds customer or sensitive information must stay under your control at all times. If it is lost or stolen, report it right away to the Privacy Office.



Immediately report any misused or mistakenly or wrongfully disclosed personal information to the Privacy Office by submitting a Privacy and Security Incident Submission Form.

## Key Definitions

- **Personal Information (Personal Data)** is any piece of information that can be linked by itself, or in combination with other information, to an individual. It could be a name, photo, email address, date of birth, ethnicity, religion, financial record, medical information or employment history. It can even be posts on social networking sites or technical information about a device a person uses.
- **Data Privacy** is about having a say in the purposes and conditions under which personal information is collected, used, stored and shared.
- **Data Security** is about what we do to protect the data from unauthorized access. Keeping personal data safe and secure is an important part of maintaining data privacy.

## MORE INFORMATION

- Policy 11100 - Privacy and Security of Personally Identifiable Information (PII)
- Policy 10300 - Clean Desk/Fax Machine/Copier Privacy
- Policy 10150 - Emergency/Incident Reporting - Information Security
- Policy 6313 - Encryption Policy
- Policy 6315 - Portable Storage Devices
- Policy 11303 - Business Associates
- Policy 11400 - Data Breach Notification

# Cybersecurity and Data Protection

We are increasingly dependent on networks, databases and the information they contain. It is the responsibility of every associate to protect our data and information systems from accidental and intentional breaches. Each CNO associate has a responsibility to:

- Follow all company policies and practices that are designed to protect our networks, computers, programs and data from attack, damage or unauthorized access. This includes knowing how to report security incidents.
- Protect your user names and passwords. Never share your password or use the password of another associate.
- Be alert to phishing scams or other attempts to uncover sensitive information.
- Don't open suspicious links in emails, even if you think you know the source. Report suspicious emails by clicking on the "Phish Alert Report" button.

## Situational Awareness

Being aware of your surroundings and potential security threats is key to cybersecurity. While technology helps detect risks, your alertness can catch threats that systems might miss.

Always pause to assess the situation—especially when requests involve money or confidential data. Stay alert to physical risks too, like unknown individuals trying to enter secure areas.

*It is not enough to hold ourselves to the highest ethical standards. We must also do everything we can to ensure that our agents and business partners meet the same high standards.*



**I got an email that looked like it came from IT, asking me to click a link and reset my password. I clicked it before realizing it looked suspicious. What should I do now?**



You should report it immediately to the Security Operations Center (SOC) at [SOC@CNOinc.com](mailto:SOC@CNOinc.com). Quick reporting helps limit the damage and allows the team to take protective steps.

## MORE INFORMATION

- Cybersecurity Services Homepage
- Information Technology Policies and Procedures

# Fair Dealing and Vendor Relations

CNO works with a wide range of business partners. These include agents, benefit educators, brokers, enrollment partners, financial professionals, technology providers and vendors. Their work and support are important to our success.

We are committed to doing business in a legal, honest and responsible way. We expect our business partners to meet the same high standards. In addition to this Code, we have other resources that explain what CNO expects, such as the Producer Compliance Guidelines and the Vendor Code of Conduct.

You help CNO succeed when you:

- Build every business relationship with honesty, fairness, mutual respect and a commitment to non-discrimination.
- Refrain from engaging in manipulation, withholding key information, misusing confidential data, misrepresenting facts or taking part in any other unethical conduct with our business partners.
- If you oversee business partners:
  - Make sure they understand our expectations for ethical conduct and compliance, along with their contractual duties.
  - Select vendors based on objective qualifications, not personal connections or friendships.
  - Stay alert for any signs that a business partner may be violating laws or regulations.
  - Report any situation that could look like a conflict of interest right away.
  - Keep our business partners' confidential and proprietary information safe.

## ① MORE INFORMATION

- Policy 3300 - Requesting a Non-Payroll Resource
- Policy 7800 - Review of All Contracts and Agreements
- Policy 9500 - Sourcing and Purchasing



# Accurate Recordkeeping and Financial Reporting

Regulators, investors and others rely on our accurate and honest books and records. Accurate information is also essential within the company so that we can make informed business decisions.

Associates in finance or accounting have special responsibilities in this area, but everyone contributes to the process of recording business results and maintaining records. Each of us has a responsibility to ensure that the information we record is complete, fair, accurate, timely and understandable.

To meet CNO's responsibility to cooperate with audits, investigations and legal document requests, you must preserve records according to our policies, respond fully with all information requested and refrain from editing, modifying or deleting requested information. This means you must:

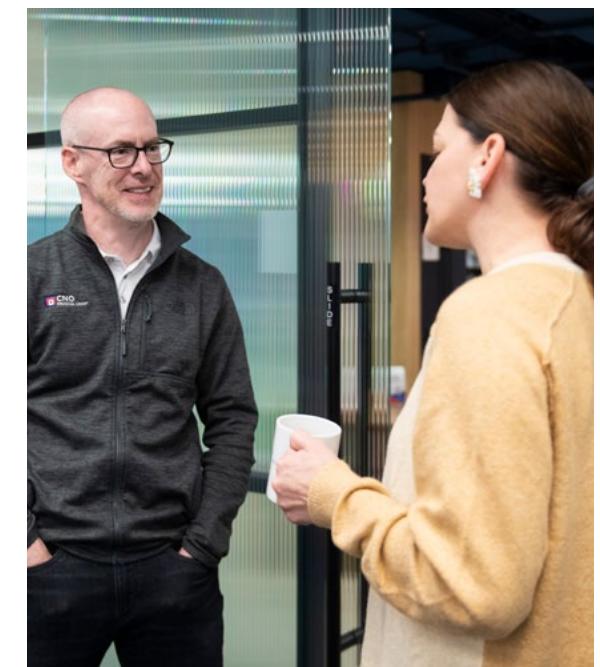
- Ensure that all company accounting and financial records meet generally accepted accounting principles and all other applicable regulatory or industry standards.
- Check that our records are clear, complete and supported by documents that explain the nature of the entries.
- Never record false sales or record sales early. Never understate or overstate known liabilities and assets. Never defer recording items that should be expensed.
- Never establish any accounts of unrecorded company funds or assets, or any other types of "off the books" accounts.
- Never pressure, manipulate or mislead outside accountants who are involved in auditing or reviewing our financial statements or internal controls.

## Records Management and "Litigation Hold Orders"

CNO retains our business records as long as needed for business purposes or longer if required by law. Documents may be destroyed only in accordance with our records retention policy. Documents may never be destroyed in reaction to or in anticipation of an investigation, lawsuit or audit.

If you receive a "Litigation Hold Order," you must not alter or discard any relevant information. Contact the Law Department if there is any doubt about whether record destruction is appropriate.

*We have a responsibility to be honest and transparent about our operations and performance, to use our property with care and to protect confidential and private information.*



Q:

**My manager asked me to record an entry which will result in a possible misstatement of the value of an asset on our books. Should I do what she asks?**

A:

No. You may not ever knowingly misstate the value of an asset. Doing so would be a misrepresentation. It could be fraud. You need to discuss your concern with your manager, but if you are not comfortable doing so, seek immediate help using any of the other resources listed in the Code.

### **(i) MORE INFORMATION**

- Policy 2200 - Payroll Reporting
- Policy 7100 - Service of Lawsuits, Subpoenas and Other Legal Documents
- Policy 8200 - Suspected Thefts, Unauthorized Transactions and Similar Irregularities
- Policy 9500 - Sourcing and Purchasing
- Policy 9701 - Records Storage Services
- Policy 9702 - Records Retention



## **Confidential Company Information**

You have a responsibility to protect all confidential CNO information, including intellectual property. Always keep such information secure and protect it from loss, misuse or inappropriate access and disclosure. To fulfill this responsibility, each associate must:

- Share confidential information only with those who are authorized to have it and require it to do their jobs.
- Never share confidential information, either internally or externally, unless you have verified the following information:
  - The identity of the person requesting the confidential information;
  - The person requesting the confidential information is authorized to receive it and you are authorized to send it;
  - The information will be used for an authorized purpose; and
  - The information can be transmitted in a secure manner.
- Properly label confidential information to indicate how it should be handled, distributed and destroyed.
- Follow computer and network security procedures to prevent unauthorized access.
- Never install unauthorized software on company computers or share IDs or passwords.
- Never discuss confidential information if unauthorized persons could overhear your conversation. For example, do not have such conversations on elevators, in visitor or common areas, around others, or when using mobile phones in non-private spaces.
- Immediately report any theft, loss or unauthorized disclosure of confidential information.

**Confidential information** is any data that should be kept private and not shared with the public. Examples include:

- Personal contact details.
- History of insurance claims.
- Social Security or Tax ID numbers.
- Payment and bank account information.
- Medical records and health information.
- Associate files and records.

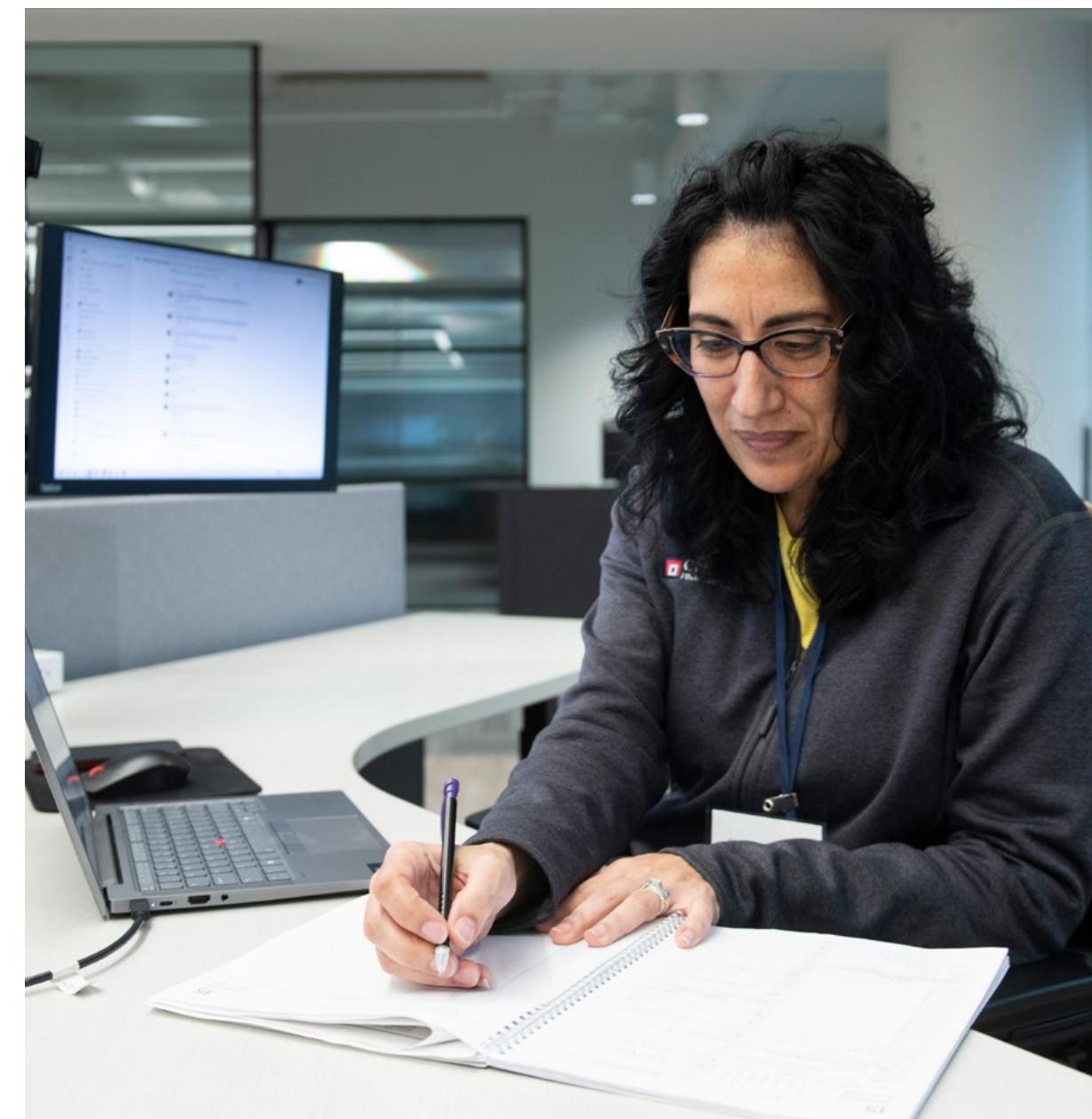
**Proprietary information** is private business knowledge that helps a company stay ahead of its competitors. It belongs to the company and is not shared with the public.

This can include **intellectual property (IP)**, which is protected by law. IP includes things like inventions, logos and creative work that the company has created. Examples include:

- Intellectual property like patents, trademarks and copyrighted materials.
- Plans for new products and how to advertise them.
- Methods used to set insurance rates and prices.
- Software and tools created by the company.
- Internal review and compliance procedures.
- Documents for how the company runs its operations.

## MORE INFORMATION

- Policy 8000 - Protection of the Company's Confidential Information and Invention Ownership
- Policy 7700 - Insider Trading and Confidentiality
- Policy 6303 - Protection, Disposal and Destruction of PII and Other Data



# Inside Information

In the course of your work, you may become aware of “inside information” about CNO or other publicly traded companies. Using this information for personal gain or sharing it is not only unfair to investors, it is illegal.

What constitutes inside information can be a complicated question. If you have any questions about whether you possess inside information, or whether information is material or nonpublic, please contact the Law Department.

The basic rules you must follow include:

- Never buy or sell any stocks, bonds, options or other securities of CNO, or any public company, based on “inside information.”
- Do not “tip off” others, such as friends and family, so that they can take advantage of the inside information you have. This, too, is illegal.

If you have any questions about whether information is material and nonpublic, contact the Law Department.

## Examples of Inside Information:

- Company financial results.
- Projections of future financial results.
- News of a pending or proposed alliance, merger or asset purchase.
- A major new contract or contract cancellation.
- Information regarding litigation or regulatory action involving the company.
- A change in dividend policy.
- A change in senior management.



*Protect CNO's resources  
as if they were your own.*

**Inside information** is something a reasonable person would find useful in determining whether to buy, sell or hold a stock or other security and that **has not been released to the public**. Inside information may be information that could be perceived as either positive or negative for the company.

Information is **material** if it is likely that a reasonable person would consider the information important in making a decision to buy, sell or hold a company's stock.

Information is considered to be **nonpublic** until one full business day after it has been disseminated to the public through a broadly distributed press release or a report made to the SEC.

## ① MORE INFORMATION

- Policy 7700 - Insider Trading and Confidentiality
- Policy 8000 - Protection of the Company's Confidential Information and Invention Ownership

# Use of Company Assets

Each of us is entrusted with the care of company assets. We must protect them from loss, damage, theft, waste and improper use.

- Use company assets only for business purposes.
- Physically secure your office, workstation and equipment by locking items or completely shutting down systems.
- Report any equipment that is damaged, unsafe or in need of repair.
- Only use authorized software, devices and procedures.
- When using CNO email, information systems and internet access, you should have no expectation of personal privacy.
- Personal use of company items like laptops, printers, internet, phone or messaging tools is okay once in a while. However, it can't get in the way of your work or violate any company policies or laws.
- Seek value whenever purchasing supplies and other company assets.
- When working from home or another remote location, you still need to follow all company rules and security guidelines.

## CNO Assets Include:

**Physical**—Facilities, vehicles, furniture, equipment and supplies.

**Information**—Data, databases, reports, files, plans, records or intellectual property, including trademarks and logos.

**Financial**—Company funds, including checks, credit cards, invoices and other records that serve a monetary purpose.

**Electronic**—Laptops, telephones, internet/intranet access, electronic storage devices, information systems, and other similar devices, systems, and technology.



**When I work remotely, do I really need to secure my laptop when I'm not using it?**



Yes. Working at home brings its own set of privacy and security concerns. It's important for us to focus on the privacy of our customers' personal information—and other sensitive business information—while we are working outside the office.



**I run a small side business from home. Can I use my company laptop to help with that?**



No. Using our laptop for your personal business would violate company policies and create legal or security risks.

## MORE INFORMATION

- CNO Secure Work from Home/Remote Guidelines
- Policy 1001 - Acceptable Usage
- Policy 6300 - Personal Computer Policies and Procedures
- Policy 6315 - Portable Storage Devices
- Policy 6500 - Business Communications: Email

**Think carefully before you send an email or text.**

# Speaking on Behalf of Our Companies

CNO speaks with one clear and consistent voice when providing information to the public and the media. For this reason, it is important that only designated associates speak publicly on behalf of CNO and its operating companies.

- CNO's Chief Marketing Officer and identified "Authorized Spokespersons" are the only associates authorized to speak with the media on behalf of CNO.
- Unless you are authorized to do so, never give the impression that you are speaking for or on behalf of CNO in any communication that may become public, including social media.



- If you are not an "Authorized Spokesperson" and you receive an outside inquiry about the company from news media, investors, or any other outside person or organization, please:
  - Politely decline to comment. Do not engage in a discussion or provide information.
  - Do not say "No comment."
  - Do not ignore a media call.
  - Immediately refer the inquirer to Communications Director Valerie Dolenga, and notify her of the inquiry, at (312) 396-7688 or [Valerie.Dolenga@CNOinc.com](mailto:Valerie.Dolenga@CNOinc.com).
- If you are contacted by a law enforcement agency or government official regarding CNO-related business or activities, or receive any type of legal enforcement process documentation pertaining to CNO, immediately notify the Corporate Investigations & Support (CI&S) at (317) 817-4848 or Online Referral Form.
- If you are contacted by a regulatory agency or regulator regarding CNO-related business or activities, immediately notify the Law Department.



**A reporter called and asked for a comment related to my work. I know the answer to her question, but I'm not sure if I am allowed to respond. What should I do?**



If you are contacted by a member of the media, you should explain you are not authorized to answer questions on behalf of CNO and you will direct their call to Communications Director Valerie Dolenga at (312) 396-7688 or [Valerie.Dolenga@CNOinc.com](mailto:Valerie.Dolenga@CNOinc.com).

## SPEAKING AT EVENTS

Sometimes, CNO employees are asked to speak at outside events like industry conferences, panel discussions, social media chats, podcasts or public meetings. Before saying yes, you must get approval from your Executive Leadership Group (ELG) leader, the Corporate Communications team and the Law Department.

When you speak at an event, you are representing CNO, so it's important to follow company rules and protect our brand. You are not allowed to talk to the media or say you speak for CNO unless you've been given permission. You cannot share private or company-only (proprietary) information, and you must use the approved presentation style. If you have questions or want to start the approval process, reach out to Corporate Communications or the Law Department.

**Q:** **I was asked to be part of a panel presentation. What do I need to do?**

**A:** Obtain approval from your ELG member, Corporate Communications and the Law Department before agreeing to participate. Opportunities are reviewed on a case-by-case basis. You'll need to provide event details at least three weeks in advance.

**Q:** **A member of the media requested an interview. Can I participate?**

**A:** Unless the Corporate Communications team has given approval, you may not participate. You should say *“Thanks for the interest. I am not an authorized spokesperson and cannot speak to you about the company or the business. Please reach out to our public relations team. They will certainly try to answer any questions you might have.”*



## USING SOCIAL MEDIA

Social media is a great way to connect with people and potential customers, but always be careful when writing anything that might be published online. Practice common sense by keeping your electronic communications professional and consistent with our values and policies. Always assume the whole world will read your posts.

- Do not post information about CNO products or services or any financial information about CNO without prior approval from CNO.
- Be careful when listing CNO as your employer on any social media. Your social media profile and activity may have an impact on CNO, including the company's reputation.
- If you mention that you are a CNO associate in external social media, in your user profile or by signing your online comments as "John Smith, CNO marketing manager," you must include a statement to the effect that the views that you express are your own and do not reflect those of CNO.
- You are responsible for your posts. Do not engage in activity online that would be unacceptable in person or that would call into question the reputation and integrity of CNO.
- Remember that CNO policies and procedures, in addition to various laws and regulations, may apply to your social media interactions.
- Our sales teams have established procedures for creating and posting on social media platforms. Consult your management team before using social media for business purposes.

Q:

**Someone posted a statement about CNO on an online social network that I know is false. I think it's important that we correct the misinformation. Should I post a response?**

A:

No. While it may be tempting to correct the information and engage with the source of the misinformation, you should instead contact Media Relations and let them take the necessary steps.

### **i MORE INFORMATION**

- Policy 2805 - Social Media
- Policy 7000 - Information Disclosure - Media and Investor Communications
- Policy 8000 - Protection of the Company's Confidential Information and Invention Ownership
- Policy 8200 - Suspected Thefts, Unauthorized Transactions and Similar Irregularities



# Preserve Our Reputation for Integrity

Companies do not fulfill commitments, people do. Our commitment to our stakeholders and communities depends on working together to fulfill the promises that we make. CNO's compliance and ethics program serves a critical role in helping to promote an ethical business environment and to prevent and detect noncompliance. These initiatives are designed to protect investors, consumers, agents and the workforce.

## In this section:

▪ Conflicts of Interest	30
▪ Gifts and Other Business Courtesies	32
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▪ Facilitation Payments, Bribes and Kickbacks	34
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# Conflicts of Interest

A conflict of interest may occur when your personal interests or activities affect your ability to make objective decisions on behalf of CNO and our customers.

In many instances, conflicts can be avoided or managed. Avoid situations that might lead to even the appearance of a conflict. If you find yourself in a potential conflict of interest situation, talk with your manager, Human Resources department or Law Department.

*Be alert and proactive. Know and avoid the kinds of situations that can present a conflict or even the appearance of a conflict.*

## EXAMPLES OF POTENTIAL CONFLICTS OF INTEREST

- **Dating a supervisor or subordinate**—You're in a romantic relationship with someone who reports to you—or who you report to.
- **Reporting to a close friend or family member**—Your boss is also your close friend or relative, which could affect fair decision-making.
- **Ignoring misconduct by a friend**—You don't report a coworker's bad behavior because he or she is your friend.
- **Starting a competing business**—You start your own company that offers similar services to your full-time employer.
- **Doing work for a competitor**—You help a competing company with projects or advice, even if it's outside your regular work hours.
- **Working for a competitor**—You take a part-time job with a company that sells similar products or services.
- **Owning part of a vendor's business**—You own shares in a company that sells products or services to your employer.

- **Posting company weaknesses online**—You share negative comments about your company's problems on social media.
- **Selling company info for money**—You accept payment from another company in exchange for confidential or inside information about your employer.
- **Using inside info for personal gain**—You use private company information to make money or get ahead personally.
- **Making business decisions to benefit yourself**—You choose a vendor or make a purchase that helps a business you own or have invested in.
- **Accepting expensive gifts from a client**—A client gives you hard-to-get tickets to a big game, even though company policy limits gift value.
- **Sharing company plans**—You talk about your company's future plans during a job interview with another company or during a business conference.

It's not possible to list every situation that could lead to a conflict of interest, but some situations are more common than others. To help you spot and handle potential conflicts, here are some basic guidelines to follow. If you're ever unsure or have questions, reach out to the Law Department or other CNO resources for help.

- **Outside employment and professional activities**—You should not take on outside work that interferes with your work at CNO. In addition, you are prohibited from outside work for or on behalf of any customer, vendor or competitor. You are also prohibited from working with any organization in which your work could involve using CNO assets, information or intellectual property.
- **Financial interests**—It may be a conflict if you, or a relative or a close friend, hold a significant financial interest in a company or outside organization that does business with or otherwise is related to or could affect CNO's business or reputation. If you have any reason to believe that you, or a relative or close friend, may have this type of financial interest, bring your question to the Law Department. Indirect investments, for example, in a mutual fund where you do not control specific investment choices are acceptable.
- **Business with relatives**—You are not permitted to have any input into the employment conditions, compensation, performance evaluation or job assignment of any relative who is also employed at CNO unless the Human Resources Department has specifically approved it.
- **Corporate opportunities**—If you learn about a business opportunity through your work at CNO, you may not take advantage of that opportunity for personal gain unless you have discussed it with your supervisor. If CNO declines the opportunity, you may then pursue it yourself.

## ⓘ MORE INFORMATION

- Policy 2103 - Employment (Hiring and Job Movement of Relatives)
- Policy 2800 - Outside Interests, Activities and Employment of Associates

### Required Annual Certification

Each year you must complete the Conflict of Interest Questionnaire honestly and thoroughly.

If you think you might have a conflict of interest, or you're not sure, talk to your manager and the Law Department right away.



# Gifts and Other Business Courtesies

Business courtesies, such as gifts, entertainment and meals, can help build successful business relationships, but there are times and circumstances when even well-intentioned gifts or entertainment can cross an ethical line or even be illegal.

- Gifts and entertainment that you provide on behalf of CNO must be consistent with our policies and all applicable laws and regulations and also must be consistent with the policies of the recipient's organization.
- Accurately record all expenses for gifts and entertainment.
- Any gift, entertainment or meal that you provide on behalf of CNO should be modestly priced and must be related to a business meeting or discussion. As a rule of thumb, gifts of modest value include promotional items like company-labeled pens, cups and other nominally priced items.
- Unless approved by your supervisor, entertainment or meals should not involve family members or friends of a stakeholder or a vendor.

## These Rules Always Apply:

- Your supervisor must approve, in advance, any gifts you plan to provide.
- Your supervisor must also document the particular need for any gift in excess of nominally priced items, as such gifts may suggest an improper motive. Please refer to our policies for gift-value guidance.
- You must notify your supervisor if you receive any business-related gift.
- You may not provide gifts to government employees, foreign officials, outside agents, agent organizations or sponsors of groups of insureds.
- You may not offer or accept any gift, whether an item or a service, that could embarrass you or CNO or harm our company's reputation.



**I got invited to a very expensive restaurant by a technology vendor who's being considered for a CNO project. It's just dinner—can I go?**



No, you shouldn't go. Accepting a high-value gift like an expensive dinner from a vendor who may do business with CNO goes against our policy and could be seen as a conflict of interest. It might look like the vendor is trying to influence your decision or gain favor. Always check with your manager or the Law Department before accepting gifts or invitations.

## MORE INFORMATION

- Policy 8400 - Receipt of Business-Related Gifts
- Policy 3200 - Travel and Entertainment
- Policy 7500 - Foreign Corrupt Practices Act

# Fraud

Fraud is an intentional act of deception, misrepresentation or concealment done in order to gain something of value. At CNO, we manage the risk of fraud through our Core Value of integrity and through personal responsibility, utilizing our business processes, controls and the standards in this Code.

We have **zero tolerance for fraud** and similar misconduct and will seek to identify, investigate, resolve and possibly prosecute any fraud or related misconduct committed by any associate, vendor or other third party.

- You have a duty to follow established procedures and report suspected fraud, misconduct or dishonesty.
- Be alert to all types of fraud, including fraud committed by associates, customers, vendors or other third parties affiliated with CNO.
- If something seems suspicious, don't ignore it—follow up by reporting your concerns to your supervisor so the situation can be investigated.

## HOW TO CONTACT

If you have concerns, questions or reports about potential fraud, waste and abuse (FWA); potential elder abuse and financial exploitation; or if you are contacted by a law enforcement agency—contact Corporate Investigations & Support (CI&S).

- Hotline: (317) 817-4848
- Online Referral Form



**I was helping a customer with his insurance policy, and he seemed confused. His caregiver kept answering for him and pushed for changes that didn't seem to benefit the customer. Should I be concerned?**



Yes, that could be a sign of elder abuse or financial exploitation. It's important that you submit an online referral to CI&S.



## MORE INFORMATION

- List of Red Flags
- Policy 8200 - Suspected Thefts, Unauthorized Transactions and Similar Irregularities
- Policy 8500 - Money Laundering Prevention



# Facilitation Payments, Bribes and Kickbacks

Always work honestly and with integrity. Never offer or accept a bribe or kickback from anyone. Be mindful that every associate is responsible not only for their own actions, but also to report concerns of improper conduct by any third party that is affiliated with CNO.

- Do not offer, give, solicit or accept bribes or kickbacks, or provide or accept any other kind of improper payment or item or service of value.
- Do not pay facilitation payments. If a facilitation payment is requested, immediately report the request to the Law Department.
- Keep accurate books and records so that payments can be honestly and completely described and documented.
- Be alert for anyone doing business on our behalf who has a reputation for questionable business practices. Be vigilant in monitoring that person's or organization's behavior, and report your concerns to a supervisor or to the Law Department.

## MORE INFORMATION

- Policy 7500 - Foreign Corrupt Practices Act



### Key Definitions

A **bribe** is anything of value that is given to influence the behavior of someone in government or the private sector in order to obtain business, financial or commercial advantage.

A bribe can be something other than cash. A gift, a favor to you or a family member, or the offer of a loan or a job could be considered a bribe.

**Facilitation payments** typically are small payments to a low-level government official that are intended to encourage the official to perform his/her responsibilities.

A **government official** includes anyone who works for or is an agent of a government-owned or government-controlled entity, including elected and appointed officials of national, municipal or local governments. Government official also includes officials of political parties and candidates for political offices, as well as employees of a government or a state-controlled company.

# Anti-Money Laundering

Money laundering occurs when someone uses financial transactions to conceal the identity, source or destination of illegally gained money. Anti-money laundering laws make this activity a crime. In response to these laws and regulations, CNO maintains an anti-money laundering program, and other programs, to prevent and detect these transactions. It is important that you know and comply with all laws and regulations intended to prevent money laundering.

- CNO maintains screening processes to monitor and avoid inadvertent participation in attempts to launder funds derived from illegal activities or making payments to prohibited individuals.
- All associates must ensure that they are conducting business with reputable customers, for legitimate business purposes, with legitimate funds.

## What are Sanctions and Embargoes?

**Sanction:** a rule or punishment that countries use when someone—like a person, country or organization—is believed to be breaking international law.

Sanctions are usually agreed on by several countries working together. They can include things like freezing bank accounts, stopping trade of certain goods or weapons, or banning travel for specific people.

**Embargo:** a ban or limit on trade with a country. It can stop all trade or just certain goods from being bought or sold.

CNO also has processes and procedures to comply with international sanctions laws. This includes rules from the U.S. Treasury's Office of Foreign Assets Control (OFAC), the U.K.'s His Majesty's Treasury (HMT), the United Nations, Bermuda and Canada.

## MORE INFORMATION

- Policy 8500 - Money Laundering Prevention

## MONEY LAUNDERING AND RELATED FINANCIAL CRIMES

Terrorists, narcotics traffickers, counterfeiters, smugglers and other criminals often attempt to use legitimate companies to hide their proceeds or their sources of funds.

Many forms of other crimes are related to money laundering, including forging financial documents, exploitation of vulnerable persons, hacking and identity theft.

Aiding in money laundering and making payments to prohibited individuals are serious criminal offenses.

### Watch Out For These “Red Flags”:

- Payment requests that are unusual in any way, such as payments in cash equivalents, including money orders or traveler's checks, or requests for payment in currencies other than the currency specified on the invoice.
- Requests to make payments to individuals, companies, addresses, countries or third parties that have no apparent connection to or legitimate interest in the transaction.
- Business partners or customers who hesitate to provide the complete information that we need to process payments.
- Business partners or customers who structure transactions to avoid recordkeeping requirements, such as requesting or making payments just below thresholds that require regulatory reporting.
- Business partners or customers who provide unusually favorable trade terms.
- Requests for funds transfers that are unexplained or unusual.

# Managing Government Relationships

Activities involving government relations can be very complex. CNO has policies in place to address government-related issues including political activity and lobbying, gifts and improper payments.

You are required to coordinate with the Law Department in all matters involving government relations. Failure to do so can place CNO at risk for violation of federal, state or municipal laws.

All associates should be aware of the following important guidelines:

- Never offer or provide gifts to a government official or staff member. Immediately report any request from a government official or staffer for a gift or improper payment.
- Before you discuss employment or vendor opportunities with a current or former government official, bring the matter to the attention of the Law Department.
- Notify the Law Department immediately about any request for information from state regulators (e.g., Department of Insurance or Insurance Commissioner), federal entities (e.g., Department of Labor, Department of the Treasury, Centers for Medicare & Medicaid Services, Securities and Exchange Commission or Internal Revenue Service) or national organizations (e.g., National Association of Insurance Commissioners). This ensures CNO will be appropriately and completely responsive to the request.

## ① MORE INFORMATION

- Policy 7500 - Foreign Corrupt Practices Act
- Policy 2800 - Outside Interests, Activities and Employment of Employees



# Show We Care

Our Mission is to secure the future of middle-income America by providing insurance and financial services that help protect their health, income and retirement needs, while building enduring value for all our stakeholders.

**In this section:**

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▪ Political Activities and Contributions	41
▪ Sustainability and Environmental Stewardship	42



# Health and Safety

We understand the importance of providing a healthy, safe and secure workplace for our co-workers and others who visit our facilities. Our commitment to health and safety is a team effort: look out for one another, use common sense and speak up whenever you suspect a health, safety or security risk.

- Be alert and use good judgment. Speak up about any possible hazards and always report work-related accidents or illnesses.
- Always follow safety, fire and security procedures.
- Wear your ID badge and discourage anyone who attempts to tailgate into secure areas without showing their ID.
- Help contractors and third parties to act in a manner consistent with our safety requirements.
- Do not work under the influence of alcohol or illegal drugs, including marijuana.
- Immediately report anyone, whether a co-worker or visitor to the premises, who uses threats or intimidation or is violent. These actions endanger everyone and, in addition, undermine our company culture as an ethical organization.
- Do not bring firearms or other weapons onto CNO premises, except as authorized.

CNO has identified and created programs to ensure safety of our associates and our business continuity.

## Off-Duty Conduct

CNO can be held responsible for your actions if your off-duty conduct interferes with our ability to conduct our business or poses a risk to our company's reputation.



**I suspect an associate has been coming to work under the influence of prescription drugs, and I'm concerned that it's affecting his work. I'm also worried about him personally. What should I do?**



Share your concerns with your supervisor. If your suspicions are correct, this will give us an opportunity to address the issue and connect him with resources that may be able to help.



**A colleague confided in me that she's having a domestic dispute with her partner. She's afraid for her safety and thinks her partner might show up at the office. What should I do?**



Encourage her to discuss the situation with her supervisor or contact Corporate Security. If she doesn't wish to come forward, you will need to report the threat because it may impact the safety not only of your colleague but others in the office.

## MORE INFORMATION

- Safety and Security Intranet Homepage
- Policy 6100 - Urgent Notification System (Preparis)
- Policy 10600 - Workplace Safety
- Policy 2801 - Drugs and Alcohol
- Business Continuity FAQs

# Serving Our Communities

CNO is proud to support our communities, our associates and our customers through non-profit organizations that support the health and financial wellness of middle-income Americans.

Associates are encouraged to take active roles in their communities and to participate in CNO-sponsored activities. Your participation in company-sponsored activities is voluntary. You should never feel pressured or required to participate with financial contributions or through your efforts or presence.

To ensure that our personal and corporate responsibility efforts are aligned with our commitment to ethics and integrity, please keep the following in mind:

- Do not make any direct or indirect contribution on behalf of CNO unless you are authorized to do so.
- If you volunteer to help a charitable organization, be sure that your participation does not interfere with your work responsibilities.
- When you are representing CNO, demonstrate the company's commitment to ethical and professional conduct.
- You are prohibited from soliciting or pressuring fellow associates, customers or business partners to support your favorite charities or causes.

## MORE INFORMATION

- Team CNO Intranet Homepage
- Sustainability at CNO



*When individuals commit themselves to a cause, they have more power than they know to make a positive difference in the lives of others.*

# Human Rights

We are committed to respecting the human rights and dignity of everyone.

CNO's policies, practices and community programs support our belief that every person should be treated with respect and dignity and is entitled to basic internationally recognized human rights as outlined in the United Nations Universal Declaration of Human Rights and United Nations Guiding Principles on Business and Human Rights. We comply with all applicable laws pertaining to fair employment practices, freedom of association, privacy, collective bargaining, immigration, working time, wages and hours. We abide by laws prohibiting forced and compulsory child labor, employment discrimination and human trafficking.

CNO shall respect the rights of workers to associate freely with any group, to join or not join labor unions, and to communicate openly with management regarding working conditions and management practices.

We will not tolerate abuse of human rights in our operations or be complicit in human rights violations in our supply chain.



You can support efforts to end human rights abuses by taking action:

- Report any suspicion or evidence of human rights abuses in our operations or in the operations of our business partners to your supervisor or use any of the reporting channels in this Code.
- If you have a question or if you know or suspect there has been a violation of these policies, you need to speak up. Remember: an issue cannot be addressed unless it's brought to someone's attention.
- Remember that respect for human dignity begins with our daily interactions with one another and with our customers and business partners. It also includes focusing on people and working to welcome, value and respect them, accommodating disabilities and doing our part to protect the rights and dignity of everyone with whom we do business.

## MORE INFORMATION

- [I am CNO Homepage](#)
- [Policy 2101 - Equal Employment Opportunity and Anti-Harassment](#)

# Political Activities and Contributions

CNO supports the rights of our associates to participate in the political process. If you choose to be politically active, you must do so as an individual citizen—on your own time and at your own expense.

Laws and regulations place numerous restrictions on the company's role in political activities and funding. In accordance with applicable laws, CNO exercises our right and responsibility to make our position known on relevant policy issues to government leaders, when appropriate.

- Any political statements you make must be identified as yours alone and not the views of CNO.
- Make sure that any political work you do is done on your own time and without the use of CNO assets or funds.
- You may not pressure others to contribute to, or support or oppose, any cause, political candidate or party. Do not solicit contributions or distribute political literature during work hours.
- You are not permitted to make political campaign contributions on behalf of CNO, nor may you engage in any political advocacy or “lobbying” activities on behalf of CNO without specific advance approval from the Law Department.
- If your CNO responsibilities include soliciting or negotiating contracts with government entities, be sure you understand “pay-to-play” restrictions with regard to political contributions and that you fully coordinate your activities with the Law Department.

## Solicitation and Distribution of Literature:

It's important that we maintain an environment that is conducive to work and free from pressure from colleagues to participate in initiatives that are not approved by the company.

Without appropriate advance approvals, do not solicit others during work time, whether in person, through company email or by distributing or posting written materials—about outside issues or causes.



**I am supporting a local political candidate who openly supports CNO and the work we do. May I speak out at her campaign event and identify myself as a CNO associate?**



No. Our political advocacy is conducted through our membership in industry trade associations, as well as direct engagement with legislators and regulators through our government affairs staff working in conjunction with senior executives. The CNO Concerned Citizens Federal Political Action Committee (CNO PAC) was established to supplement these educational efforts.

## MORE INFORMATION

- Policy 2100 - Solicitation of, and Distribution by, Associates
- Policy 2800 - Outside Interests, Activities and Employment of Employees
- Political Action Committee Intranet Homepage

# Sustainability and Environmental Stewardship

CNO is committed to minimizing the impact of our operations on the environment while integrating sustainability processes into our business practices and throughout our value chain.

- Be proactive and look for ways to reduce waste and use energy and natural resources more efficiently.
- Recycle when you can and conserve paper by limiting printing.
- Speak up if you have any suggestions about reducing our environmental impact. Please reach out to [Sustainability@CNOinc.com](mailto:Sustainability@CNOinc.com).

*CNO believes that driving sustainability throughout our enterprise makes good business sense and can make a difference in the world.*



# Closing Thoughts



Thank you for taking the time to read our Code of Conduct.

At CNO, we have built a reputation of trust with our customers, shareholders, agents and associates. Every day we strive to honor this trust through our commitment to our values: People Focused, Customer Driven, Integrity and Excellence.

But without action, our values are just words on a page. This Code is your guide to the action you must take to fulfill our commitment to those values and maintain the standards of ethics and integrity that form the core of our relationships with our stakeholders.

Please refer to the Code whenever you have questions or need advice about our standards and expectations. By understanding and applying the principles outlined within, and by participating in all our required compliance and ethics training, you can ensure that your actions strengthen the trust placed in us and reinforce our legacy of excellence.

Finally, the Code and resources mentioned throughout are here to help you, but they are not your only resources. We achieve our greatest successes through collaboration. If you ever find yourself in a difficult situation, or if you have suggestions about how to improve our Code or compliance programs, please do not hesitate to contact either of us.

Thank you for your commitment to our customers and each other.

A handwritten signature in black ink, appearing to read "Matthew J. Zimpfer".

**Matthew J. Zimpfer**  
General Counsel

A handwritten signature in black ink, appearing to read "Nancy Sweet".

**Nancy Sweet**  
VP, Chief Compliance Officer,  
Deputy General Counsel

# Resources

We have an open-door policy and you should feel free to talk to your immediate supervisor, manager, all Human Resources associates, members of the Law Department, senior and executive leadership, or any other company resource outlined below.

Resource	Contact
<b>Ethics Hotline:</b> Reporting ethical concerns, misconduct, violations of law, regulations or corporate policies, or abuse of CNO's resources. It provides a way to remain anonymous.	<a href="mailto:TelICNO@GetInTouch.com">TelICNO@GetInTouch.com</a> US: (855) 835-5266 Bermuda: 1-844-820-2011 <a href="http://Report.Syntrio.com/CNOinc">Report.Syntrio.com/CNOinc</a>
<b>Human Resources:</b> Concerns, questions or reports about HR issues.	<a href="#">Open a Case in Workday</a> <a href="#">Human Resources Homepage</a>
<b>Corporate Investigations and Support (CIS):</b> Concerns, questions or reports about potential fraud, waste and abuse (FWA), potential elder abuse and financial exploitation, and if you are contacted by a law enforcement agency.	CIS Hotline: (317)-817-4848 <a href="#">Online Referral Form</a>
<b>Physical Security:</b> Health and safety concerns, or questions about the security of physical spaces and the people inside of them. In case of a real health and safety emergency, always contact 911 first.	<a href="#">Security Homepage</a> <a href="mailto:Shane.Shepherd@CNOinc.com">Shane.Shepherd@CNOinc.com</a>
<b>Cybersecurity:</b> Concerns, questions or reports involving security of information systems or accounts, or devices/equipment used to conduct Company business. Always treat suspected malware or compromise of login credentials (e.g., email or voice phishing) as a cybersecurity emergency.	General questions: <a href="mailto:SOC@CNOinc.com">SOC@CNOinc.com</a> Events: Report a Privacy/IT Security Incident Cyber Emergencies: Call (800)-396-7181 to notify the Security Operations Center 24/7
<b>Privacy:</b> Concerns, questions or reports about privacy and information about security issues. Any event in which Personally Identifiable Information (PII) has been disclosed to an unauthorized party or used in an unauthorized way should be reported immediately.	<a href="mailto:Privacy@CNOinc.com">Privacy@CNOinc.com</a> <a href="#">Report a Privacy/IT Security Incident</a> <a href="#">Privacy Homepage</a>
<b>Distribution Compliance:</b> Reporting concerns and misconduct, or general questions about agent market conduct or MAP exams.	<a href="mailto:AMCReferrals@CNOinc.com">AMCReferrals@CNOinc.com</a>
<b>Law Department:</b> Concerns, questions or reports about compliance, regulatory affairs, litigation, labor and employment, new laws and regulations, product development, marketing and sales initiatives, corporate governance, securities regulations or other legal issues.	<a href="mailto:CNOLawDepartment@CNOinc.com">CNOLawDepartment@CNOinc.com</a>
<b>Media Relations:</b> Requests for information, interviews or inquiries from news media, investors or other outside organizations.	Valerie Dolenga: <a href="mailto:Valerie.Dolenga@CNOinc.com">Valerie.Dolenga@CNOinc.com</a> <a href="#">Corporate Communications Homepage</a>

## One more thing...

We value your feedback. If you have suggestions for ways to enhance our code, our policies or our resources to better address a particular issue you have encountered, bring them forward. Promoting a more ethical organization is a responsibility we all share.

CNO supports our associates' right to speak out about matters of public concern or engage in certain activities related to the terms and conditions of their employment. Nothing in this Code or in any of our policies is intended to limit or interfere with the right to engage in activities protected under Section 7 of the U.S. National Labor Relations Act, such as discussions related to wages, hours, working conditions, health hazards and safety issues.

This Code may be periodically amended or updated. You should check the CNO website ([CNOinc.com](http://CNOinc.com)) if you are unsure about the most current version of this Code.

## Waivers

Waivers of or exceptions to the Code shall require specific written approval of the Chief Executive Officer, CNO's Board of Directors or a Board Committee prior to undertaking any action or activity that would be otherwise deemed a Code violation. Any waivers granted will be publicly disclosed as required.