Code of Business Ethics & Conduct
At Liberty Mutual, we’re unified around a common purpose of helping people embrace today and confidently pursue tomorrow.

One important way we do this is by acting responsibly: We choose to do the right thing every day. Acting with honesty and integrity is embodied in the policies and practical guidance of our Code of Business Ethics & Conduct.

The Code is the foundation for how we conduct our business lives. It puts Liberty’s values into practice and guides our ethical behavior – whenever and wherever we do business or act on behalf of Liberty.

We all have a responsibility to follow through on our promises and speak up if we see something that doesn’t seem right.

If you’re ever unsure about the right thing to do, I encourage you to use the many resources we provide.

By holding ourselves to the highest standards, we’ll continue to make Liberty an organization that earns the trust and respect of our customers, policyholders, business partners and employees.
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Our Code of Conduct
We act responsibly and honestly and do the right thing.

The way we conduct our business is essential to our reputation and the trust we build with our customers. The Code of Business Ethics & Conduct (the “Code” or “Code of Conduct”) guides our ethical behavior and puts our values into practice. While the Code offers guidance on specific legal requirements, an ethical workplace is about more than complying with the law. As Liberty employees, we treat each other, our customers and those in our communities with empathy, dignity and respect.
Your responsibilities

All Liberty employees, officers and directors are responsible for knowing and following the guidelines in the Code – whenever and wherever we do business or act on behalf of Liberty.

Use the Code to guide your actions and consult it whenever you have questions.

Some operations or departments may have additional requirements that supplement the Code. You should discuss with your manager whether any additional requirements apply to you.

Code violations can lead to disciplinary action, up to and including termination of employment. In some cases, certain violations may result in criminal or civil penalties for you, your manager or the company.

Leading with integrity

We all have a responsibility to act ethically and follow the guidance in the Code, but managers have an added responsibility to serve as role models for their teams.

Managers should:

• Demonstrate high ethical standards in their decision making and business activities
• Set expectations for their teams by discussing the Code’s guidance and its applicability to business practices
• Ensure their teams are familiar with compliance policies and resources, and they complete compliance training

It’s also important that managers establish an environment where all employees feel comfortable raising compliance questions and concerns without fear of retaliation. If an employee raises a compliance concern to their manager, the manager must ensure the concern is escalated by raising the issue to the Compliance Helpline or directing the employee to contact the Compliance Helpline.
We all have a responsibility to speak up if we see or suspect behavior that violates the Code or any laws or regulations.

If you suspect misconduct, contact the Compliance Helpline (the “Helpline”) so Liberty can investigate and take appropriate action. The Helpline can also help answer any compliance-related questions you may have.

The Compliance Helpline is available in many operations. Reference the Resources section of the Code for Helpline information in Asia Pacific, Bermuda, Canada, Europe, Mexico and South America.

To report a concern or ask a question:

**U.S.**
- Talk with your manager
- Submit an online report at libertycompliancehelpline.com
- Call the Compliance Helpline at 1-800-989-2434
- Email Liberty’s compliance staff at ComplianceHelpline@libertymutual.com
- Contact the HR Support Center

**Asia Pacific, Bermuda, Canada, Europe, Mexico and South America**
- Talk with your local compliance or legal staff
- Review the Resources section for information on the Compliance Helpline in your operation
- Contact your local Human Resources staff

If you would like to contact the Helpline anonymously, you may do so online or by phone. No matter how you raise a concern, Liberty handles all inquiries as confidentially as possible. Each question and concern undergoes a full and fair review, and Liberty takes prompt steps to address all allegations of misconduct or non-compliance.

If you are asked to provide information during a compliance investigation, it’s your responsibility to respond fully and honestly to the request.

By reporting an incident or concern, remember that you’re acting responsibly, doing the right thing to uphold Liberty’s reputation, and preserving a good working environment for everyone.

**Retaliation**

It’s critical that employees are comfortable raising compliance and ethics concerns.

To ensure employees are protected when they report concerns, Liberty does not allow retaliation. You can feel secure knowing that when you raise a concern, you will not be retaliated against.

Liberty does not tolerate discrimination, demotion, suspension, or harassment in any form because of an individual’s protected status or for raising a compliance concern in good faith or cooperating in a compliance investigation. Likewise, you may not retaliate against any employee you think may have made a report about your conduct.

When an investigation indicates that discrimination, harassment or retaliation has occurred, the company will take appropriate disciplinary action, up to and including termination of employment. Appropriate disciplinary action, up to and including termination, will also be taken against managers who knowingly allow such behavior.

Reference the company’s Discrimination, Harassment and Retaliation Policy to learn more. If you believe you have witnessed or experienced retaliation, contact the Compliance Helpline.
Avoid conflicts of interest
A **conflict of interest** arises when a personal interest or activity interferes, or appears to interfere, with your work for and responsibilities to Liberty.

We all have a responsibility to act in Liberty’s best interests. This includes avoiding situations where our own interests conflict or appear to conflict with Liberty’s interests.
Common types of conflicts of interest include:

- Misusing company assets or our relationship with Liberty for personal benefit
- Giving or accepting lavish gifts and entertainment
- Participating in outside work or other activities that compete with our business, benefit a competitor or interfere with Liberty’s interests
- Having improper personal relationships with vendors, customers or other business partners who do business with Liberty

All employees must disclose any potential conflicts of interest as soon as they arise, and prior to engaging in the activity. Global Compliance & Ethics will work with you and your manager to provide guidance and safeguards to follow to ensure you and the company are protected from a conflict of interest.

In addition, officers, directors and certain other employees are required to disclose any conflicts of interest in an annual Disclosure and Certification Statement distributed by Global Compliance & Ethics. This statement must be updated any time there is a change in circumstances. To do so, contact the Compliance Helpline.

Misusing company resources

Using company resources for reasons unrelated to your work or to serve a personal interest results in a conflict of interest. In order to protect our business, you should not use Liberty resources for your personal benefit.

Examples of Liberty resources

- Work time
- Work product
- Information and ideas
- Intellectual property such as trade names, patents, trademarks and copyrights
- Financial assets such as cash, corporate credit cards, funds and accounts
- Physical assets like equipment, buildings and office space
- Computers, email, software and other technology
- Company systems that contain customer information or other sensitive information
- Business affiliations, contacts and partnerships
- Business opportunities
Giving and accepting gifts and entertainment

When it comes to gifts and entertainment, ask yourself: could this look improper to an outside observer? If so, say no.

Business gifts and entertainment may be appropriate courtesies, but a conflict could arise if these courtesies appear to influence a business decision or if they give you a personal benefit.

Gifts and entertainment should be infrequent and nominal in value. You should avoid any offer of lavish gifts or entertainment. Employees handling claims may not accept gifts or entertainment from anyone—including policyholders, customers, claimants, outside counsel or vendors doing business or seeking to do business with Liberty.

If you’re not sure if a gift or offer of entertainment is acceptable, ask your manager or contact the Compliance Helpline.

Additionally, there are strict rules around gifts to government officials. Refer to the Anti-Corruption Policy and the Political Compliance Guide for more information.

Returning unpermitted gifts and entertainment

Use the language below as a template for what to say when you receive a gift or offer of entertainment that doesn’t follow Liberty’s guidelines. If the item is perishable and logistically impossible to return, contact the Compliance Helpline for guidance.

Dear [Name],

Thank you so much for the gift. Liberty Mutual’s Conflicts of Interest Policy prevents me from accepting gifts from our [customers/vendors/business partners].

I appreciate doing business with you and look forward to working with you in the future.

Sincerely,
[Your Name]

Usually acceptable

• Nominal gifts of food around the holidays
• Business meal with a business partner
• An occasional sports outing with a business partner if there is a legitimate business reason
• A nominal “thank you” gift from a business partner at the end of a project

Usually not acceptable

• Lavish or frequent meals or entertainment
• Offer by a business partner to pay travel expenses to a sponsored event
• Gift from a producer to an underwriter while the underwriter is considering the submission
• Gift from outside counsel

Never acceptable

• Gifts of cash or a cash equivalent such as a generic credit gift card
• A gift from a vendor during a Request for Proposal (RFP) or negotiation
• Entertainment without a valid business purpose
• For claims handlers: any gifts or offers of entertainment from policyholders, customers, claimants, outside counsel or vendors doing business or seeking to do business with Liberty
Competing outside work or activities

We value and encourage participation in community, civic and charitable activities outside of work, but we put our work and responsibility to the company first.

To avoid a conflict of interest, don’t engage in work or activities that may compete with any type of Liberty business. You may not have a material interest in or affiliation with a company that competes in any way with Liberty. Additionally, you may not engage in outside activities that may affect Liberty’s interests, or interfere with your job performance.

Prior to engaging in any outside employment, you should inform your manager and Global Compliance & Ethics.

If you are considering serving on an outside board, review Liberty’s Guidelines for Service on Outside Boards to determine whether management approval and a conflicts of interest disclosure is required.

Never acceptable

- Selling any insurance product outside of Liberty and/or working for an outside insurance company, financial services company, insurance agency or broker
- Providing claims or other insurance-related evaluation, administration, consulting or support services
- Selling any financial product that competes with any product sold by Liberty, or that requires you to have a securities license and affiliation with an outside broker-dealer
- Providing real estate sales or related services if you sell, service or handle property-related products or services for Liberty
- Engaging in any outside legal work, including working for an outside law firm or working as a litigation consultant or expert
- Soliciting or selling to customers, business partners or on company premises on behalf of outside companies, businesses, charitable organizations or personal interests not sponsored by Liberty

Usually acceptable

- Participating on a board of a for-profit business with prior approval from Global Compliance & Ethics
- Serving on the board of a non-profit organization
- Running for a local elected position with prior approval from both Global Compliance & Ethics and Public Affairs
- Part-time work, such as working at a retail store or restaurant
To avoid even the appearance of a conflict:

• Don’t conduct business on behalf of Liberty with relatives or friends without prior approval from the company

• Don’t share confidential information outside the company, including with relatives or friends

• Don’t provide claims or other insurance-related consulting or support services to friends or family, including using our claims systems to access information on a claim you are not handling or managing
Protect information
Information is one of our most valuable assets.

We are all responsible for protecting and properly handling the information that fuels our business.
Private information

Liberty classifies information into two categories: public and private. While we can share public information freely, we must keep private information confidential and secure.

Private information includes the personal information of our customers, and confidential and restricted business information like business plans, customer lists, pricing and other competitive terms of our business.

We should always handle private information according to the Privacy Principles, Data Privacy and Protection Standard, applicable data protection laws and our privacy notices.

Classes of information

Internal information is intended solely for Liberty's internal use. You may not share internal information outside Liberty unless explicitly authorized to do so.

Examples: corporate policies, the Employee Handbook, department presentations

Confidential information may only be shared with authorized individuals on a need-to-know basis. Any offer of confidential information from outside sources should be refused unless appropriate legal safeguards have been followed.

Examples: non-U.S. personal information, customer names and addresses, loss history, coverage limits, employee personnel records, payroll and vendor contract terms and conditions

Restricted information may only be shared on a need-to-know basis as authorized.

Examples: government-issued identification, credit cards or bank account numbers, customer or employee medical information, passwords to computers or applications and highly sensitive business information

Take these steps to protect private information at Liberty:

- Access and use private information only if you have an appropriate business reason to do so.
- Collect only the private information that you need to perform the business process and have the legal right to obtain and use.
- Only share private information if the recipients legitimately need it to perform their duties.
- Avoid reviewing or discussing confidential information in public places like elevators, coffee shops or public transportation.
- Don’t post private information on social media.
- Don’t share private information with third party vendors without an approved contract and security assessment.
- Keep information about the terms of third party agreements confidential.
- Don’t transfer personal data outside of the country in which it was collected without approval from your legal department or Global Compliance & Ethics.
- Don’t use your personal email account to send or receive business-related email, especially emails including private information.

For more information, including how Liberty classifies information, see the Data Privacy and Protection Standard, the Privacy Principles, and visit the Global Compliance & Ethics site on myLiberty.
Data security incident

It’s critical that the company acts quickly to protect private information in the event of a data security incident.

A data security incident could include:

• Any loss, unauthorized use, or unauthorized access to personal information
• Data compromises, misdirected emails or lost documents.
• Unauthorized attempts to access our network
• Lost or stolen equipment including personal device used to conduct business
• Social engineering, such as impersonating a customer or employee
• Phishing emails

• Unauthorized access or upload of confidential or restricted data
• Notification from a third party vendor of a data incident

As soon as you are aware of or suspect a potential data security incident, report it to your manager, the IT Help Desk, or the Compliance Helpline if you work in the United States. If you work in Asia Pacific, Bermuda, Canada, Europe, Mexico or South America, follow your operation’s reporting procedures.

Prompt reporting is important as many countries have regulatory reporting requirements for data security incidents within very short timeframes.

Trademarked, copyrighted and licensed information

Just as we protect private information of our customers and coworkers, we protect information owned by Liberty or by third parties according to copyright laws, license requirements and restrictions.

Additionally:

• Don’t use patented items without the patent holder’s permission.
• Don’t use or copy software in a way that is not permitted by its license.
• Make sure to follow the Brand Guidelines and check with the Trademark team before letting outside business partners or vendors use Liberty’s trademarks.

Refer to Liberty’s Copyrighted Materials Policy for more information.
**Business records**

At Liberty, business records must be retained according to the Records and Information Compliance Policy and the Records Retention Schedule. Records that are critical to your business, or legally required, should be retained for the period prescribed by the Records Retention Schedule.

Dispose of business records when the applicable retention period expires. You should dispose of files and documents that are not business records when they are no longer useful.

Occasionally, the Legal Department may issue a Legal Hold, which suspends the Records Retention Schedule and requires you to preserve existing records related to actual or anticipated litigation or investigation.

You will be notified when the hold is released. At that point, the Records Retention Schedule, including its rules for disposition, resumes and applies to the applicable records.

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**Trade secrets**

A trade secret is information that gives its owner a competitive advantage and is not generally known within the industry.

Liberty’s innovative business practices and ideas are valuable and contribute directly to our profitability. We are responsible for protecting Liberty’s trade secrets as well as any trade secrets our customers and business partners entrust to us in the course of doing business with them. Do not disclose to unauthorized individuals – whether inside or outside of Liberty – any information that would tend to compromise proprietary information or trade secrets. In addition, reasonable precautions should be taken to prevent the inadvertent disclosure of such information.

If you reveal a trade secret to others, you and the company may be held liable for resulting financial losses. Even after your employment with Liberty ends, you must continue to protect trade secrets and may still be held liable for unauthorized disclosure.
Comply with the law
The insurance industry is highly regulated. By acting responsibly and honestly, we protect Liberty and our customers.

As Liberty employees we must follow all applicable laws and regulations.

Liberty is subject to legal requirements that touch key aspects of our business, including sales, underwriting and claims activities. Our internal procedures are designed to comply with these requirements. You should be familiar with and follow all applicable department and business unit procedures that relate to your work, our products and your dealings with customers, policyholders and claimants.
Antitrust and competition

We engage in fair competition. Antitrust and competition laws are established to encourage an open and fair marketplace. We conduct our business in compliance with both the letter and the spirit of these complex laws.

Occasionally, you may attend trade association meetings or gatherings where you may have the opportunity to discuss common interests, problems or concerns that impact our industry with our competitors. These gatherings can be worthwhile, but they also present a risk of violating antitrust and competition laws.

Some situations that could lead to an antitrust violation include:

- Sharing price or other competitive information
- Offering or agreeing to allocate markets or customers
- Requiring a customer to purchase one type of insurance policy in order to be able to purchase a different type of policy, except where previously approved by your local compliance or legal resources
- Attempts to preclude Liberty from selling to or contracting with a vendor or customer
- Suggestions by competitors that Liberty follow a schedule of prices for third-party services, such as medical or repair services
- Discussions at trade association meetings on competitively sensitive topics

Refer to your local compliance and legal staff for more information. In the U.S., reference the Antitrust Compliance Guide for more information on antitrust laws that affect Liberty’s business.
Anti-corruption and bribery
We act responsibly and do business with integrity. We don’t make business decisions based on personal benefit.

In addition to our guidelines around gifts and entertainment, there are strict rules governing gifts to government officials. Anti-corruption laws may prohibit payments and/or gifts to government officials or other individuals. Refer to the Anti-Corruption Policy and in the U.S., the Political Compliance Guide for more information.

A bribe is offering something of value to improperly influence a decision. At Liberty, we do not pay or accept bribes — regardless of local laws or customs.

Don’t offer, promise or give anything of value to a government official, business associate, or anyone else to gain a business advantage. Government officials include employees of any government, political parties and candidates for office, employees of public organizations and employees of government-linked enterprises.

Liberty’s policy on anti-corruption laws applies to you and anyone acting on our behalf. Take care in selecting agents and brokers who may be authorized to act on Liberty’s behalf to ensure that they follow these guidelines and ethical standards.

Bribes can include:

- Expensive gifts
- Entertainment, hospitality and travel beyond business needs
- Loans
- Personal favors
- Political or charitable contributions
- Kickbacks (a payment provided to an individual for facilitating a business deal)
Economic and trade sanctions

Many countries, including the United States, have economic and trade sanctions programs which restrict or prohibit dealings with certain countries, individuals or businesses.

The U.S. Office of Foreign Assets Control ("OFAC"), which is part of the U.S. Treasury Department, administers and enforces economic and trade sanctions programs, primarily against countries and individuals considered to be terrorists or narcotics traffickers.

Liberty operations around the world must comply with U.S. sanctions and the economic and trade sanctions laws in the countries in which they operate.

Global Compliance & Ethics is responsible for oversight of the company's sanctions compliance program, including the company's International Economic and Trade Sanctions Compliance Policy.

If you have any questions about dealings with current or prospective policyholders, claims payments or transactions, contact corporate_compliance@libertymutual.com.
**Integrity of data, financial controls and public reporting**

All information entered into Liberty systems and records, including information entered or used for sales, underwriting, claims or other business functions, must be accurate and comply with all legal and business requirements. Maintaining accuracy and integrity in our financial accounting and reporting is also essential.

Beyond meeting legal and industry requirements, our business and financial data help us make sound business decisions. All of Liberty’s books, records and financial statements should be maintained in reasonable detail, accurately reflect our transactions and conform to legal requirements and our financial systems and controls.

The Chief Executive Officer, Chief Financial Officer and those with responsibilities related to Liberty’s financial accounting, auditing and reporting must ensure they are familiar with and follow all applicable financial controls and procedures. Liberty is committed to filing full, fair, accurate, timely and understandable disclosures and other information which the company submits to regulatory authorities among others.

**Underwriting standards**

Liberty employees who underwrite or negotiate the sale of policies, or who deal with producers, must adhere to the highest legal and ethical standards.

We do not return false or artificial quotes. Only offer a quote in a genuine effort to bind coverage.

We communicate with competitors about the pricing of current or potential customers only where it is a necessary component of a program that Liberty has been asked to quote.

Individual business units have protocols to ensure proper underwriting practices. Follow these protocols and consult with your business unit’s legal counsel if you have any questions about the propriety of an underwriting request.
Securities trading

Through the course of your work, you may learn information about Liberty or a business partner that is not available to the general public. This information could be important in making an investment decision, or could affect the price of a company’s publicly traded securities. This kind of information is known as Material Non-Public Information (“MNPI”).

MNPI must be treated confidentially. Don’t use it for financial or personal gain, and never share MNPI with anyone who is not properly authorized to have that information.

Insurance industry fraud

In the United States, federal and state laws impose fines and prison sentences for employees who engage in fraudulent acts or companies who knowingly permit such acts. Examples of these acts include:

- Knowingly making a false material statement in connection with a financial report to an insurance regulatory official
- Embezzling or misappropriating insurance company funds
- Making false or deceptive statements about an insurance company’s financial condition or solvency so as to deceive a regulator
- Obstructing an investigation by an insurance regulator
- Working or knowingly hiring someone to work in the insurance field after conviction for a felony involving dishonesty or breach of trust without a waiver from state government authorities

If you observe or suspect any type of insurance fraud, notify your manager, the Compliance Helpline or Global Internal Audit immediately.

Although Liberty and its subsidiaries are not public companies, we may encounter situations that could risk violating securities laws, including:

- Trading securities of a customer or business partner based on MNPI or sharing that information with an outside party
- Trading in Liberty’s own debt securities based on MNPI
- Trading in securities of a company that you learn Liberty is considering acquiring

In addition, any purchase or sale of Liberty’s own debt securities by directors, executive officers or employees must comply with Liberty’s Policy on Insider Trading of Debt Securities for Directors, Executive Officers and Employees. This includes the requirement that all directors, executive officers and employees pre-clear purchases and sales of Liberty debt securities with Global Compliance & Ethics during each trading window.
**Political compliance**

In the United States, Liberty is directly affected by the actions of federal, state and municipal officials.

Liberty engages in lobbying to express the company’s views. Liberty also engages in campaign finance activities to support candidates or participate in ballot questions.

Lobbying and campaign finance laws require registration and reporting by the company or its employees. In addition, gifts and gratuities to public officials are highly regulated.

If you contact government officials about Liberty matters, are involved in any political campaign activity other than purely personal activity or are thinking of offering a gift or service to a public official, review the [Political Compliance Guide](#) and contact the Public Affairs Group.

For more information on political compliance, refer to the [Political Compliance Guide](#) or contact Public Affairs.

**Use of legal designations**

If you hold a Juris Doctor degree or have been admitted to the practice of law, you are only permitted to hold yourself out as a lawyer in your work for Liberty if your job entails providing legal services to Liberty.

You should not use “J.D.,” “Esq.,” “Esquire” or other similar legal designations when referring to yourself in external or internal communications unless you are employed by Liberty to provide legal services.
Resources
As a global insurer, **Liberty Mutual has worldwide resources to help you easily act with integrity.**

[libertycompliancehelpline.com](http://libertycompliancehelpline.com)
The Compliance Helpline is available in the specified countries below. If the country you work in is not listed, contact your local compliance or legal staff.

<table>
<thead>
<tr>
<th>Country</th>
<th>Phone Numbers</th>
<th>Website</th>
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</thead>
<tbody>
<tr>
<td>Australia</td>
<td>0011-1-800-989-2434</td>
<td>libertycompliancehelpline.com</td>
</tr>
<tr>
<td>Bermuda</td>
<td>No phone</td>
<td>libertycompliancehelpline.com</td>
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<tr>
<td>Brazil</td>
<td>0800-890-0288 or 0800-888-288 and then dial 0800-743-6778</td>
<td>libertycompliancehelpline.com</td>
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<tr>
<td>Canada</td>
<td>1-800-989-2434</td>
<td>libertycompliancehelpline.com</td>
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<td>Chile</td>
<td>1230-020-5445</td>
<td>libertycompliancehelpline.com</td>
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<td>China</td>
<td>10-800-711-0746 or 10-800-110-0690</td>
<td>libertycompliancehelpline.com</td>
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<tr>
<td>Colombia</td>
<td>01-800-912-0555</td>
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<td>Hong Kong</td>
<td>0011-1-800-989-2434</td>
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<td>1-800-81-8173</td>
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<td>Mexico</td>
<td>001-855-423-5478</td>
<td>libertycompliancehelpline.com</td>
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<td>Northern Ireland</td>
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<td>libertycompliancehelpline.com</td>
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<tr>
<td>Vietnam</td>
<td>800-294-3398</td>
<td>libertycompliancehelpline.com</td>
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Global Compliance & Ethics *myLiberty* site

For additional information about the topics covered in the Code, other policies and guidance, and training, visit the Global Compliance & Ethics site on *myLiberty*. If you do not have access to the company intranet, contact your manager, local compliance or legal staff, or the Compliance Helpline.

**Reporting financial impropriety**

Reports or concerns involving financial integrity, accounting or audit controls, financial fraud or deliberate errors in recording or maintaining the company's financial records should be reported to:

Corp_IA_Fraud@LibertyMutual.com

Global Internal Audit
175 Berkeley Street
Boston, MA 02116

You may also report financial integrity concerns to the Compliance Helpline.

**Reporting employment concerns**

Employee Relations administers Liberty's employment policies and procedures, including time off, performance management, disciplinary action, alleged harassment, and discrimination.

To ask a question or report an employment concern:

**U.S. employees**
- Talk with your manager
- Contact the HR Support Center

**Asia Pacific, Bermuda, Canada, Europe, Mexico and South America employees**
- Talk with your local Human Resources staff

The Code of Business Ethics & Conduct is not intended to interfere with, restrain or prevent employee communications regarding an employee's own wages, hours or other terms and conditions of employment; nor are employees ever prevented from exercising their rights to report unlawful conduct to appropriate governmental authority.

The Code of Business Ethics and Conduct does not alter the at-will nature of your employment, and the policies that it contains should not be construed to create a contract of any kind.