Liberty Mutual Insurance
Supplier Code of Conduct

Introduction

At Liberty Mutual Insurance, our purpose is to help people embrace today and confidently pursue tomorrow. We prioritize doing business with integrity above all else, and this commitment is embodied in the policies and practical guidance of our Code of Business Ethics & Conduct. As the foundation for how we conduct our business, the Code of Business Ethics & Conduct puts our Values into practice and guides our behavior. All Liberty employees, officers and directors are responsible for knowing and following its guidelines – whenever and wherever in the world we do business or act on behalf of Liberty.

Similarly, we've created a Supplier Code of Conduct to reinforce our Values and share expectations of our Suppliers, as well as their Suppliers. We define "Suppliers" as contractors, consultants, agencies, vendors and any third parties that are acting on Liberty Mutual Insurance's behalf. You are responsible for ensuring that your directors, officers, employees, representatives, Suppliers, and business partners understand and comply with the expectations set forth in this Code. All are held to the same expectations of doing business with integrity above all else.

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

- Engaging with integrity in ethical business practices regardless of the country where they are doing business
- Avoiding actions that would improperly influence our employees' objectivity and decisions or would exert improper influence over third parties
- Complying with all applicable fair trade, antitrust, competition, anti-corruption, anti-bribery laws including but not limited to the US Foreign Corrupt Practices Act and the UK Bribery Act

Reporting legal violations or violations of this Code to Liberty Mutual Insurance and cooperating in any investigation as requested by Liberty.

We expect our Suppliers to adhere to the standards set forth in this Code. Suppliers may be asked to affirm compliance with this Code. Upon request, we expect our Suppliers to provide evidence of compliance. Additionally, we expect our Suppliers to support and respond to inquiries from us about corporate actions pertaining to supplier diversity and environmental stewardship.

Liberty Mutual Insurance reserves the right to assess its Suppliers' compliance with this Code and address any opportunities. Those who do not demonstrate alignment to these expectations may jeopardize their future relationship with Liberty Mutual.

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

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

SupplierConduct@LibertyMutual.com

Liberty Mutual Insurance Supplier Code of Conduct	
Compliance	At Liberty Mutual, we act with integrity and honesty and do the right thing. We are committed to compliance with all laws, rules and regulations. As a Supplier, you and those acting on your behalf are expected to comply with all federal, national, state, and local laws and regulations applicable to your business when providing services to Liberty Mutual.
Discrimination & Harassment	Liberty Mutual is committed to maintaining a workplace free from discrimination or harassment (including sexual harassment) because of any category or status protected under applicable law. Individuals who raise concerns in good faith or who assist, cooperate or testify in such an investigation or legal proceeding are protected from retaliation. Liberty Mutual expects our Suppliers, including when Suppliers are performing work on behalf of Liberty Mutual, to uphold these same principles by complying with all applicable local, national, and international anti-discrimination and anti-harassment laws, rules and regulations where they operate . To the extent that an individual raises a concern of misconduct, Liberty Mutual expects cooperation from its Suppliers to appropriately investigate and remediate the matter.
Environmental Stewardship	We are committed to environmentally responsible business practices and minimizing our environmental footprint by reducing our consumption of energy, water and waste. Liberty Mutual expects our Suppliers to conduct their operations in a similar manner and to comply with local, national and international environmental regulations where they operate.
Diversity & Inclusion	Liberty Mutual serves customers from different cultures and backgrounds across 29 different countries. To succeed in this global environment, we aspire that our workforce, Suppliers, and business partners reflect the communities in which we live and work. Liberty Mutual considers diversity from a number of perspectives, including, but not limited to, recognized diverse business enterprises from all backgrounds and cultures and, by doing so, hopes to contribute to the overall economic success of the communities we serve and the expansion of our markets. We encourage our Suppliers to support similar business practices.
Conflicts of interest *Personal relationships* *Financial interests* *Gifts & Entertainment* *Illegal/Improper Payments*	Liberty Mutual's employees have a responsibility to act in Liberty Mutual's best interests. We expect our Suppliers to avoid actions that would improperly influence our employees' objectivity and decisions. Suppliers are expected to disclose personal relationships with Liberty Mutual employees, including relationships with friends or relatives. Suppliers are expected to disclose if a Liberty Mutual Insurance employee has a financial interest in its business. Suppliers may not give, offer, promise or accept, or solicit anything of value when dealing with government officials or any other person, including Liberty Mutual employees, to gain an improper business advantage, to facilitate a transaction, to exert influence or under circumstances that create the appearance of impropriety. This includes any benefit, fees, commissions, dividends, cash, gratuity, services, quid pro quo, or any inducement whatsoever. Bribes, kickbacks, facilitation payments and other similar payments are strictly prohibited.

Financial crimes – fraud – extortion – kickbacks - money-laundering - bribery – corruption	Liberty Mutual Insurance expects its Suppliers to adhere to the highest standards of ethical conduct and not engage in any form of corrupt practices, including but not limited to extortion, fraud, money-laundering, kickbacks or bribery. Suppliers must fully comply with requirements of all applicable bribery and anti-corruption laws (e.g., U.S. Foreign Corrupt Practices Act, UK Bribery Act). Suppliers shall neither make bribes not accept them, nor induce or permit any other party to make or receive bribes on its behalf, nor cause other parties, including Liberty Mutual Insurance, to violate any applicable anti-corruption or antibribery laws when working on behalf of Liberty Mutual Insurance. Suppliers must never pay or receive a bribe or improper benefit in any amount, to or from anyone, anywhere, for any reason whatsoever, whether on Liberty Mutual Insurance's behalf, the Supplier's behalf, or on behalf of others, regardless of local custom and practice. Suppliers must maintain books and records that accurately reflect the true nature of its transactions. All invoices, customs or similar documents submitted to Liberty Mutual Insurance or governmental authorities in connection with transactions involving Liberty Mutual Insurance must accurately describe the goods and services provided and applicable price.
Economic & 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. Liberty Mutual's operations around the world, as well as Liberty Mutual's Suppliers, must comply with applicable U.S. sanctions and the economic and trade sanctions laws in the countries in which they operate.
Health & Safety	We are committed to a safe and healthy work environment. We expect our Suppliers to comply with all applicable safety and health laws and regulations in the countries in which they operate.
Managing Liberty Mutual's Information	We respect the privacy of all individuals and expect our Suppliers to do likewise. Suppliers will protect the privacy of personal information of everyone with whom they do business, including suppliers, customers, consumers, and workers. While processing Personal Data, we expect our Suppliers to comply with applicable privacy, data protection laws, rules, regulations, orders, conventions and ordinances applicable to each Supplier and all representations made in Supplier's data privacy policies. Liberty Mutual does not sell personal data and we do not authorize our Suppliers to sell our personal data. We expect our Suppliers to promptly notify Liberty Mutual after becoming aware of a personal data breach.
Compliance policies and non-retaliation	Suppliers are expected to be aware of and have policies and processes in place to ensure compliance with applicable laws, regulations and requirements set forth in this Code. Suppliers must have policies and processes in place to facilitate timely discovery, investigation, disclosure to Liberty Mutual Insurance and corrective action for violation of applicable laws, regulations and requirements set forth in this Code. All Suppliers must ensure they have policies in place to stop fraud, financial crimes, money laundering, bribery and corruption. Suppliers must have reasonable and lawful payment policies with their own Suppliers. We expect Suppliers to have a policy and process for reporting compliance concerns. The policy and process should protect reporting and participating individuals from retaliation.

Media	We expect Suppliers to forward all media request/inquiries across all channels (print, broadcast, online, radio, social media, etc.) regarding Liberty Mutual, or work done by Supplier for Liberty Mutual, for review and approval to mediarelations@libertymutual.com. Suppliers should not speak about Liberty Mutual to media or in any public forum without consent from the Liberty Mutual Public & Media Relations department.
Contact us	Any individual with knowledge of an actual or potential violation of the terms and conditions of this Supplier Code of Conduct or any applicable laws and regulation in connection with work performed for Liberty Mutual must report this knowledge to their primary business contact, or, alternatively contact Procurement at SupplierConduct@LibertyMutual.com