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Since our founding in 1851, MassMutual has helped people secure their future and protect the ones they love. This means that every day our policyowners and customers rely on us to provide them with financial security and peace of mind. This is a responsibility we hold with the utmost importance — and is why we have an enduring focus on ethics and integrity.

The foundation of this long-standing commitment is our Code of Conduct. Centered on our core values, it establishes key principles of behavior that we all live by to ensure we do the right thing for our policyowners, our customers, our company and each other. Please take time to become familiar with the code and our company’s policies and, most importantly, use it to guide you in making the best ethical decisions as we continue to help people build a more confident future.

Our integrity has long been one of our greatest strengths, and together, we all play an important role in protecting it. At our core, we are a company of people helping people, and we hold ourselves to the same high standards as our founders did more than 165 years ago.

Thank you for your ongoing dedication to upholding the values that make our company a leading role model in our industry and beyond.

Sincerely,

Roger Crandall
Chairman, President and CEO
MassMutual Winning Ways

Focus on the customer
We understand our customers well and look for every opportunity to deliver an experience that is clear, easy, personal, human, empowering, and trustworthy.

Act with integrity
We deliver on our promises by being open, honest, and humble and by adhering to the letter and spirit of applicable laws, rules, regulations, and company policies.

Value people
We respect and learn from each other’s diverse backgrounds, experiences, and ideas. We engage and develop people to their greatest potential.

Work collaboratively
We work together to achieve results by actively listening, seeking understanding, and creating solutions as a unified team driving toward one company, one culture, one brand.

Achieve results
We focus on winning by exceeding expectations and getting better — everyone, every day.
What is the MassMutual Code of Conduct?

Acting ethically and with integrity is how we do business. It is part of how we help people secure their future and protect the ones they love. Founded on the Winning Ways, our Code of Conduct establishes the expectations and principles for our behavior and helps guide us when we are faced with making difficult decisions.

Why do we have a code, and why must we follow it?

While the Code of Conduct cannot address every situation we may face, it provides information about how to raise issues or concerns. The Code of Conduct describes various resources available to employees, like company policies, to help guide us when a decision is not clear or easy.

Compliance with the Code of Conduct and company policies is a condition of employment. Each year, we must acknowledge that we have read and understand the Code of Conduct and agree to comply with the Code of Conduct and company policies.

Who must follow the code?

The Code of Conduct applies to employees of MassMutual and certain subsidiaries. MassMutual expects its other business partners, including advisors, brokers and other distributors, vendors, suppliers and other third parties, to follow the principles outlined in the Code of Conduct when working with or on behalf of MassMutual. If we violate the Code of Conduct or other company policies, or if we do not take appropriate action against illegal, unethical or improper conduct, we may be subject to discipline, including termination of employment.
Our responsibilities as employees

As MassMutual employees, we have a responsibility to:

• Honor our company values by acting ethically and with integrity in business dealings.
• Understand and comply with our Code of Conduct and company policies.
• Raise compliance and ethics issues or concerns promptly through proper reporting channels.
• Acknowledge the Code of Conduct annually and complete the required education.

Additional responsibilities for managers

As MassMutual leaders, we have a responsibility to:

• Demonstrate the Winning Ways behaviors and lead by example.
• Help employees comply with the Code of Conduct, policies and applicable laws and regulations and understand the behaviors expected of them.
• Identify business compliance risks and take prompt corrective action.
• Promote an environment where employees feel comfortable speaking up, asking questions, seeking advice and reporting concerns without fear of retaliation.
• Acknowledge and reward ethical behavior.
• Refer matters we are unable to resolve to the appropriate resource channel.
When we are unsure how to handle a situation or question whether it is the right thing to do, we should consider the following questions:

• Is my decision or action consistent with the standards in the Code of Conduct, company policies or legal requirements?
• Is my decision or action consistent with MassMutual’s values — our Winning Ways?
• Does the situation or proposed action feel right?
• Would my decision or action be the right thing to do for MassMutual, its customers, employees, or others?
• Would I feel comfortable explaining my decision or action to others?
• Would I feel comfortable if my decision or action became public?

If the answer to any of these questions is no or you are not sure, seek guidance from the following reporting channels:

• Your manager or another manager within the reporting chain
• Your Human Resources business partner
• Compliance & Ethics Department
• Law Department
• Enterprise Risk Management
• Enterprise Cyber Security
• Compliance & Ethics Reporting Hotline
“As a company, we need to ground each decision we make and each action we take on what we believe is the right thing to do. If you think someone is acting in an unethical or illegal manner, speak up. It’s everyone’s responsibility to protect our policyowners, customers and MassMutual’s reputation for ethics and integrity.”

— Brad Lucido, Chief Compliance & Ethics Officer
SPEAK UP

We all have an obligation to “Speak Up” and report compliance, ethics or risk issues or concerns that are, or seem to be, unethical or illegal. By addressing them promptly and appropriately, we can minimize the potential negative impact on MassMutual and us and help identify issues that can improve our operations and performance. You are encouraged to “speak up” and utilize one of our numerous reporting channels.

COMPLIANCE & ETHICS REPORTING HOTLINE

The Compliance & Ethics Reporting Hotline provides a reporting channel in cases where we may not be comfortable discussing the issue or concern with an individual or where we may prefer to raise the issue or concern anonymously. The Hotline is administered by an independent third party vendor. We can reach the Hotline twenty-four hours a day, seven days a week by calling 1-800-422-1381 or via the web at www.MassMutual.com/ethics.

WHISTLEBLOWER PROCEDURES

Our obligation to “speak up” and report issues or concerns within MassMutual is not intended or should be construed to restrict, discourage or interfere with communications or actions protected or required by law, including the exercise of our right to contact any regulatory authority directly to report violations of law under applicable “whistleblower” laws. We do not need the prior authorization of or notice to MassMutual to make any such reports or disclosures, and will not be retaliated against for making such reports or disclosures.

INVESTIGATION OF REPORTS

MassMutual handles reports of unethical or illegal behavior promptly. While MassMutual makes every effort to keep reports confidential, information may need to be shared with individuals who are involved in investigating the report so they can investigate and follow-up appropriately. If we become involved in a company investigation, we must cooperate fully and provide complete and honest answers to all questions.

ANTI-RETIALLATION

MassMutual values reports of compliance, ethics or risk issues or concerns and will support us for raising those issues or concerns in good faith. Anyone who engages in retaliatory conduct against a person who has in good faith raised a compliance, ethics or risk issue or concern will face disciplinary action, up to and including termination of employment.
Guiding principle

We will conduct business ethically, with integrity and in compliance with applicable laws.

Why it matters?

Doing the right thing for our policyowners and customers, our company and each other requires more than just complying with applicable laws and regulations. We are also committed to conducting business ethically in order to provide our policyowners and customers with financial security and peace of mind. Unethical or illegal behavior is never justified.

How we do it?

- We are committed to conducting business ethically and in compliance with applicable laws.
- Unethical or illegal behavior is never justified.
- We compete vigorously, but fairly, and will gain business advantages only through appropriate behavior.
- Fraudulent behavior by anyone — policyowners, customers, employees, advisors or third parties — will not be tolerated.
- We are all responsible for being familiar with and following the relevant laws, regulations and company policies that govern how MassMutual does business.
# COMPANY POLICIES

**ANTI-BOYCOTT | ANTI-BRIBERY AND ANTI-CORRUPTION**  
**ANTITRUST | ANTI-MONEY LAUNDERING**

## WHAT COULD IT LOOK LIKE?

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<th>What’s the issue?</th>
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<tr>
<td><strong>ANTITRUST</strong></td>
<td>Laws designed to stop companies from making deals that could hurt consumers by removing competition from the marketplace. This could result in higher prices and limited product choices for consumers.</td>
<td>While at an industry meeting, an employee from a competitor suggests that each company at the meeting charge the same price for its products.</td>
<td>Leave the discussion without participating. Topics like price fixing, market allocation, boycotting and exchanging competitively sensitive information are off-limits for discussion with competitors. Review the Antitrust Policy for more information.</td>
</tr>
<tr>
<td><strong>BRIBERY</strong></td>
<td>Giving someone something of value because you expect them to do something that benefits you in return.</td>
<td>You provide an all-expense paid trip to Disneyland to a foreign government official with whom MassMutual is interested in doing business.</td>
<td>Before providing anything of value to a foreign government official, check with a member of the Law Department to see if it’s permitted. Review the Anti-Bribery and Anti-Corruption Policy for more information.</td>
</tr>
<tr>
<td><strong>MONEY LAUNDERING</strong></td>
<td>A process by which an individual, corporation or other entity tries to create the appearance that illegally derived funds come from legitimate sources.</td>
<td>A few weeks after purchasing a whole life insurance policy, the policyowner contacts MassMutual to take a loan against the policy.</td>
<td>This may be an attempt by the policyowner to use his life insurance policy to illegally launder money. Report it to your manager immediately. For more information, refer to the Anti-Money Laundering Policy.</td>
</tr>
</tbody>
</table>
Respecting each other

Guiding principle
We will be respectful to others and welcome and encourage diverse opinions, attitudes, attributes and feelings.

Why it matters?
Respecting the opinions, attitudes, attributes and feelings of others makes our work environment richer and leads to empowerment, innovation and better business decisions.

How we do it?
• We are committed to maintaining a diverse, respectful and productive workplace.
• We treat everyone fairly and respectfully.
• We make job-related decisions based on qualifications or individual abilities, not someone's status as a member of a certain class of people — for example, age, race, religion, sex, disability or veteran status.
• We maintain a positive workplace free from illegal harassment and other inappropriate behavior.
• We keep a safe work environment, free of violence or threatening behavior.
# Company Policies

**Drug and Alcohol Free Workplace | Workplace Violence Statement of Respect and Anti-Discrimination and Harassment**

## What Could It Look Like?

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<td><strong>Harassment</strong></td>
<td>Conduct or behavior that makes the recipient feel uncomfortable, offended or intimidated, or that creates a hostile work environment. Harassment based on sex, race, age, religion and other protected categories is a form of discrimination and is illegal.</td>
<td>An employee views inappropriate websites while at work.</td>
<td>If you feel comfortable addressing the situation directly, let the employee know that the conduct is inappropriate and makes you uncomfortable. If you don’t want to speak to the employee, report the incident to your manager or Human Resources business partner. For more information, refer to the Statement of Respect and Anti-Discrimination and Harassment Policy.</td>
</tr>
<tr>
<td><strong>Drug and Alcohol Abuse</strong></td>
<td>Being impaired by or under the influence of illegal drugs or alcohol while performing your job responsibilities.</td>
<td>An employee comes to work visibly intoxicated.</td>
<td>Being under the influence of illegal drugs or alcohol while at work could result in harm to the employee or others. Report the employee to your manager or Security immediately. For more information, refer to the Drug and Alcohol Free Workplace Policy.</td>
</tr>
<tr>
<td><strong>Workplace Violence</strong></td>
<td>Violence, threats of violence, harassment, intimidation or other disruptive behavior that threatens or frightens others in our workplace.</td>
<td>An employee treats you in a way that makes you afraid to come to work or unreasonably interferes with your work performance.</td>
<td>Remove yourself from the situation and immediately contact Security, your Human Resources business partner or your manager. For more information, refer to the Workplace Violence Policy.</td>
</tr>
</tbody>
</table>
Safeguarding restricted and confidential information

Guiding principle
We will protect restricted and confidential information of MassMutual, its policyowners, customers and employees against unauthorized access, use or improper disclosure.

Why it matters?
Our company, policyowners, customers and employees rely on us to protect against unauthorized access, use or improper disclosure of and to preserve restricted and confidential information. Improper use and disclosure of restricted and confidential information would impact our reputation and subject the company to fines and penalties.

How we do it?
- We are responsible for properly handling, using and safeguarding restricted and confidential information.
- We will only share restricted and confidential information with individuals who have a business need to know it.
- We will not use material, non-public information (inside information) when making securities trades or unlawfully communicate inside information to others who use that information to trade securities.
**WHAT COULD IT LOOK LIKE?**

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<tr>
<td><strong>RESTRICTED AND CONFIDENTIAL INFORMATION</strong></td>
<td>Non-public information that might be of use to competitors or harmful to MassMutual, its policyowners, customers or employees if improperly accessed, used or disclosed.</td>
<td>You post details about a new product you’re developing for MassMutual on your social media page.</td>
<td>Information about your work that hasn’t been made available to the public is restricted, confidential or both, which means it’s off limits to share with anyone — including via social media. For more information, refer to the Restricted and Confidential Information Policy and the Social Media Policy.</td>
</tr>
<tr>
<td><strong>INSIDER TRADING</strong></td>
<td>Unlawfully using material, non-public information (inside information) when making securities trades or unlawfully communicating inside information to others who use that information to trade securities.</td>
<td>You decide to buy securities in a company based on non-public information you learn through your work on MassMutual’s investment activities.</td>
<td>While working at MassMutual, you may have access to inside information about other companies. Trading securities based on inside information, or sharing that information with others who buy or sell securities, is illegal. Only use public information as the basis for your investment decisions. For more information, refer to the Insider Trading Policy.</td>
</tr>
<tr>
<td><strong>PRIVACY</strong></td>
<td>Protecting the personal information of MassMutual’s policyowners, customers or employees.</td>
<td>You can’t wait to tell your friend about a conversation you had with a famous MassMutual policyowner.</td>
<td>Do not share information about MassMutual’s policyowners, customers or employees with anyone who does not have a business need to know the information. For more information, refer to the Restricted and Confidential Information Policy and the Privacy Policy.</td>
</tr>
</tbody>
</table>
Avoiding conflicts of interest

Guiding principle

We will avoid conflicts of interest between ourselves and MassMutual.

Why it matters?

Making business decisions based on what is in the best interest for the company, and not our personal gain or benefit, will allow us to maintain our reputation and the trust people place in us.

How we do it?

• A conflict of interest occurs when our personal interests, activities or relationships interfere with our ability to objectively and fairly make decisions or perform our responsibilities on behalf of MassMutual.

• We will avoid conflicts of interest and, to the extent possible, even the appearance of conflicts of interest.

• If we cannot avoid a conflict of interest, we must disclose it to MassMutual so it can be properly managed.

• Examples of situations that may involve conflicts of interest:
  – Taking personal advantage of a business or investment opportunity that we learn about through MassMutual.
  – Acquiring a significant interest or investment in a MassMutual competitor or supplier.
  – Giving or accepting business gifts or entertainment.
  – Having a personal relationship with third parties that do or are trying to do business with MassMutual.
  – Family and personal relationships between employees.
### COMPANY POLICIES

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<tr>
<td><strong>BUSINESS GIFTS</strong></td>
<td>Any item of value provided to or accepted from a business partner at no charge.</td>
<td>Accepting an expensive watch from a potential supplier during the contract negotiation process.</td>
<td>Gifts that are greater than $100 in value are generally not allowed. You should also avoid accepting the gift if you think the supplier will expect favorable treatment in return. For more information, refer to the Business Gifts and Entertainment Policy.</td>
</tr>
<tr>
<td><strong>OUTSIDE BUSINESS ACTIVITIES</strong></td>
<td>Business activities that may conflict with your duties to MassMutual.</td>
<td>Taking a second job at one of MassMutual’s suppliers.</td>
<td>If the outside business has a relationship with MassMutual, it may expect you to provide it with favorable treatment. Before you take the job, check with your manager. Your manager will work with the Compliance &amp; Ethics Department to address any conflict. For more information, refer to the Conflicts of Interest Policy.</td>
</tr>
<tr>
<td><strong>PARTICIPATION ON A BOARD OF DIRECTORS</strong></td>
<td>Serving on a board of directors, board of trustees, advisory or other board in a personal capacity or as a representative of MassMutual.</td>
<td>A charitable entity asks you to serve on its board of directors.</td>
<td>In general, serving on the board of directors of a charitable entity in a personal capacity (not as a representative of MassMutual) is not a conflict of interest, so you don’t need to disclose the directorship or obtain approval. For more information, refer to the Participation on Board of Directors Policy.</td>
</tr>
</tbody>
</table>
Protecting MassMutual property

Guiding principle
We will use MassMutual property for business purposes and protect it from misuse, theft or damage.

Why it matters?
It is important to properly use and protect company property from misuse, theft or damage in order to preserve its value.

How we do it?
- We will use MassMutual property, including facilities, equipment and technology resources, appropriately and for authorized business purposes.
- We will limit personal use of MassMutual technology resources such as email, telephone systems and computers, to incidental and appropriate purposes.
- We should have no reasonable expectation of privacy. MassMutual tracks and monitors the use of its technology resources.
- We will protect and properly use intellectual property that belongs to MassMutual and third parties.
- Intellectual property created by us while working on behalf of MassMutual is the property of MassMutual.
**COMPANY POLICIES**

RESTRICTED AND CONFIDENTIAL INFORMATION | TECHNOLOGY ACCEPTABLE USE
ENTERPRISE INFORMATION RISK MANAGEMENT | ENTERPRISE CYBER SECURITY
INFORMATION GOVERNANCE AND RECORDS MANAGEMENT
INTELLECTUAL PROPERTY | TELEPHONES, PHOTOGRAPHS AND RECORDING DEVICES

### WHAT COULD IT LOOK LIKE?

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<td>ACCEPTABLE USE OF TECHNOLOGY RESOURCES</td>
<td>Using technology resources — MassMutual-owned hardware, software, applications, networks, systems and devices — for limited, incidental and appropriate personal purposes only.</td>
<td>Spending the majority of your workday checking Facebook or shopping online instead of completing your work assignments.</td>
<td>MassMutual understands that sometimes you need to get personal activities done while at work. Too much personal use, however, is an abuse of MassMutual time or resources. Spending most of your workday on Facebook or shopping online is not limited, incidental or appropriate use of technology resources. Limit personal use to activities that take a short amount of time to accomplish and don’t interfere with your job responsibilities. For more information, refer to the Technology Acceptable Use Policy.</td>
</tr>
<tr>
<td>INTELLECTUAL PROPERTY</td>
<td>Company trademarks, service marks, patents, copyrighted material and trade secrets.</td>
<td>Using images created by a third party that you found online in an internal presentation.</td>
<td>Never use a third party’s intellectual property without their permission. Review the copyright restrictions posted on the third party’s website or check with the Law Department before using someone’s work product. For more information, refer to the Intellectual Property Policy.</td>
</tr>
<tr>
<td>MASSMUTUAL PROPERTY</td>
<td>MassMutual provides facilities, equipment and technology resources for business purposes.</td>
<td>You take company supplies, including pens, folders and notepads, for your child to use at school. You have your personal packages delivered to you at work.</td>
<td>MassMutual provides facilities, equipment and technology resources for business purposes. Using MassMutual property for non-business purposes may be considered theft.</td>
</tr>
</tbody>
</table>
Governing our information assets

Guiding Principle
We will create and maintain information assets, including company records, that are needed to conduct business effectively and comply with legal and regulatory obligations.

Why it matters?
It is important that company records are authentic, accurate, complete, unaltered and retained securely for as long as they have business value.

How we do it?
• Information assets can be paper documents, electronic documents, email or voicemail.
• Final versions of information assets must be authentic, reliable, complete, unaltered and readily accessible.
• We will destroy an information asset once it meets its disposition period, according to the Information Disposition Schedule, as long as it is not subject to a legal hold.
• We will report business information accurately, honestly and on time, and follow applicable internal controls.
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<tr>
<td><strong>INFORMATION GOVERNANCE</strong></td>
<td>The appropriate management and disposition of all company information assets in compliance with business needs, company standards and applicable laws.</td>
<td>You find a file of papers that was left in your desk by another employee. You don’t know what the file contains, but you assume it must not be needed, so you throw the file away.</td>
<td>Information assets should not be destroyed until it’s determined whether they have reached their disposition period or are subject to a legal hold. If you aren’t sure, contact your Unit Information Coordinator to help you verify whether the information should be retained. To learn more, refer to the Information Governance and Records Management Policy.</td>
</tr>
<tr>
<td><strong>LEGAL HOLD</strong></td>
<td>A directive by the Law Department to retain and preserve all requested information relevant to the legal matter.</td>
<td>You realize you have information assets that are beyond their disposition period. Before you destroy them, you receive a legal hold memo.</td>
<td>You must retain those information assets even though their applicable disposition period has passed. The legal hold now applies and the information assets cannot be destroyed until the legal hold is released. To learn more, refer to the Information Governance and Records Management Policy.</td>
</tr>
<tr>
<td><strong>RECORD</strong></td>
<td>The final version of an information asset, regardless of medium or format, that memorializes the decisions, operations and transactions of MassMutual.</td>
<td>You’ve been working on a report, and you have a number of drafts, as well as the final version. You’d like to get rid of anything you don’t need to keep, but you aren’t sure if the drafts are records.</td>
<td>Only the final version in a series of drafts is considered to be the record. It must be retained according to the Information Disposition Schedule. Drafts which have been superseded should be discarded. However, drafts must be retained if subject to a legal hold. To learn more, refer to the Information Governance and Records Management Policy.</td>
</tr>
</tbody>
</table>
Working with the government and third parties

Guiding principle
We will be honest and forthright in our dealings with the government and third parties and will comply with applicable laws when participating in the political process or when interacting with the government.

Why it matters?
Building strong partnerships with the government and third parties and preventing unfair influence helps us keep our promises and doing business as a trusted partner.

How we do it?
MassMutual encourages employees to participate in the political process as private citizens.

• Our political activities could impact MassMutual’s ability to do business with state or local governments. We must pre-clear any political activities or contributions we make to a political official, a candidate for a state or local political office or a current state or local official running for federal office.
• We must make sure we understand applicable laws before interacting with the government.
• We must obtain approval before using MassMutual resources for political activities, lobbying on behalf of MassMutual or interacting with or hiring a current or former government employee.
• We should contact the Law Department if we receive an inquiry from a regulator, government agency or law enforcement, or a complaint, subpoena, notice of audit or other legal document related to MassMutual, or if we are contacted about litigation against MassMutual or its employees.
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<tr>
<td><strong>COMMUNICATIONS WITH REGULATORS</strong></td>
<td>Only certain employees are authorized to communicate with regulators, government agencies or law enforcement on behalf of MassMutual.</td>
<td>You receive a letter from a state insurance department requesting company records.</td>
<td>Forward the letter to the Law Department. For more information, refer to the Communications with the Media and Other External Parties Policy.</td>
</tr>
<tr>
<td><strong>GIVING GIFTS TO GOVERNMENT OFFICIALS AND EMPLOYEES</strong></td>
<td>Some laws limit the government official’s/employee’s ability to accept gifts (including meals/beverages).</td>
<td>You are trying to develop business leads at a conference. During a break you offer to buy the person next to you a cup of coffee.</td>
<td>If the person is a government official or works for a government agency, don’t buy anything unless you check with the Compliance &amp; Ethics Department first. For more information, refer to the Anti-Bribery and Anti-Corruption Policy and the Business Gifts and Entertainment Policy.</td>
</tr>
<tr>
<td><strong>SOLICITATION</strong></td>
<td>Your time and activities in obtaining or arranging a political contribution.</td>
<td>Your friend is running for local office and wants you to ask other MassMutual employees for campaign contributions.</td>
<td>Using MassMutual’s equipment for political activities like soliciting campaign contributions is generally not allowed. Before forwarding any requests or making any contributions, contact the Compliance &amp; Ethics Department. For more information, refer to the Political Contributions and Solicitation Policy.</td>
</tr>
</tbody>
</table>
Key company policies

Company policies provide more detailed information about a variety of topics. For additional information about a topic, click on the company policy title below.

- Anti-Boycott
- Anti-Bribery and Anti-Corruption
- Anti-Money Laundering
- Anti-Nepotism
- Antitrust
- Attendance
- Business Gifts and Entertainment
- Business Travel and Expense
- Communications with the Media and Other External Parties
- Restricted and Confidential Information
- Conflicts of Interest
- Criminal, Disciplinary and Regulatory Disclosure
- Disciplinary Action
- Dress
- Drug and Alcohol Free Workplace
- Employee References and Employment Verification
- Enterprise Cyber Security
- Enterprise Information Risk Management
- Equal Employment Opportunity
- Hours of Work
- Identification Badge and Visitors
- Information Barrier
- Information Governance and Records Management
- Insider Trading
- Intellectual Property
- Occasional Illness
- Participation on Board of Directors
- Political Contributions and Solicitation
- Privacy
- Procurement Policy
- Smoke and Tobacco Free Workplace
- Social Media
- Solicitation and Distribution
- Speaking Up
- Statement of Respect and Anti-Discrimination and Harassment
- Technology Acceptable Use
- Telephones, Photographs and Recording Devices
- Time Recording
- Workplace Violence
“Thank you for your ongoing dedication to upholding the values that make our company a leading role model in our industry and beyond.”

ROGER CRANDALL
CHAIRMAN, PRESIDENT AND CEO