

# MassMutual® Code of Conduct for Suppliers

The Winning Way



At Massachusetts Mutual Life Insurance Company (“MassMutual”) and its affiliates, acting ethically, with integrity and in compliance with applicable laws is not only the right thing to do, it is how MassMutual does business. MassMutual’s Code of Conduct describes MassMutual’s principles and values and establishes the standards for MassMutual employees’ behavior.

As one of MassMutual’s suppliers, you are expected to share MassMutual’s commitment to act ethically, with integrity and in compliance with applicable laws. This Code of Conduct for Suppliers articulates the principles, values and expectations of behavior MassMutual has for suppliers when doing business with MassMutual. You are responsible for understanding the Code of Conduct for Suppliers and adhering to its contents. If you have questions about the Code of Conduct for Suppliers, please contact MassMutual Procurement at 413-744-3800.



Focus on the  
Customer



Act with  
Integrity



Value  
People



Work  
Together



Achieve  
Results

## Guiding principles

**We will conduct business on behalf of MassMutual ethically, with integrity and in compliance with applicable laws.**

- We are committed to conducting business ethically and in compliance with applicable laws, including all applicable wage, health and safety laws and regulations. Work weeks should not exceed the maximum set by applicable law.
- Unethical or illegal behavior is never justified.

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

- We are committed to maintaining a diverse, respectful, and productive workplace.
- We will treat everyone fairly and respectfully.
- We will maintain a welcoming workplace free of discrimination, that is inclusive for all regardless of their race, color, age, gender, sexual orientation, gender identity, disability, religion, or veteran status.
- We will maintain a positive workplace free from illegal harassment or other inappropriate behavior.
- We will keep a safe work environment, free of violence or threatening behavior.

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

- We are responsible for properly handling, using and safeguarding MassMutual's restricted and confidential information.
- Restricted and confidential information includes all non-public information pertaining to MassMutual that might be of use to competitors or harmful to MassMutual, its customers or employees if improperly accessed, used or disclosed.
- We will take steps to safeguard restricted and confidential information to protect against unauthorized access, use or improper disclosure.

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

- We will use MassMutual property, including facilities, equipment and technology resources, appropriately and for authorized business purposes.
- 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.
- We will adhere to MassMutual's Supplier Information Risk Management Standards when doing business with MassMutual.

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

- Information assets can be paper documents, electronic documents, email or voicemail.
- We are committed to keeping company records authentic, accurate, complete, unaltered and readily accessible, and retained securely for as long as they have business value.
- We follow all rules and regulations regarding accessibility and ask our suppliers to do the same. Suppliers should be following accessibility standards based on federal, global and state disability laws. This includes all digital and print assets.

**We will avoid conflicts of interest between ourselves and MassMutual.**

- A conflict of interest occurs when our personal interests, activities or relationships interfere with — or even appear to interfere with — our ability to objectively and fairly perform our responsibilities on behalf of MassMutual.
- We will avoid conflicts of interest when doing business with MassMutual, including not offering to nor accepting from MassMutual employees any business gifts or entertainment that could be perceived as improper attempt to influence a business decision.
- If we cannot avoid a conflict of interest, we will disclose it to MassMutual so it can be properly managed.

**We will be honest and forthright in our dealings with the government and will comply with applicable laws when participating in the political process or when interacting with the government on behalf of MassMutual.**

- If we interact with members of the government on behalf of MassMutual, we will comply with applicable laws governing corporate political activity, lobbying, gifts and entertainment with respect to government officials, and interactions with current or former government employees.

# Commitment to Social and Racial Justice

MassMutual is committed to working towards social and racial justice inside and outside of the workplace and does not tolerate behavior or conduct that violates this Policy.

As a supplier to MassMutual, we ask that suppliers align with our values and maintain a welcoming workplace free of discrimination, that is inclusive for all regardless of their race, color, age, gender, sexual orientation, gender identity, disability, religion, or veteran status. MassMutual values diversity in both our workplace and our supply chain, we look to our Suppliers to follow the same best practices including working with diverse suppliers certified through the national certifying agencies.

## Speaking up

If you suspect or observe a violation of the Code of Conduct for Suppliers, either by you or one of MassMutual's employees, contact your MassMutual Supplier Relationship Manager or Procurement contact. You may also report conduct that violates, or that you suspect violates, the Code of Conduct for Suppliers to MassMutual's Compliance and Ethics Reporting Hotline ("Hotline").

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The Hotline can be reached 24 hours a day, seven days a week, by calling **1-800-442-1381** or via the web at **[www.MassMutual.com/ethics](http://www.MassMutual.com/ethics)**. Reports to the Hotline can be made on an identified or anonymous basis.

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It is a violation of the Code of Conduct for Suppliers for anyone to knowingly raise a false allegation, or initiate or encourage retaliatory action against any person who in good faith reports known or potential violations.

