

## Supplier Code of Conduct

Sun Life commits to the highest standards of honesty, integrity and professionalism. We're transparent with our business dealings. We're rigorous about our governance practices. And we're committed to creating a diverse and inclusive workplace where our Employees, Clients and communities can shine. Sun Life has developed a Supplier Code of Conduct ("Code") that reflects these standards and ethics. We strive to create supplier relationships that are mutually helpful and foster fair and open competition.

This Code outlines certain minimum expectations that Sun Life has for its Suppliers. We expect suppliers to:

- maintain the highest standard of professionalism, honesty and integrity in their interactions with Sun Life;
- self-monitor their compliance with this Code; and
- ensure that their employees understand and comply with this Code.

### ***Ethical business dealings***

#### ***Act in compliance with laws, policies and procedures***

We expect suppliers to conduct their business:

- ethically and responsibly;
- in full compliance with all applicable federal, provincial, state, local laws and regulatory requirements; and in full compliance with this Code and any other policies and procedures Sun Life communicates.

#### ***Anti-corruption and anti-bribery***

We expect suppliers to follow all laws and regulatory requirements regarding bribery and corruption. Suppliers must not engage in any form of corruption. This includes bribes, kickbacks, facilitation payments and extortion.

#### ***Anti-money laundering***

Suppliers may not engage – directly or indirectly – in any form of money laundering. They may not conduct business that violates the anti-money laundering laws. This includes accepting, concealing, converting and/or transferring any funds obtained from criminal activities, including and related to terrorist financing.

#### ***Anti-trust and competition***

Suppliers may not conduct business for Sun Life that isn't compliant with anti-trust and fair competition laws and regulations in the jurisdictions they operate.

#### ***Conflicts of interest***

Suppliers must avoid circumstances, situations, or relationships that could improperly influence business decisions. They must avoid all appearances of potential conflicts of interest. Suppliers must immediately disclose relationships, associations or activities that can create actual or potential conflicts of interest.

#### ***Fraud prevention***

Suppliers must not participate in any form of fraudulent or dishonest business activities. This includes:

- alteration, forgery or falsification of company documents or information;
- misuse or removal of records;
- misappropriation of company assets; and,
- theft or embezzlement.

#### ***Gifts and entertainment***

Sun Life expects that suppliers won't offer any Sun Life employee gifts, entertainment or any other advantage that could lead to improper advantage or preferential treatment. Improper gifts, entertainment and any advantages received may result in Sun Life ending the relationship with the supplier.

## **Privacy, confidentiality and information security**

### ***Privacy and information security***

Sun Life commits to respecting privacy and confidentiality. We expect suppliers to comply with all laws and regulatory requirements regarding privacy and information security requirements. Those include appropriate access to and/or handling of Sun Life confidential information. Suppliers must safeguard and not use or disclose Sun Life confidential information without permission from Sun Life. We expect suppliers to have adequate controls in place. They need to effectively and properly take care of the authorized collection, use, retention, destruction, maintenance, access and disclosure of Sun Life confidential information.

### ***Insider trading***

Suppliers must have policies, procedures and practices in place to prevent the use of confidential information for the purposes of trading company securities.

### ***Corporate property***

Suppliers may have access to Sun Life's property. They must use Sun Life's property in a responsible manner, solely for authorized business purposes. Sun Life's corporate property includes hardware, software, websites, e-mail, telecommunications, internet access, records, documents, supplies and intellectual property. Suppliers must return all of Sun Life's corporate property at the end of a project. They can't use Sun Life's name, trademark or logos without Sun Life's consent.

## **Labour and human rights**

### ***Employment practices and working conditions***

Sun Life has adopted employment practices that comply with labour laws, and regulations. They include the Universal Declaration of Human Rights. We expect suppliers to comply with all applicable wage laws, labour laws and regulations governing employee compensation and working hours. Suppliers should not use or practice forced labour. That includes work or services extracted under the threat of penalty. Sun Life will not tolerate the use of child or forced labour.

### ***Respect, discrimination and harassment***

Sun Life commits to diversity and inclusion across our global footprint. We integrate diversity and inclusion in what we do. Across Sun Life, our business practices reflect a commitment to diversity of all kinds. We expect suppliers to provide an inclusive and nondiscriminatory working environment. They must value all their employees and empower them to succeed. Discrimination or harassment based on race, colour, ethnic origin, religion, age, sex, sexual orientation, gender orientation or any other status protected under any applicable law is prohibited.

### ***Health and safety***

We expect suppliers to provide adequate and safe working conditions. They must comply with applicable health and safety policies and all applicable laws.

### ***Sustainable practices***

Sustainability is a priority for our Company and is essential to our overall business success. Our [sustainability plan](#) builds from our foundation as a trusted and responsible business. At the core of this foundation is our commitment to be a responsibly-managed business. We are Client-focused, competitive, forward-thinking, financially and environmentally resilient, and sustainable for the long term. We expect suppliers to support this commitment and the priority we place on sustainability.

### ***Code compliance and monitoring***

Sun Life expects suppliers to comply with the Code. Periodically our Procurement team may require a supplier to confirm that they meet Sun Life's requirements. Sun Life must also be able to monitor and audit a supplier's control environment. Failure to comply with the Code may result in Sun Life ending a relationship with a supplier.