

SUPPLIER BUSINESS ETHICS CODE OF CONDUCT



INTRODUCTION

The Phoenix Company of Chicago, Inc., and its affiliates are committed to complying with all applicable laws and regulations in a manner that reflects the highest standards of ethics and integrity in our business conduct. Our Company policies, procedures and practices reflect our strong commitment to good corporate business values as stated in

our Code of Ethics and Business Conduct policies. Employees, agents, and subcontractors will not engage in improper trafficking-related activities that could damage the Company's reputation and otherwise result in serious consequences for the employees involved.

PURPOSE AND APPLICABILITY OF PLAN

The Supplier Code of Conduct Compliance Plan was developed to help prevent, detect, monitor, and prohibit human trafficking-related activities from occurring in the workplace. In accordance with Federal Acquisition Regulation 52.222.5-50(h), it is required to adopt and maintain a compliance plan to be implemented on Federal Government Contracts or subcontracts for supplies acquired or services performed outside the United States. The purpose of this plan is to:

- 1) Make all employees, agents, and subcontractors of The Phoenix Company of Chicago, Inc. aware of the conduct prohibited under the anti-trafficking laws and regulations and from engaging in activities that include fraudulent recruiting practices, denying access to identity, harboring, transporting or obtaining of a person for labor or services through the use of force, fraud or coercion.
- 2) Outline the actions that will be taken as a result of any violations to this policy by employees, agents, and subcontractors of The Phoenix Company of Chicago, Inc.
- 3) Summarize The Phoenix Company of Chicago Inc's recruitment and wage practices, with the expectation that our suppliers uphold similar standards.

This plan defines the standards for Combating Trafficking in Persons compliance and applies to all U.S. Government contracts, subcontracts, and agreements. This Compliance Plan will be appropriately maintained based upon the size and complexity of the contract and the nature and scope of the activities to be performed, including the risk that the contract or sub-contract will involve services or supplies susceptible to trafficking.

EMPLOYEE TRAINING AND AWARENESS PROGRAM

We provide training and education to all employees on prohibited trafficking-related activities to promote an organizational culture that encourages good ethical conduct. The Human Resource Department conducts annual training that provides general awareness on human trafficking, prevention tips, indicators of labor trafficking, myths and misconceptions, fair recruitment practices, and examples of what human trafficking looks like. As part of our on-boarding process, all employees and temporary employees are required to participate in the Combating Trafficking in Persons training presentation, as it provides employees with general information, video examples, reporting requirements and the hotline number to contact for reporting any trafficking activities. All employees and temporary employees are given a copy of the Business Code of Conduct and Ethics Policy, and all must sign an acknowledgement form to ensure they have read and understood the policies,

procedures, and principles to uphold our Company commitment to good ethical business practices. The Phoenix Company of Chicago Inc. will continue its efforts in providing ongoing awareness through worksite posters, effective communications, and manager training certifications. Any violation of the FAR's, the DFARS and/or this plan could result in disciplinary action which may include but is not limited to an employee's removal from a contract or even termination of employment.

RECRUITMENT PRACTICES, WAGE PLAN & SAFETY

The objective of the Company is to obtain individuals who are qualified or trainable for the positions by virtue of education, training, experience, and personal qualifications. We engage in recruiting practices that comply with all applicable employment and immigration laws. The Company policy strictly prohibits:

- Disparate treatment based on race or ethnicity in hiring, promotions, recruitment, vendor agreements, and program participation.
- Charging of recruitment fees to employees and prospective employees during our hiring practices.
- Engaging in all forms of forced labor and human trafficking to include child labor.
- Withholding worker immigration documents.
- Using recruiters that do not comply with Local, State, and Federal labor laws.
- Unlawful business practices, including false advertising, unfair competition, or improper advantage.
- Non-compliance with protections of internal and external whistle blowers.
- Improper protection of Intellectual Property or disclosure of confidential information.

The Phoenix Company of Chicago, Inc., and affiliated companies will ensure wages are competitive within labor market guidelines and comply with all applicable wage and hour law regulations. In addition, we provide equal employment and advancement opportunities to all employees and make employment decisions based on each person's performance, qualifications, and abilities. The Company does not discriminate before hiring, on the job or upon leaving based on race, age, sexual orientation, religion, political opinion, national origin, disability, or veteran status. The Phoenix Company of Chicago, Inc. upholds all health, environmental, and safety policies and commits to ongoing continuous improvement actions through training, risk assessments, and audits to ensure the safety and wellbeing of our valued employees.

The Phoenix Company of Chicago, Inc., does not participate in Government contracts that require host country housing. In the event housing is necessary for the completion of a future US Government contract, the necessary housing will be provided that complies with all country and safety standards.

It is the Company's expectation that all supplies, contractors, and subcontractors will uphold our same values in support of combatting unlawful forced labor practices. All supply chain procedures and standards must include strict enforcement of the prohibition on the importation of goods into the United States manufactured wholly or in part with forced labor. Entity Lists that summarize manufacturing areas deemed prohibited can be found on the United States Department of Homeland Security's (DHS) website.

EXTERNAL RECRUITMENT AGENCIES

Our Human Resource Department will ensure all contracts with recruiting agencies adhere to all local, state, and national government laws and recruiting firms uphold similar standards related to combating human trafficking to include:

- [DFARS 252.225-7040](#)— Displaying the Trafficking of Persons posters as appropriate within their facilities that includes the Human Trafficking Hotline phone number to contact and report any claims of misconduct.
- [FAR 52.222-50](#)—Train employees on combating trafficking related activities and support policies including:
 - wages that comply with all applicable minimum wage and hour law regulations.
 - document checks to verify employment eligibility.
 - at-will employment offers made with accurate and detailed job responsibilities.

- ability to form and join trade unions, bargain collectively and to engage in peaceful assembly in conformance with local laws.
- [FAR 52.222.90](#)– Prohibit suppliers from engaging in racially discriminatory practices in hiring, promotions, recruitment, vendor agreements, program participation and other DEI activities.
- [Contract Clauses](#) - Ensure all applicable FAR and DFARS clauses are included in all contracts with recruitment agencies to ensure compliance with contracts regarding human trafficking policies.

Recruiting agencies are provided a copy of The Phoenix Company of Chicago, Inc. Combatting Trafficking in Persons Compliance Plan and asked to certify that they read and understand the supplier expectations under the policy.

PROCEDURES FOR SUPPLIER COMPLIANCE AND PREVENTION

The Phoenix Company of Chicago, Inc. and affiliated companies, will ensure all agents and subcontracted recruiting agencies agree to comply with all applicable anti-trafficking laws and regulations. In addition, a copy of the Supplier Code of Conduct Compliance Plan will be posted on the company website for all employees, vendors, customers, and contractors to view. This compliance plan was initiated to ensure supplier's responsibility in preventing, detecting, and monitoring supplier employee's activities and report actions taken for violations with those parties that have engaged in such trafficking in persons activities.

All Applicable FAR and DFARS regulation clauses regarding anti-trafficking laws are indicated in boiler plates on customer and vendor purchase agreements to help bring awareness to potential human trafficking activities and minimize risk through our supply chain. In addition, all service providers are given a copy of the Combating Trafficking in Persons Compliance Plan and asked to certify their compliance in upholding the expectations under the supplier code of conduct. Suppliers or service providers that fail to comply with the requirements of the FARs and/or this plan, will result in appropriate actions, up to and including immediate termination of that subcontractor's or agent's contract with The Phoenix Company of Chicago, Inc. All signed Supplier Code of Conduct Compliance Plan acknowledgments received from agents and subcontractors will be stored on our Company Web Document portal for monitoring and record retention.

PROCESS FOR REPORTING VIOLATIONS

Every employee, agent and sub-contractor has the responsibility to promptly report any violation or suspected violation of the law. This includes creditable information from any source including vendors, employees, subcontractors, leased employees, and agents. Reports should be made to the Human Resource Department, President or CEO and will be handled in confidence to the fullest extent reasonably possible. Legal counsel may be appointed for guidance with investigations and disclosure on violations as needed.

All questions, concerns, complaints, and reported violations are taken seriously. The Phoenix Company of Chicago, Inc., and its affiliates will not tolerate retaliation against any employee who raises a good-faith concern or complaint or participates in a business conduct investigation. Employees, without fear of retaliation, may also report any trafficking-related concerns to the **Global Human Trafficking Hotline** at **1-844-888-FREE**; help@befree.org or to one of the following business representatives:

Larissa Stone, Human Resource Manager
22 Great Hill Road
Naugatuck, CT 06770
(630) 616-2270

John Slesinski, President
22 Great Hill Road
Naugatuck, CT 06770
(630) 616-2272

Failure of employees, temporary employees or third parties doing work on behalf of the Company to comply with the Combating Trafficking in Persons Compliance Plan may result in disciplinary action up to and including termination of employment and/or supplier contract agreements.

The Human Resource Department, and in conjunction of Legal Counsel, will ensure disciplinary action is taken in all appropriate circumstances, including but not limited to, any employee, temporary employee, contractor, agent, vendor, subcontractor, who is found to:

- Authorize, condone, participate in, or conceal actions that are in violation of these standards.
- Approve or disregard a violation, or who, through lack of diligent supervision, fail to prevent or report violations.
- Encourage others to retaliate against an employee who reports a violation of these standards.

CERTIFICATION OF PLAN

The Phoenix Company of Chicago, Inc. will obtain the necessary documentation as requested under the FAR 52.222-50 regulations to certify compliance of maintaining a Supplier Code of Conduct Compliance Plan and require any employee, agent or sub-contractor to take action, raise concerns and report any violations of human trafficking activity to align with our company ethical standards.

ACKNOWLEDGEMENT

This Supplier Code of Conduct Compliance Plan contains the ethical business practice standards that are required for all agents, suppliers, contractors, sub-contractors and service providers of The Phoenix Company of Chicago, Inc. and Affiliated Companies. It should be used as a guide to assure they align and comply with our Company standards. The Phoenix Company of Chicago, Inc. and Affiliated Companies, will observe the highest standards of ethics and integrity in our business conduct. Our Company is committed to complying with all applicable federal and state laws and regulations in an ethical and proper manner. We view these as the essential standards underlying our approach to doing business and have expectations that our suppliers, contractors, agents, consultants, representatives, and distributors adhere to these standards as well.

We appreciate your support in doing your part to maintain an ethical business environment.

I have received and read The Phoenix Company of Chicago, Inc. and Affiliated Companies Code of Conduct for Service Providers and acknowledge that I/we will abide by the Code.

X

Employee Name and Title (Printed)

X

Company Name

X

Employee Representative Signature

X

Date

Please kindly sign and date the acknowledgement to confirm receipt and understanding of this document, and return the complete document to the contact listed below:

Mail: *The Phoenix Company of Chicago, Inc.*

OR

Email: Fstone@phoenixofchicago.com

Attention: Faith Stone, HR Assistant

22 Great Hill Road, Naugatuck, CT 06770