



Supplier Code of Conduct

Revised August 2019

Summary

Lincoln National Corporation and its affiliates and subsidiaries (collectively referred to as "Lincoln Financial Group," "Lincoln Financial," "LFG," or "the Company") are committed to demonstrating the highest level of integrity and ethical standards, and to operating in full compliance with all applicable laws, rules, and regulations in all facets of our business. We source products and services from businesses that reflect the diversity of our markets and contribute to the sustainability of our communities.

The Lincoln Financial Group Supplier Code of Conduct ("Supplier Code") sets out the basic principles and expectations for unaffiliated third parties who are engaged by LFG to provide goods and/or services to the Company ("Suppliers"). Suppliers are expected to cause all personnel (including Supplier's employees, subcontractors, etc.) involved in providing goods and/or services to LFG to adhere to all applicable portions of the Supplier Code.

It is the responsibility of a Supplier to know the requirements of the Supplier Code and operate in accordance with its principles. Suppliers are expected to integrate, communicate, and comply with the terms below in addition to their other contractual responsibilities with Lincoln Financial. The most current version is available online and effective when posted.

Responsibilities of LFG Suppliers

1 GOVERNANCE AND ETHICAL BUSINESS PRACTICES

Suppliers are expected to behave in an ethical manner and refrain from all forms of illegal or improper activity. LFG reserves the right to conduct a supply chain audit to evaluate a Supplier's business practices.

Non-Discrimination: It is our expectation that discrimination or harassment of anyone based upon race, ethnicity, color, religion, sex, age, national origin, disability, pregnancy (including childbirth or a related medical condition), sexual orientation, gender identity, veteran's status or genetic information is strictly forbidden.

Conflicts of Interest: We expect Suppliers to disclose any potential conflicts of interest prior to initiating their relationship with Lincoln Financial, or as soon as a Supplier becomes aware of a conflict after initiating a relationship. Gifts or entertainment given or received in the course of doing business should be appropriate and business-related, reasonable in value, not cash or a cash equivalent, and must comply with applicable laws and regulations.

Improper payments and the Foreign Corrupt Practices Act: Lincoln Financial prohibits improper or unethical payments (i.e., bribes) to any person or business.

Information management: We expect Suppliers to protect the privacy and confidentiality of all information received, stored, or processed from, or on behalf of, Lincoln Financial. Suppliers are also expected to safeguard all physical, financial, and informational assets belonging to Lincoln Financial.

Anti-money laundering: Suppliers must comply fully with applicable anti-money laundering laws and regulations and conduct business with reputable parties involved in legitimate business activities and whose funds are derived from legitimate sources.

Antitrust and Fair Competition: Suppliers must comply fully with applicable antitrust laws.

Financial controls: Suppliers must have appropriate internal controls to assure compliance with applicable laws, regulations, internal policies, and this Supplier Code.

Insider trading: Lincoln Financial requires not only full compliance with applicable insider trading laws, but also the avoidance of the appearance of impropriety. Inside information is any material nonpublic information that a reasonable investor is likely to consider important in making an investment decision.

Media/communications: Only designated individuals on Lincoln Financial's communication teams and in Investor Relations are authorized to communicate with the media and analysts to explain Lincoln Financial's business practices, strategies, procedures, or policy positions. Suppliers who engage in public communication on behalf of LFG, such as posting to social media, must clearly indicate their relationship to the Company and refrain from doing anything that may reasonably create the impression that they are communicating on behalf of or as a representative of LFG if they are not specifically authorized to do so.

Political activity and contributions: A Supplier's involvement and participation in any political activity must be on its own behalf, on its own time, and at its own expense.

Solicitation: Solicitation and distribution on Company property is only permissible in certain instances approved in writing by the Company. Email KeyCityTeam@LincolnFinancial.com if you have a question or wish to submit a request regarding solicitations.

2 SUPPLIER DIVERSITY AND INCLUSION

Lincoln Financial is committed to equal opportunity, diversity, and inclusion in the workplace, marketplace and communities where we operate, and provide services. We believe diversity of thought, background, experience, and people drive innovation, support our growth objectives, and produce results that differentiate Lincoln Financial in today's marketplace.

While we seek Suppliers that provide first-rate goods and services at the best total value, we also consider innovative ideas and solutions. A diverse and inclusive Supplier base enhances our brand, expands the breadth of our supplier talent and reinforces our commitment to the communities where we live and work.

Examples of diverse Suppliers include: minority, LGBT, disabled, disabled veteran, veteran, women, small businesses, and small disadvantaged businesses.

We encourage Suppliers to integrate and utilize equivalent standards of Supplier diversity in their operations and in their subcontractor decisions.

3 LABOR, HUMAN RIGHTS AND SOCIAL RESPONSIBILITY

Lincoln Financial has publicly available policies in place to ensure a safe, secure and healthy workplace and working environment, free from violence, threats, harassment, intimidation, coercion or any other disruptive behavior. We conduct business in a manner consistent with the principles expressed in the United Nations' Universal Declaration of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. We expect our Suppliers to ensure that their businesses respect these standards and policies.

Suppliers must have policies and practices that apply to all workers, including migrant and temporary workers, and address issues such as wage and benefits, forced labor prohibitions, child labor restrictions, maximum working hours, occupational injury and illness, and workers' freedom of association.

Wages and benefits: Suppliers shall provide workers timely payment of all wages earned with a pay stub or similar record of payments and withholdings and legally-mandated or agreed-upon benefits.

Forced labor: Suppliers shall not use forced or involuntary labor, whether bonded, indentured, or otherwise, including through third-party recruitment or hiring. Mandatory overtime is not permitted, and workers must be allowed to leave their employment after giving reasonable notice.

Child labor: Suppliers shall not employ individuals under the age of 15 or under the minimum age for employment in the applicable jurisdiction, whichever is greater.

Occupational safety: Suppliers are expected to provide appropriate controls, safe work procedures, preventative maintenance, and protective measures to mitigate health and safety risks in the workplace that meet or exceed applicable federal, country, state, provincial and municipal laws regulating occupational safety and health.

Freedom of association and the right to collective bargaining: Suppliers must respect the rights of workers to associate, organize and bargain collectively in a lawful and peaceful manner without unlawful interference.

4 MAINTAIN MANAGEMENT SYSTEMS

Suppliers must have procedures and systems in place that allow workers to report issues such as occupational injury and illness incidents, illegal conduct, and conflicts of interest, without fear of retaliation, as well as a system to investigate, classify, track, and manage such reports and implement corrective actions.

5 ENVIRONMENTAL STEWARDSHIP

LFG believes what's good for our communities is good for our business. As a Dow Jones Sustainability Index "Sustainability Leader" we are committed to reducing our impact on the environment, and we expect our Suppliers to join us in this effort and to adhere to the standards set forth in our [Environmental Policy](#), as summarized in the following paragraph.

Suppliers shall obtain, keep current, and comply with all required environmental permits, and shall comply with the reporting requirements of applicable permits and regulations. LFG also expects Suppliers to conduct their operations in a manner that protects the environment by making reasonable efforts to meet industry best practices and standards with respect to the waste management, recycling, reduction of energy use, greenhouse gas and carbon emissions, waste and water use. Suppliers must also ensure that potential impacts to community health, safety and security, such as accidents, spills, impacts on natural resources, exposure to pollution or other community issues that may arise from business operations are appropriately mitigated and managed. Suppliers are encouraged to train on issues like worker protection, emergency preparedness and response, and hazardous material safety. LFG reserves the right to perform supply chain audits for environmental management.

The failure or omission by LFG to insist upon strict performance and compliance with any of the provisions of this Supplier Code at any time shall in no way constitute a waiver of its contractual rights. In the event of any conflict or ambiguity between any provision of this Supplier Code and the provisions of any relevant contract with any Supplier, the provisions of that contract will prevail.

Suppliers who have violated the requirements of this Code are required to inform us immediately or as soon as is practicable and remedy any such violation in a timely and sensitive manner. Failure to do so may lead to review or termination of the relationship.

RAISING CONCERNS

If you encounter what you believe to be any potential integrity concerns, including but not limited to violation of local laws or regulations, this Supplier Code, or unethical behavior, you must report it to your LFG contact or the **Lincoln Financial Code of Conduct AlertLine at 800-381-8482** or the AlertLine website: <https://www.integrity-alertline.LFG.com>.

If you have concerns about your ability to implement the provisions outlined in this Supplier Code, reach out to your LFG contact.

REMINDER: LFG prohibits retaliation against persons who report misconduct or other concerns in good faith.