

Voya Financial Supplier Code of Conduct

Introduction

At Voya, we build our business on the trust of our customers in our products, services and employees. Our vision is to become America's Retirement Company® and our goal is to help people realize their financial needs and be a life-long partner in helping to plan for retirement and financial security. We are equally committed to conducting business in a way that is ethically, economically, socially and environmentally responsible.

Our corporate values and our [Code of Business Conduct and Ethics](#) are the cornerstones of our culture and central to our success. Together, these clearly define the expectations of our employees and directors at Voya. While our corporate values represent who we are, our Code of Business Conduct and Ethics represents how we act and reflects our commitment to maintaining the highest level of quality and integrity in everything we do.

This Supplier Code of Conduct sets forth Voya's standards and expectations with respect to key areas of corporate responsibility. Our goal is to work with suppliers* to ensure alignment with our corporate values, operate ethically and responsibly, and comply with applicable laws, regulations and corporate policies.

This Supplier Code of Conduct has been approved by Voya's senior leadership, and may be updated to reflect ongoing improvements.

Voya's Corporate Values

At Voya, we focus on conducting business in a responsible manner. This means adhering to our corporate values and a code of conduct by which everyone in the company operates; building strong external affiliations; implementing policies; and developing sustainable and responsible products and services.

The Supplier Code of Conduct is premised on Voya's core values, which govern decision-making, shape our culture and are central to the character of our company. We have customer passion and provide the best customer service, by listening and responding with a sense of urgency. We do the right thing, telling the truth, upholding the letter and the spirit of the law and treating everyone with respect. We are accountable, individually and collectively, as we act as one team (at Voya, we term this "We are the We"). We have a winning spirit and adapt to our stakeholders' needs. We care by positively impacting our communities and planet. We are inclusive and incorporate diverse perspectives in all that we do.

We believe that profitability and integrity are inextricably connected. An ethical mindset goes hand in hand with value-based decision-making at Voya. We pride ourselves in focusing on doing not only what is good for business, but for our people and the communities in which we live and work. This means integrating corporate responsibility and sustainability into all facets of the company.

Therefore, we expect our suppliers to support us in realizing our vision throughout our business partnership by demonstrating a commitment to the values and principles outlined in this document when it comes to how they interact with customers on Voya's behalf, as well as how they treat their own employees, contractors, sub-contractors and representatives.

* A supplier is any third party who provides goods and services (does not include third-party administrators, distribution intermediaries or other parties contracted by plan sponsors).

Voya's Business Ethics

At Voya, we take business ethics very seriously and pride ourselves on being consecutively recognized on the World's Most Ethical Companies® list by the Ethisphere Institute. We seek partners who conduct their business with the highest integrity. This includes adherence to any and all applicable laws and regulations in their own geographies, and a display of the highest level of integrity, confidentiality and respect in business dealings. Voya suppliers must refrain from any and all forms of any illegal activities such as misrepresentation, embezzlement, bribery, corruption and extortion. We expect suppliers to employ measures to help minimize and resolve potential conflicts of interest (for example, monitoring employees giving and/or receipt of gifts and/or entertainment to third parties, particularly governmental officials, customers, prospects, third-party suppliers and intermediaries).

Voya takes care to follow all regulations and procedures pertaining to government officials and entities. To that end, suppliers are prohibited from making any political contributions or present any gifts in the name of Voya to any candidate for public office or elected officials, and suppliers will ensure that any recipient of their own political contributions (including any affiliated political action committees) do not represent an endorsement of or from Voya. Unless given prior written approval, suppliers may not undertake activities on Voya's behalf that would require registration as a lobbyist.

Voya's Commitment to Environmental Sustainability

Greening our operations means integrating sustainability into our business and focusing on ways to reduce our environmental impact. Voya utilizes a five-pronged environmental strategy of:

- Increased energy and water efficiency;
- Utilization of the three R's: reduce, reuse, recycle;
- Conducting employee awareness programs;
- Greening our supply chain; and
- Investing in green energy.

To guide us in this strategy, Voya maintains its [Environmental Commitment Statement and an Environmental Procurement Policy](#). We expect our suppliers to conduct business in ways that will protect, preserve and enhance the environment and to minimize the impact on the environment. We expect our suppliers to maintain effective environmental policies and to align all their activities in accordance with the best environmental practices and standards, which includes, but is not limited to, complying with all applicable local environmental laws and regulations, as well as making reasonable efforts with respect to managing greenhouse gas emissions and waste, energy use, water consumption, recycling, and management of hazardous materials. We also request that our suppliers, when applicable or appropriate, offer to us or use products and/or services that have acquired environmental certifications.

Voya is an Equal-Opportunity Employer and Promotes Diversity

Voya fosters a supportive and respectful work environment where the highest standards of integrity and fairness are maintained. Voya Financial is an equal-opportunity employer that provides equal opportunity to qualified individuals regardless of race, color, sex, national origin, citizenship status, religion, age, disability, veteran status, creed, marital status, sexual orientation, gender identity, genetic information, or any other status protected by state or local law. We are committed to maintaining a diverse workforce. This commitment governs all decisions related to employment, including selection, development and compensation. It also includes an employee's

request for reasonable accommodation. All employees will be treated in a manner free from discrimination or harassment.

We also believe in the respect of the rights of the workers of our suppliers, customers and members of the relevant communities. As such, Voya maintains a [Human and Workplace Rights Statement](#), which outlines our commitment to ethical behavior, diversity and inclusion, non-discrimination, health and safety, wage compensation, labor practices and issue resolution. At a minimum, we require suppliers' workplace practices to align with the following:

- **Diversity and Inclusion** – We seek to retain and develop highly qualified, diverse and dedicated individuals across our workforce.
- **Discrimination** – Voya believes all employees deserve to be in a work environment that is free from any kind of discrimination or harassment. We maintain a strict policy that prohibits discrimination or harassment.
- **Safe and Healthy Workplace** – Voya provides a safe and healthy workplace and complies with applicable safety and health laws, regulations and internal requirements.
- **Work Hours, Wages and Benefits** – Voya compensates employees competitively relative to the industry and local labor market. We operate in full compliance with applicable wage, work hours, overtime and benefits laws.
- **Forced Labor and Human Trafficking** – Voya prohibits the use of all forms of forced labor.
- **Child Labor** – Voya follows all applicable minimum age requirements for employment everywhere it operates.

Voya's Commitment to Information Protection

At Voya, we are very serious about privacy, security and confidentiality of any and all information. Any information received by our suppliers from Voya in the course of doing business with Voya is confidential and proprietary, is to be kept confidential and secured at all times, and must not be shared by any means with others or used for any personal purpose or gain. For any questions or terms of doing business with Voya, including questions on proprietary and confidential information obligations, agreements currently set in place between Voya and a supplier, or non-disclosure agreements, if such exist, should be consulted.

Customers' data security and privacy are a high priority at Voya as well and our suppliers must treat customers' data, confidential information, including personally identifiable information, with the utmost confidentiality, security and respect. All confidential and secured information must be protected by the suppliers at all times in accordance with any and all applicable data security and privacy laws and industry standards and policies. Additionally, by working with Voya, suppliers are bound by our Voya Financial Privacy Policy. Voya's [Privacy Notice](#) further outlines how we collect, share and protect our customers' personal information.

Policy Compliance

It is the responsibility of each supplier to ensure its employees, contractors, sub-contractors and representatives completely understand and comply with this Supplier Code of Conduct. A supplier who becomes aware of a violation of this code must notify Voya as soon as possible. We expect a supplier to cooperate with Voya in the remediation of any violation. Voya intends to proactively monitor adherence to this code. Failure to comply with any provision of this Supplier Code of Conduct may be considered a breach of Voya's contract with a supplier.