

## Horace Mann Code of Conduct

### **Provide lifelong financial well-being for educators and their families through personalized service, advice and a full range of tailored insurance and financial products.**

All Horace Mann employees are responsible for conducting business with honesty and integrity and complying with all applicable laws and regulations. These qualities have enabled the Company to operate as a successful business for more than 75 years. However, what is right or wrong in a business situation is not always immediately clear. That's why we have the Code of Ethics and Conduct.

While the Codes do not address every situation you may encounter, they do summarize many existing Company policies and rules pertaining to business behavior. And they can help you make the right choice when you're faced with difficult issues.

This Code requires that any waiver of the Code may be made only by the Board of Directors. Any such waiver must be promptly disclosed to shareholders.

### **Support fairness and equal opportunity**

Treat both employees and applicants for employment fairly and equitably. Evaluate employees and applicants by their qualifications, demonstrated skills and achievements.

Never discriminate based on a person's race, color, religion, gender, age, national origin, veteran status, disability or sexual orientation. Apply equal opportunity principles in recruiting, hiring, advancement, training, compensation and retention of employees.

All employees have the right to work in an environment free from intimidation or harassment. Do not practice or tolerate any verbal or physical conduct that harasses, disrupts or creates an intimidating, offensive, abusive or hostile work environment.

Employees are strongly encouraged and management is obligated to promptly report any incidents of harassment, alleged harassment or other violations of the Equal Employment Opportunity policy to your Human Resources Business Partner or the Human Resources Hotline at 1-888-783-3580.

Deal fairly with all suppliers and conduct all negotiations and transactions with suppliers in good faith. Enforce both the terms and spirit of any agreement.

Support fair competition in the sale and service of all products. Do not make or condone the use of disparaging remarks or misleading statements in reference to a competitor, its employees or its products.

## **Confidentiality and privacy**

Respect our customers' and employees' right to confidentiality and privacy. This includes information related to health, history, family and finances. Discuss confidential information in private and only with people who need to know. Provide information to third parties only as authorized by the Company. Protect confidential information from loss, misuse or unauthorized access.

Follow all Horace Mann policies with respect to telephone and e-mail solicitations, and don't send solicitations by facsimile. Refer to the "[Marketing Compliance Policy](#)" sections for more information.

## **Safeguarding client information**

It is your responsibility to assess the risks related to your office environment and take reasonable efforts to prevent the unauthorized disclosure or misuse of client information by you or those working for you.

## **Gifts, favors and entertainment**

Maintain the highest level of integrity when dealing with customers and business associates. Unless endorsed by the Company, do not give or accept business-related gifts, invitations to social or recreational events, entertainment or other favors. Gifts, favors or entertainment may never be linked to the purchase of insurance or securities, the referral of Company business to an outside vendor or the underwriting of a policy.

Examples of Company-endorsed gift-giving situations include:

- parties, refreshments or drawings for customers or potential customers;
- exchange of gifts among co-workers; and
- participation in United Way as sponsored by the Company.

Permitted situations for gifts:

- you may provide a current customer with a nominal gift for a referral. However, the nominal gift cannot be contingent upon you making a sale or associated specifically with a securities products referral. The value of the gift must also be in accordance with the dollar limits established by your state for gifts associated with insurance advertising or transactions (for details see the Horace Mann [policy on “Dollar limitations on gifts”](#)).
- an invitation to conferences, trade shows or seminars sponsored by vendors may be accepted as long as the purpose of the event is business-related, open to other companies, prior written approval is provided by your division head, and all associated travel, room and non-business-related expenses are paid by Horace Mann unless prior written approval is given by the President and Chief Executive Officer;
- business meals that are reasonable and customary and are for the purpose of discussing business-related matters;
- awards, plaques or other mementoes given in recognition of exemplary service to the Company or in acknowledgement of the successful completion of a corporate project; and
- unsolicited tokens of appreciation, free samples, or other gift items from existing vendors or vendors soliciting our business (e.g., coffee mugs, calendars, golf balls, pens, folders, binders, inexpensive calculators, etc.) or where the return of the gift item or sample is impractical (i.e., the item is personalized, the cost to return the item exceeds its worth, or the item is perishable).

If you receive a gift that is impractical to return, if possible, share the gift with your co-workers or donate the gift to a charitable organization in the name of the donor. If you receive a gift that does not fall within one of the permitted situations noted above, you must comply with the Company’s “Rules for Giving and Receiving Gifts.”

### **Rules for Giving and Receiving Gifts**

Accepting or giving gifts can create an expectation of reciprocal favors. And even if the giver neither wants nor expects anything in return, a perception can arise among fellow employees or others that reciprocal favors are being exchanged between the recipient and the giver.

The Company expects its employees to neither give nor receive any business-related gifts, unless such gifts are endorsed by the Company or fall within one of the exceptions noted in the Code of Conduct.

In the event an employee or group of employees receive a business-related gift (either at work or at home) that is not endorsed by the Company or does not fall within one of the exceptions noted in the Code of Conduct, the following steps should be taken:

1. The employee(s) should immediately notify management that they have received a gift.
2. If the gift can be returned, it should be returned.
3. If the gift is perishable, arrangements should be made to either deliver the gift to a local charity that accepts perishable goods or place the perishable goods out in an open space to be seen and shared by many employees.

### **Conflicts of interest**

A conflict of interest exists when an employee has a relationship, engages in any activity or has any personal financial interest that might impair his or her independence of judgment or influences his or her decisions or actions concerning Company business.

In dealings with the Company, its customers or business associates, always act in the best interest of the Company to the exclusion of any personal benefit or advantage. If a conflict or potential conflict of interest arises, make prompt and full disclosure of all facts to your management.

### **Follow appropriate guidelines**

Comply with all laws and regulations applicable to Horace Mann's business. The following are examples of significant laws with which we must comply:

#### **Antitrust**

Do not engage in conduct with other insurers or securities firms that can harm or limit a consumer's right to a competitive product at a competitive price. Such conduct includes:

- fixing premiums or interest rates;
- allocating markets, territory or clients;
- limiting products or services; or
- boycotting another Company's products or services.

#### **Unfair trade practices**

Comply with and support the principles and substance of these laws and regulations. These acts prohibit:

- misrepresentation of the benefits, advantages and features of our products and services;
- misrepresentation of our Company's financial condition;
- failure to maintain complaint handling procedures as required by state or federal regulatory authorities;
- misrepresenting oneself as a financial planner, investment advisor or consultant; and
- failure to maintain claims handling procedures that ensure prompt, fair and equitable investigation and settlement of claims.

### **Non-discrimination in the sales and services of our products**

Do not refuse to quote or issue coverage, cancel coverage or charge higher premiums for coverage to members in the same class unless such treatment is supported by applicable law and regulation.

### **Insider information**

Any material fact about the Company not known publicly is considered insider information. Information is material if it could reasonably be expected to affect the market price of Horace Mann stock or an investor's decision to buy, sell or hold Horace Mann stock.

Until such information is disclosed to the public, it is illegal to directly or indirectly use, disseminate, publish or disclose such information except in the course of your job duties.

### **Handle transactions accurately, completely and on time**

Record and report all business information honestly, completely, accurately and on a timely basis. Reliable records play an important role in making responsible business decisions. Our investors and policyholders depend on complete and accurate information about the way we do business.

Do not make any entry or report that intentionally hides or disguises the true nature of any transaction.

All financial records and accounts must accurately reflect transactions and events and conform to generally accepted and/or statutory accounting principles.

Be as clear, concise, truthful and accurate as possible when you record any information. Do not exaggerate, use colorful language, draw conclusions or make derogatory characterizations of people or their motives.

Refer any external requests you receive about Horace Mann's activities, results, plans or position on any issues to Michelle Eccles at 217-788-5394 in Communications. If the matter involves an issue related to Investor Relations, please refer the request to Heather Wietzel at 217-788-5144.

## **Safeguard our reputation, assets and information**

Protect ideas, information and data that are proprietary to Horace Mann. Do not use or disseminate such information except in the course of your job duties and as authorized by Horace Mann. This includes, but is not limited to:

- client lists, business plans, manuals, in-house developed software or any other Horace Mann intellectual properties developed for internal use; and
- manuals, software or any other Company-owned assets provided for Horace Mann's use by outside vendors.

Protect Horace Mann's property from loss, misuse, unauthorized access or damage. This includes office facilities, computers, data or client files, software, etc.

It is the policy of Horace Mann to protect computing resources and information under its management from unauthorized access, use, modification, copying, distribution or destruction, internally and externally. It is your responsibility as an employee of Horace Mann to review the Corporate Information Security policies periodically for any changes or additions, and you must comply with these policies in all aspects of your job. Company-owned materials must be returned to Horace Mann upon request or when employment ends. Theft, embezzlement or misappropriation of any Company property is illegal, and the Company will take appropriate action to deter, correct, and prosecute such offenses. Every employee must cooperate fully during an investigation.

It is critical that we all hold ourselves accountable and that our performance and behavior reflect adherence to our Code of Ethics, Code of Conduct and other Company policies and procedures.

## **Copyright compliance**

Do not photocopy or reproduce, for internal or external use, copyrighted materials of another person without obtaining permission.

## **Misconduct and impropriety**

Exercise sound business judgment and avoid any situation that creates or appears to create a conflict between Horace Mann's interest and outside interests. Don't engage in transactions for personal gain to the detriment of Horace Mann, its employees or customers.

## **We're relying on you**

Every Horace Mann employee is charged with the duty of protecting and preserving Company assets and is expected to act honestly in dealing with all Company business relationships. Compliance with all federal and state laws and regulations is the responsibility of every Horace Mann employee.

If you suspect any conduct or practice violates the Horace Mann Code of Ethics or the Code of Conduct and/or the Company's policies, or laws and regulations, it is your obligation to report:

- Business conduct and compliance issues to: **Compliance and Ethics Hotline** at 1 (844) 975-2649 or [www.horacemann.ethicspoint.com](http://www.horacemann.ethicspoint.com)
- Employee, EEO or personnel issues to: **Human Resources Hotline** at 1 (888) 783-3580

You may also report violations or concerns to any Division leader, an officer of the Human Resources Division, Enterprise Compliance, or your management.

A critical part of our Code of Conduct and ethical responsibility is ensuring that our financial practices – including our internal accounting controls and auditing procedures – are followed with the utmost honesty and integrity. If you are not comfortable using internal resources to report these specific types of concerns or suspected violations, you can communicate with the Audit Committee of the Horace Mann Board of Directors:

- Written communications (non-anonymous) may be addressed to: HMEC Board of Directors Audit Committee, c/o the General Counsel;
- e-mail correspondence may be addressed to: [hmechofd@horacemann.com](mailto:hmechofd@horacemann.com) (non-anonymous);
- you may report to the Compliance and Ethics Hotline (anonymous) at 1 (844) 975-2649 or [www.horacemann.ethicspoint.com](http://www.horacemann.ethicspoint.com).

The Company will not tolerate retaliation against you if you comply with your duty to report a violation under this Code. You will be fully protected. If you report a violation and believe you are being retaliated against, report your suspicions immediately to the Law Division, Human Resources or any Division leader.

The Company is committed to fully investigating any suspected violation of these Codes and will cooperate with all regulatory authorities. Every employee is obligated to fully cooperate with any investigation conducted by the Company or any regulatory authority.

### **Verification Statement**

Employees are required annually to acknowledge understanding of and compliance with the Code of Ethics and Code of Conduct. Failure to complete the annual Verification Statement may result in disciplinary action up to and including termination.