Acting ethically, with integrity and in compliance with applicable laws is not only the right thing to do, it is how we do business. Company policies define the requirements that govern your conduct. The Speaking Up Policy ("Policy") provides information on your obligation to “speak up” and report compliance, ethics or risk issues or concerns.

**Applies To**

This Policy applies to employees of the following companies (collectively “MassMutual”), including when acting on behalf of other MassMutual subsidiaries or affiliates:

- Massachusetts Mutual Life Insurance Company
- MassMutual International LLC
- The MassMutual Trust Company, FSB

This Policy applies to MassMutual employees who work for a MassMutual field agency or firm.

This Policy also applies to temporary or contract workers and interns (“temporary personnel”).

**General Requirements**

Speaking up and reporting compliance, ethics or risk issues or concerns helps management address them promptly and appropriately and can minimize the potential negative impact on MassMutual and its employees. Your input may also help identify issues that can improve our operations and performance.

You are obligated to speak up and report compliance, ethics or risk issues or concerns, including situations where, in good faith:

- you believe that someone acting on behalf of MassMutual has done or may do something that violates the [Code of Conduct](#), company policies, or other legal requirements or ethical standards;
• you believe that you or anyone else you know may have been involved in misconduct when acting on behalf of MassMutual;

• you are unsure about the proper course of action and need advice; or

• you believe or suspect that someone acting on behalf of MassMutual has engaged in excessive, reckless or inappropriate risk taking.

MassMutual offers a number of channels to raise compliance, ethics or risk issues or concerns. You are encouraged to use the channel that is the most appropriate or which you are most comfortable. Reporting channels include:

• Your manager or another manager within the reporting chain

• Your HR business partner

• Compliance & Ethics Department

• Law Department

• Enterprise Risk Management

• The Compliance and Ethics Reporting Hotline ("Hotline")

The Hotline provides a reporting channel in cases where you may not be comfortable reporting through any of the reporting channels listed above or where you prefer to raise your issue or concern anonymously. The Hotline is operated by an independent third party. You can reach the Hotline at any time by calling 1-800-422-1381 or via the EthicsPoint website. While the Hotline allows for anonymity at the time of initial reporting, anonymity may be difficult to maintain once an investigation begins.

Nothing in this Policy is intended or should be construed to restrict, discourage or interfere with communications or actions protected or required by state or federal law or regulation, including the exercise of your rights to directly contact any regulatory authority, government agency or entity, to report possible violations of law or make other disclosures under applicable “whistleblower” laws. You do not need the prior authorization of or notice to MassMutual to make any such reports or disclosures, and will not be retaliated against for making such reports or disclosures.

Anti-Retaliation

Anyone who retaliates against someone who raised a compliance, ethics or risk issue or concern in good faith will face disciplinary action, up to and including termination. If you suspect retaliation in connection with speaking up, immediately report the matter to any of the reporting channels described above.

Being Told to "Keep Quiet"

If you report a compliance, ethics or risk issue or concern to your manager or other person and are told to "keep quiet", you must immediately contact one of the reporting channels described above and report both the original issue or concern and the fact that you were told to "keep quiet." If you are asked to participate in an investigation and are asked not to cooperate, or asked by anyone other than the investigator(s) to keep quiet, report the incident to any of the reporting channels described above.
Your Responsibilities as a Manager

If anyone comes to you with a compliance, ethics or risk issue or concern, you must handle the matter with discretion and to treat the person with respect. If you need to escalate the matter, contact any of the reporting channels described above for further guidance.

Self-Reporting

If you feel that you may have violated the Code of Conduct, company policy, or other legal requirements or ethical standards, you are obligated to speak up and self-report.

Investigations and Confidentiality

All reports are taken seriously. Once an issue or concern is reported, MassMutual will promptly investigate the matter. MassMutual handles all reports with discretion and will take steps to keep reports confidential, but certain individuals may need to know about the report in order to conduct an effective investigation and follow-up appropriately. MassMutual may have a legal obligation to make information about reported compliance or ethics issues or concerns available to third parties.

Enforcement and Discipline

If you violate this Policy, you may be subject to discipline, including termination of employment.

For temporary personnel who violate this Policy, appropriate action may include termination of contract or business relationship, or dismissal or prohibition from MassMutual property or events.

Additional Resources

For more information about this Policy, contact:

- Your manager
- Your HR business partner
- Compliance & Ethics Department
- Enterprise Risk Management
- Law Department