A MESSAGE FROM THOMAS J. WILSON

ALLSTATE CHAIRMAN

Allstate’s values and principles are the foundation for Our Shared Vision. They form the foundation for everything we do and every interaction with more than 16 million households. Our commitment to doing the right thing has been at the core of this company throughout our history. We do the right thing, the right way at the right time.

The ASPL Code of Ethics is derived from the Allstate Code of Ethics and it guides both our overall purpose as a company and the things we do every day. This Code provides a roadmap for making decisions and ensuring we make the right choices.

We stand apart because of our people. You are the key to our success. This Code reflects the values and principles you embody and ensures Allstate Solutions Private Limited has the highest ethical standards.

Thomas J Wilson
Chairman - Allstate
A MESSAGE FROM CHETAN GARGA
MANAGING DIRECTOR, ALLSTATE SOLUTIONS PRIVATE LIMITED

ASPL is the newest addition to the Allstate family. As we build this organization in the image of Allstate and ensure that we are consistent in the way we do business, our code of Ethics is the beacon and guiding force. As much as the ideas and thoughts shared herein seem obvious, it is important that we recognize the thought and purpose and demonstrate them through our actions and words in all that we do.

The ASPL Code of Ethics describes our values, what we stand for and what sets us apart. These values are integral to each one of us and at the same time unite us in our purpose. These are constant, enduring and are the foundation on which we meticulously build our business and ensure that we do the right thing, always.

We sincerely believe that imbibing these Ethics enhances your problem-solving skills and improves your ability to make the best decisions for yourself, our customers and the company as a whole.

I look forward to your support in building ASPL into a world class organization by adopting our Code of Ethics in every thought, word and deed.

Chetan Garga
Managing Director - ASPL
In My Good HandsSM
THE ASPL CODE OF ETHICS

OUR VALUES IN ACTION
At ASPL (“Company”), we’re committed to operating with absolute integrity. Always doing the right thing in the right way for the right reason is important to our business and our reputation. It builds trust, making us a stronger, more cohesive organization, and it strengthens the bonds with our customers and other stakeholders and prepares us for the future.

Our path to sustainable success is mapped out in Our Shared Vision. Making this vision a reality is all about aligning our organization’s purpose, strategy and execution with behaviors. The behaviors, which are exemplified in this Code, should be guided by the values that are at the core of who we are and what we do. Our values define our culture and core beliefs and set forth expectations for how we conduct our work. They are:

- Honesty, Caring and Integrity
- Inclusive Diversity
- Engagement
- Accountability
- Superior Performance

We put our values into action by demonstrating them through our behaviors, decisions and interactions each and every day. When faced with decisions, sometimes the answer is clear and the right decision is easy. Other times, decisions can be complex and guidance is needed.

All of our choices matter. This Code is one of many resources available to help us make the right choices and honor our values. Read the Code carefully, and consider how it applies to you and your job. It is a business resource as well as a symbol of our commitment to doing the right thing and delivering on the Good Hands® promise. Read the Code in its entirety, seek guidance whenever needed and be comfortable speaking up when you have questions or concerns.

By understanding the Code and seeking help in unclear situations, you’re in the best position to promote the values of this organization, which are reflected in its You’re In Good Hands With Allstate® slogan.

USING THE CODE
We know that situations involving business conduct and ethics can be complex. As a cornerstone of our commitment to operating with integrity, this Code includes information and resources, and realistic question-and-answer scenarios to help guide us in making decisions. We encourage you to read this Code in conjunction to the ASPL policies.

The Code topics are organized under four major headings representing expectations of key stakeholder groups. They are:

- Our Employees
- Our Customers
- Our Investors
- Our Communities

The categories are not exclusive; the obligations laid out within them may overlap. We must never assume based on our job responsibilities or interactions that any part of the Code does not apply to us as individuals. In fact, while specific details may be more relevant to some of us than others, we are all responsible and accountable for upholding the Code in its entirety.

The interpretation of this Code is subject to applicable laws. If you have questions about the Code or its content, speak with your manager, another manager or your Chief People Officer.
OUR RESPONSIBILITIES

COMPLIANCE WITH THE LAW

We share the responsibility for ensuring that ASPL achieves its goals in the right way. It is important to be proactive in regard to the matters covered in the Code so that we can anticipate and avoid problems that could disrupt our business or harm ASPL’s reputation and relationships. We also need to be able to address issues that do occur in an appropriate way and as quickly as possible.

Each of us has a personal obligation to ask questions, raise concerns and report misconduct. ASPL is committed to fostering an environment in which everyone feels comfortable and well supported in doing these things.

Each of us needs to understand and comply with the laws, rules and regulations applicable to our jobs.

Compliance with laws, rules and regulations, both foreign and domestic, protects the customers who depend on us and the shareholders who have invested in our Company. In addition to not engaging in any illegal or unethical activity, we all must report observed or suspected noncompliance(s).

At ASPL, we:

- Act with honesty, care and integrity in a manner that protects ASPL’s reputation
- Follow the law and ASPL policies when conducting Company business
- Respect colleagues and those with whom we do business
- Ask questions and seek help if we are unsure about making the right choices
- Promptly report all known or suspected violations of the law, this Code or Company policies
- Encourage an environment of comfort speaking up about concerns
- Cooperate with all Company investigations
- Never intimidate or retaliate against colleagues who report an ethics or compliance concern or participate in any investigation

SPECIAL RESPONSIBILITIES OF LEADERS AND MANAGERS

Managers have the added responsibility of exemplifying the behaviors we expect of everyone at ASPL and promoting the ethical culture we want to sustain.

In particular, if you are a leader or manager, you should:

- Promote a culture of ethics and legal compliance through personal leadership that demonstrates the highest ethical standards and quality in your work every day
- Achieve performance goals in a manner consistent with the values and principles of our Company
- Be aware of laws, rules, regulations, policies, procedures and processes pertinent to your responsibilities
- Guide and empower your teams by ensuring that they have the knowledge, training and resources necessary to follow the law and the Code
- Be visibly engaged and proactive in relation to ethics and compliance matters
- Supervise employees by ensuring they follow the law, this Code and ASPL’s policies and procedures
- Respond quickly to any ethics and compliance questions (with assistance, if required, from others including, but not restricted to Human Resources personnel
- Ensure that any actual or potential breach of the Code is dealt with or escalated immediately
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- Listen respectfully
- Stand against any form of intimidation or retaliation

ASKING QUESTIONS AND REPORTING CONCERNS

MAKING ETHICAL DECISIONS

Every decision we make is a reflection of our Company.
No code of ethics can cover every situation. When faced with ethical issues where the right decision or course of action is unclear, we should ask ourselves:

- Is it legal?
- Is it the right thing to do?
- Does it conflict with our values?
- Is it consistent with the Code and Company policies?
- Could it adversely affect our Company or its stakeholders?
- What are the consequences?
- How would it be perceived by your family and friends?
- Would you feel comfortable reading about your action in the news?

If you are still uncertain about the ethics or legality of an issue, seek additional guidance from your reporting manager and/or HR and/or ASPL i-Report before proceeding.

RESOURCES FOR GETTING ANSWERS OR RAISING CONCERNS

Each of us plays an important role in ensuring that ASPL achieves the highest levels of ethical conduct.

Part of doing the right thing in the right way for the right reason is speaking up if something does not feel right. If you see or suspect misconduct, report it immediately. If the Code or policies and procedures do not provide enough direction, seek help.

Below are many resources available to help you when you have a question, need additional guidance about the topics discussed in this Code or want to raise an issue or report a concern:

- For assistance with Code-related ethics and compliance concerns or questions about ASPL’s company policies, send an e-mail to ASPL i-Report.
- To report a potential violation of laws, rules or regulations or a potential violation of the Code, speak with your manager, another manager or your local Human Resources team

ASPL i-Report is ASPL’s commitment to a fair, prompt and safe resolution of your concern. It should be used to report ethical, legal, regulatory or compliance concerns regarding ASPL employees, agents, vendors, clients and customers. You can use the ASPL i-Report Process by calling the ASPL i-Report Line at [], or accessing the website at [].

Anonymous reports cannot be submitted using the Allstate i-Report website. To remain anonymous, please use the (will give the ASPL i-Report phone number once we sign up). We would prefer that people identify themselves since this always helps us conduct thorough and efficient investigations and necessary follow-up. If you choose to remain anonymous, we will conduct an investigation using the facts provided while working to maintain your anonymity as far as permitted by law.
NON-RETALIATION

We do not tolerate intimidation or retaliation against anyone who raises a concern, reports a violation or participates in an investigation.

We understand that it isn’t always easy to speak up regarding a concern and that doing so takes courage and may not feel comfortable.

No matter what our position within the Company, we report all instances of retaliation if we see or are aware of them. Retaliation by anyone against an employee for raising an issue or reporting a concern may result in discipline, up to and including termination of employment.

ADMINISTRATION OF THE CODE

ANNUAL COMPLIANCE CONFIRMATION

ASPL’s compliance standards and procedures are designed to ensure prompt and consistent action against violations of the Code. As a condition of employment, each of us is required annually to read and certify to our understanding of the Code and, where applicable, individual business unit professional conduct requirements. Failure to complete Annual Compliance Confirmation may result in discipline, up to and including termination of employment.

INVESTIGATIONS

We are committed to thoroughly investigating reports of potential violations. Most investigations are handled internally. In rare circumstances, an investigation may be referred to an outside agency.

Reports that concern a possible violation of the law or the Code, or any complaints or concerns about accounting, auditing, disclosure or other financial or reporting practices will be referred to the Chief Compliance Officer for investigation. The Chief Compliance Officer may refer these matters to the Compliance Committee.

DISCIPLINARY ACTION

Violations of the Code or the law, or retaliation by anyone against an employee for raising an issue or reporting a concern, may result in discipline, up to and including termination of employment.

ADOPTION AND DISCLOSURE OF THE CODE

The ASPL Code of Ethics, in its entirety, applies to every ASPL employee and officer, as well as ASPL’s outside directors. This Code is adopted by the Board of Directors of ASPL.

WAIVERs OF THE CODE

We recognize that in rare circumstances a strict application of the Code may result in a serious hardship. In these exceptional cases, a waiver of the Code in order to mitigate a serious hardship may be sought.

Any waiver of the Code of Ethics for any executive requires approval from the ASPL Board.
OUR EMPLOYEES
IN MY GOOD HANDS

A positive and dynamic work environment with a robust ethical culture is essential to ASPL’s success. It defines and enriches our interactions with each other and our customers; it also helps to foster the mutual respect and trust that enables us to collaborate effectively and serve those who count on ASPL. This environment doesn’t happen by accident. We create and sustain it when we treat each other with fairness and respect, support our colleagues and work in harmony with our values. Our workplace and businesses are enhanced when we value the individual differences, unique perspectives and contributions that each of us brings to ASPL.

VALUING DIVERSITY AND INCLUSION

At ASPL, we value and leverage the full breadth of our differences, which enrich our perspectives in the service of customers and make us a strong and inclusive organization.

Everyone counts and has a voice at ASPL, regardless of role or length of service. Our ability to outperform competitors in serving customers depends on attracting, developing and retaining a rich mix of talented, committed people based on merit. Treating people inside and outside our organization fairly and respectfully honors our values of honesty, caring and integrity and helps to protect and enhance our reputation. It also builds the trust upon which collaboration and long-term mutual benefit are based.

We Value Diversity and Prevent Discrimination By:

- Treating each other with dignity, respect and courtesy
- Strictly prohibiting discrimination on the basis of:
  - Race; color; age; sex; sexual orientation; gender identity/gender expression; national origin; religion; disability; citizenship; status as a veteran; military service or any other status protected by applicable law
- Making reasonable accommodations as appropriate for others’ disabilities and religious beliefs
- Committing to equal opportunity for all employees and applicants
- Complying with all applicable employment laws, rules and regulations
- Making employment-related decisions on the basis of job performance
- Reporting instances of unfair treatment or discrimination to your manager, another manager or your local Human Resources personnel
- Not retaliating against anyone who reports discrimination or participates in an investigation of these reports

INTEGRITY IN ACTION SCENARIO

Q: I’m considering an applicant who came to the interview in a wheelchair for a job. I believe that she can satisfy the expectations of the job, but I’m afraid that some employees may be uncomfortable with her disability. Assuming that she can perform the requirements of the job, is this a legitimate reason not to hire her?

A: No. To deny an applicant or employee a job based on the reaction of others to a disability or other protected status is discrimination. If the applicant is the best qualified person for the job, we should hire her. At ASPL, we appreciate what makes each of us different.

PREVENTING HARASSMENT

At ASPL, we believe that everyone has both the right to work in an environment free from harassment as well as the duty to help prevent it. The objective of this policy is to
ensure that all employees maintain appropriate standards of business and personal conduct with colleagues, clients and with the public at large.

We don't tolerate any form of verbal or physical harassment, intimidation or bullying. Remember that harassment isn't always obvious or deliberate and that unintentional or seemingly innocent behavior could be interpreted as harassment.

We Respect Each Other and Prevent Harassment By:

- Conducting ourselves appropriately in all dealings with others in the workplace
- Being conscientious as to how our actions and comments might be perceived or misunderstood by others
- Avoiding behavior that creates a hostile, intimidating or offensive work environment, such as:
  - Unwanted verbal or physical conduct or degrading/disparaging jokes relating to race; color; age; sex; sexual orientation; gender identity/gender expression; national origin; religion; disability; citizenship etc
  - Persistent or unwelcome flirting, sexual advances, sexual comments, touching, pressure for dates or other sexually suggestive behavior
- Being vigilant for signs that others may be experiencing harassment
- Reporting instances of harassment to your manager, another manager, your local Human Resources personnel or the ASPL i-Report hotline.
- Not retaliating against anyone who reports harassment or participates in an investigation of these reports

SEXUAL HARASSMENT

As per the guidelines laid down by the honorable Supreme Court of India/ SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION & REDRESSAL) ACT 2013, sexual harassment includes any unwelcome sexually determined behavior, such as:

- physical contact;
- a demand or request for sexual favors;
- sexually – colored remarks;
- display / sharing of pornographic material;
- Any other unwelcome physical, verbal or non verbal conduct of sexual nature.

Sexual harassment can take place in any of the following forms:

- **Verbal**: Suggestive comments or questions of a sexual nature, humor and jokes about sex or gender specific traits, sexual propositions and unwarranted pressure for dates, insults, threats, unwanted letters, phone calls or interviews which explicitly discuss personal sexual matters, display of sexually suggestive objects, pictures showing pornography, cartoons and gossip regarding one’s sex life
- **Non verbal**: Leering, whistling, suggestive or insulting sounds and gestures, offensive written notes
- **Physical**: Touching the body (brushing, patting, pinching), “friendly” arms around the shoulder, actual or attempted sexual assault, and actual or attempted rape.

General Guidelines

- Each employee shall maintain an appropriate standard of conduct with his/her colleagues.
- The employee must ensure that he/she does not get involved in any inappropriate act, conduct, conversation or dealings in his/her official, private and personal spheres.
- It will be the responsibility of every employee to communicate/ report any unacceptable behavior of the kind mentioned in the definition to sexual harassment, initiated towards self or colleagues.
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- Sufficient precaution will be taken by the Company to ensure that complete confidentiality is maintained and no form of discrimination is faced by the employee who has escalated the complaint and accused unless proven guilty.

Complaints Procedure

- To redress complaints of sexual harassment, there is a 5 member Complaint Committee.
- Any woman can file a complaint in writing on sexual harassment to any of the members of the Complaint Committee, within a period of three months. If the aggrieved woman is unable to make a complaint on account of her physical or mental incapacity or death her legal heir may make a complaint.
- The Complaint Committee (“Committee”) before initiating enquiry will, on the request of the complainant, take steps to settle the matter between the complainant and the accused through conciliation but the settlement will not be for monetary benefits. The Committee shall, if any settlement is arrived at, record the settlement and forward the same to the management. A copy of the settlement if any arrived at shall be given to the complainant. The committee will not conduct any enquiry if a settlement is arrived at in the conciliation.
- The Committee shall enquire when the complainant informs the Committee that the terms and conditions of the settlement have not been complied with and shall forward the complaint to the police.
- The Committee shall give opportunity to both the parties and copy of the findings shall be made available to both the parties. The Committee for the purpose of conducting an enquiry shall have the same powers as that of the civil court under civil procedure code for
  a) Summoning and enforcement of the attendance of any person and examining him on oath.
  b) Discovery and production of documents.
  c) Any other matter which may be prescribed.
- The Committee may recommend to the employer;
  a. To transfer the aggrieved woman or the accused to any other work place.
  b. Grant leave to the aggrieved woman up to the period of 3 months, or
  c. Grant such other relief to the aggrieved woman as may be prescribed.

- The Committee shall provide the report of its findings to the employer within 90 days.
  The committee shall recommend the action to be taken for sexual harassment as misconduct under the service rules and to deduct from the salary or wages of the accused of such sum as it may consider appropriate to be paid to the complainant or her legal heirs.
- The Committee, if it comes to the conclusion that the allegation of sexual harassment against the accused is malicious, may recommend to the employer to take action against the woman or the person who has made the complaint. The Committee may also recommend taking action against any witness who gives false evidence or produces any forged or misleading documents.
- The identity and address of the complainant, accused and the witnesses, any information relating to conciliation and enquiry, recommendations of the Committee and the action taken by the employer shall not be published or communicated to public or media in any manner without Judicial/legal ordinance.
- The Committee will maintain a complaint register keeping track of complaints received.
- The Committee shall prepare an annual report in each calendar year and submit the same to the employer.
Disciplinary Action

- The Company shall act on the recommendations of the Committee within 60 days.
- Retaliation against an employee who has complained of sexual harassment will attract disciplinary action up to termination.

The Company shall:

a. Provide a safe working environment at the work place.
b. Provide assistance to the complainant if he/she chooses to file a complaint in relation to the offence under Indian Penal Code or any other law for the time being encosed.
c. Initiate action under Indian Penal Code against the perpetrator
d. Organize workshops and awareness programs against the sexual harassment at the work place.
e. Include in its report the number of cases filed, their disposals to the state government.

PROMOTING A SAFE AND HEALTHY WORKPLACE

At ASPL, we care about the health and safety of our employees, visitors and other companies’ employees working at our facilities. We take reasonable and legally required precautions to provide safe and secure workplaces.

A safe and healthy workplace provides a productive work environment where all people have the ability to achieve their goals. The working conditions at ASPL are intended to protect the health and safety of employees, visitors and business partners. It is important for all of us to comply with all applicable health and safety policies and procedures at our work locations, including relevant standards, instructions and processes.

A drug- and alcohol-free workplace supports our health and safety goals and is vital to our integrity, reputation and business performance. We cannot allow our judgment to be impaired at any time. No one may be under the influence of intoxicants or any controlled substance that has not been prescribed by a licensed physician while conducting ASPL business or while on Company premises.

Acts of violence, threats or physical intimidation have no place at ASPL, and we all have a responsibility to help ensure they do not occur.

We Support a Safe and Healthy Work Environment By:

- Reporting to management any accident, injury, illness, or unsafe or unhealthy condition of which we become aware of.
- Knowing what to do in an emergency and cooperating during the practice of emergency drills
- Maintaining a drug- and alcohol-free workplace
- Not saying or doing anything that could create fear or threaten the safety or security of others
- Not bringing firearms or other weapons onto Company premises or vehicles or while traveling on Company business (except to the extent we are required to permit this activity under applicable laws)
- Reporting instances of unsafe or violent behavior or unsafe working conditions to your manager, another manager or your local Human Resources personnel
- Not retaliating against anyone who reports unsafe or violent behavior or unsafe workplace conditions or participates in an investigation of these reports
INTEGRITY IN ACTION SCENARIO

Q: My coworker talks about consuming alcohol after leaving work when he is busy or stressed and frequently says that he needs a drink. I think that he may have an alcohol dependency, and it could be affecting his health, working relationships and business judgment. If I report this to my manager, will my coworker lose his job?

A: No. Your coworker would not be terminated simply for having an alcohol dependency. We understand that addiction occurs and can be overcome. ASPL may support the employee by referring them to an appropriate counselor. To the extent that your coworker requires additional assistance to help him perform his job, your manager can talk to and work with him to provide appropriate assistance. However, we do expect that no employee will conduct business while under the influence. Employees under the influence of alcohol or any other controlled substance at work may be subject to discipline.

For additional information on our Company policies, talk to your manager, another manager or your local Human Resources personnel

OUR EMPLOYEES
IN MY GOOD HANDS

A positive and dynamic work environment with a robust ethical culture is essential to ASPL’s success. It defines and enriches our interactions with each other and our customers; it also helps to foster the mutual respect and trust that enables us to collaborate effectively and serve those who count on ASPL. This environment doesn’t happen by accident. We create and sustain it when we treat each other with fairness and respect, support our colleagues and work in harmony with Allstate’s values. Our workplace and businesses are enhanced when we value the individual differences, unique perspectives and contributions that each of us brings to ASPL.

VALUING DIVERSITY AND INCLUSION

At ASPL, we value and leverage the full breadth of our differences, which enrich our perspectives in the service of customers and make us a strong and inclusive organization.

Everyone counts and has a voice at ASPL, regardless of role or length of service. Our ability to outperform competitors in serving customers depends on attracting, developing and retaining a rich mix of talented, committed people based on merit. Treating people inside and outside our organization fairly and respectfully honors our values of honesty, caring and integrity and helps to protect and enhance our reputation. It also builds the trust upon which collaboration and long-term mutual benefit are based.

We Value Diversity and Prevent Discrimination By:

- Treating each other with dignity, respect and courtesy
- Strictly prohibiting discrimination on the basis of:
  - Race; color; age; sex; sexual orientation; gender identity/gender expression; national origin; religion; disability; citizenship; status as a veteran; military service or any other status protected by applicable law
- Making reasonable accommodations as appropriate for others’ disabilities and religious beliefs
- Committing to equal opportunity for all employees and applicants
- Complying with all applicable employment laws, rules and regulations
- Making employment-related decisions on the basis of job performance
- Reporting instances of unfair treatment or discrimination to your manager, another manager, your local Human Resources consultant or by contacting ASPL i-Report
PREVENTING BRIBERY AND CORRUPTION

Trust and transparency are the foundation of our business relationships. We never offer or accept any form of payment or anything of value to improperly influence a business decision.

A bribe involves giving or offering any payment or anything of value to obtain favorable treatment. Kickbacks involve giving or receiving personal payments as a reward for the grant of a contract or other favorable outcome or business transaction.

We strive to maintain high ethical and legal standards in our business relationships. We win on the merits of our people, products and services and never offer or accept bribes or kickbacks.

We Prevent Bribery and Corruption By:

- Following Company policies related to giving and receiving gifts and entertainment
- Never offering, promising or giving anything of value to a government official, or to anyone else, in order to gain a business advantage
- Not offering or accepting bribes or kickbacks
- Not using a third party to make improper payments that we cannot make ourselves
- Recording all payments and receipts completely and accurately

To learn more, see the Anti-Bribery Compliance Policy.

INTEGRITY IN ACTION SCENARIO:

Q. I have a friend who owns a car rental business and wants to become a transport vendor for ASPL. I put him in touch with someone in Admin, and, ultimately my friend's business met our criteria and was added to the program. My friend has just sent me a check as a referral fee. Can I keep the money?

A. No. At a minimum, accepting such a check would be considered an improper personal benefit and the payment may constitute an illegal kickback. Contact HR Head to determine the best way to return the check, and allow the Company to decide how to handle the matter with the vendor.

PROTECTING PERSONAL DATA

At ASPL, we respect the privacy of all individuals and take the necessary and legally required precautions to protect personal data.

Keeping personal information secure at all times is fundamental to remaining a trusted business and employer. Not only is this the right thing to do, it is also mandated by increasingly stringent privacy laws.

We Respect and Protect Personal Data By:

- Complying with all applicable privacy laws and Company policies on privacy and information technology usage
- Requesting and retaining only the personal information that is needed
- Communicating clearly how personal information is used, retained and disclosed
- Respecting and protecting the privacy of every individual's personal information
- Embedding strong privacy protection practices in all business processes and systems
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- Using a secure site when accessing personal information electronically
- Never leaving personal information on or around workstations, and locking away any printed personal information
- Immediately e-mailing your supervisor or the Chief Compliance Officer if you know or suspect personal information has been disclosed inappropriately
- Disclosing personal data or other confidential business information only to those who have a valid business need to know, or as required by law
- Requiring suppliers or business partners to safeguard confidential consumer information and only use it to provide the requested services
- Only sharing consumer or employee information as permitted by the Company Privacy Policy

INTEGRITY IN ACTION SCENARIO

Q: I work in HR and I just received a call from someone at a hospital stating that our employee’s spouse is hospitalized. They have requested the hospitalization insurance details and the employee’s phone number. I have authenticated the caller, but I haven’t spoken to the employee yet. Should I provide the phone number to the caller?

A: Although you have authenticated the caller, you do not have our employee’s permission to release their personal information. Before you provide the employee’s phone number, you should contact the employee. Our employees should expect nothing less than our absolute commitment to protecting their personal data.

For additional information on our Company policies, talk to your manager, another manager or your local Human Resources personnel.

OUR INVESTORS
IN MY GOOD HANDS

At ASPL, we focus on doing the right thing in the right way for the right reason. This enables us to build lasting business relationships, exceed our customers’ expectations and create sustainable value for our investors and other stakeholders.

In order to accomplish these goals, we must always make decisions and act in accordance with ASPL’s values. We maintain high ethical standards in all of our interactions because doing so is right and will earn the respect and trust of those we serve. We are personally accountable for conducting our business in a manner that protects ASPL’s reputation as an honest and trusted company.

AVOIDING CONFLICTS OF INTEREST

At ASPL, we make objective, prudent decisions and act with integrity. We always put the interests of the Company, our customers and investors before our personal interests.

We must not allow ourselves to be influenced by what serves our personal interests or those of a third party when those interests are contrary to what is best for ASPL and Allstate, our customers or our investors. Use good judgment to make unbiased decisions. Even the appearance of a conflict can be interpreted negatively or cause others to be concerned that we are not acting properly. So it’s important to avoid the appearance of a conflict, as well as an actual conflict.

We Avoid Conflicts of Interest By:
- Consulting with a manager or local Human Resources personnel and, if necessary, obtaining prior approval before pursuing any outside activity that creates, or appears to create, a conflict of interest
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- Declining external board service when it is inconsistent with our employment at ASPL
- Not allowing our personal or family financial interests to influence or affect ASPL’s business or business relationships
- Ensuring that our close personal relationships do not interfere with our business judgment
- Never giving or accepting inappropriate gifts, loans or other improper personal benefits
- Not taking for ourselves opportunities that ASPL may have an interest in pursuing

Personal Conflicts of Interest

We will never put ourselves in a position where our decision making or actions could be influenced by close personal or family relationships.

Certain types of relationships in the workplace are problematic because they create an actual or apparent conflict of interest. For this reason, it is not appropriate to:

- Directly or indirectly supervise anyone with whom you have a close personal or family relationship
- Participate in selecting or hiring a new employee when the candidate is a person with whom you have a close personal or family relationship
- Participate in the selection or relationship management of a business partner if the firm employs someone with whom you have a close personal or family relationship

Outside Employment or Self-Employment

Employees are expected to ensure that any involvement in outside activities does not decrease the quality or timely performance of their duties to the Company. Employees are not permitted to be involved in activities including other employment, self-employment, consulting services, or service on a board of directors or committee outside of the Company unless it has been approved in advance by the Management Committee at ASPL. You should not engage in such activities with any Company or organization that provides services to ASPL — where such services constitute more than one percent of the annual revenues of such company or organization.

The Company encourages you to be involved in volunteer activities that better our communities. If you spend work time on these activities, you should discuss with your supervisor in advance.

Under no circumstance must an ASPL employee engage in activities that
- Interfere with their job responsibilities or performance
- Involve competing against ASPL
- Risk damaging the Company’s business or reputation
- Use ASPL’s resources, including other employees
- Create any other kind of conflict of interest

External Board Service

Serving as a board member for an external organization is permitted only to the extent that it does not conflict with, or interfere with, our ASPL responsibilities.

Political Activity

ASPL encourages you to personally participate in the political process, by voting or otherwise being involved in political activity.
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ASPL will never require or expect you to express a political view that is contrary to your personal view. However, you need to be careful not to create the impression that you are speaking or acting on behalf of the Company when you express a personal political opinion.

You must inform the Company as soon as possible when considering either running for public office or accepting a public position. The purpose is to prevent a conflict, or the appearance of one, between private employment or benefits and the officeholder’s performance of your duties. In addition, numerous laws, regulations and court decisions regulate relationships between public officeholders and private enterprise. The Company does not seek to limit the activities in which you may participate on your own time, or the gifts or contributions you may make with your own funds, but no payment, gift or contribution shall be made or authorized to be made with Company funds to any candidate for public office, campaign fund, political party or organization, except as may be authorized by the Company’s Board of Directors. Required payments may be made, such as tax pay mentor payments for licenses or permits. No payment, gift or contribution shall be made either with Company funds or your personal funds, to any government official or employee for the purpose of influencing conduct, actions or decisions in any matter. Laws in each country and their subordinate jurisdictions also differ as to the legality of the use of corporate funds for political contributions or expenditures. It is the Company’s policy to comply with applicable country laws, and no Company contribution or expenditure may be made in connection with an election without the appropriate approval.

Outside Financial Activities or Investments

Our personal and family investment decisions must not create conflicts with ASPL’s business relationships.

You may not make or hold an undisclosed financial interest in a business venture that is similar to ASPL or in an organization that has a business relationship with ASPL. We define financial interest as owner, proprietor, manager, active or silent partner, officer, director, shareholder or beneficiary.

In most instances, financial interest does not pertain to ownership of a limited number of shares in publicly held firms or shares owned through a mutual fund or similar diversified investment vehicle.

You must disclose to Human Resources any holdings of five percent or more in any publicly traded companies. You must also disclose holdings in any other company or business whose principal business or holdings relate to the insurance industry, such as insurance companies and agencies. Disclosures will be reviewed to determine whether a conflict exists and what further actions may be necessary.

Business Courtesies

We do not give or receive inappropriate gifts and entertainment.

Business courtesies are often exchanged in the normal course of business because they promote goodwill and enhance business relationships. Business courtesies include gifts, entertainment, meals, beverages and invitations to social and recreational events.

We must avoid giving or receiving any gift or entertainment of an inappropriate nature or value, because this could create a conflict of interest and call into question the motives of the giver and the recipient.

We protect our business relationships by ensuring receipt of gifts of minimal value:

- Are approved by your manager
- Are legal and ethical and do not violate either party’s policies
- Do not call the recipient’s objectivity into question
- Create no risk or perception of improper influence
The exchange of courtesies with friends who are also business associates is permitted.

Improper Personal Benefits

We do not accept or offer any improper gift or personal benefit.

We may not accept gifts or services of greater than minimal value, or solicit or require those of any value from any person doing business with ASPL, seeking to conduct business with ASPL, or with whom ASPL is seeking to conduct business.

ASPL will not make personal loans to executive officers or members of the board of directors.

Corporate Opportunities

We never take for ourselves personally any opportunity in which ASPL may have a proprietary interest.

We all have a duty to advance ASPL’s legitimate interests when the opportunity arises. If our position at ASPL enables us to discover information or a business, investment or other opportunity that the Company may have an interest in pursuing, we must not divert that opportunity for our own personal gain, for the benefit of another company or to compete against the Company.

INTEGRITY IN ACTION SCENARIO

Q: Today I received a package in the mail from one of our new vendors. It arrived shortly after our last meeting, in which I told them that I would be on maternity leave. The package includes a baby photo album and a gift certificate to a popular clothing store for children. Am I allowed to keep it?

A: Personal gifts and gratuities can create conflicts of interest, impair independent thinking and judgment, and could harm ASPL’s reputation. It is advised that you politely return the gift.

CREATING AND MAINTAINING ACCURATE RECORDS

ASPL is committed to maintaining complete and accurate records in order to make responsible business decisions and to provide information in compliance with applicable legal and statutory disclosure requirements.

Business and financial records are essential to ASPL’s success. We rely on the integrity and accuracy of those records, both for internal decision making and for the benefit of investors, government agencies and others to whom we report. Accurate and transparent record-keeping protects our reputation, promotes organizational efficiency and helps us to meet our legal and regulatory obligations.

Records include financial accounts as well as other documents, reports, submissions and files. Records can include information in any medium, including hard copies and electronically stored information.

Maintaining the integrity of our business and financial records is everyone's responsibility, not just that of finance personnel. We manage records in a manner that protects the integrity of the information and ensures appropriate access. Creating, altering or destroying records or
documents for the purpose of impeding the efforts of any governmental or regulatory agency is unacceptable and may be a criminal offense.

We Ensure the Integrity of Our Records By:

- Maintaining Company records and reports in accordance with the law and Company standards
- Recording financial transactions properly, accurately and fairly
- Recording all financial transactions in the proper account, department and accounting period
- Never falsifying or altering a record
- Ensuring that all reports, disclosures and communications to government authorities and investors are full, fair, accurate, timely and understandable

INTEGRITY IN ACTION SCENARIO

Q: After calculating figures for our department’s quarterly report, I realize that I made a mistake. The error is minor and I doubt that it will have an impact on the report or create any deviation from the actual trend figures. Should I bring the mistake up to my manager?

A: Yes. Every employee has an obligation to ensure that we provide accurate information and errors are corrected. Being honest about mistakes is important. Even if the information is solely for internal use, we base our business decisions on the information we have available, and our decisions should be based on true and complete information.

PROTECTING OUR ASSETS

We protect ASPL’s reputation and other tangible and intangible assets so that we can better serve our customers and preserve value for our investors and other stakeholders.

ASPL’s assets are critical to our success and are acquired through the hard work of all of us. They are essential to running our company profitably and successfully. We all share the responsibility to protect Company assets and ensure their efficient use. We take care to avoid loss, damage, destruction, theft, unauthorized or improper use and waste. All Company assets should be used for legitimate business purposes.

We must take care and use good judgment in relation to the following types of assets:

Information assets are any data relating to ASPL business, regardless of how it is created, distributed, used or stored.

Financial assets are the Company’s money, financial instruments and anything that can be converted to money.

Physical assets are anything of a tangible nature provided by the Company to employees for use in conducting ASPL business. Examples include information and communications equipment and systems, office equipment and supplies.

Intangible assets are things such as our reputation, ideas, inventions, improvements, intellectual property, registered and unregistered copyrights, trademarks, patents, service marks or trade secrets that we conceive, develop or practice.

We are Good Stewards of ASPL’s Assets By:

- Safeguarding Company assets entrusted to us personally or to which we have access
- Taking reasonable care to prevent loss, damage, destruction, theft, unauthorized or improper use, or waste of Company assets
In My Good Hands™
THE ASPL CODE OF ETHICS

- Protecting, securing, retaining and destroying ASPL information in accordance with
  Company or business unit requirements
- Safeguarding data from unauthorized access, modification, duplication, destruction or
disclosure, whether accidental or intentional
- Protecting Company information, both nonpublic and publicly available information in
  which ASPL or others have intellectual property rights
- Using or authorizing the use of any Company asset only for ASPL’s business
  purposes, regardless of condition or value
- Never selling, lending, borrowing, giving away or disposing of Company assets
  without proper authorization
- Reporting any concerns about the use, abuse or endangerment of company assets to
  a manager or authorized personnel

The following asset-related topics warrant special attention.

Corporate Reputation

Our reputation is our most valued asset, and we must strive to protect and enhance it
in everything we do.

Each of us is the face of ASPL to the communities in which we live and work. When
representing ASPL, we must protect our reputation by using sound business judgment at all
times.

Some of us may be called upon to speak publicly at conferences or in other situations where
others will associate us with ASPL. During those occasions, we must conduct ourselves in a
manner that honors ASPL’s values.

Every one of us has a responsibility to ensure that our decisions and conduct every day help
to sustain ASPL’s good name and reputation for integrity. Certain employees have specific
responsibilities to safeguard our reputation when dealing with external requests and inquiries
from the media or investors. Media inquiries should be directed to the designated employees
within Allstate.

Confidential and Proprietary Information

We must safeguard ASPL’s proprietary and confidential business information against
unauthorized disclosure and misuse.

Proprietary information that ASPL owns is a valuable asset, especially when it is confidential
business information. ASPL’s proprietary information, especially our intellectual property, is
vitally important in helping us develop new products and services, attracting new customers
and maintaining our competitive advantage. Much of our proprietary information is confidential
and, if disclosed, could be of value to competitors or harmful to our company or its customers.
Examples of confidential business information include:

- Nonpublic financial information or projections
- Information about proposed transactions
- Intellectual property
- Proprietary ASPL processes
- Trade secrets
- New product or service plans
- Allstate/ASPL-developed software and related documentation
- Business partner information
- Certain operating procedures
- Any other information that might be useful to competitors
We Safeguard Our Proprietary and Confidential Information By:

- Disclosing personal data or other confidential business information only to those who have a valid business need to know, or as required by law
- Not discussing confidential information in public places or where a conversation may be overheard, or on social media.
- Never using proprietary and confidential information for our own personal gain or to benefit anyone outside of ASPL
- Ensuring that confidential or proprietary information contained in our workspaces is properly protected
- Remembering that the obligation to protect the Company’s confidential information continues after discontinuing employment with ASPL

Information & Communications Systems

ASPL’s information and communications systems are provided to enable us to conduct our business. The data transmitted, received and stored by or within those systems is a valuable asset that we must take care to protect.

We must all be prudent and responsible in our use of the Company’s information and communications equipment and systems. We must protect Company information and data from accidental or unauthorized disclosure, misuse, improper alteration or destruction. We must follow Company policy against storage of Company information on personally owned devices or equipment.

Minimal personal use of Company telephones, computers, faxes, photocopiers and network bandwidth is acceptable if incidental and infrequent, and this privilege must not be abused. The same principle applies to personal use of our own wireless devices during working hours.

Personal use is not acceptable if it:

- Significantly reduces the value of ASPL’s assets
- Incurs significant additional costs to the Company
- Interferes with our productivity
- Places ASPL at risk of liability

It is strictly prohibited to use Company systems (including e-mail, instant messaging, the Internet or the intranet) for activities that are unlawful, unethical or otherwise contrary to this Code or Company policy. Usage will always be inappropriate if it involves:

- Pornographic, obscene, offensive, harassing or discriminatory content
- Chain letters, pyramid schemes or commercial ventures
- Gambling, auctions or games
- Large personal files containing graphic or audio material
- Unauthorized mass distributions
- Violation of others’ intellectual property rights
- Malicious software or instructions for compromising the Company’s security

To learn more about information assets and proper technology use, see the ASPL IT Usage Policy.

INTEGRITY IN ACTION SCENARIO

Q: When I left the office yesterday, I forgot to empty my personal confidential paper bin. This morning, I noticed that it was empty. I’m afraid that those documents may have been thrown...
away by our housekeeping service. Who should I tell about this situation and how can I better protect our information assets?

A: First, you should speak with your manager about the possibility that the papers in your personal confidential bin were disposed of improperly and insecurely. Second, you may want to set a reminder to empty your personal confidential bin at the end of your shift, or put it in a more visible place as a reminder. If that doesn't work, you could bypass it altogether and securely dispose of the documents in your possession as soon as you are finished with them by placing them in your department’s locked secure disposal bin.

AVOIDING INSIDER TRADING

We never use or disclose material, nonpublic information about Allstate or ASPL or another company for the purpose of buying or selling securities.

Many of us have access to information about Allstate that may not be known to the public. Material, nonpublic “inside” information is information about any company that has not been made publicly available and that a reasonable investor would consider important when deciding to trade in the securities of that company.

Using inside information for personal advantage can damage ASPL’s reputation and erode the trust of those we serve. Insider trading can distort the financial marketplace and is a serious violation of the law carrying significant penalties. Insider trading is both unethical and illegal, and it will be dealt with decisively.

Some examples of nonpublic information that could be considered material are:

- Earnings announcements or estimates, or other unpublished financial information
- An acquisition, the sale of a business unit, a major change in management or strategy or a significant new contract or partnership
- A decision to expand or reduce operations

We Avoid Insider Trading By:

- Never purchasing or selling any type of security while we are personally aware of material, nonpublic information about ASPL or another company
- Not “tipping,” which means directly or indirectly passing along material, nonpublic information about any company to anyone who may trade while aware of such information
- Protecting material, nonpublic information from unauthorized disclosure

Insider trading rules are complex. When in doubt, review our Insider Trading Policy of Allstate and/or consult Allstate Law & Regulation counsel.

INTEGRITY IN ACTION SCENARIO

Q: I’m aware of information about the acquisition of another company. Because I anticipate that we’ll have expanded operations and a lot of new customers, I’d like to invest some of my personal savings in Allstate stock. Would I be violating our Insider Trading Policy?

A: Yes. If the information on the acquisition is only available internally, it remains material and nonpublic. This is information that an investor would consider important when making investment decisions. You may not trade Allstate securities or inform anyone else about the acquisition so that they may trade in Allstate securities. Doing so would be a violation of insider trading laws and would subject you to severe penalties.

For additional information on our Company policies talk to your manager, another manager or your local Human Resources personnel.
OUR COMMUNITIES
IN MY GOOD HANDS

ASPL is committed to building stronger communities, bettering society and operating responsibly to reduce the impact that our operations have on the environment. We believe that giving back brings value not only to our Company, but also to the communities where we live and work. Helping people in times of need is not only the nature of our business, but the commitment we make to our communities and society.

GIVING BACK TO OUR COMMUNITIES

At ASPL, we’re committed to the communities where we do business and the betterment of society. Each and every day, we must continue to earn our reputation as a leading corporate citizen.

When we give back, we honor the special responsibility and role we play in helping our communities thrive. We are committed to making positive change through community partnerships, charitable giving and volunteerism. Our charitable contributions reflect our commitment to the communities we serve.

We Responsibly Give Back to Our Communities By:

- Getting proper approval before donating Company funds or making contributions in ASPL name
- Verifying that all Company charitable contributions are made in accordance with all applicable laws, rules and regulations
- Never pressuring others to contribute to charitable organizations
- Getting proper approval before acting as a Company representative at any community event

INTEGRITY IN ACTION SCENARIO

Q: I regularly volunteer at a local shelter for women and children who are survivors of domestic abuse. Since ASPL advocates for financial empowerment of domestic abuse survivors, can I represent to the shelter that my service is being provided on behalf of ASPL?

A: ASPL values and praises community involvement by its employees. We especially want to encourage your involvement in social issues that the Company supports. However, you should seek permission before presenting yourself as a Company representative.

PROTECTING THE ENVIRONMENT

At ASPL, we’re committed to environmental stewardship and solutions that protect our planet.

We promote sustainable business success by managing operations in ways that minimize our impact on the environment. That means reducing energy use in our facilities, stressing sustainability in building construction and renovation, cutting paper use by employees and in communications with customers, and maintaining or lowering our overall carbon footprint. Carelessness in environmental matters, including violations of environmental laws, can have serious consequences for our Company, our communities and the planet.

We Protect the Environment By:

- Complying with all applicable environmental laws and company environmental policies
• Adhering to the requirements of all environmental permits
• Immediately reporting environmental accidents

INTEGRITY IN ACTION SCENARIO

Q: When I think about the environment, I often think of pollution. We’re in the business of insurance. We don’t manufacture anything or have factories. How can we commit, as a company, to reducing our environmental impact?

A: Although we do not have factories or manufacturing plants, we have many Company facilities. We’re committed to reducing our carbon footprint, reducing energy usage at our facilities, reducing our paper consumption and focusing on sustainability during the renovation and construction of our facilities.

SPEAKING TO NEWS MEDIA AND THE PUBLIC

At ASPL, we speak with one voice when communicating to the media, financial analysts, investors and the general public.

Our customers and shareholders deserve accurate, clear, complete and consistent communications about our Company. To be sure that we comply with the law and protect our interests, only those who are specifically designated to do so should represent the Company to the public or media. All requests for information from the media must go through ASPL’s Corporate Communications Department.

If You Receive a Media Inquiry:

• Do not speak about the Company, unless you are authorized to do so
• Assume you are on the record and that what you say may be used in a story
• Do not disclose any information
• Be friendly and courteous

To be sure that we comply with the law and protect ASPL, only those who are designated to speak on behalf of the Company should answer any public or media inquiry.

INTEGRITY IN ACTION SCENARIO

Q: A friend who works at a local newspaper has contacted me about one of ASPL’s recent sponsorships. I know a little about the sponsorship from what I read in an article on our Company intranet. What can I tell him?

A: You may not speak to your friend about the sponsorship, since the information you provide may be communicated through the newspaper that employs him. Direct his inquiry to Corporate Communications or HR Personnel.

USING SOCIAL MEDIA RESPONSIBLY

Everything we say and do affects our reputation, even as we find new ways to communicate with our customers and communities.

Social media is becoming part of mainstream corporate culture. We often use social media both personally and in our professional lives. At times, our work and social life intertwine through the use of social media; distinguishing the two is increasingly difficult but nevertheless important.

Social media includes, but is not limited to:

• Social networking sites
Professional networking sites
Video- and photo-sharing sites
Blogs and micro blogging sites
Online forum and discussion boards
Collaborative publishing

We believe social media can be a great vehicle for communicating our passion and knowledge to our customers and the outside world. When working with social media, we all have a responsibility to communicate in a manner that is consistent with our values. We are always careful to distinguish our personal views and opinions from the Company’s position.

We Use Social Media Appropriately By:

- Adhering to the Company’s values in all authorized business communications
- Complying with ASPL Social Media Policy
- Never creating the impression that our personal opinions are those of ASPL
- Ensuring that the time and effort spent with social media does not interfere with our work commitments
- Not identifying yourself as a Company representative without authorization
- Not disclosing proprietary Company information
- Not divulging the personal information of others, especially personal data obtained as part of our Company relationships

INTEGRITY IN ACTION SCENARIO

Q: I use a popular social networking site and want to reference ASPL as my employer, along with my service date. Am I allowed to do this?

A: You are permitted to reference ASPL as your employer. However, if you do so, you will need to add a disclaimer stating that the views you post on the site are your personal opinions and not necessarily representative of ASPL’s position. Always be sure to comply with our Social Media Policy.

For additional information on our Company policies talk to your manager, another manager, or your local Human Resources personnel.