

# Horace Mann Educators Corporation

## Code of Conduct

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 since its founding in 1945. However, what is right or wrong in a business situation is not always immediately clear. That's why we have the Code of Conduct, which may also be referred to as the Codes of Conduct and Ethics.

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

We expect all suppliers to adhere to the requirements set forth in the Code, and may suspend business relationships with suppliers who fail to meet these expectations. Horace Mann provides a copy of the Code at the outset of its relationship with all new suppliers.

The Horace Mann Board of Directors is responsible for the maintenance and adherence to this Code of Conduct and any relevant business ethics issues. The principles set forth in this Code of Conduct were approved by the Board and the Executive Team of the Company. 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.

The Board shall conduct business with integrity and high ethical standards consistent with the disciplines and principles set forth in this Code. The Board adopted this Code for its Board members as it applies to each Board member's business conduct on behalf of Horace Mann. Annually, each Board member completes a Verification Statement.

### **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, sexual 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 Helpline at 1-888-783-3580. Any employee involved in an instance of discriminatory practices and/or harassment may receive disciplinary or corrective action.

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 "[Horace Mann Marketing Compliance Policy](#)" for more information.

## Protected rights

Nothing contained in the Horace Mann Code of Conduct limits employees' ability to file a charge or complaint with the Securities and Exchange Commission, or any other federal, state, or local government regulatory or law enforcement agency ("Government Agencies.") Further, nothing in this Code limits employees' ability to communicate with any Government Agencies or otherwise participate in or fully cooperate with any investigation or proceeding that may be conducted by any Government Agency, including providing documents or other information, without notice to or approval from the Company. Any employee can provide confidential information to Government Agencies without violating this Code.

## 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 charitable giving 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 chart on "[Advertising and Promotional Gift Limitations](#).")
- 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 mementos 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 their independence of judgment or influences their 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.

## **Outside employment**

It is the expectation of Horace Mann that employees are actively engaged in the Company’s business and interests. Outside employment and/or outside business activity must not interfere with an employee’s work performance or work schedule. Employees may not solicit or conduct any outside employment and/or outside business activity during their work schedules, unless approved, and may not use occasional illness time for the outside employment and/or outside business activity. For more details, see the Company’s [Outside Employment and Business Activity Policy](#).

## **Responding to the media**

Only certain employees are authorized to speak publicly on behalf of the Company. Do not speak on behalf of the Company unless you are given specific authorization to do so.

## **Social media**

Social media offers a great way to connect with others and exchange ideas. We respect your right to use social media, but you should follow the law and all applicable social media policies. You should never create the impression that your personal opinions are those of the Company. We never tolerate the use of social media to intimidate, harass, or discriminate. For more information, see the [Horace Mann Social Media Policy](#).

## Political involvement

We believe in the rights of our employees to participate in the political process. Though we respect your involvement in political activities, such involvement should be kept separate from your work at the Company. You should not bully or force your political views on others in the workplace. It is also important to remember you may not use any Horace Mann funds to support or oppose political candidates or campaigns.

While Horace Mann is a member of select industry-relevant trade organizations, we do not make monetary or non-monetary contributions to support or oppose political candidates or campaigns. Written approval from our General Counsel would be required before any Horace Mann-funded political contribution, whether it is financial or a contribution in kind, could be made.

## Follow appropriate guidelines

Horace Mann's General Counsel oversees the Company's compliance with all laws and regulations applicable to Horace Mann's business. In addition to this Code and other Company policies, 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.

### *Anti-Corruption and Anti-Bribery*

Bribery and corruption have no part of the Horace Mann culture and are strictly prohibited in business transactions with both the public and private sector. Do not engage in any transactions that are intended to unduly influence or gain any unfair advantage on behalf of the Company. For more details, see the Horace Mann Anti-Bribery and Anti-Corruption Policy.

### *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 Horace Mann's Public Relations Manager. If the matter involves an issue related to Investor Relations, please refer the request to Horace Mann's Vice President of Investor Relations and Enterprise Communications.

### **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 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 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, 1 Horace Mann Plaza, Springfield, Ill. 62715;
- e-mail correspondence may be addressed to: [hme.cbofd@horacemann.com](mailto:hme.cbofd@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 this Code 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.

## Annual Training and Verification Statement

Employees are required annually to complete the assigned Code of Conduct training and acknowledge understanding of and compliance with the Code of Conduct, including its guidance on complying with all laws and regulations applicable to Horace Mann's business. Failure to complete the annual training and Verification Statement may result in disciplinary action up to and including termination.

Revised: December 2022