



SEDGWICK VENDOR / BUSINESS PARTNER CODE OF CONDUCT ("Code of Conduct")

This Sedgwick Vendor / Business Partner Code of Conduct sets forth the principles and standards of conduct that Sedgwick expects vendors/suppliers, their employees, subcontractors and sub-suppliers to meet during the provision of goods and services to the Company. To support compliance with this Code of Conduct, vendors/suppliers shall ensure that the Code of Conduct is shared with all individuals assigned to perform work for or on behalf of Sedgwick and/or Sedgwick clients, and that all related tasks are executed by individuals with the skills, expertise and certifications necessary to uphold the principles and meet the standards of the Code of Conduct.

1. COMPLIANCE WITH THE VENDOR / BUSINESS PARTNER CODE OF CONDUCT

Vendors, Suppliers, Consultants and their employees, agents and subcontractors (collectively referred to as "Vendors") must adhere to this Code of Conduct while conducting business with or on behalf of Sedgwick. Vendors must promptly inform Sedgwick via the email address below when any situation develops that causes the Vendor to operate in violation of this Code of Conduct. Sedgwick may audit Vendors or inspect Vendors' facilities to confirm compliance. Vendor agrees to participate in any required training offered by Sedgwick specific to this Code of Conduct.

2. LEGAL AND REGULATORY COMPLIANCE PRACTICES

Vendors shall comply with all applicable local, national and international laws, regulations, treaties and industry standards, including, without limitation, those pertaining to the manufacture, pricing, sale and distribution and safety of the relevant products and/or services. Vendors shall comply with all applicable federal, state, and regional environmental legislation. In the event that the requirements of these Standards are stricter than applicable local, national or international law, Vendors shall comply with these Standards. However, if there is any conflict between the requirements of these Standards and the requirements of any applicable local, national or international law, Vendor is to comply with the local, national or international law. Vendor shall notify Sedgwick in writing of any such conflicts. Vendors are required to timely report to Sedgwick actual or suspected violations of these Standards or applicable laws by anyone acting on Sedgwick's or the Vendors' behalf.

3. BUSINESS PRACTICES AND ETHICS

Sedgwick Vendors must conduct their business interactions and activities with integrity and must, without limitation, address:

Business Integrity

Corruption, extortion, embezzlement, and other questionable/inappropriate business practices, in any form are strictly prohibited. Vendors shall not violate the Foreign Corrupt Practices Act (FCPA), any international anti-corruption conventions, and applicable anti-corruption laws and regulations of the countries in which they operate, and shall not engage in corruption, extortion, or embezzlement in any form. Vendors shall not offer bribes or other means to obtain an undue or improper advantage. Vendor shall under no circumstances tolerate the giving or receiving of undue reward to influence the behavior of another individual, organization, politician or government body, so as to acquire a commercial advantage; this extends to all operations, regardless of whether bribery is officially tolerated and condoned. Vendors must conduct business in a fair and ethical manner in all



aspects of their business. This includes maintaining confidentiality over all Sedgwick client sensitive and confidential information.

Gifts and Conflicts of Interest

Sedgwick and many of its clients have policies limiting gifts to colleagues. Vendors shall abide by these policies. The Sedgwick Gifts policy prohibits Sedgwick colleagues from accepting personal gifts, entertainment, or favors of significant value (over \$100), or engaging in private business or professional activities where there is or would appear to be a conflict between the individual's private interests and the interests of Sedgwick. Colleagues cannot accept gifts of cash or cash equivalents (e.g., gift cards). Sedgwick colleagues must avoid accepting a gift or series of gifts or business courtesies where circumstances might create or appear to create an expectation that the acceptance is in exchange for favorable business decisions. Vendors should avoid situations that appear or actually create a conflict of interest or appearance of impropriety for Sedgwick colleagues. For more information, refer to the Sedgwick Gifts policy and any applicable Sedgwick client policy.

4. LABOR PRACTICES AND HUMAN RIGHTS

Sedgwick expects its Vendors to share its commitment to human rights and equal opportunity in the workplace. All Sedgwick Vendors must conduct their employment practices in full compliance with all applicable laws and regulations, and must, without limitation:

- Cooperate with Sedgwick's commitment to create a culture and a business environment based upon inclusion, mutual respect, responsibility, and understanding. Vendors shall not discriminate in hiring and employment practices, including salary, benefits, advancement, discipline, termination or retirement, on the basis of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, marital status, political opinion, disability, or any other category protected by law. Vendors shall treat each employee with dignity and respect, and shall not use corporal punishment, threats of violence or other forms of physical, sexual, psychological or verbal harassment, abuse or intimidation.
- Vendors shall not use child labor unless this is part of a government-authorized job training or apprenticeship program that would clearly be beneficial to the persons participating so as long as these programs comply with all applicable laws and regulations.
- At a minimum, Vendors shall comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime, maximum hours, piece rates and other elements of compensation, and provide legally mandated benefits.
- Vendors shall not use forced labor, regardless of its form.

5. HEALTH AND SAFETY

Sedgwick Vendors are expected to integrate sound health and safety management practices into all aspects of business, and must, without limitation provide a safe working environment that supports accident prevention and minimizes exposure to health risks. Vendors are expected to comply with all applicable safety and health laws and regulations in the countries in which they operate.

Disclosure of Information

Vendors must accurately record and disclose information regarding their business activities, structure, financial situation, and performance in accordance with applicable laws, rules and regulations.



6. REPORTING QUESTIONABLE BEHAVIOR

If you wish to report questionable behavior or a possible violation of this Code of Conduct, you are encouraged to initially work with your primary Sedgwick contact in resolving your concern. If that is not possible or appropriate, please contact by sending an email to:

VendorCodeOfConduct@Sedgwick.com

Sedgwick will maintain confidentiality to the extent possible and will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behavior or a possible violation of this Code of Conduct.