

Voya Financial Supplier Code of Conduct

Introduction

At Voya, we build our business on the trust of our customers in our products, services and employees. Our vision is to become America's Retirement Company® and our goal is to help people realize their financial needs and be a lifelong partner in helping to plan for retirement and financial security. We are equally committed to conducting business in a way that is ethically, economically, socially and environmentally responsible.

Our corporate values and our [Code of Business Conduct and Ethics](#) are the cornerstones of our culture and central to our success. Together, these clearly define the expectations of our employees and directors at Voya. While our corporate values represent who we are, our Code of Business Conduct and Ethics represents how we act and reflects our commitment to maintaining the highest level of quality and integrity in everything we do.

This Supplier Code of Conduct sets forth Voya's standards and expectations with respect to key areas of corporate responsibility. Our goal is to work with suppliers* to ensure alignment with our corporate values, operate ethically and responsibly, and comply with applicable laws, regulations and corporate policies.

This Supplier Code of Conduct has been approved by Voya's senior leadership and may be occasionally updated.

Corporate Values

At Voya, we focus on conducting business in a responsible manner. This means adhering to our corporate values and a code of conduct by which everyone in the company operates; building strong external affiliations; implementing policies; and developing sustainable and responsible products and services.

The Supplier Code of Conduct is premised on Voya's core values, which govern decision-making, shape our culture and are central to the character of our company. We have customer passion and we strive to provide the best customer service, by listening and responding with a sense of urgency. We do the right thing, telling the truth, upholding the letter and the spirit of the law, and treating everyone with respect. We are accountable, individually and collectively, as we act as one team (at Voya, we term this "We are the We"). We have a winning spirit and adapt to our stakeholders' needs. We care by positively impacting our communities and planet. We are inclusive and incorporate diverse perspectives in all that we do.

We believe that profitability and integrity are inextricably connected. An ethical mindset goes hand in hand with value-based decision-making at Voya. We pride ourselves in focusing on doing not only what is good for business, but for our people and the communities in which we live and work. This means integrating corporate responsibility and sustainability into all facets of the company.

Therefore, we expect our suppliers to support us in realizing our vision throughout our business partnership by demonstrating a commitment to the values and principles outlined in this document when it comes to how they interact with customers on Voya's behalf as well as how they treat their own employees, contractors, sub-contractors and representatives.

* A supplier is any third party who provides goods and services (does not include third-party administrators, distribution intermediaries or other parties contracted by plan sponsors).

Business Ethics

At Voya, we take business ethics very seriously and pride ourselves on being consecutively recognized on the World's Most Ethical Companies® list by the Ethisphere Institute. We seek partners who conduct their business with the highest integrity. This includes adherence to any and all applicable laws and regulations in their own geographies, and a display of the highest level of integrity, confidentiality and respect in business dealings.

Voya suppliers must refrain from any and all forms of any illegal activities such as misrepresentation, embezzlement, bribery, corruption and extortion. We expect suppliers to employ measures to help minimize and resolve potential conflicts of interest (for example, monitoring employees giving and/or receipt of gifts and/or entertainment to third parties, particularly governmental officials, customers, prospects, third-party suppliers and intermediaries).

Political Contributions

Voya follows all regulations and procedures pertaining to government officials and entities. To that end, suppliers are prohibited from making any political contributions or presenting any gifts in the name of Voya to any candidate for public office or elected officials, and suppliers will ensure that any of their own political contributions (including any affiliated political action committees) do not represent a contribution or an endorsement by or on behalf of Voya. Unless given prior written approval, suppliers may not undertake activities on Voya's behalf that would require registration as a lobbyist.

Conflicts of Interest

Voya is open and transparent in our business dealings and we require our suppliers to follow the same principle. No Voya employee, spouse, domestic partner or relative shall have or receive a direct or indirect financial benefit as a result of the supplier's business with Voya. If a Voya employee or a supplier is aware of such a relationship or any other relationship that might represent a conflict of interest they should disclose this to Voya.

Gifts, Meals and Entertainment

While exchanging gifts and entertainment can be a common practice to develop a business relationship, it is subject to multiple laws and regulations, must have a business purpose, and be reported by the employee to Voya. Employees of Voya are subject to an annual limit for these items as well as other restrictions and can advise the supplier of the specific limitations. From time to time, Voya will request information from its suppliers about gifts, meals and entertainment provided to Voya employees, and our suppliers shall cooperate with such requests.

Commitment to Environmental Sustainability

We expect our suppliers to conduct business in ways that will protect, preserve and enhance the environment and to minimize the impact on the environment. We expect our suppliers to maintain effective environmental policies and to align all of their activities in accordance with the best environmental practices and standards, which includes, but is not limited to, complying with all applicable local environmental laws and regulations as well as making reasonable efforts with respect to managing greenhouse gas emissions and waste, energy use, water consumption, recycling and management of

hazardous materials. We also request that our suppliers, when applicable or appropriate, offer to us or use products and/or services that have acquired environmental certifications.

Supplier Diversity

Voya is committed to maintaining a supply base that is diverse and represents the communities we serve. We are committed to sourcing from minority-, women-, LGBTQ+- and veteran-owned suppliers and expect the same from our suppliers when they buy goods and services. All of Voya's suppliers should support Voya's diversity initiatives, including, but not limited to, providing reporting of their activities to increase interactions with diverse suppliers.

Human and Workplace Rights

Respect for and the commitment to human rights is a cornerstone of Voya's culture. Voya has adopted and maintains a Human and Workplace Rights Statement that evidences its commitment to human and workplace rights. Voya expects our suppliers to share this commitment by ensuring:

- All of their employees have a workplace free of discrimination or harassment of any kind.
- Their employees are able to work in a safe and healthy workplace that complies with applicable laws.
- They operate in full compliance with applicable wage and work hour laws, and that employees are paid a market-competitive wage.
- They not only have a workplace free of forced labor, child labor or human trafficking, but also will support activities to curtail this practice.

Commitment to Information Protection

At Voya, we are very serious about privacy, security and confidentiality of any and all information. Any information received by our suppliers from Voya in the course of doing business with Voya is confidential and proprietary; it is to be kept confidential and secured at all times, and must not be shared by any means with others or used for any personal purpose or gain. For any questions on terms of doing business with Voya, including questions on proprietary and confidential information obligations, our suppliers should consult agreements currently in place between Voya and a supplier, or nondisclosure agreements, if such exist.

Customers' data security and privacy are also a high priority at Voya, and our suppliers must treat customers' data and confidential information, including, but not limited to, personal information, with the utmost confidentiality, security and respect. All confidential and secured information must be protected by the suppliers at all times in accordance with any and all applicable data security and privacy laws and industry standards and policies.

Additionally, by working with Voya, suppliers are bound by our Voya Financial Privacy Policy. Voya's [Privacy Notice](#) further outlines how we collect, share and protect our customers' personal information.

Policy Compliance, Misconduct Reporting and Anti-Retaliation

It is the responsibility of each supplier to ensure its employees, contractors, sub-contractors and representatives completely understand and comply with this Supplier Code of Conduct. A supplier who becomes aware of a violation of this code must notify Voya via our Ethics Helpline at (844) 418-7604 as soon as possible. Under no circumstances shall a supplier retaliate against any of their employees or representatives for reporting a violation of Voya's Supplier Code of Conduct. While no guarantee can be made about the long-term relationship between Voya and the supplier, their good-faith efforts to report potential non-compliance and assist in the remediation of any violation will be viewed favorably. Failure to comply with any provision of this Supplier Code of Conduct may be considered a breach of Voya's contract with a supplier.