



**Nationwide<sup>®</sup>**  
is on your side

Nationwide<sup>®</sup> Procurement

# Supplier Code of Conduct



Our purpose is to protect people, businesses and futures with extraordinary care. It's what drives us every day to make the choices we make, including who we partner with. Our suppliers are valuable business partners who help shape the Nationwide brand our members can count on.

The Nationwide Supplier Code of Conduct is a tool to guide you through our partnership and ensure alignment with our values. It sets the bar for how we expect our suppliers to conduct business: with high standards for professionalism, cooperation, recognition and respect for diversity, communication, confidentiality and ethics.

I look forward to continuing the success of our partnerships.

Chuck White



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# Introduction

Nationwide® is committed to conducting business in an ethical, legal and socially responsible manner.

This Supplier Code of Conduct sets forth certain minimum standards that Nationwide requires of all its suppliers, vendors and contractors who provide third-party goods and services to Nationwide (collectively, “Suppliers”). Other Supplier requirements shall be set forth in individual agreements between Nationwide and Supplier.

Suppliers shall adopt or establish a management system designed to ensure compliance with this Supplier Code of Conduct and all applicable

laws and regulations. Suppliers shall also take appropriate steps to ensure that this Supplier Code of Conduct is communicated, adopted and applied by all Supplier employees, contractors, subcontractors, agents or workers (“Supplier Personnel”).

Nationwide reserves the right to require a certification of compliance of this Supplier Code of Conduct from all Suppliers.

Suppliers requiring access to Nationwide systems are required to review applicable policies, comply with system access requirements, and hold their resources accountable for adherence to those policies and processes.



## Anti-discrimination and diversity

Nationwide supports and values diversity in our organization. Suppliers shall promote and provide a diverse nondiscriminatory working environment, in all hiring and employment practices, that is inclusive for all employees irrespective of their race, color, age, gender, sexual orientation, gender identity, ethnicity, disability, genetic information, religion, national origin,

ancestry, veteran status, marital status or any other characteristic protected by law in the applicable jurisdiction. Suppliers shall support sourcing and procurement practices that promote diverse and/or minority certified entities as defined by the federal government or approved by national certifying agencies.



# Conflicts of interest

Nationwide expects that our relationship with Suppliers will be on a professional level consistent with good business practices. Suppliers shall avoid situations that could create or appear to create conflicts between the Supplier's interests and those of Nationwide in its provision of third-party goods and services or Nationwide associates' personal interest.

Offers of gifts, favors and entertainment to Nationwide associates are discouraged. It is a violation of Nationwide's Code of Conduct for Nationwide associates to solicit for gifts, favors or entertainment from current or prospective Suppliers.

We recognize that an occasional meal can serve a business purpose; however, we encourage both parties to pay separately.

Advertising novelties of nominal value with your company's logo may be accepted from time to time. However, gifts of more than nominal value should not be offered and will be returned. Similarly, invitations to lavish events or activities should not be offered and will be declined. Suppliers shall not solicit Nationwide associates to invest in or own any interest in a Supplier.

## Endorsements

Requests for endorsements are discouraged. Nationwide associates may only endorse a Supplier's products or services with prior approval of Nationwide.

# Corruption and bribery

Corruption, extortion and embezzlement in any form are strictly prohibited. Suppliers shall not offer or accept bribes or other means to obtain an undue or improper advantage. Suppliers shall uphold fair business standards in advertising, sales and competition.

## Anti-money laundering and anti-terrorism

"Money laundering" is the converting of illegal proceeds by criminals, terrorists or others to make the funds appear legitimate. Nationwide will conduct business only with Suppliers involved in legitimate business activities with funds derived from legitimate sources. Suppliers are required to comply with all applicable anti-money laundering and anti-terrorism laws.



## Criminal convictions

Federal law prohibits individuals who have been convicted of a felony involving breach of trust or dishonesty from participating in the business of insurance. Federal law also prohibits any individual from participating in banking who has been convicted of a felony or misdemeanor for a crime of dishonesty, breach of trust or money laundering. Suppliers shall require Supplier Personnel to notify Supplier of any criminal conviction that may affect Supplier's business interests, corporate image, the performance of Supplier Personnel's job duties or the welfare of other Supplier Personnel.

## Defend Trade Secrets Act notice

Suppliers shall ensure that the following notice is made available to all of its employees providing services to Nationwide and shall provide Nationwide (upon Nationwide's request) with reasonable evidence of the Supplier's compliance with this obligation:

"In accordance with the Defend Trade Secrets Act of 2016, an employee or subcontractor of Nationwide is immune from and shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a Nationwide trade secret that: (a) is made (i) in confidence to a federal, state or local government official, either directly or indirectly, or to an attorney; and (ii) solely for the purpose of reporting or investigating a suspected violation of law; or (b) is made in a complaint or other document that is filed under seal in a lawsuit or other proceeding."



# Digital content accessibility

Nationwide requires digital content accessibility for individuals with disabilities and encourages its Suppliers to support such accessibility objectives. Each supplier shall use commercially reasonable efforts to ensure that its applicable services, deliverables, website and mobile applications conform to the Level A and Level AA Success Criteria and Conformance Requirements of the Web Content Accessibility Guidelines (WCAG) 2.1, or the most current version available, published by the World Wide Web Consortium, Web Accessibility Initiative, available at [w3.org/TR/WCAG21/](http://w3.org/TR/WCAG21/).



For more information on Nationwide's approach to Digital Accessibility, please see the Digital Accessibility Center site at [nationwide.com/accessibility](http://nationwide.com/accessibility).





# Direct marketing

All direct marketing communication regarding business solicitation should occur between the Supplier Account Manager and the appropriate Procurement resource only. Supplier representatives (account managers, onsite representatives, contingent workers and subcontracting partners) shall not engage in the direct marketing of candidates or other service

offerings outside of the approved procurement process or outside the scope of their existing contract. Such activity may cause the Supplier to be reviewed by the Nationwide governance team and can result in consequences up to and including suspension, financial penalty and/or termination.



# Environment

Suppliers shall conduct their operations in a way that minimizes the impact on the community and natural resources and protects the environment while safeguarding the health and safety of

the public. Suppliers will comply with all applicable laws related to environmental permit requirements, air emissions, water discharges, toxic substances and hazardous waste disposal.



## Fair competition

Nationwide complies with all applicable fair competition and antitrust laws everywhere it operates. Our Suppliers must comply with these laws as well.

## Freedom of association

Suppliers shall respect the rights of Supplier Personnel to associate, organize and bargain collectively in a lawful manner, as permitted by and in accordance with applicable laws and regulations. Supplier Personnel shall not be subject to discrimination, intimidation or harassment in the exercise of their right to join or to refrain from joining any organization.

## Illegal, fraudulent and dishonest acts

Any Supplier or Supplier Personnel who commits an illegal, fraudulent or dishonest act affecting Nationwide will be subject to appropriate action, which may include, but is not limited to, termination of a contract, criminal prosecution and civil action.



# Labor and human rights

## Child labor

Nationwide does not engage or support illegal use of child labor and expects its suppliers to employ only workers who meet the minimum legal age of employment for their locality. If no minimum age of employment is defined, the minimum age of employment shall be 18 years of age.

Suppliers shall not use, participate in or benefit from any forms of forced, bonded, slave, compulsory or involuntary labor, including bonded labor, slave labor or any form of human trafficking.

## No retaliation

Suppliers shall create programs and policies to ensure the protection of and prohibit retaliation against Supplier Personnel who make a good faith report of abuse, intimidation, discrimination, harassment, or any violation of law or of this Supplier Code of Conduct, or who assist in the investigation of any such report.

## Privacy

Nationwide takes seriously the handling and retention of confidential information. Suppliers shall follow reasonable procedures and shall abide by all applicable privacy laws, regulations and contractual obligations.

# Reporting

If you suspect misconduct that involves Nationwide or a Nationwide associate, report all related facts to the Nationwide Office of Ethics and Business Practices for investigation.

### The Office of Ethics may be contacted as follows:



**Helpline**

1-800-453-8442

We do not use caller ID or recording devices. Callers may choose to remain anonymous.



**Fax**

614-249-8442



**E-mail**

[Ethics@nationwide.com](mailto:Ethics@nationwide.com)



**Mail**

One Nationwide Plaza  
P.O. Box 182653  
Columbus, OH 43218



## Substance-free workplace

Nationwide complies with all federal and state laws regarding illegal drugs and/or controlled substances. This policy applies even in states where marijuana may be decriminalized under state law; however, this policy is not intended to be applied to supersede any applicable federal, state or local laws. Contingent workers working under the influence of or

possessing, selling, distributing, dispensing, manufacturing or using illegal drugs or unauthorized controlled substances, which may include misuse of prescription drugs, while on Nationwide premises or while conducting Nationwide business will be subject to disciplinary action up to and including termination of contract.



# Workplace conditions and compensation

## Health and safety

Nationwide is committed to providing a safe and healthy work environment. Suppliers shall provide Supplier Personnel with a safe and healthy workplace in compliance with all applicable laws and regulations that support accident prevention and minimize exposure to health risks. At a minimum, all Supplier Personnel shall have reasonable access to potable water, sanitary facilities, and adequate lighting and ventilation. Sound health and safety management practices that support accident prevention and minimize exposure to health risks shall be integrated into all aspects of Supplier's business. Supplier shall abide by any direction provided by Nationwide's Office of Safety with regards to any work performed on Nationwide premises.

## Fair treatment

Nationwide is committed to providing a workplace free from harassment of any kind. Suppliers are required to commit to a workplace free of harassment of any kind and shall prohibit harassment and unlawful discrimination in the workplace.

## Compensation and working hours

Suppliers shall pay all Supplier Personnel at least the minimum wage required by applicable laws and regulations, including those relating to wages, overtime, maximum hours, piece rates and other elements of compensation, and provide all legally mandated benefits.

## Disciplinary practices

Suppliers shall not inflict or threaten to inflict corporal punishment or any other forms of physical, sexual, psychological, or verbal abuse or harassment on any Supplier Personnel. Suppliers shall also not use deductions from wages as a disciplinary measure.

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