

MONY GROUP PLC

CODE OF CONDUCT POLICY



POLICY OWNER	General Counsel and Company Secretary
POLICY APPLIES TO	This policy applies to all persons working for us or any Group Company or on our behalf in any capacity, including all employees, managers, directors, the Executive Team and the Board. Our suppliers, providers, agents, contractors, consultants, third-party representatives and business partners, and sponsors are subject to many of the principles of the Code of Conduct through our Supplier Guiding Principles.
POLICY EFFECTIVE DATE	December 2025
VERSION CONTROL	June 2026
POLICY REVIEW	We reserve the right to amend or withdraw this policy at our absolute discretion, in accordance with the law and business needs. This policy and procedure does not form part of your contract of employment.

If you have any questions on this document please contact:	
General Counsel and Company Secretary	
E:	companysecretary@monygroup.com

CODE OF CONDUCT - AT A GLANCE

At MONY Group, we treat each other with respect, and we value the contributions of every member of the team. We know that we can only be successful if we create an inclusive, fair and positive working environment.

We are always lawful and ethical, and we always do the right thing. Above all else, we always act with integrity towards the communities in which we live and operate.

Our corporate culture and our success as a business relies on our Group behaviours: 'Create Belonging'; 'Grow and Develop' and 'Innovate to Deliver'. These behaviours are a clear everyday standard of what we believe in, value and expect of each other, irrespective of role and are embedded in this Code.

We are always accountable for our actions. Conduct in line with this Code is expected when colleagues are at work in any capacity, including when representing the Company outside of working hours and when attending work-related social events (for example, team days/socials, parties, leaving drinks). Behaviour outside of work (including use of your social media) will be considered as misconduct and treated under the [Disciplinary Procedure](#) if it affects your colleagues, your ability to carry out your job, generates adverse publicity for the Company, brings the Company name into disrepute, results in a loss of business or loss of faith in the Company or the individual's integrity.

It is our responsibility to be informed about the requirements of the Code, to participate in mandatory training and to ask questions if we need clarification. There are no exceptions due to competitive pressures, commercial demands or industry custom. No one, no matter how senior they are in the organisation, is entitled to violate the Code of Conduct or to give you instructions to do so. Failure to comply with the Code of Conduct by any employee is treated very seriously and may result in disciplinary action, up to and including dismissal. It could also expose the Group and its employees and directors to other sanctions and liabilities.

Raising Concerns

If you notice violations of this Code, it is your responsibility to raise your concerns. You can do this by involving your line manager or the General Counsel and Company Secretary.

At any time and for any type of matter, you can use the confidential whistleblowing helpline, Safecall on 0800 915 1571. The Safecall line is available 24/7/365 days. You may also contact Safecall via e-mail at monygroup@safecall.co.uk or via the web www.safecall.co.uk/report. Available to all colleagues, it is a place where you can confidentially and, if you choose, anonymously report any concerns related to potential violations of this Code.

Non-retaliation

MONY Group will protect against retaliation any employee who raises concerns honestly and in good faith. Honest reporting does not mean that you must be right when you raise a concern, you just have to believe in good faith that the information you are providing is accurate.

Any colleague, including senior managers, who retaliates against an employee who has raised concerns under this Code, or who discourages or prevents another employee from making a report or seeking assistance, will be subject to disciplinary action. Please also see our [Whistleblowing Policy](#).

Related Policies and Legal Requirements

This Code does not cover all corporate rules but instead lays out general principles by which we all should measure our conduct. There are corporate policies and legal requirements that apply to specific matters. The key policies are referred to throughout this Code and are also available on the [Hub](#).

Integrity in the Group

1. Human Rights, Diversity and Inclusion

- 1.1** We recognise and support the need to work together to ensure that principles of respect, fairness and integrity remain at the heart of how we run our business. We believe in every member of our team, and we always treat each other with dignity and respect. We value the diversity of our workforce and strive to ensure a positive and creative environment in which everyone is valued and respected, and where our talents are fully utilised and organisational goals are achieved.
- 1.2** We do not tolerate any form of discrimination or harassment based on race, sex, colour, national or social origin, age, disability, sexual orientation, political opinion or any other status protected by applicable law.
- 1.3** The Group has signed up to Race at Work Charter, which includes a specific commitment at Board level to zero tolerance of racial harassment or bullying. This means that all allegations of racial bullying or harassment will be taken seriously, managed consistently and in line with Group's Anti-Bullying and Harassment Policy, with formal action taken where necessary.
- 1.4** Modern slavery is a crime, under the Modern Slavery Act 2015, and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.5** Please see our Modern Slavery Policy and Equal Opportunity, Inclusion and Diversity Policy for further information.

2. Business Records

- 2.1** This Code applies to all persons working for us or any Group Company or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.
- 2.2** Accurate record-keeping and reporting of financial and non-financial information reflect on our corporate reputation and are an important part of our legal and regulatory obligations as a listed company. Accurate record-keeping and reporting are also necessary to assess individual performance and assess compensation for all employees fairly, based on merit and actual results.
- 2.3** The term “business record” is interpreted broadly. Every corporate document, even an apparently insignificant one, must be complete and accurate.

EXAMPLE OF BUSINESS RECORDS	EXAMPLES OF CODE VIOLATIONS
■ Expenses and travel reports ■ Invoices ■ Purchase orders ■ Accident reports ■ Performance reviews ■ Accounting records ■ Minutes of Board Meetings ■ Minutes of Forums	■ Reporting better KPIs than were achieved ■ Submitting inaccurate expense reports ■ Splitting purchase orders of goods or services in order to simplify the approval process ■ Falsifying customer savings

- 2.4** Always make sure that you record and document business transactions properly and correctly, namely: in the right time period, with the right amount, authorised internally by the appropriate persons, and describing the true nature of the transaction.
- 2.5** In order to comply with legal and regulatory requirements, we may be required to retain our business records for reasonable time periods before they can be destroyed. This relates particularly to contractual documentation, tax, finance, accounting, employee, health and safety and the environment related documentation. Also, records and documentation pertinent to a particular investigation or legal dispute may not be destroyed once we have notice of an investigation or related pending litigation.

3. Reasonable Use of MONY Group Assets

- 3.1** MONY Group assets, e.g. money, products, mobile devices, laptops and tablets, are there to conduct the Group's business and are provided to you to do your job in the most efficient way. Employee time and intellectual property (anything that you create on MONY Group time, at MONY Group's expense or within the scope of your duties) must also be used in the best way possible for the Group. We are generally not allowed to use MONY Group assets for personal purposes and benefits. Limited personal use of mobile devices, laptops and tablets within reason is permitted, but the use should be lawful, appropriate and never interfere with your time at work. Theft of corporate assets, irrespective of value, is a serious breach of this Code.

Example of Code Violations: Using your corporate laptop to run your family business, using mobile devices to make international calls, using a corporate tablet for online shopping.

- 3.2** Colleagues must safeguard our confidential information, trade secrets and intellectual property (including copyright and trademarks) in the same way that they must protect all of our other important assets. All documents, files, materials, records and reports acquired or created in the course of employment with us are the property of MONY Group plc or one of its subsidiaries. Colleagues may only remove originals or copies of such property from our offices for the sole purpose of performing their work duties, and they must return such records at any time upon request.
- 3.3** We sometimes use intellectual property, trade secrets and/or confidential information belonging to others, under licence or obtained during a proposed acquisition. Colleagues must ensure that their use of any such assets or information has been permitted by the owner and does not infringe anyone's intellectual property rights.

Confidential Information and trade secrets

- 3.4** Every colleague has responsibility for protecting the Group's confidential information both during and after their employment. Confidential information and trade secrets include any of our information and technology, financial, operational or strategic plans or data and any financial, commercial or technical information that is valuable to us and has not yet been disclosed to the public and may be valuable to a third party if they had access to it.
- 3.5** If you have access to confidential information and trade secrets, you should be careful about its use and vigilantly protect it from disclosure. You should also ensure you comply with our obligations to maintain the confidentiality of information received from third parties.
- 3.6** While colleagues should be aware of and keep up to date with freely available industry information, they must not use any unethical, unlawful or improper means to obtain confidential information from any competitor, provider, supplier, customer, user or other third party. This includes hiring any person with the intent of that person providing confidential knowledge of their former employer.

Social Media

- 3.7** Social media can be a very powerful tool and we want to embrace its use. However, exposure the web provides carries its own dangers, particularly as regards our hard-earned reputation. You are free to choose whether or not to link your personal social media account(s) to your employment – there is no need to seek approval for this. If you do, in doing so, you are also accepting certain restrictions as to how you use their personal social media.
- 3.8** All employees holding personal social media accounts, regardless of whether they do or do not choose to link their social media account(s) to their employment must observe our Universal Social Media Guidelines. Please see our Social Media Policy for more information.

4. Protection of Information and Operational Assets

- 4.1** MONY Group relies widely on its business data and information systems to achieve its business objectives.
- 4.2** We are each responsible for ensuring that we always do business in a secure way, limiting risks of any leakage or loss of business data and of any damage to or misuse of our information systems. We should be particularly careful in protecting the Group's confidential business data that refers to any information that the Group has not disclosed or made generally available to the public and that, if disclosed, could harm the interests of the Group.

Information Security Management System (ISMS)

- 4.3** Our ISMS makes sure that our business data and information systems are protected from a wide range of threats and events that could have a negative impact on the confidentiality, availability and integrity of our business data and information systems. Please refer to the ISMS for all policy documents relating to information security.

Example of Code Violations: To leave a computer password with a co-worker to handle any requests or provide approvals on Group systems while you are on annual leave.

IT Acceptable Use Policy

- 4.4** Our Acceptable Use Policy is part of the ISMS and gives you specific guidance on the proper use and protection of our corporate information resources, e.g. email, internet, workstations, applications, mobile devices etc. Please see the [Acceptable Use Policy](#) for further information.

AI Security Policy

- 4.5** Our AI Security Policy gives you specific guidance on the proper use of our AI tools and protects you, our providers, and our customers/users against the risks of careless or irresponsible use of AI tools. This is to ensure that the confidentiality, integrity, and availability of the data in our custody are safeguarded, and that trust between the Group and our customers is maintained. Please see the [AI Security Policy](#) for further information.

5. Use of Recording Devices

5.1 Making a recording (including taking photographs, videos, sound, and voice recordings) of colleagues or others at work without their express consent is not permitted. Recordings are not usually necessary and can put you and the Company on an unequal footing. Examples of what this may result in include:

- breaching an individual's privacy;
- breaching confidentiality;
- impacting on the trust and confidence between an individual and the Company; and/or
- restricting open and honest discussions.

5.2 You must not make any recordings (whether on your own device or on a Company device) of any Company meetings or conversations with colleagues or others connected with your work, without obtaining their consent in advance. A copy of any such recording must be made available to the person (or people) being recorded if requested. Covert recording will be treated as gross misconduct under our [**Disciplinary Policy and Procedure**](#) and may lead to summary dismissal.

6. Right of Search

6.1 We may conduct searches to prevent misappropriation of Company property or if we believe one of our policies is being breached (for example, if there is a genuine belief that drugs or other illegal substances are on the premises).

6.2 A search should only be carried out in exceptional circumstances where there is a clear, legitimate reason to search a colleague or their possessions. Consent must be given by the colleague, and managers should agree the search and its parameters with their People Partner in advance.

6.3 If a colleague refuses to undergo a search, they will be expected to explain their reasoning. If a colleague unreasonably refuses to undergo a search, this might amount to unreasonable behaviour and/or jeopardise evidence in relation to an investigation and may result in disciplinary action.

7. Dealing with Customers, Suppliers and Providers

7.1 We should always be honest, fair and truthful in all of our dealings with our customers, suppliers and providers. Our stakeholders expect absolute integrity from us and we must never attempt to deceive or mislead others.

7.2 Our customers and users are the reason we exist and are at the heart of everything we do. We are committed to acting appropriately and quickly in relation to any complaints. We are committed to providing customers and users with accurate information on which they can make an informed decision and not to mislead them.

7.3 When you deal with any customer or supplier you should always put the Group's interests first, above any personal preferences, and treat them entirely based upon the merits of such persons and their businesses. It is a violation of this Code to try to favour a particular customer, supplier or provider in their dealings with the Group.

7.4 Applying these principles helps us to put our consumers first and treat them fairly by ensuring:

- (a) We are clear with our consumers;
- (b) The information we provide is up to date, balanced and accurate;
- (c) We all take responsibility to protect our consumer's information; and
- (d) Our information is easy to understand, jargon free, and our sites are easy to use.

Further information your requirements under our Customer First Principles can be found in our [Compliance Policy](#).

7.5 The Group deals with many independent providers and a wide range of suppliers of goods and services, including professional advisers and consultants. They are an important resource and should be treated with respect and fairness at all times.

7.6 It is our intention to only contract with suppliers who can satisfy our standards including with regards to labour and welfare conditions (see also clause 1 'Human Rights, Diversity and Inclusion').

7.7 We will maintain high ethical standards in all our dealings with providers and suppliers. We will also seek to promote the same ethical standards with our providers and suppliers as we operate within the Group.

7.8 Further information on dealings with suppliers can be found in the [Procurement page](#) on the Hub.

8. Dress code

8.1 Individuals are free to dress in what they feel comfortable wearing and should use their own judgement on whether professional attire is required, for example, depending on which meetings they have and what kind of work they'll be doing that day.

8.2 We value individual expression and inclusivity, as well as maintaining a professional atmosphere. Our casual dress code encourages comfort and personal style, while upholding a workplace environment that is respectful and productive. Clothing that is revealing, exposing too much skin or undergarments, is not appropriate in the workplace.

9. Personal Relationships at Work

- 9.1** We recognise that individuals who work together may form close personal relationships. Personal relationships at work are a normal part of life and you are entitled to a private life. At the same time, we are committed to promoting a working environment based on dignity, trust and respect. It is important for us to ensure that colleagues behave in an appropriate, professional and responsible manner at work and that any personal relationships do not compromise this.
- 9.2** If you are involved in a close personal relationship with a colleague, contractor, client, customer, supplier or partner, you must not allow that relationship to influence your conduct, have an adverse effect on your work, give rise to a conflict of interest or provide any other workplace advantage.
- 9.3** If you enter into a personal relationship with a colleague working in the same function, an individual that you manage, a manager or with any individual which may give rise to a conflict of interest, you must declare your relationship to your line manager and People Partner. Any information that you disclose will be treated sensitively and in confidence.
- 9.4** There will be circumstances where the colleagues concerned will need to withdraw from decision making or from undertaking certain roles to avoid unfair bias. For example, recruitment and the development and promotion of colleagues should not be influenced by relationships at work. Where one individual has access to confidential information, is in a position of authority over the other or there is a potential conflict of interest, we reserve the right to consider transferring individuals or responsibilities to an alternative role or team if appropriate. In such circumstances, we will consult both individuals and seek to reach a satisfactory agreement regarding the transfer.
- 9.5** If a personal relationship at work has broken down and you find yourself in a situation where you are treated unfairly at work as a result, you should raise this with your manager or People Partner. You can raise it formally under our [Grievance Procedure](#).

10. Conflicts of Interest

- 10.1** Conflicts of interest impair our ability to act with excellence. A conflict of interest arises when your personal activities, interests or relationships interfere, or appear to interfere, with your professional duties as a director or employee of MONY Group or your ability to act in the best interest of MONY Group. Even in circumstances where you do not receive personal benefit, the appearance of a conflict of interest may negatively impact your credibility.
- 10.2** You must proactively notify, via the [Conflicts of Interest Declaration Form](#), any relationships or interests that could conflict or appear to conflict with the performance of your duties for the Group. All notifications are treated confidentially.
- 10.3** It is not possible to define all situations or relationships which may create a conflict of interest, so each situation must be evaluated individually. Some specific conflict of interest situations and examples are set out below and within the [Conflicts of Interest Policy](#). Always keep in mind that in most cases conflicts can be resolved by open discussion and transparency. A

conflict of interest is not necessarily a Code violation, but not disclosing it is.

Examples of conflict of interest situations could be if a colleague:

- places a contract on behalf of Group company with a supplier managed by a close friend or family member;
- works as a consultant, paid or unpaid, in a private capacity for a provider or supplier of a Group company;
- carries on a business in their own time of a similar nature to their work at a Group company;
- has a personal or financial interest in a business that has transactions or dealings with a Group company; or
- obtains a personal financial gain or advantage (other than normal remuneration) in business transactions or dealings involving a Group company.

Integrity in the Community

11. Anti-corruption and bribery

- 11.1** We have a zero-tolerance policy when it comes to bribery. Employees and directors may never directly or indirectly give, offer, promise or authorise anything of value or any advantage to any public official or anyone else to induce that person to perform a function or activity improperly. Please see our [Anti-Corruption and Bribery Policy](#) for more information.
- 11.2** The same rule applies to our suppliers, distributors, agents, consultants and contractors when acting on our behalf. You may not instruct, authorise or allow a third party to make a prohibited payment on your or the Group's behalf.
- 11.3** We never give gifts or entertainment to, nor accept such items from, any third party that could be regarded as bribes or that are otherwise considered excessive in accordance with our policies. Please see the [Anti-Corruption and Bribery Policy](#) which show how gifts and entertainment can be given to or accepted.

Donations and political activities

- 11.4** The Group does not make corporate contributions or donations to political parties, organisations affiliated to political parties, or individuals standing for public office. You can donate money in your own name to a political party without prior approval.
- 11.5** We do, ensure our views are expressed to governments in an appropriate and effective manner on matters that affect our business. All lobbying activity requires prior approval of the relevant member of the Executive Team and must only be carried out in accordance with the [Lobbying and Political Support Policy](#).
- 11.6** Any political activity and participation in electoral politics by our colleagues must occur strictly in an individual and private capacity and not on behalf of the Group. Colleagues may not use Group time, property, equipment or funds to conduct or promote personal political activity.
- 11.7** We only make charitable donations that are legal and ethical under local laws and practices. No

donation must be offered or made in the name of the Group without the prior approval of the Community ERG.

- 11.8** We support employees who wish to volunteer to help in their community, charity or an initiative that supports the Group's purpose of helping households save money. In you wish to donate your time you are entitled to paid leave. Please discuss this with your line manager in the first instance.

12. Environment, health and safety

- 12.1** MONY Group is committed to providing and maintaining a safe and secure working environment and maintaining safe and healthy working conditions. We always conduct our operations in compliance with applicable environmental and health and safety laws. Our highest priority is protecting the safety and health of all relevant stakeholders, including employees, contractors and members of the communities where we do business. We always consider the environmental, health and safety implications of the business decisions that we make. It is a violation of this Code to knowingly disregard our environmental, health and safety standards. See our [Environmental](#) and our Health and Safety Policies for more details.

- 12.2** Any breaches of our policies at work will be investigated and where appropriate disciplinary action will be taken.

13. Competing honestly in the marketplace and complying with competition laws

- 13.1** Our aim is to compete vigorously, honestly and fairly in the marketplace and so all colleagues are required to comply fully with laws governing free and fair competition.
- 13.2** Collusion with competitors is strictly prohibited and may contravene competition laws resulting in serious adverse consequences for us including damage to reputation and the imposition of heavy financial penalties. Please see the [Competition Law Policy](#) for more details.

14. Privacy and protection of personal data

- 14.1** We value and safeguard the privacy of all our employees, job applicants, business partners and consumers. It is everyone's responsibility to adhere to the following core principles when we handle personal data:

1. Process data lawfully, fairly and in a transparent manner
2. Collect data for specified, explicit and legitimate purposes only
3. Do not collect or process data you do not need
4. Keep data accurate and up to date
5. Limit how long you keep collected data
6. Ensure appropriate security of personal data

- 14.2** Always act in accordance with our Data Protection policies.

15. Dealing in Company Securities

- 15.1** You may not buy, sell or transfer shares or other securities of MONY Group Plc or any other company based on inside information or material non-public information – that is information which is not publicly available and which an investor would consider important when deciding whether to buy, sell or hold shares or other securities (an activity known as ‘insider trading’). Trading in shares or securities based on inside information or material non-public information, or providing such inside or material non-public information to others who might trade, is a serious offence and may result in criminal prosecution. It is the responsibility of every individual to comply with rules on insider trading. Please see our [Inside Information Policy](#) and seek guidance from the General Counsel and Company Secretary if you have any questions.
- 15.2** You must not disclose inside or material non-public information to anyone else unless you are authorised to do so. Our directors, senior managers and certain key personnel who are designated as Persons Discharging Managerial Responsibilities have additional obligations and restrictions when engaging in share-dealing. Please see our Share Dealing Code and seek guidance from the General Counsel and Company Secretary if you have any questions.

Administration of the Code

16. General

- 16.1** The Code is designed to ensure consistency in how employees conduct themselves. No set of rules can cover all circumstances. Nothing in this Code should lead to the contravention of local laws, which, wherever contrary, will prevail. MONY Group reserves the right to amend or alter the Code at any time and for any reason.

17. Training

- 17.1** Training on the Code will be conducted on a regular basis. If you have any questions concerning your training curriculum, please contact People Support (PeopleSupport@MonyGroup.com). It is the responsibility of every employee to undergo the mandatory training and to do so in a responsible and engaged manner.