

# Global code of business conduct

The Allstate family of companies

**Allstate**<sup>®</sup>



# Table of contents

- The Allstate family of companies**.....2
- Leadership messages**.....3
- Our Code**.....4
  - Adoption and disclosure of the Code.....4
  - Waivers.....4
- Our Shared Purpose**.....5
  - Our Values.....5
  - Our Behaviors .....5
  - Responsibility and accountability.....6
  - Special responsibilities of managers.....6
  - Ethical decision-making.....7
  - Speaking up, seeking help and resolving concerns.....8
  - How reports are handled.....8
  - Fair process and disciplinary action.....8
- Our people make us a different kind of company**.....9
  - Valuing inclusive diversity and equity.....9
  - Promoting equal opportunity.....9
  - Fostering a respectful workplace.....9
  - Keeping the work environment safe and healthy.....9
  - Respecting the intellectual property of others.....10
  - Using social media responsibly.....10
- We're a winning team for our customers, our communities and each other**.....11
  - Selling and marketing with integrity.....11
  - Competing fairly.....11
  - Gathering competitive intelligence fairly.....11
  - Safeguarding our assets and information.....12
  - Using information and communication systems responsibly.....12
  - Preventing insider trading.....13
  - Protecting confidential and restricted information.....13
  - Protecting personal data.....14

- We create value for our stakeholders**.....15
  - Avoiding conflicts of interest.....15
    - Relatives and friends.....16
    - Personal or family financial interests.....16
    - Gifts and entertainment.....17
    - Corporate opportunities.....18
    - Outside employment and other activities.....18
  - Following internal controls.....19
  - Responding to inquiries from investors, analysts and the media.....19
  - Creating, maintaining and disclosing accurate records and accounts.....20
- We live with integrity on a global scale**.....21
  - Doing business across borders.....21
  - Preventing money laundering.....22
  - Preventing bribery and corruption.....23
  - Respecting and protecting human rights.....24
- We support the communities where we live and work**...25
  - Protecting our planet.....25
  - Improving our communities.....25
  - Participating in the political process.....26
- Resources**.....27



# The Allstate family of companies

Allstate protects people from life's uncertainties with a wide array of protection for autos, homes, electronic devices and identity theft. Allstate is primarily engaged in the property and casualty insurance business in the United States and Canada. Additionally, Allstate provides customers other protection solutions such as life, accident and health insurance and protection plans that cover electronic devices and personal identities.

Allstate has been protecting people since 1931. We continuously develop and improve products and services to empower customers to live a life well protected. Our ability to serve customers and communities is stronger than ever. We've expanded to include more innovative products, services and subsidiaries.

**The Allstate Corporation** is one of the largest publicly held personal lines insurers in the United States. Its business is conducted principally through Allstate Insurance Company and other subsidiaries.

**Allstate Benefits** provides accident, health and life insurance through employers and is one of the top voluntary benefits carriers.

**Allstate Canada Group** supports its customers with Allstate products through its network of agencies and with brokers in five provinces across Canada (Ontario, Quebec, Alberta, New Brunswick and Nova Scotia).

**Allstate Identity Protection** provides identity protection services, including monitoring, alerts, remediation and a proprietary indicator of identity health.

**Allstate Northern Ireland** provides core technology competencies, programming, operations support, cybersecurity, integration services and risk analytics to Allstate and its subsidiaries.

**Arity** is a mobility data and analytics company that provides data-driven solutions to companies invested in transportation. Customers turn to us to better understand and predict driving behavior at scale, enabling them to deliver smarter, safer, and more economical services to consumers.

**Avail** is a peer-to-peer car sharing platform that connects drivers and car owners, providing a protected car sharing experience conveniently located where people live, work and travel.

**Allstate Business Insurance** serves the insurance needs of small business owners.

**Allstate Dealer Services** offers finance and insurance products through independent agencies and brokers to auto dealerships countrywide.

**Allstate India Private Limited** provides software development, software testing, business process offshoring and management, technology support, analytics and other IT-enabled services to Allstate and its subsidiaries.

**Allstate Protection Plans** provides consumer protection plans throughout the world for mobile phones, consumer electronics, furniture and appliances, which provide customers protection from mechanical or electrical failure and, in certain cases, accidental damage from handling.

**Allstate Roadside** is a leading roadside assistance provider.

**Answer Financial** allows consumers to compare quotes and purchase coverage for auto, home and commercial small business insurance from over 40 top-rated carriers.

**National General** offers a variety of insurance products, including personal and small business automobile, homeowners, umbrella, recreational vehicle, motorcycle, lender-placed, supplemental health and other niche insurance products.



## Our global presence

Together, Our Shared Purpose and our Global Code of Business Conduct make us who we are now and into the future as one Allstate.

But no matter where we work or what we work on, we are all united by Our Shared Purpose. It embodies what we stand for as a company and guides how we interact with the world and each other.

Our Global Code of Business Conduct ensures we make choices consistent with Our Shared Purpose, providing a roadmap for making decisions as we do business wherever we are.





## Leadership messages



There is one constant at the heart of what it means to be an Allstater: Our Shared Purpose.

Our commitment to Our Values of Integrity, Inclusive Diversity & Equity, and Collective Success defines who we are and how we act. It's what makes Allstate a special place. These values represent our solemn responsibility to serve our customers and society — and we will not compromise them.

[Our Shared Purpose](#) defines Allstate's strategic vision and the kind of culture we need to drive results and make a difference. It's a culture where we collaborate early and often, challenge ideas, provide clarity for and offer feedback that is candid and actionable.

Our Global Code of Business Conduct is your guide for living into these values. Refer to it often. It's how we let our customers and communities know that no matter how they come to us — or where we serve them — they can count on us. We're transforming our Company to make a difference.

It's an exciting time to be a part of the Allstate family, and with it comes great responsibility.

It's up to each of us to ensure we stay true to our purpose and the values outlined in our Code.

**Thomas J. Wilson**  
*Chair, President and CEO*

The Allstate family of companies is united under one Global Code of Business Conduct, committed to the highest degree of integrity. Our Values and conduct define our collective culture and are essential to the kind of company we are and intend to remain.

We pride ourselves on being different — a difference built on integrity and trust. How we respond when faced with a situation that doesn't quite feel right says a lot about us, our culture and how we serve customers.

As we continue to lean into Transformative Growth, digitization, and technology enablement, it's more important than ever to retain the foundations of ethics and continue to evolve how and where our decision-making is applied.

The Code is our toolkit, meant to help us make the right decisions as we live into Our Values every day. We all have a responsibility to integrate the principles of our Code into our work, to build on the trust bestowed upon us by our stakeholders and to protect our brand reputation.

Please use the Code and refer to it often as a guide to make your decisions. If you need assistance, please contact your local representative or use the [Speak Up Process](#).

**Courtney Welton**  
*Chief Ethics & Privacy Officer*

**Jocelyn Liu**  
*Chief Compliance Officer*

# Our Code

The Global Code of Business Conduct, which we refer to throughout this document as our Code, declares who we are and what we stand for. It underscores our commitment to doing business not only legally but also ethically. This Code provides the framework for the decisions we make and the actions we take every day, around the globe. It's also a practical tool to help us understand what is expected of us, how we live Our Values and when we should seek help. We can't possibly anticipate all the scenarios and questions you might have as you live into Allstate's Values, so we encourage you to ask questions.

Our Code applies to all employees, leaders, officers, internal and external directors of Allstate. It's up to each and every one of us to use and follow it at all times. It contains references to relevant policies that should be adhered to. It also provides guidance on how we can help our customers, shareholders, communities and people prosper without compromising Our Values. This commitment to doing the right thing strengthens our business by making us more reliable, resilient and responsive to those we serve.

*Throughout this document, "Allstate," the "Allstate family of companies" and "Company" are defined as The Allstate Corporation and its subsidiaries.*

## Adoption and disclosure of the Code

The Code provides ethical guidelines for conducting business on behalf of the Allstate family of companies. It applies to every employee and officer, as well as outside directors, of the Allstate family of companies. This Code was adopted by the Audit Committee of the board of directors of The Allstate Corporation. The Audit Committee is responsible for periodic review and assessment and approval of changes to the Code.

The Code cannot address every issue that may be encountered, so we must be familiar with its principles and use it to guide our judgment and inform our actions.

## Waivers

We recognize that in exceptional cases, a strict application of the Code may result in serious hardship. In these rare circumstances, except for employees of Allstate Canada Group, a waiver of the Code to mitigate hardship may be sought. Any waiver of the Code for the CEO, CFO, Controller or other senior financial or executive officers, or outside directors, must be approved by the Audit Committee. For all other employees, any waiver must be approved according to procedures adopted by the Audit Committee.

Additional information and relevant policies may be found in the Resources listed at the end of this document.





# Our Shared Purpose

## As the Good Hands...

We **empower** customers with protection to help them achieve their hopes and dreams.

We **provide** affordable, simple and connected protection solutions.

We **create** opportunity for our team, economic value for our shareholders and improve communities.

At Allstate, Our Shared Purpose is meant to unite us in heart and mind, in word and deed, by signifying what the Company stands for and how we're here for each other. We empower customers with protection. We improve communities. We provide opportunity for our teams. And we create economic value for our shareholders.

Throughout the family of companies, we leverage the unique identities of our customers and each other to build the Allstate of tomorrow, today.

What makes Allstate unique is how we take our longtime motto *In Good Hands* to heart. Our Values define who we are, and Our Behaviors embody how we work. We call this foundation Our Shared Purpose.

Our Code illustrates what it means to live into Our Shared Purpose with every decision we make. When we live into the ideals of our Code, we continue earning the trust of our customers, communities and each other.



## Our Values

Our Values define what it means to be part of the Allstate family of companies.

- **Integrity** is non-negotiable.
- **Inclusive Diversity & Equity** values and leverages unique identities with equitable opportunity and rewards.
- **Collective Success** is achieved through empathy and prioritizing enterprise outcomes ahead of individuals.

## Our Behaviors

Our Behaviors don't just define our purpose; they are the actions we bring forward to achieve our purpose.

- **Collaborate** early and often to develop and implement comprehensive solutions and share learnings.
- **Challenge Ideas** to leverage collective expertise, evaluate multiple alternatives and create the best path forward.
- **Provide Clarity** for expected outcomes, decision authority and accountability.
- **Provide Feedback** that is candid, actionable, independent of hierarchy and safe.

## Our Shared Purpose

Our Values and Behaviors make up part of **Our Shared Purpose**. In full, Our Shared Purpose defines who we are.





## Responsibility and accountability

Fulfilling Our Shared Purpose means holding ourselves and each other accountable to the Code. Accountability is often confused with responsibility, but in fact, it's more. Responsibility is something given to you, and accountability is something you must take upon yourself. It's about integrity, results and ownership. By being accountable to our Code, we honor Our Values and the people we serve.

We expect all employees to understand and comply with the Code and all requirements of foreign and domestic laws, rules, regulations and Company policies that apply to our jobs. This protects the customers who depend on us and the shareholders who have invested in us. That means we each have an obligation to ask questions, raise concerns and report violations regarding the Code.

We are committed to fostering an environment that empowers us to lead from every seat and raise concerns without the threat of retaliation. If you see something, you must do the right thing and say something even if the situation is outside of your immediate team. Anyone who violates Our Values, policies or Code through illegal or unethical behavior may face disciplinary action, up to and including termination of employment.

In addition, we're all expected to:

- Act with integrity in a manner that protects the Company's reputation.
- Respect our coworkers, customers, business partners and communities.
- Ask questions and seek help if we are unsure how to proceed and nurture an environment that encourages everyone to come forward with concerns.
- Promptly report all known or suspected violations of the law, the Code or Company policies.
- Cooperate with all Company investigations.
- Never intimidate or retaliate against anyone who reports a concern or cooperates with an investigation.
- Promptly disclose any unpardoned felony, criminal offense or other serious conviction of ourselves or a coworker to Human Resources.

## Special responsibilities of managers

People leaders have a special responsibility to proactively promote the ethical, inclusive and purpose-driven culture with their teams. If we lead or supervise others, we should:

- Provide personal leadership that demonstrates the highest quality and ethical standards every day by building a psychologically safe working environment where team members feel comfortable speaking up.
- Be aware of laws, rules, regulations, policies, procedures and processes that relate to our responsibilities, and ensure that team members have the knowledge, resources and training needed to follow the law and our Code.
- Identify and mitigate ethics, compliance and policy risks.
- Listen respectfully and respond in an appropriate and timely way to employees who seek advice or raise concerns.
- Address or escalate violations immediately and stand firm against any form of intimidation or retaliation.





## Ethical decision-making

When faced with ethical issues where the right decision or course of action is unclear, we can use the following model for our decisions.

## Ethical decision-making model

In a challenging situation, use the following questions to assist you to make an ethical decision. Select *Yes* or *No* to determine how to proceed. If the consequences of a decision could have a negative impact or if you are uncomfortable or unsure answering any of these questions, seek guidance before proceeding.

### Is it legal?

- YES:** Go to the next question.  
**NO:** Do not proceed. Seek guidance to find a solution that meets the letter and spirit of the law.

### Does this decision align with Allstate's Values?

- YES:** Go to the next question.  
**NO:** Do not proceed. Seek guidance to find a solution that aligns with Our Values.

### Would this decision harm Allstate in any way?

- YES:** Consider the situation from all perspectives. Find a decision that protects Allstate.  
**NO:** Go to the next question.

### Would I feel comfortable making this decision public?

- YES:** Proceed with confidence!  
**NO:** Continue to challenge your ideas until you find a decision you are comfortable sharing. Seek guidance before proceeding.

## Digital ethics and ethical decision-making

Allstate's digital ethics framework builds on Allstate's Values and Behaviors by providing guidance on how to evaluate ethical concerns and address ethical issues at any point in the data lifecycle. This means that just because something is legal, we also need to decide if it is the right thing to do.

The digital ethics framework also works to help eliminate inadvertent biases, as well as unintended consequences and potential harm to people from the collection, use or sharing of data.

For more information, see the Resources listed at the end of this document.







## Speaking up, seeking help and resolving concerns

We can rely on our integrity to guide us, but when we are not sure how to proceed, we also have a duty to step forward, ask questions and seek help. And if we believe a violation of our policies, our Code or the law has happened or may be about to happen, we are obligated to report it.

To seek help, report violations and resolve concerns, you can follow the Speak Up Process by:

- Contacting any manager.
- Contacting Human Resources.
- Emailing your affiliate Compliance mailbox (if applicable).
- Using the additional local reporting options as listed in the Speak Up Process box to the right.

Often it is best to start with your manager when raising a concern, but sometimes this may not be feasible. The most important thing is that you lead the way, speak up and seek help when something doesn't feel right.

## How reports are handled

**We do not tolerate retaliation against anyone who raises a concern, makes a report or cooperates in an investigation.**

The Company will always strive to address concerns fairly and discreetly. We are committed to thoroughly investigating all reports of violations. Employees with concerns are strongly encouraged to identify themselves when seeking assistance. This is the best way to ensure that a thorough and complete investigation can be made, and that an effective and lasting resolution can be reached.

However, we recognize that in some cases people may prefer to remain anonymous when raising concerns. Anonymous reports can be made through the Speak Up Process. An investigation will be conducted using the facts provided, while working to maintain your anonymity as far as permitted by law. When necessary, the Company may also consult with you confidentially if anonymity would hinder the investigation or resolution of the issue.

Reports about a possible violation of the law or any questions about accounting, auditing, disclosure or other financial or reporting practices will be referred to the General Counsel or their designee for investigation. The General Counsel or their designee may refer these matters to the Audit Committee.

## Fair process and disciplinary action

When possible and where required, all parties involved in an investigation will get a fair chance to explain circumstances and present their side of the story. We make efforts to complete the process promptly, while still taking whatever time is needed to conduct a proper and thorough investigation.

### Speak Up Process

The Speak Up Process is an important resource for providing fair, prompt and safe resolutions of concerns. It should be used to report legal, ethical, regulatory or compliance concerns regarding employees, agents, vendors, clients and customers of the Allstate family of companies. You can follow the Speak Up Process 24/7 in the following ways:

- Answer Financial and Allstate U.S. (Allstate Benefits, Allstate Business Insurance, Allstate Dealer Services, Allstate Insurance Company, Allstate Roadside, Arity and Avail): Call (800) 706-9855 or access the website at [Allstate.com/iReport](https://www.Allstate.com/iReport).
- Allstate Canada Group: Call the ClearView Connects hotline at (866) 275-2138 or access the website at [Allstate.ca/iReport](https://www.Allstate.ca/iReport).
- Allstate Northern Ireland: Call the ANI i-Report line at 0808 273-4938 or access the website at [AllstateNI.com/iReport](https://www.AllstateNI.com/iReport).
- Allstate India Private Limited: Call the AIPL i-Report line at 000-800-050-3837 or access the website at [AllstateIndia.com/iReport](https://www.AllstateIndia.com/iReport).
- Allstate Identity Protection: Call the Convercent hotline at (800) 706-9855 or access the website at [AllstateIdentityProtection.com/iReport](https://www.AllstateIdentityProtection.com/iReport).
- Allstate Protection Plans: Call the Convercent hotline at (800) 461-9330 or access the website at [Helpline.SquareTrade.com](https://www.Helpline.SquareTrade.com).
- National General: Call (800) 706-9855 or access the website at [NationalGeneral.com/iReport](https://www.NationalGeneral.com/iReport).

Employees are encouraged to identify themselves but may remain anonymous during this process.



# Our people make us a different kind of company

**Valuing inclusive diversity and equity**

**Promoting equal opportunity**

**Fostering a respectful workplace**

**Keeping the work environment safe and healthy**

Respecting the intellectual property of others

Using social media responsibly

At Allstate, we dare to be bold. It's only through our collective power that we achieve greatness as a company — through daily acts of integrity that protect and empower our customers. It all starts with us.

With Our Shared Purpose, we come together every day with our best ideas, diverse talents and empathetic approach. We do this to inspire and support each other. We do it to bring original ideas and challenge each other to make them better. This isn't just about working together — it's about thriving together. It's why we live Our Shared Purpose each and every day. See how Allstate is prioritizing inclusive diversity and equity in our Environmental, Social and Governance Report at [AllstateSustainability.com](https://www.allstate.com/sustainability).

## Valuing inclusive diversity and equity

**We succeed together when we value unique identities and perspectives.**

We provide equitable opportunity when we hold each other accountable to encourage and embrace our collective differences. Our individual characteristics, values and beliefs, as well as our backgrounds and experiences, give us fresh perspective and purpose. We work harder, meet customer needs more effectively, share better and identify more innovative ideas when we are accepted for who we are. Our success comes from a chorus of many different voices. At Allstate, every voice counts.

## Promoting equal opportunity

**We evaluate based on performance, and we reward achievement.**

**We never discriminate.**

When we hire and promote based on successful performance, we not only honor Our Values but also ensure that our Company and our customers get the very best. Discrimination of any kind is wrong. Our commitment to equal opportunity helps us find the right person for every role.

## Fostering a respectful workplace

**We respect and support each other. This means being accountable for maintaining a workplace free from verbal or physical harassment, abuse and intimidation of any kind.**

We serve our customers and each other best when we are empathetic and respectful. By caring about the feelings and perspectives of others, we avoid misunderstandings and create a positive work environment that empowers us to deliver superior performance. Engaging with others openly and respectfully, and speaking up about any unwelcome conduct, helps us sustain a culture built on trust.

## Keeping the work environment safe and healthy

**We make the safety and well-being of everyone who works with us a top priority.**

As insurers, we see the impact of accidents and unsafe conditions every day. That's why we don't wait for bad things to happen; we take action to prevent them, and we help our customers do the same. Promoting safety is core to our business, and it starts in our own work environment. The care we show in looking out for each other puts us in the best position to help our customers stay healthy and safe as they pursue their dreams.

If you see or suspect anything that could undermine our commitment to inclusive diversity and equity, promoting equal opportunity, or fostering a respectful and safe workplace, follow the [Speak Up Process](#).



### Integrity insights

Integrity is at the heart of who we are. It's non-negotiable. And quite frankly, it's simple: if you see something, say something. You don't have to be the actual victim of harassment, sexual or otherwise, to make a report. Perhaps you notice a coworker who is subjected to inappropriate jokes, behavior or comments by a manager or teammate. By reporting the behavior, you may prevent future harassment or a serious incident from occurring. When our empathy drives our actions, we care for and protect each other.



# Our people make us a different kind of company

Valuing inclusive diversity and equity

Promoting equal opportunity

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Keeping the work environment safe and healthy

**Respecting the intellectual property of others**

**Using social media responsibly**

## Respecting the intellectual property of others

**We respect intellectual property, whether it belongs to us or someone else.**

We are bold with original ideas, so we understand innovation and the effort required to create intellectual property. We respect the intellectual property of others when we obtain authorization and licensing agreements before using known intellectual property. We respect intellectual property that belongs to us when we use it only while employed at Allstate and protect [confidential and restricted information](#).

When intellectual property is stolen, misused or mishandled, it clearly contradicts Our Value of Integrity. We hold ourselves and each other accountable for ensuring the proper use of intellectual property.

For questions regarding intellectual property, please contact [IP@allstate.com](mailto:IP@allstate.com).

## Using social media responsibly

**We use social media with care, exercising the right to free expression while protecting the Company's reputation.**

Social media enhances our ability to have honest, meaningful exchanges with our customers and other stakeholders. This puts the power to communicate instantly with millions of people in our hands, and we must use that responsibility with great care. By holding ourselves to the same standards of integrity and accountability online as in the workplace, we do the right thing for our customers, our stakeholders, our communities and our Company.

Using social media responsibly means we:

- Adhere to Our Values in all business communications.
- Comply with applicable social media policies.
- Never create the impression that our personal opinions are those of the Allstate family of companies. This includes using Company logos to post personal opinions or your Company email address to create accounts.
- Are transparent about our role with the Allstate family of companies.
- Do not disclose proprietary or confidential information, whether it belongs to our Company or to others.
- Ensure time spent on social media does not interfere with our work.

We understand and respect your right to express political opinions on social media. We ask that you follow the social media policy for your company and the Conflict of Interest Policy when participating in the political process.

Whether you're acting as an employee or an individual, always think before you post. If you're concerned about whether something might cross the line, see the Resources listed at the end of this document.

## Intellectual property

Intellectual property, or IP, takes many forms. Some examples include:

- Patents.
- Copyrights.
- Trademarks.
- Trade secrets.



## Integrity insights

Social media platforms or open forums include but are not limited to:

- Well-known sites like Facebook, Twitter, Instagram and LinkedIn.
- Mobile apps like Snapchat and TikTok.
- Forums and discussion boards like Reddit.
- Video-sharing sites like YouTube.
- Corporate or personal blogging sites.
- Comment sections in online articles.
- Collaborative publishing sites like Wikipedia or Google Docs.





# We're a winning team for our customers, our communities and each other

## Selling and marketing with integrity

### Competing fairly

### Gathering competitive intelligence fairly

Safeguarding our assets and information

Using information and communications systems responsibly

Preventing insider trading

Protecting confidential and restricted information

Protecting personal data

We're a collection of individuals who come together as one team, leveraging our unique identities to help our customers achieve their hopes and dreams. This means we do the right thing — always.

We never compromise Our Values, even when we take on the toughest competitors. We work hard and play fair, engaging in the marketplace with the integrity, respect and accountability that our customers, communities and stakeholders have come to expect from us.

## Selling and marketing with integrity

**We empower customers with protection to help them achieve their hopes and dreams.**

We anticipate our customers' expectations and exceed them at low cost. We provide affordable, simple and connected protection solutions and are there for our customers when they need us most.

We always represent our solutions honestly. Honoring Our Value of Integrity in this way earns customer loyalty, enhances our reputation and strengthens our ability to grow and thrive in a competitive global marketplace. Selling and marketing with integrity means we comply with all laws and regulations in all markets where we do business.

## Competing fairly

**We deliver superior performance on the strength of our products and people.**

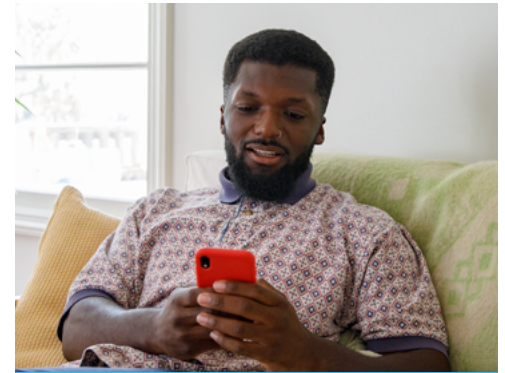
Markets depend on free and fair competition to operate properly and offer consumers choices. We rely on our original ideas, speed and conviction to beat the competition fairly and win customers. We follow fair competition and antitrust laws wherever we do business. Our Value of Integrity demands it.

Competition, or antitrust, laws are complex and vary by location. Even the appearance of an improper agreement can be a big problem. If you suspect you're at risk of violating these laws, contact your manager, legal department or Human Resources.

## Gathering competitive intelligence fairly

**We learn about competitors in ways that are transparent, legal and ethical.**

We need to obtain information about our competition to make strategic business decisions. However, our integrity compels us to treat our competitors fairly and honorably. That's how we do business, no matter how high the stakes. We never resort to unethical means to compete.



### Good is in the details

- Q.** I took a call at a Customer Contact Center from someone shopping for auto insurance. He mentioned a competitor's product and asked my opinion of it. My honest belief is that it's inferior to what we're offering. Can I say this?
- A.** We are committed to selling our products and services based on their competitive merits, not by disparaging the products and services of a competitor. In the interest of transparency, you may offer a comparison. However, when you talk about a competitor's products, you must stick to what you know to be both factual and current, separate from your opinions. In this case, it's best to focus the discussion on our own product and its value and benefits.





# We're a winning team for our customers, our communities and each other

Selling and marketing with integrity

Competing fairly

Gathering competitive intelligence fairly

## Safeguarding our assets and information

### Using information and communications systems responsibly

Preventing insider trading

Protecting confidential and restricted information

Protecting personal data

## Safeguarding our assets and information

### We treat Company assets with care and respect.

Our assets help us protect customers and earn attractive returns in the marketplace. Each asset, from our property, technology systems and investments to our information and reputation, represents our shared hard work.

Safeguarding our assets and information means we:

- Prevent loss, damage, theft, waste and misuse of all Company assets.
- Use Company assets for business purposes only.
- Use personal information only for business purposes and manage it responsibly in accordance with applicable cyber security, data, privacy laws and Company policy.
- Never remove, sell, lend, borrow, transfer or dispose of assets without authorization.

## Using information and communications systems responsibly

### We protect our communications equipment and systems, treating them with care and professionalism.

Using information systems responsibly means we never use Company systems or devices for activities that are illegal or that violate our policies and values. We must protect our hardware, software, sensitive information, and electronic data against loss, theft, damage, unauthorized access, and cyber threats. We should never store Company information on personal systems or equipment.

Immediately report any suspected security breach to Allstate Information Security by emailing [Cyber@allstate.com](mailto:Cyber@allstate.com) or any suspected privacy incident to Enterprise Business Conduct by emailing [PrivacyIncidentManagement@allstate.com](mailto:PrivacyIncidentManagement@allstate.com) or your affiliate cybersecurity team.

## Integrity insights

“Assets” can refer to many things, including:

- **Information assets**, such as any data related to our business.
- **Financial assets**, such as money or anything that can be converted into money.
- **Physical assets** provided to employees to conduct business, such as phones, computers, workspaces and vehicles.
- **Intangible assets**, such as our reputation, ideas and intellectual property (copyrights, trademarks, patents, trade secrets, etc.).

To report the mistreatment of Company assets, use the [Speak Up Process](#) or see the Resources listed at the end of this document.



Working virtually

Our focus on customers affects everything we do. When working at home, we take extra precautions to maintain that focus. Allstate provides several remote access solutions, such as a VPN and two-factor login authentication to make it possible for users to securely access systems and information when working remotely. For additional information, see your local guidelines for working from home securely.



# We're a winning team for our customers, our communities and each other

Selling and marketing with integrity

Competing fairly

Gathering competitive intelligence fairly

Safeguarding our assets and information

Using information and communications systems responsibly

## Preventing insider trading

## Protecting confidential and restricted information

Protecting personal data

## Preventing insider trading

**We never use or disclose material, nonpublic information about Allstate or another company improperly.**

Preventing insider trading means we protect material, nonpublic information from unauthorized disclosure about Allstate, its subsidiaries or any other company. Material, nonpublic information does not have to be significant alone or on its face but may also be routine business information that a reasonable investor could nonetheless use to extrapolate data or trends important to an investment decision.

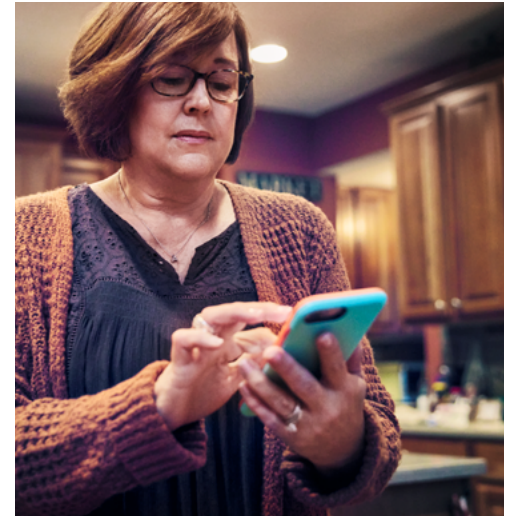
Insider trading cheats shareholders, distorts markets and erodes the trust of those we serve. It's a serious violation that can carry significant penalties.

## Protecting confidential and restricted information

**We handle our information assets with care, especially our confidential and restricted information. We all have a responsibility to protect our information and information entrusted to us by our business partners.**

Protecting confidential and restricted information means we:

- Identify and properly classify confidential and restricted information.
- Take appropriate security measures when storing or sharing such information.
- Share it only on a need-to-know basis for a legitimate business reason, even with coworkers, unless otherwise required by law.
- Never discuss confidential or restricted information in public.
- Only use it for Company purposes; never for the personal gain of yourself or others.
- Properly destroy or return all copies of confidential and restricted information when leaving the Company.
- Unless necessary, avoid printing material containing restricted information and avoid requesting or accepting confidential or restricted information (after which it should be destroyed, according to the defined retention schedule).
- Immediately report any suspected security breach to Allstate Information Security by emailing [Cyber@allstate.com](mailto:Cyber@allstate.com) or any suspected privacy incident to Enterprise Business Conduct by emailing [PrivacyIncidentManagement@allstate.com](mailto:PrivacyIncidentManagement@allstate.com) or your local cybersecurity team.



## Integrity insights

We classify data based on how carefully we need to protect it. The two most protected classes of data are confidential and restricted. How we handle these types of data is a critical part of our focus on customers. Personal information, discussed below, can be either confidential or restricted.

### Examples of restricted data:

- Social Security Number or Social Insurance Number.
- Full date of birth.
- Driver's license or government ID number.
- Credit card, debit card or primary account number.
- Financial bank account number.
- Protected health information.
- Pre-release financial performance information.

### Examples of confidential data:

- Address.
- Partial date of birth.
- Policy number.
- User login/ID (*not including password*).
- Email address.
- Service-level agreements.



# We're a winning team for our customers, our communities and each other

Selling and marketing with integrity

Competing fairly

Gathering competitive intelligence fairly

Safeguarding our assets and information

Using information and communications systems responsibly

Preventing insider trading

Protecting confidential and restricted information

## Protecting personal data

## Protecting personal data

**We protect personal information (PI) against loss or unauthorized access, use, modification, destruction or disclosure.**

Because of our global operations and presence in both insurance and non-insurance segments, we are entrusted with the PI of millions of people. We respect and protect PI not just because the law requires it, but also because it's the right thing to do and it supports our strategic vision and Our Shared Purpose. We know that failure to protect PI could impact people's lives, and we take steps to prevent PI loss and the harm that could result from it.

Respecting and protecting PI means we:

- Comply with all relevant Company policies and applicable cybersecurity, data and privacy laws.
- Embed privacy principles into the design of our products, services, technologies and business practices.
- Evaluate the ethical impacts of the collection, use and sharing of PI, beyond compliance with laws and policies.
- Consider using the PI anonymization framework to reduce privacy risk.
- Collect PI only when it is necessary for the business purposes that we've disclosed in our privacy statements.
- Take steps to maintain the accuracy and completeness of the PI we use.
- Protect PI against loss or unauthorized access, use, modification or destruction.
- Are transparent and clear about our privacy practices.
- Provide individuals with simple ways to:
  - Learn about PI we have about them.
  - Correct inaccuracies.
- When possible, provide individuals with choices about how their PI is used and shared.



## Integrity insights

PI is any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to an individual. Examples include, but are not limited to, an individual's:

- Social Security Number or Social Insurance Number.
- Bank account number.
- Date of birth.
- Geolocation data collected from a cell phone.
- Online activity such as browsing or search history.

## Good is in the details

- Q.** Another claim representative recently announced her engagement and upcoming wedding date. One of her customers called and asked for her address in order to send her a card. Can I give out her address?
- A.** We want to build strong relationships with customers, but it's not appropriate to give out the representative's personal address or information. Instead, you could ask for the customer's contact information to pass along to the claim representative.



# We create value for our stakeholders

## Avoiding conflicts of interest

- Relatives and friends | Personal or family financial interests
- Gifts and entertainment
- Corporate opportunities | Outside employment and other activities

Following internal controls

Creating, maintaining and disclosing accurate records and accounts

Responding to inquiries from investors, analysts and the media

Our business is about more than money. It's about people.

Whether it's our customers, communities, shareholders or each other, we are committed to doing the right thing, the right way, at the right time. Each of us has the opportunity to drive change and make meaningful contributions through even seemingly small acts of good, like keeping accurate records and avoiding conflicts of interest. Together, in ways large and small, we create value for all our stakeholders.

## Avoiding conflicts of interest

**We succeed with integrity, never allowing personal interests or activities to interfere with what is best for our Company. Our collective success arises from placing Company outcomes ahead of ourselves.**

A "conflict of interest" occurs when an individual's private interest interferes (or appears to interfere) with the interests of the Company. We rely on teamwork and transparency to best serve our customers. Making bold decisions and taking calculated risks requires trust — in our information, our intentions and each other.

Our commitment to integrity compels us to do what is right for the people who are relying on us. We are all accountable for recognizing actual or potential conflicts of interest and avoiding even the appearance of them. By doing so, we protect the Company's reputation, build trust with our customers and communities and position ourselves to create the best path forward.

Avoiding conflicts of interest means we:

- Disclose actual or potential conflicts honestly and promptly.
- Recognize that conflicts of interest can be avoided or addressed if promptly disclosed and properly managed.
- Consult with a manager or Human Resources for advice when we are unsure whether a conflict of interest exists.
- Remove ourselves from the decision-making process if we have a conflict of interest.

For more details on how to disclose a potential conflict, see our Conflict of Interest Policy in the Resources listed at the end of this document.





# We create value for our stakeholders

Avoiding conflicts of interest

**Relatives and friends | Personal or family financial interests**

Gifts and entertainment

Corporate opportunities | Outside employment and other activities

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**There are several potential risk areas regarding conflicts of interest that should be avoided. Some of the most common types are listed here.**

## Relatives and friends

We do not allow close personal or family relationships to improperly influence our decisions at work. This means we:

- Do not participate in the selection or hiring of job candidates who have a close personal or family relationship with us.
- Ensure those involved in business decisions are aware of any overlapping close personal or family relationships and clarify that the decision process will not be influenced by those relationships.
- Do not place family members or close personal friends in a reporting relationship within our organization.
- Remove ourselves from decisions about current or prospective business partners that employ our close friends or family members.

## Personal or family financial interests

We do not let our personal investments, or those of close family members, affect our work decisions. This means we:

- Disclose any significant personal or family financial interests in the Allstate family of companies, or in a competitor or business partner.
- Understand that a “significant” financial interest could include being an owner, partner, officer or director or a shareholder owning at least 5% of a company’s stock.
- Do not make personal loans to executive officers or members of the board of directors.

All disclosures, which may be sent via email to Human Resources or disclosed during the Annual Compliance attestation process, will be reviewed to determine whether a conflict exists and what actions, if any, ought to be taken.



### Integrity insights

It is not necessary to disclose ownership of a limited number of shares in a publicly traded company or shares owned through a mutual fund or similar diversified investment vehicle.

# We create value for our stakeholders

Avoiding conflicts of interest

Relatives and friends | Personal or family financial interests

## Gifts and entertainment

Corporate opportunities | Outside employment and other activities

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## Gifts and entertainment

**We never offer or accept inappropriate gifts or anything else of value to influence business outcomes.**

Business courtesies, like nominal gifts and modest meals, can promote goodwill and strengthen business relationships. However, our partners and customers need to understand that we always act with integrity. This means we:

- Never offer or accept gifts, entertainment or anything else of value if it appears to obligate someone to reciprocate in a certain way.
- Never offer or accept anything of value if it appears to violate the policies or values of the Company or the other party.
- Never offer or accept cash or cash equivalents, except for specific incentives of nominal value offered through an approved Company program.
- Offer or accept meals only when they serve a legitimate business purpose and are not considered extravagant by local custom.
- Accept gifts only if they are of nominal value.
- Never accept gifts of any value from customers or current or potential suppliers if we are involved in claim handling or procurement.

Remember, laws and cultural norms on giving gifts and entertainment differ around the world. For further guidance, see our Conflict of Interest Policy in the Resources listed at the end of this document.

## Guidance for gifts and entertainment

At times, you may be offered a gift in the course of your work or as a business courtesy. Use the questions to the right to help with gift and entertainment decisions. For each question, select *Yes* or *No* to help you decide whether it is appropriate to accept a gift.



### Integrity insights

You may be invited to an industry trade show, and the organizers may waive the registration fee. If the primary reason for attending is to discuss business or develop business relationships, you may accept. However, you would need to get your manager's approval first, and the Company would have to pay all associated travel expenses.

### Does accepting this gift seem wrong?

**YES:** Do not accept the gift.

**NO:** Go to the next question.

### Could this gift be seen as an attempt to gain influence?

**YES:** Do not accept the gift.

**NO:** Go to the next question.

### Is this gift being given with the expectation of something in return?

**YES:** Do not accept the gift.

**NO:** Go to the next question.

### Is acceptance of this gift in accordance with the applicable policy?

**YES:** Go to the next question.

**NO:** Do not accept the gift.

### Have all required approval and reporting processes been completed?

**YES:** You may accept the gift.

**NO:** Do not accept the gift.



# We create value for our stakeholders

## Avoiding conflicts of interest

Relatives and friends | Personal or family financial interests

Gifts and entertainment

**Corporate opportunities | Outside employment and other activities**

## Following internal controls

Creating, maintaining and disclosing accurate records and accounts

Responding to inquiries from investors, analysts and the media

## Corporate opportunities

If our Company could have an interest in an opportunity, we never take it for ourselves. This means we:

- Share knowledge of opportunities and discoveries we make so that we can better pursue our goals as a company.
- Never use Company property, information or resources for personal gain.
- Never compete with a member of the Allstate family of companies, directly or indirectly.
- Promptly disclose and assign intellectual property developed in the course of our work for Allstate.

## Outside employment and other activities

To achieve collective success as a company, we give our best effort every day. We never allow outside activities to interfere with our contributions to our Company or customers. This means we:

- Ensure that outside jobs, personal businesses and volunteer work do not hinder our work for the Company.
- Do not engage in activities that compete with the Company or could damage its reputation.
- Never use Company resources, including other employees' time, for outside activities unless approved in advance.
- Seek and gain approval from Human Resources before accepting a board service role at any for-profit company. Review our Board Service Guidelines in the Resources listed at the end of this document.



## Integrity insights

If you were to start a personal side business, it would not be appropriate for that business to involve either insurance or non-insurance segments covered by the Allstate family of companies. Even if the business is unrelated, you should not use any contacts gained as an employee of the Allstate family of companies to build your clientele.

If you are unsure about whether a business courtesy, relationship or activity involves a potential conflict of interest, do not hesitate to seek help. Contact your manager or Human Resources, or follow the [Speak Up Process](#).

For more information, see our Conflict of Interest Policy in the Resources listed at the end of this document.

## Conflict of interest checklist

If you're concerned that you might have or appear to have a conflict of interest, ask yourself these questions before taking action:

- Will I feel obligated or make someone else feel obligated to do something?
- Am I failing to honor Our Values?
- Is this an action that will benefit me but not the Company?
- Is there any chance my judgment might be compromised?
- Is there any way this action could give the appearance of a conflict of interest?

If you answer yes to any of these questions or aren't sure how to answer any of them, contact your manager or Human Resources, or follow the [Speak Up Process](#).



# We create value for our stakeholders

## Avoiding conflicts of interest

Relatives and friends | Personal or family financial interests

Gifts and entertainment

Corporate opportunities | Outside employment and other activities

## Following internal controls

### Responding to inquiries from investors, analysts and the media

Creating, maintaining and disclosing accurate records and accounts

## Following internal controls

**Our Behaviors of collaborating early and providing clarity ensure that our processes for developing internal controls involve all of us.**

A “conflict of interest” occurs when an individual’s private interest interferes (or appears to interfere) with the interests of the Company. We rely on teamwork and transparency to best serve our customers. Making bold decisions and taking calculated risks requires trust — in our information, our intentions and each other.

Together, we facilitate and follow our system of internal controls, knowing it helps us achieve our objectives, protects our assets and correctly accounts for them.

Following internal controls means we:

- Design, employ and constantly improve robust controls to protect our assets and ensure accurate financial reporting.
- Maintain a comprehensive and consistent records management system.
- Fully comply with the Sarbanes–Oxley Act, the Foreign Corrupt Practices Act and any other insurance, financial, anti-corruption or other regulations that apply where we do business.
- Empower management to implement controls transparently and thoroughly.

## Responding to inquiries from investors, analysts and the media

**We deliver consistent, accurate, clear information about our Company.**

To ensure we provide clarity and comply with the law, only specifically designated employees should represent the Company to the public or the media. If you are contacted by an investor, analyst or media representative:

- Forward all media inquiries, bloggers and other members of the media to our media relations department at [MediaTeam@allstate.com](mailto:MediaTeam@allstate.com).
- Never speak for the Company unless given specific authorization to do so.

For more information, see the Resources listed at the end of this document.



### Guidance for media inquiries

- Q.** I got an email from an industry blogger about a new line of insurance we just introduced. Can I direct her to the press release we just sent out?
- A.** Rather than send the link, direct her, or any media member, to our Media Relations Department (or Public Relations team or Corporate Relations/Media Relations Department, if applicable). That way, if the blogger has additional questions or needs further resources, the response can be easily and expertly provided.





# We create value for our stakeholders

Avoiding conflicts of interest

Relatives and friends | Personal or family financial interests

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Responding to inquiries from investors, analysts and the media

**Creating, maintaining and disclosing accurate records and accounts**

## Creating, maintaining and disclosing accurate records and accounts

**We manage all business records with accuracy and integrity, according to accepted accounting principles and legal requirements.**

We generate millions of records every year. Making sure they are accurate and properly maintained is essential to our business. It increases efficiency and improves our ability to develop winning strategies. It also provides crucial information to investors, who rely on information that is timely and correct, and it enables us to meet strict regulatory standards and avoid investigations and legal action.

Creating, altering or destroying records for anything other than a legitimate business reason is unacceptable. Doing so to impede the efforts of any governmental or regulatory agency may also be a criminal offense. Every one of us plays a role in accurate record-keeping, and we must approach that role with Our Values of Integrity and Collective Success top of mind.

Keeping accurate records means we:

- Reflect all transactions honestly, accurately and on time, and in the proper account, department and accounting period.
- Record all assets, liabilities, revenues and expenses according to the law, generally accepted accounting principles and Company policy.
- Ensure all reports, disclosures and communications to government authorities and investors are full, fair, accurate, timely and clear.
- Create, store and dispose of all business records according to records management procedures and retention schedules.
- Cooperate with all audits, market conduct exams and investigations, and safeguard any records that may relate to legal proceedings.

If you have questions or suspect inaccurate record-keeping, contact your manager or Human Resources. You can also follow the [Speak Up Process](#).



### Integrity insights

The term “records” means more than just invoices and quarterly reports. It also includes timesheets, expense reports, emails, voicemails, databases, submissions, drawings and photos. Anything that records a piece of business-related information, whether digitally or in hard-copy form, can be a record.

# We live with integrity on a global scale

## Doing business across borders

Preventing money laundering

Preventing bribery and corruption

Respecting and protecting human rights

The Allstate family of companies is powered by a global network of operations. Our collective success depends on a chorus of unique voices that helps us work harder, meet customer needs more effectively and share bolder, more innovative ideas. Our global reach also means we are subject to a wide variety of laws, regulations and procedures.

We approach these requirements with full integrity, understanding that they help protect us and those we serve. We maintain our collective success by seeking out business partners who share our competitive spirit, our commitment to quality and, most of all, Our Values. As we continue to expand our global footprint, we will not lower our ethical standards.

## Doing business across borders

**We understand and follow the letter and spirit of all trade regulations that apply to us.**

We want to be the best when it comes to protecting our customers. As a global company, we must understand and follow a variety of trade regulations and procedures. Wherever we do business, we live into Our Shared Purpose.

Doing business across borders with integrity means we:

- Observe economic and trade sanctions established by U.S. federal and international mandates.
- Follow all anti-boycott laws that apply to us and do not take part in unsanctioned boycotts.
- Obtain proper authorization before transferring materials or information across borders.
- Follow applicable privacy and data protection laws with regard to the cross-border transfer of personal information.

If you have any questions, contact your manager or your legal department, or see the Resources listed at the end of this document.



# We live with integrity on a global scale

Doing business across borders

**Preventing money laundering**

Preventing bribery and corruption

Respecting and protecting human rights

## Preventing money laundering

**We are watchful for signs of money laundering and take action to prevent criminal financial activity.**

Our global operations make us a potential target for money launderers and even those who would finance terrorism. The practice of money laundering is intended to conceal the true nature of criminally obtained funds. We must not only prohibit money laundering and terrorist financing but also actively prevent it. By learning how to recognize these practices and taking appropriate measures against them, we maintain our integrity.

Preventing money laundering means we:

- Comply with the USA Patriot Act and all other applicable anti-money laundering laws and regulations.
- Are alert for activities that facilitate money laundering or the funding of terrorist or criminal activities.
- Follow all of our anti-money laundering policies, procedures and internal controls, which are designed to ensure compliance with the USA Patriot Act and other regulations.

For any questions about money laundering prevention, contact your manager or your legal department.

You can also consult the Resources listed at the end of this document.



### Integrity insights

Money laundering is how criminals attempt to conceal the true origin and ownership of criminal proceeds in order to make those proceeds appear legitimate. Terrorist financing involves the use of money to fund illegal activities while concealing the origin of the funds or their intended use. Since the transactions often have a legitimate origin and involve small amounts of money, terrorist financing can be more difficult to identify than money laundering. Signs of money laundering or terrorist financing include but are not limited to:

- Making unusually large payments using cash equivalents (e.g., cashier's checks and money orders).
- Purchasing several policies and then canceling them.
- Making a large payment, then asking for a refund in a different form of payment.
- Purchasing a policy, then making false claims of losses.
- A customer failing to provide a full business description.
- Deposits and wire transfers that differ from established patterns.



# We live with integrity on a global scale

Doing business across borders

Preventing money laundering

**Preventing bribery and corruption**

Respecting and protecting human rights

## Preventing bribery and corruption

**Corruption has no place in our business.**

We do not tolerate it in any form, anywhere we operate. We are each accountable for recognizing the signs of bribery and corruption. We make our business and our communities stronger by refusing to participate, and we protect our reputation.

Preventing bribery and corruption means we:

- Never offer or accept bribes, kickbacks or anything of value that could improperly influence a business decision.
- Never promise or provide anything of value to public officials or business partners to gain a business advantage.
- Follow our Company policies and values when giving and receiving business gifts and entertainment.
- Record all payments and receipts completely and accurately.
- Do not use a third party to make improper payments.
- Perform due diligence to ensure our agents, contractors, suppliers and third-party representatives share our anti-corruption stance and values.
- Comply with the Foreign Corrupt Practices Act, the U.K. Bribery Act and any other anti-corruption regulations that apply to us.

For more information, see our Antibribery Policy in the Resources listed at the end of this document.

## Integrity insights

A bribe involves giving or offering any payment or anything of value to obtain favorable treatment. Kickbacks involve giving or receiving personal payments as a reward for the grant of a contract or other business transaction. Neither bribes nor kickbacks are acceptable methods to facilitate business.

## Good is in the details

- Q.** We're about to open a new office in an emerging market. The contacts there are experiencing delays getting final government approval to open, but they say a local official is offering to expedite their operating license for a one-time fee. Can they pay it?
- A.** The official appears to be soliciting a facilitating or "grease" payment. This is the term for relatively small payments that secure or speed up routine, nondiscretionary and legal government actions. They are legal in some countries, but most national laws, including the U.K. Bribery Act, prohibit even minor facilitating payments—and so do we. We see them as bribes, which we do not pay. See whether the contacts can speak with anyone besides that local official to get the license. If they still need help, have them contact Human Resources or their legal department.





# We live with integrity on a global scale

Doing business across borders

Preventing money laundering

Preventing bribery and corruption

**Respecting and protecting human rights**

## Respecting and protecting human rights

**We respect individual human rights and insist that our business partners do the same.**

We are dedicated to empowering people with the protection they need to pursue their hopes and dreams. It goes against everything we stand for to look the other way when we see human rights abuses, such as child labor, slavery or human trafficking. We embrace our responsibility to protect human rights, as an employer, purchaser of goods and services, investor and provider of insurance products and services. By supporting business partners who share Our Values, and by pushing for fairness and equality wherever we operate, we can be a positive influence for workers everywhere.

If you believe a business partner may be acting unethically, contact your manager, any manager or Human Resources. You can also follow the [Speak Up Process](#) so we can initiate an investigation.

Respecting and protecting human rights means we:

- Comply with all local and international labor laws where we do business and operate, often going above and beyond their requirements.
- Perform due diligence to find business partners who share Our Values and commitment to protect human rights and improve working conditions for all.
- Engage in site inspections and other activities to confirm our partners are upholding their commitments to safe and fair working conditions.

The [Supplier Code of Business Conduct](#) is shared with Allstate suppliers to serve as a guide. It is intended to be shared with their employees to ensure they understand and are committed to living into our expectations when serving Allstate.



# We support the communities where we live and work

Protecting our planet

Improving our communities

Participating in the political process

Our communities are an extension of us. They are where we live, work, play and grow. We care for and protect them, just as we do our customers. After all, the best brands and companies don't settle for satisfactory — they dare to be great.

## Protecting our planet

**Allstate works to understand climate risks that directly affect our insurance products and assets. And we protect our customers by doing so.**

Allstate sees climate change as one of the most critical challenges of our time. It threatens our business and our communities. Through our work to mitigate climate risk, we are part of the solution for a changing world. A changing climate means we must identify risks and opportunities associated with extreme weather patterns; and comply with all applicable environmental laws, regulations and Company policies, including permits and licenses

## Improving our communities

**We support our communities and help them thrive.**

We care about our customers and the communities they live in. These diverse communities are where we live too. We empower all people to imagine — and achieve — better for themselves and their communities through social impact programs, nonprofit partnerships, volunteer services, charity drives and other initiatives that bring Our Values to life. We make sure all contributions and charity efforts are legal and ethical.

If you have questions about whether you can represent the Company while participating in a charitable cause, ask your manager. If you think the Company might want to get involved as a sponsor and you are unsure of whom to contact, reach out to The Allstate Foundation.

For more information, see our Sustainability Report at [AllstateSustainability.com](https://www.allstate.com/sustainability).



## Integrity insights

Allstate and its subsidiaries, The Allstate Foundation and Allstate employees and agents have donated millions of dollars to charitable causes in our communities and volunteered thousands of days. These efforts have empowered youth, uplifted domestic violence survivors, advanced racial equity, and strengthened communities when they needed it most.



# We support the communities where we live and work

Protecting our planet

Improving our communities

**Participating in the political process**

## Participating in the political process

**We engage thoughtfully in the political process, protecting our interests while bringing positive change to our communities.**

We encourage work-life balance, which includes participation in the political process and civic duties. We also recognize the need to engage in politics as a company. In both cases, it is essential that we do so legally and ethically to keep from harming the Company's reputation and interests. We separate our personal political activities from our work to maintain the transparency and integrity that our customers, communities and stakeholders have come to expect from us.

Participating in the political process with integrity means we:

- Comply with all campaign finance and election laws where we do business.
- Notify the Company when we run for office or get appointed or elected to office.
- Never contact lawmakers on behalf of the Company or lobby with lawmakers for the Company's interests without getting explicit approval from Government & Industry Relations or unless participating in Company-sponsored political advocacy opportunities.
- Make it clear that we do not formally represent the Company when we take personal political action.
- Understand that activities with lawmakers outside of constituent advocacy could be considered lobbying and would have to meet all reporting and other legal requirements.
- Keep our personal political activities separate from our work environment.
- Do not force our personal political views on others in the workplace.



We understand and respect your right to express political opinions on social media. We ask that you follow the social media policy in the Resources listed at the end of this document.

If you are seeking an elected or appointed political position, contact Human Resources. Making the Company aware of your activity will help prevent potential conflicts of interest or the appearance of such conflicts. For further guidance, see our Conflict of Interest Policy in the Resources listed at the end of this document.



# Resources

Policies, guidelines, and other resources are referenced throughout the Code. If you are an employee, click on your company-specific links to access the resources that apply to you.

## The Allstate Corporation Shared Compliance Policies

- [Global Code of Business Conduct Waiver Policy](#)
- [Antitrust Policy](#)
- [Insider Trading Policy](#)
- [Anti-Bribery Policy](#)
- [Conflict of Interest Policy](#)
  - [Board Service Guidelines](#)
- [Privacy Policy](#)

## Allstate U.S. (Allstate Dealer Services, Allstate Insurance Company, Allstate Roadside, Arity, and Avail)

The shared and Allstate U.S.-specific policies are located in myHR under the HR Policy Guide.

- [Allstate Standards of Conduct](#)
- [Sexual Harassment Policy](#)
- [Inclusive Workplace Policies](#)
- [General Employment Policies](#)
- [Workplace Guidelines](#)
- [IT and Internet Communication](#)
- [Social Media Policy](#)
- [Communications Outside the Company Policy](#)
- [Attorney Conduct Policy](#)
- [Policy to Ensure Compliance with the Violent Crime Control and Law Enforcement Act of 1994](#)

Compliance Mailbox: [HRSupport@allstate.zendesk.com](mailto:HRSupport@allstate.zendesk.com)

## Allstate Northern Ireland

- [Equal Opportunity Policy](#)
- [Dignity at Work Policy](#)
- [Employee Health and Safety Policy](#)
- [Social Media Policy](#)
- [Information Technology Usage Policy](#)
- [Employee and Contractor Data Privacy Policy](#)

Compliance Mailbox: [ANICompliance@allstate.com](mailto:ANICompliance@allstate.com)

## Allstate Identity Protection

The shared and Allstate Identity Protection-specific policies are located on the [Allstate Identity Protection Intranet](#) (located in ADP) in the forms library. Go to the resources tab, click company information and then click on forms library.

- [Acceptable Use and Security Policy](#)
- [Employee Handbook](#)
- [Non-Harassment and Sexual Harassment Policies](#)

Compliance Mailbox: [HR@aip.com](mailto:HR@aip.com)

## Allstate Canada Group

For ACG Employees the shared and Canada-specific policies are located on the ACG Intranet under [Company Policies/Code of Ethics](#).

Compliance Mailbox: [HRCanada@allstate.ca](mailto:HRCanada@allstate.ca)

## Allstate Protection Plans

The shared and Allstate Protection Plans-specific policies are located on the [Allstate Protection Plans Intranet](#) under Company Policies. To get to the company policies, go to the resources tab, and under company information, click on company policies.

- [Employee Handbook](#)
- [Information Security Policy](#)
- [Travel and Expense Policy](#)
- [Anti-Harassment, Discrimination & Retaliation Policy](#)

Compliance Mailbox: [HR@Squaretrade.com](mailto:HR@Squaretrade.com)

## Allstate India Private Limited

- [Asset Management Policy](#)
- [IT Usage Policy](#)
- [Policy on Employee and Contractor Data Privacy](#)
- [Prevention of Sexual Harassment](#)

Compliance Mailbox: [ASPLEthicsEducation@allstate.com](mailto:ASPLEthicsEducation@allstate.com)

## Answer Financial

The shared and Allstate Identity Protection-specific policies are located on the [Answer Financial Intranet](#) (located in ADP) under company policies.

Compliance Mailbox: [Compliance@AnswerFinancial.com](mailto:Compliance@AnswerFinancial.com)

## National General

- [National General Employee Handbook](#)
- [Enterprise Information Security Policies](#)
- [Travel and Entertainment Policies](#)

Compliance Mailbox: [HRCompliance@NGIC.com](mailto:HRCompliance@NGIC.com)





