



# A Message to our Suppliers

At CNA, we build relationships with suppliers that are based on trust, teamwork, honesty, mutual respect and contractual business terms. We are committed to working with suppliers who contribute to our overall business and sourcing goals, which include the provision of high-quality products and services and excellent customer service at market competitive prices. In this document, we outline our Supplier Code of Conduct, including the guiding principles that ensure honesty and accountability.

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## Single Points of Contact

We promote direct and open communications. All contract initiations and finalizations are coordinated through Procurement. Vendor development and management will be coordinated through various business areas. Suppliers will be provided with the appropriate point of contact for engagement.

## Quality

CNA engages in business with suppliers who consider their customer as a true extension of their process, including a focus on positive outcomes for CNA's goals. Suppliers must ensure that each of their products and services complies with the contractual requirements with CNA. Suppliers are accountable for the value of the products and services they provide as well as the quality of related products and services of their suppliers, subcontractors, service providers, and/or material sources. We expect all suppliers to conduct their activities in a professional manner and to adhere to our standards. Our employees will also use the highest level of professionalism.

## Workplace Health & Safety

We prohibit discrimination based on race, color, religion, age, disability, gender, sexual orientation, gender identity, national origin, marital status, citizenship, veteran status, genetic information, or any other characteristic protected by applicable federal, state or local law. We prohibit harassment based on a protected status, including sexual harassment. Suppliers are expected to comply with these standards.

Suppliers will provide employees with a safe and healthy workplace in compliance with all applicable laws and regulations. Suppliers will take adequate steps to prevent accidents and injury to health at work including providing workers with appropriate workplace health and safety information and training. Suppliers will identify and assess emergency situations and minimize their impact by having adequate emergency preparedness plans and response procedures to ensure their employees' health and safety.

CNA's global footprint, flexibility and supplier relationships are key to the resilience of our supply chain. CNA expects suppliers to develop and maintain a business continuity and resiliency plan in accordance with any agreements made with CNA.

## Diversity

CNA is committed to fostering a diverse and inclusive culture grounded in equity. We prioritize talent and programs in ways that empower our organization, clients and communities to act as active allies and advocates for equality.

In line with that vision, CNA's Supplier Diversity program aims to build strong, innovative relationships, with qualified companies, ensuring that diverse businesses have an equitable opportunity to compete for and win our business. By reducing barriers, promoting economic empowerment, and ensuring competitive access to contract and purchasing opportunities for a diverse base of suppliers, we will increase equity in today's business environment.

CNA expects suppliers to uphold similar values in their own supply chains, and is committed to promoting and monitoring direct and indirect diverse supplier spend of the companies with which we partner.

## Data Security, Confidentiality & Accuracy

Suppliers will handle and process data with the purposes for which it was collected or made available. Suppliers shall demonstrate appropriate industry standard data security controls to ensure that all information is protected and secure from damage and unauthorized use. In addition to the above, suppliers shall also follow any data security policies and requirements specified in contractual agreements with CNA.

Suppliers must respect and maintain the confidentiality of all non-public information about CNA and its activities, including all non-public information obtained in the performance of the supplier's duties about CNA's customers, clients

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or applicable third parties.

If suppliers experience any security incidents, they must notify appropriate contacts within time frames specified within the service contract.

### **Supplier Due Diligence & Ongoing Management**

CNA is committed to responsible sourcing and suppliers should continue to make changes that will bring long-lasting, sustainable impact not only to their own facilities and operations, but also to CNA.

CNA conducts appropriate risk-based due diligence on all suppliers during the initiation of the relationship and throughout the term of the relationship. Suppliers must comply with CNA's due diligence procedures and provide complete, accurate, and timely information when requested to facilitate such efforts.

Key suppliers must undergo a quarterly business review with CNA, which includes scoring and/or metrics of their performance, particularly regarding sustainability, risk, and security. Suppliers must maintain and provide upon request, proper, accurate, complete and reliable financial and business records to CNA relating to any transactions or expenditures relevant to CNA business.

### **Ethics**

Suppliers will operate with integrity, in an ethical manner and in compliance with all applicable laws, rules and regulations applicable to their industry and place of business. Suppliers will not engage in bribery, corruption, embezzlement, extortion, kickbacks, excessive commissions, inducements or fees or any other prohibited business practices.

### **Suppliers are expected to:**

- Recognize and avoid situations that can create an actual or apparent conflict of interest when working with or on behalf of CNA. Conflicts of interest can occur if a personal, social, financial, professional, or political activity interferes or appears to interfere with (1) a supplier's ability to perform its work with or on behalf of CNA effectively and objectively, or (2) the interests of CNA.
- Adhere to applicable laws and regulations when exchanging gifts or business courtesies and avoid even the perception of impropriety. While working with or for CNA, suppliers may only offer or accept non-cash gifts, meals or entertainment when:
  - Promoting a successful working relationship and overall goodwill;
  - Relating to a legitimate business interest;
  - Occurring at an appropriate venue;
  - The gift is reasonable in value; and
  - The gift does not create the appearance of an improper attempt to influence a business decision (i.e. during an active RFP or contract renewal)
- Comply with all applicable trade laws and regulations
- Comply with applicable privacy, data protection and data exportation/importation laws and regulations
- Comply with antitrust laws and fair competition laws that govern the jurisdiction in which they conduct business
- Comply with anti-money laundering and anti-terrorism regulations and take the necessary steps to ensure that CNA business is conducted only with reputable parties that are financed only from legitimate sources

### **Suppliers are prohibited from:**

- Engaging in bribery, corruption, embezzlement, extortion, kickbacks, excessive commission, inducements or fees and any other prohibited business practices of any kind. Suppliers are expected to comply with the U.S. Foreign Corrupt Policies Act and the UK Bribery Act, regardless of where in the world they are operating, and must engage in appropriate due diligence to ensure that subcontractors are not likely to engage in corruption. CNA has zero tolerance for bribery or corruption of any kind and prohibits suppliers from paying improper facilitation payments
- Participating in any international boycotts that are not sanctioned by the U.S. government or applicable laws
- Representing themselves as employees or agents of CNA



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- Using CNA's trademarks, intellectual property, or confidential information without prior authorization from CNA
  - Disclosing its relationship with CNA without prior authorization from CNA, excluding cases where required by law, regulation or to comply with an active law enforcement investigation
  - Engaging in any activity that may adversely impact CNA's reputation. This includes but is not limited to taking any such action on any type of social media platform

### **Reciprocity**

No supplier is required to purchase our products or services in order to compete for our business.

### **Reporting Suspected Violations**

All suppliers must adhere to this Code of Conduct while conducting business with, or on behalf of, CNA. We rely on our suppliers to report issues or concerns related to unethical or illegal conduct, including but not limited to, employment practices, work environment concerns, fraud, financial or accounting practices, and violations of policies.

The below reporting channels are available for any issues and/or concerns:

Suspected Data Breach:

- 866-262-6244
- [SecurityControlCenter@cna.com](mailto:SecurityControlCenter@cna.com)

Suspected Misconduct or Compliance Issues:

- 888-679-9252
- [CNA Compliance Hotline](#)

CNA does not tolerate retaliation. We consider acts of retaliation to be misconduct that can result in disciplinary action, up to and including termination. We seek to provide a safe, healthy and productive workplace for our employees and our business partners who assist us in our business operations and invite our suppliers to adopt similar internal procedures.

