Aflac Supplier Code of Conduct

Aflac is committed to the responsibilities of fair labor practices, ethical business conduct, and legal compliance in all communities in which it does business. The Aflac Supplier Code of Conduct ("the Code") outlines Aflac's commitment to responsible supply chain management practices and applies to all organizations doing business with Aflac. Aflac may take appropriate actions against any supplier who violates, or is suspected of violating, the Code, including the termination of business relationships with the supplier, if necessary, at Aflac's sole discretion. The obligations in this Code are in addition to any obligations set forth in agreements between Aflac and its suppliers.

General Expectation

It is expected that Suppliers will at all times act ethically and in full compliance with all applicable laws, rules, and regulations of the United States and those of the respective country of manufacture, operations, or exportation.

Service Level and Quality Expectations

Aflac suppliers are expected to meet the following service standards:

- Respond promptly and accurately to questions
- Honor and meet all contractual obligations as described in the terms and conditions of the instrument(s) of agreement (purchase order, valid contract, etc.), unless modifications are negotiated and integrated into the instrument
- Strictly conform to all Aflac policies concerning conduct with our employees
- Conduct all business relationships with honesty, fairness, and integrity
- Ensure that all Aflac information related to our business relationship is kept confidential
- Actively support Aflac's supplier diversity initiatives by offering subcontracting opportunities to certified diverse suppliers associated with providing our products and services
- Support Aflac's sustainability efforts by considering the economic, social, and environmental impacts of materials and services offered

A supplier is expected to adopt and carry out processes and procedures within its own organization that enable it to comply with this Supplier Code of Conduct.

If a supplier fails to comply with this Supplier Code of Conduct, Aflac shall have the right to wholly or partially suspend or terminate its relationship with the supplier and any or all outstanding purchase orders, contracts, and agreements without penalty, liability or obligation.

Aflac shall not be responsible for any delays or nonperformance caused by a supplier's efforts to comply with this Supplier Code of Conduct.

Supplier Employees

Employee engagement is achieved through fostering a fair, diverse, healthy, and safe workplace. Aflac has always valued the contributions of each employee. We expect our suppliers to promote a similar culture. Suppliers must observe all applicable labor laws.

Aflac is committed to safeguard workers' rights under both United States and international labor and social security laws and regulations. All Suppliers shall adopt and adhere to rules and conditions of employment that respect workers and, at a minimum, safeguard workers' rights under applicable national and international labor and social security laws and regulations.

Employment Age

No workers employed by Suppliers may be under the age of 15 or under the age for completion of compulsory education, whichever is higher. Suppliers must observe all local guidelines and laws and requirements for work of employees under 18 years of age, particularly those pertaining to hours of work and working conditions.

Freedom of Association and Collective Bargaining

Suppliers shall recognize and respect the right of employees to freely associate and collectively bargain, in accordance with applicable rules and regulations.

Child labor

As defined by the International Labor Organization, child labor is any "work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development."[1] All suppliers must follow local child labor laws.

Forced labor

Forced Labor is "all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily."[2] Suppliers must not participate in forced or slave labor or human trafficking.

All suppliers must warrant that the merchandise has been manufactured in compliance with the Uyghur Forced Labor Prevention Act and 19 USC §1307, which prohibits the importation of merchandise or its components made with forced labor, the International Labor Organization's indicators of forced labor, and the Fair Labor Standards Act and rules and regulations thereunder.

Suppliers also warrant that its merchandise has not been manufactured in contravention of any Withhold Release Order ("WRO") issued by U.S. Customs and Border Protection ("CBP").

Should CBP detain any shipment, suppliers acknowledges that it is Aflac's decision whether to make a submission to CBP in order to obtain the release of the detained merchandise.

Harassment

Suppliers agree that it will treat employees fairly and create a workplace culture where employees feel comfortable and safe. Suppliers agree it will not subject its employees to any form of corporal punishment, physical, sexual, psychological or verbal harassment or abuse at any time for any reason. Suppliers should not use monetary fines as a disciplinary practice.

Discrimination

[1] http://www.ilo.org/ipec/facts/lang--en/index.htm

[2] http://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/forced-labour/lang--en/index.htm

Suppliers must always comply with all applicable laws, rules and regulations concerning discrimination and equal opportunity in hiring and employment practices. We expect suppliers to make all employment decisions based on merit and not on a person's race, color, national origin and country of citizenship, veteran status, medical condition, religion, age, gender, sexual orientation, gender identity, marital status, disability or any other basis prohibited by law.

Women's Rights

Suppliers must ensure that female employees receive equal treatment in all aspects of their employment. Employees should not be exposed to hazards that may endanger their reproductive health.

DE&I

Aflac believes that DE&I are social and economic imperatives and looks to its Suppliers to share this commitment in their operations, workforces, and within their supply chains. Suppliers and their subcontractors are expected to engage a fair workforce, inclusive of diverse groups. Suppliers are expected to proactively ensure that all groups and individuals are provided access and consideration to be hired for their services.

Compensation and working hours

Suppliers must always comply with all applicable laws, rules and regulations regarding wages and working hours in the locations in which it operates, including, but not limited to, all applicable laws, rules and regulations relating to minimum wage, time off and overtime compensation.

Supplier must ensure employees' hours worked shall not exceed the legal limitation on regular and overtime hours in the jurisdiction in which they operate.

Health and Safety

A supplier must always comply with all applicable health and safety laws, rules and regulations and provide a healthy and safe working environment that promotes accident prevention and minimizes exposure to health and safety risks. Suppliers should encourage employees to report all accidents, injuries, unsafe or hazardous working conditions and to alert management before performing tasks if the work is considered unsafe. Suppliers must also ensure that the same standards of health and safety are applied in any housing provided to employees.

Customers

Our business depends on Aflac's reputation for integrity and principled business conduct. People worldwide have chosen Aflac because they know we will keep our promise to provide financial assistance when an illness or serious accident occurs. Suppliers must help Aflac deliver our promise to customers by adhering to all consumer's rights laws and regulations.

Confidential Information

Aflac collects and maintains a great deal of information about the people we insure. State and federal laws and regulations, including Health Insurance Privacy and Accountability Act (HIPAA), limit how Aflac and its suppliers may use and disclose this information. Suppliers must comply with all HIPAA regulations and all obligations set forth in their agreements with Aflac.

It is expected that Suppliers will preserve and protect confidential information and will not permit any unauthorized disclosure or use of confidential information that it may receive or obtain or to which it may

be given access in connection with its relationship with Aflac. Suppliers should recognize that unauthorized use or disclosure of such information may have personal, legal, reputational and financial consequences for the supplier, the individuals whose personal information may be implicated, and for Aflac. In addition, suppliers must comply with all applicable privacy/data protection and information security laws and regulations.

Fair and Accurate Communication

All marketing communications to customers should fairly and accurately represent the products or services suppliers provide.

Environment

Aflac suppliers must comply with local laws and regulations regarding waste disposal, air pollution, and water use. In addition, Aflac encourages all suppliers to implement best environmental practices. Best environmental practices include:

- Having a written statement from the senior company officer outlining the company's commitment to sustainability.
- Informing Aflac of fines or sanctions resulting from non-compliance of environmental laws and regulations.
- Reporting to the Global Reporting Initiative (GRI), Dow Jones Sustainability Index, or Ethisphere Survey. Suppliers who are not eligible for these reporting frameworks can still follow the guidelines laid out by these organizations.
- Setting goals for reducing negative natural resource impacts on the environment, the economy and society.
- Transparency in environmental impact reporting, i.e. reporting to the Carbon Disclosure Project and producing annual Corporate Social Responsibility reports.
- Suppliers must comply with all applicable local environmental laws and regulations. Aflac is committed to preserving the world's natural resources. This includes implementing processes to identify and manage risks and opportunities related to climate change. Where appropriate to the size and nature of their operations, Suppliers should address the environmental impacts from its operations including raw material usage, greenhouse gas emissions, water, waste, air quality and biodiversity. Suppliers are encouraged to track, manage, and mitigate the environmental impact of their operations and strategies, including those of their suppliers. Where feasible, Suppliers should take steps to incorporate how they will mitigate the impact of climate change into their strategies and business resiliency plans, including establishing scope 1, 2 and 3 greenhouse gas (GHG) emissions reduction targets, and realizing these targets through efficiency measures, including selecting low GHG products and services, and other initiatives, where relevant and as applicable to their operations. If requested by Aflac, Suppliers are encouraged to disclose energy and GHG emissions management policies and performance. Suppliers are encouraged to take steps to conserve, reduce the use of, and reuse water in their own operations. Suppliers are also encouraged to manage water resources to ensure their operations do not prevent access to sufficient safe water, sanitation and hygiene for all users in surrounding communities, including those both up and downstream from their facilities. Suppliers are encouraged to take concrete steps to minimize or eliminate waste across their operations and those of their suppliers. Any waste, and in particular hazardous waste, must be managed in a responsible manner. Chemical and other materials posing a hazard if released to the environment should be identified and managed to ensure safe handling, movement, storage, recycling, reuse or disposal. All workers who handle waste and hazardous wastes must be properly trained on how to deal with substances and the

potential hazards the material presents if mismanaged or released to the worker and environment. Suppliers must only use permitted transporters and haulers that have a positive record of operating safely and complying with applicable transportation laws and best management practices.

Ethics

Bribery/Gifts

Giving and/or receiving business-related gifts is not appropriate if doing so creates, or appears to create, an obligation or bias, or if the gift is given with the intent to influence a business decision. While gift giving is accepted in some cultures, we ask suppliers to help us maintain our integrity by not offering gifts to Aflac employees. Gifts in excess of $100 are discouraged and, if made, the Aflac employee is required to report the gift to the corporate compliance coordinator. The supplier must certify that they are fully compliant with applicable laws and regulations, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act, as well as local anti-bribery and anti-corruption laws.

Bribes, kickbacks, and other similar payments are unacceptable practices. Aflac prohibits these payments in all circumstances.

Currency Controls and Money Laundering

A supplier must always comply with all applicable currency controls and never directly or indirectly participate in or cooperate with any money laundering scheme in connection with any matter involving or relating to Aflac.

Conflicts of Interest

Suppliers are expected to ethically handle actual or apparent conflicts of interest between personal and professional relationships. Before participating in any transaction or business arrangement or otherwise acting in a manner that creates or appears to create a conflict of interest; suppliers must fully disclose all facts and circumstances.

Communication

Suppliers will help Aflac in its efforts to be socially responsible and sustainable by communicating this Code with their employees, managers, and supervisors that support Aflac.

Inspection and Compliance

The supplier will maintain on-site documentation as evidence of their compliance with the guidelines and policies expressed herein. Aflac will take affirmative measures, such as on-site inspections of the supplier's facilities to ensure compliance. The supplier must allow Aflac representatives complete and full access to their facilities, as well as employee records, and employees for confidential interviews in connection with social compliance visits. Violation of these compliance guidelines and policies will be appropriately remedied at the cost of the supplier.

Monitoring and Reporting

The Code should be made readily available to all employees of the supplier company. Aflac reserves the right to audit suppliers for compliance as necessary. Audits may include but are not limited to, inspections of facilities and on- and off-site interviews with employees. Suppliers may be occasionally asked to provide documentation describing how the Aflac Supplier Code of Conduct is implemented in their operations. Supplier agrees to assist and cooperate in any investigation related to potential

violations of this Vendor Code of Conduct.

Any violation of this Vendor Code of Conduct is to be reported to Aflac immediately upon discovery. Supplier must allow its employees to report violations of this Vendor Code of Conduct to Aflac without threat of retaliation or punishment. Violations of the Code may be confidentially reported to Aflac through the following:

Aflac Supplier Code of Conduct Department
Call (844) 246-4371 to submit a report or do so online at www.aflac.ethicspoint.com

Mail
Aflac Supplier Code of Conduct
Third Party Management
1932 Wynnton Road
Columbus, GA 31999-0001

Questions or concerns about the code may be emailed to Aflac's Third Party Management Department: Third Party Management@aflac.com.

Additional Aflac related supplier information can be found at:
http://www.aflac.com/aboutaflac/corporateoverview/vendorinformation.aspx

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