Vendor Code of Ethics and Business Conduct

Cincinnati Financial Corporation and its U.S. affiliates and subsidiaries (collectively "Cincinnati") are committed to ethical business practices. We strive to ensure that business decisions are guided by a commitment to operate within <u>The Cincinnati</u> <u>Ethic</u>. Our reputation depends, in part, on the integrity of our vendors with which we do business. We expect our vendors to embrace our commitment to integrity by complying with all applicable laws and regulations, and by acting ethically at all times.

This Vendor Code of Ethics and Business Conduct ("Vendor Code") sets forth minimum standards that Cincinnati requires of all current and future vendors, sub-vendors and their personnel. In instances where standards outlined in this Vendor Code differ from local laws, vendors must respect these standards within the framework of the applicable local laws.

The expectations in this Vendor Code are not intended to conflict with the terms of a vendor's contract with Cincinnati. In the event of any conflict or ambiguity between any provision of this Vendor Code and the provisions of any relevant contract, the provisions of that contract will prevail. Vendors should have adequate monitoring and recordkeeping systems to ensure compliance with this Vendor Code. Cincinnati reserves the right to monitor, review and verify compliance with this Vendor Code.

Legal and Regulatory Compliance

Cincinnati is committed to obeying the law wherever it conducts business. Vendors are expected to comply with all federal, state, and local laws and regulations applicable to your business and to the provision of goods and services to Cincinnati.

Integrity and Ethical Business Practices

Accuracy of Records: Accurate records and disclosure allow Cincinnati to meet its legal, financial and regulatory obligations. Vendors must keep complete and accurate records of all matters related to your business with Cincinnati, including financial records. You must never tamper with, manipulate, alter, or conceal any business record and must never make a false or misleading entry on any record or report. Your practices must conform to the applicable industry rules and standards for maintaining and retaining records.

Anti-Money Laundering and Anti-Terrorism:

Vendors must never knowingly facilitate or participate in any money laundering, terrorist financing, or other financial criminal activity. Cincinnati expects you to promptly report any suspicious activity. You must also respect all applicable government policies on trade sanctions and comply with applicable trade sanction programs and export regulations. Cincinnati will conduct business only with vendors involved in legitimate business activities derived from legitimate sources.

Asset Protection: Vendors engaged in business with Cincinnati agree to protect and preserve Cincinnati's assets, whether tangible or intangible. This includes the use of Cincinnati's name, logos and other trademarks and service marks, which is prohibited without prior consent.

Conflicts of Interest and Gifts: Cincinnati is transparent in our business dealings and avoids situations that put our associates' personal interests in conflict with those of the company or lead others to question our business objectivity. Vendors are expected to disclose any conduct or relationship that could present an actual or perceived conflict with our interests. Additionally, you may not offer any Cincinnati associate anything that may create the risk or perception of undue influence or call Cincinnati's objectivity into question.

Corruption and Bribery: Vendors must not participate in extortion, bribes or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector. You must comply with all applicable anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act, Foreign Extortion Protection Act and the U.K. Bribery Act, as well as laws governing lobbying, gifts and payments to public officials, political campaign contribution laws, and other related regulations.

Environment and Sustainability: Cincinnati is committed to creating a sustainable enterprise that creates long-term value for our stakeholders, including our shareholders, our associates, our independent insurance agents, our policyholders and our communities. You can find more information at *www.cinfin.com/sustainability*. We expect vendors to comply with all relevant environmental laws and regulations.

Insider Trading: Buying or selling securities based on inside information is illegal. Never directly or indirectly share non-public information acquired by conducting business with Cincinnati.

Employment and the Workplace

Anti-Retaliation: Vendors must prohibit retaliation against their personnel who report compliance or other ethical issues during the course of work performed for Cincinnati or who cooperate in good faith with the investigation of such a complaint.

Harassment, Discrimination and Diversity:

Cincinnati is committed to a workplace free from harassment and abuse and supports diversity and equal opportunity in all hiring and employment practices. We expect our vendors to uphold the same commitments by complying with all applicable laws, rules and regulations concerning harassment and discrimination.

Health and Safety: Cincinnati is committed to a safe and healthy work environment. We expect our vendors to uphold the same commitment by complying with all applicable safety and health laws and regulations. To ensure that a safe environment is maintained, vendors are prohibited from:

- Performing any work for or on behalf of Cincinnati while under the influence of any illegal drugs or controlled substance.

- Bringing firearms or other weapons onto Cincinnati facilities, except as permitted under applicable laws and regulations.

- Assigning Cincinnati insurance-related work to any personnel whom a vendor knows, or should have reasonably known, to have been convicted of a felony involving dishonesty or breach of trust.

- Bringing any personnel onto Cincinnati facilities whom vendor knows, or should have reasonably known, may pose a significant risk to the health or safety of others. **Security:** While performing services on site at any of Cincinnati's facilities, Vendor personnel must comply with Cincinnati's badging, parking, and security policies.

Human Rights: Respect for and commitment to human rights is a fundamental part of Cincinnati's culture. Vendors must fully comply with all applicable labor, health and safety, antidiscrimination, anti-retaliation and other workplace laws, including those addressing equal pay, child labor, forced labor, slavery and human trafficking, and wage and hour laws.

Data Security and Confidentiality

Cincinnati respects the privacy of all individuals. We are committed to complying with applicable laws concerning proprietary, confidential and personal information. Vendors will handle and process data only for the purposes for which it was collected or otherwise made available. Vendors shall demonstrate appropriate industry standards and best practices data security controls to ensure that all information is protected and secure from damage and unauthorized use. Your specific duties and obligations with respect to privacy and data security will be set forth in your contracts with Cincinnati.

Report Any Concerns

Cincinnati expects our vendors to report any illegal or unethical conduct and regulatory compliance concerns. You may contact Cincinnati's Corporate Compliance Officer or call our toll-free reporting hotline (available 24 hours a day, 7 days a week) at 877-470-8328 where you may provide your name or report your concern anonymously.

This Vendor Code is available online at www.cinfin.com/vendor-conduct. Cincinnati may update and revise this Vendor Code from time to time. Please refer to the above website for changes to this Vendor Code.