

Supplier Code of Conduct

Overview

Founded in 1879, Principal Financial Group[®] (Principal[®]) is a leader in offering businesses, individuals and institutional clients a wide range of financial products and services, including retirement and investment services, insurance and banking through its diverse family of financial services companies.

The **Principal Global Code of Conduct** (Code) reflects our commitment to ethical business practices and regulatory compliance. The Code is an extension of our core values: Integrity, Customer Focus, Operational Excellence, Financial Strength, and Employee Empowerment. All employees, directors and officers are expected to conduct business according to the Code.

Supplier Responsibilities

Principal expects its suppliers to share our commitment to integrity. We recognize that suppliers are independent entities; however, their actions may impact and/or reflect upon Principal and its reputation. Therefore, we expect all our suppliers and their employees, agents, and subcontractors (jointly “Suppliers”) to adhere to our Supplier Code of Conduct (“Supplier Code”). It is the responsibility of Suppliers to understand and comply with the Supplier Code. Suppliers are expected to self-monitor their compliance through their own administrative processes and notify Principal when a violation occurs.

Key Obligations

Legal and Regulatory Compliance

Principal is committed to conducting business with integrity and in full compliance with applicable laws and regulations. Suppliers shall conduct their business activities in full compliance with applicable laws and regulations in all jurisdictions in which they operate. Suppliers must comply with all laws and regulations on bribery, corruption, privacy, antislavery, human trafficking and prohibited business practices in the countries in which they conduct business, including but not limited to, the United States Foreign Corrupt Practices Act. No offer, payment, consideration or benefit of any kind which constitutes an illegal or corrupt practice, shall be made, either directly, indirectly or on behalf of Principal, as an inducement or reward for entering into a contract or in connection with the provision of any goods or services under a contract.

Privacy

One of our highest priorities is maintaining the privacy and confidentiality of customer and employee information entrusted to us. Our Suppliers must share our strong commitment to safeguard such information and must have policies and procedures in place to protect confidential information. Suppliers are required to take all precautions reasonably necessary to protect customer and employee information and to maintain physical, technical and procedural safeguards in compliance with all applicable data security and cybersecurity laws, including the European Union General Data Protection Regulation (GDPR) and others.

Employment Practices

Principal is committed to maintaining a positive work environment where people are treated with dignity and respect. Principal expects Suppliers to share this commitment. Suppliers must use only voluntary labor, follow all applicable wage and benefit laws, and not employ under-age individuals in violation of any applicable child labor laws. Suppliers should not engage in slavery or in human trafficking activities. This includes transporting, harboring, recruiting, transferring or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud for the purposes of exploitation. Suppliers shall provide a work environment that is safe and healthy, and free of harassment and unlawful discrimination. While we recognize and respect cultural differences, we believe that Suppliers should not engage in discrimination based on age, race, color, religion, sex, gender identity, pregnancy, national origin, citizenship status, disability, sexual orientation, marital status, domestic partner status or veteran status.

Gift and Entertainment

Principal is a leader in an industry that relies on customers' trust and confidence. It is important that we do not engage in activities that create actual or perceived conflicts of interest. Our employees are not permitted to give or receive anything of value intended to influence a decision. Suppliers shall not offer gifts to Principal employees or others that could be perceived to influence sound business judgment. Principal makes purchasing decisions based on the merit of Suppliers' products and services, not on gifts, entertainment or other business courtesies.

Reciprocity

Principal does not participate in reciprocity purchasing arrangements. Reciprocity has been found to be anti-competitive under the antitrust laws under some circumstances. We expect Suppliers to share our commitment to conduct business in a manner that avoids even the appearance of a violation of antitrust laws. Suppliers shall not request preferential consideration based on their current or future customer status.

Environment

Principal strives to incorporate practices that help protect the environment for future generations. Suppliers are expected to conduct their operation in an environmentally conscientious manner and to comply with all applicable environmental laws and regulations.

Reporting Non-Compliance

Various options are available for reporting questionable behavior or a possible violation of the Supplier Code of Conduct that occurred during the time a Supplier was providing services to Principal. You are encouraged to work with your primary contact at Principal (or their leader) to resolve the situation. However, we recognize that there may be times when this is not possible or appropriate. The following reporting options exist:

- Ethics Hotline 1.866.858.4433 (staffed 24/7)
- [Unethical or Fraudulent Activity Reporting form](#)*
- Betsy Happe, Chief Compliance Officer, 515.362.0282

*For locations outside the U.S., submit an online report form.

Available Online

The Supplier Code of Conduct is available online at <http://www.principal.com/partners/suppliers/index.htm>.

The Supplier Code may be updated and revised from time to time. Please refer to the above website to view changes.

Principal Life Insurance Company, Des Moines, Iowa 50392-0002

www.principal.com

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