



Code of Conduct

January 2025

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MESSAGE FROM CEO

Integrity. It's the first word of Modern Woodmen's official value statements. It means we are honest, ethical and trustworthy in our daily actions and interactions. Simply put, we do what is right.

You work hard every day to provide financial products and fraternal programs that improve quality of life for our members and their communities. Every step to develop these products and programs is taken with ethical action and integrity in mind.

Working as part of the Modern Woodmen team means making a commitment to uphold our values and to follow the code of conduct outlined in this document. Thank you for continuing to serve our members, their communities, our vendors, and each other, with integrity.

Sincerely,

A handwritten signature in black ink that reads "Gerald J. Lyphout". The script is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Gerald J. Lyphout
President and CEO

INTRODUCTION

This Code of Conduct (Code) outlines the ethical and legal standards under which Modern Woodmen operates. This Code cannot address every circumstance, it summarizes Modern Woodmen's policies and practices relating to business behavior. The Code underscores our commitment to acting in the best interest of our members.

Modern Woodmen has many specific policies that complement this Code. Required training on many of the policies and other subjects is routinely given. You should be familiar with and adhere to the Code as well as all referenced policies. Failure to adhere to them or take any required training will result in disciplinary action as appropriate.

Modern Woodmen's Code consists of four key elements:

- Integrity
- Financial Strength
- Respectful Workplace
- Fraternalism

Before exploring the details of each element, it is important to understand who the Code applies to, what happens when the Code is violated, how to make good decisions, how to voice your concerns, and the acknowledgement and disclosure process.

WHO DOES THE CODE APPLY TO?

WHAT HAPPENS IF THE CODE IS VIOLATED?

Everyone who is part of the Modern Woodmen team must follow the Code. Modern Woodmen exists for the benefit of our members. We are obligated to follow the Code of Conduct. Any reference to Modern Woodmen includes any and all of its subsidiaries.

THE CODE APPLIES TO:

- Employees and Interns
- Regional Directors and Administrative Assistants
- Financial Representatives and field staff
- Activities Coordinators and Youth Service Club Leaders
- Members of the Board of Directors
- Contract workers, consultants and other non-employees

Everyone has an obligation to:

- Understand and follow the Code and any relevant practices, policies, laws and regulations.
- Handle every interaction and decision with utmost integrity.
- Cooperate fully with any investigations into misconduct.
- Speak up if you see or suspect misconduct.
- Ask questions if you are ever unsure of what to do.

Managers have additional responsibilities to:

- Be a model of integrity by upholding the Code and Modern Woodmen's policies and practices.
- Have an open-door policy and be prepared to answer employee questions about the Code.
- Reinforce the Code by discussing it in your team communications and meetings.
- Escalate promptly and appropriately any concern that is reported to you or any concern you observe or suspect is a violation of the Code; do not conduct your own investigation.
- Never retaliate or allow others to retaliate against anyone who comes forward with a concern in good faith or who asks questions about policies or practices.

WHAT HAPPENS IF THE CODE IS VIOLATED?

Anyone who violates the Code is subject to consequences, including anything from written or verbal warnings to termination, civil liability or even criminal charges.

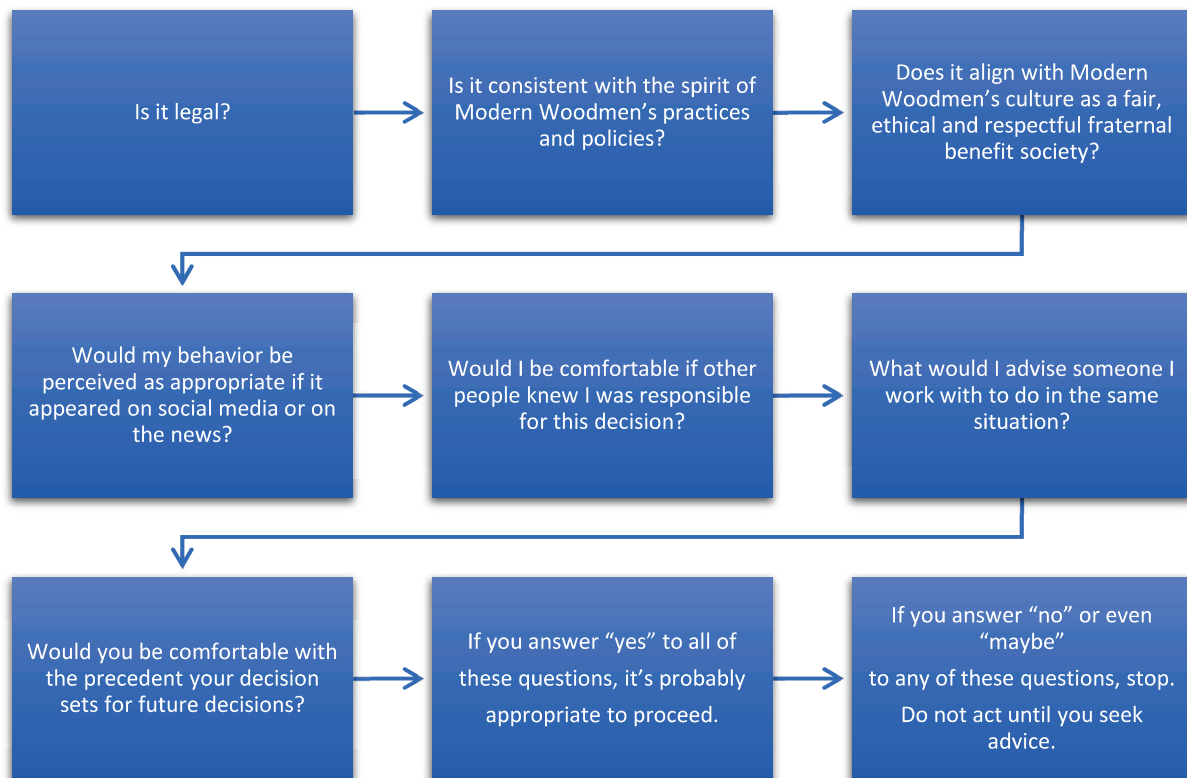
EVERYONE WHO IS PART OF MODERN WOODMEN MUST FOLLOW THE CODE.

THE BOTTOM LINE

MAKING GOOD DECISIONS

The Code highlights principles that guide our behavior, but it can't address every ethical situation. Regardless of the situation, exercise honesty and integrity in everything you do. You are responsible for complying with Modern Woodmen's policies, procedures and practices, applicable laws, and regulations.

When faced with a difficult decision, it may help to ask yourself the following questions when you are unsure of what to do and need some guidance. ***Remember, you are in charge of your decisions and actions or inaction. When in doubt, speak with those who have the expertise to provide guidance.***



IF THE PATH ISN'T CLEAR, ASK FOR GUIDANCE.

THE BOTTOM LINE

VOICING YOUR CONCERNS

Modern Woodmen relies on your honesty and courage. If you see something that doesn't seem right, you have a responsibility to report any issue or concern that you, in good faith, believe may be a violation of the Code or any other Modern Woodmen policy. A "good faith" report means telling the truth as you know it about a possible violation of the Code or other policy or law.

Sometimes the only way we will find out about a concern is from you. You are the front-line defense and have the ability to protect Modern Woodmen's reputation and financial strength by speaking up and allowing suspected violations to be investigated.

Regardless of the resource you use to voice your concern, you can be confident that your report will be handled promptly and discreetly. Modern Woodmen investigates reports and will take necessary action based on the investigation results. Fear of retaliation is often a concern people have when they see something that doesn't seem right. Modern Woodmen does not tolerate retaliation against anyone who comes forward with a concern in good faith or who asks questions about policies or practices. If you believe you have faced retaliation, report it for investigation. Those who retaliate are subject to discipline, up to and including termination. For more information, please see Modern Woodmen's **Reporting and Protection policy**.

How to voice your concerns

There are many ways to voice a concern, and you should use the method you feel most comfortable with or feel is most appropriate. Promptly share your concerns when you suspect misconduct. Concerns may be reported to:

- Your manager
- Chief Human Resources Officer 309-793-5520 or 309-793-5645
- Chief Distribution and Marketing Officer at 309-793-5548
- Legal Department at 309-793-5521
- Third-party, anonymous Compliance and Ethics hotline (the Hotline) available 24 hours a day, 7 days a week. The Hotline may be reached at:
 - 877-534-0372
 - www.reportlineweb.com/modernwoodmen

The Hotline is an independent, outside company that will receive your concerns and questions and forward them to Modern Woodmen for review and handling. You may choose to remain anonymous, and any information provided to the Compliance & Ethics Hotline will be treated as confidential to the extent possible. If you report a concern anonymously, please continue to check back using your case number and password. We may have follow-up questions and updates for you.

**THERE IS NO WRONG WAY TO SPEAK UP;
THE ONLY MISTAKE IS TO NOT SPEAK UP AT ALL.**

THE BOTTOM LINE

ACKNOWLEDGEMENT AND DISCLOSURE PROCESS

Annually you will be required to read and acknowledge that you understand and will comply with the Code of Conduct. In addition, you must disclose to Modern Woodmen's Human Resources Department immediately if you are convicted of a crime, or agree to enter a pretrial diversion in connection with a prosecution for a crime, involving dishonesty, a breach of trust or money laundering.

INTEGRITY

FOLLOW THE LAW

Modern Woodmen conducts business in a highly regulated environment. You must be honest, fair and accurate in your representations, actions and interactions. You must comply with both the letter and spirit of all laws which govern Modern Woodmen's business. You are expected to be familiar with and follow those laws which pertain to your work to ensure your activities are in accordance with such regulations and in the best interest of our members and Modern Woodmen. This may include federal and state laws and regulations, as well as agency rulings and standards.

ADMIT MISTAKES

Everyone makes mistakes. One element of integrity is being willing to admit your mistakes and learn from them. Admitting mistakes allows Modern Woodmen to address the issue.

CRIMINAL HISTORY

Certain laws prohibit participation in the business of insurance, or affiliation with a financial holding company, by any individual who has been convicted of a crime involving dishonesty, a breach of trust or money laundering. If you have been convicted of such a crime or agreed to enter a pretrial diversion in connection with a prosecution for such a crime, you must apply for a waiver and obtain a written consent in addition to obtaining any necessary licenses from the regulatory authorities in all appropriate jurisdictions to work for or be affiliated with Modern Woodmen. If you participate in Modern Woodmen business, you are required to disclose the existence of any such circumstances or convictions to Modern Woodmen's Human Resources Department. Additionally, other particular criminal convictions may prevent you from acting in certain roles with Modern Woodmen.

You will be asked to certify your status regarding the above annually when you acknowledge the Code of Conduct. If you have questions or any doubt as to whether any of the above prohibitions apply to your own individual circumstances, contact the Legal Department for assistance. Be aware that you have a continuing obligation to report any of the crimes above upon its occurrence while you work for or are affiliated with Modern Woodmen.

CONFLICTS OF INTEREST

Conflicts of interest happen when the business decisions you make or influence are motivated by personal benefit rather than the best interest of Modern Woodmen. You must avoid situations where a conflict, even in appearance, may exist between your interests and Modern Woodmen's.

Think about whether your outside activities, employment, business relationships, or personal interests could be perceived as a conflict of interest. If you believe you or an immediate family member has a conflict of interest, you must disclose it. Some roles at Modern Woodmen will require you to identify related party interests and may have heightened conflict of interest rules to follow.

Questions about conflicts of interest should be directed to the Legal Department. Contact the Manager, Financial and Investment Reporting, currently Tyler Tschopp, to disclose conflicts of interest. See also ***Modern Woodmen's Conflicts of Interest policy***.

Who is considered an immediate family member?

- Parents
- Grandparents
- In Laws (parents, siblings, sons and daughters)
- Spouses or Domestic Partners
- Brothers and Sisters
- Children (by blood, marriage or adoption)
- Grandchildren
- Cousins
- Aunts or Uncles
- Nieces or Nephews
- Anyone who resides in your home

GIVING AND ACCEPTING GIFTS

Giving and accepting gifts is a normal gesture of goodwill and appreciation; however, gifts can also cross the line from a common courtesy to a conflict of interest. Whether there is an apparent or actual conflict of interest, Modern Woodmen's reputation can be damaged. Just the appearance of a conflict between your personal benefit and the interest of the Modern Woodmen undermines the commitment to high ethical standards.

When gifts influence business decisions, it can raise questions about fairness to competitors or trigger violations of anti-bribery laws and FINRA rules. Since these guidelines cannot cover every situation that may arise, use good judgment and demonstrate integrity when representing Modern Woodmen. Discuss any situations you are unsure of with the person you report to or the Legal Department.

Only accept gifts, gratuities, and entertainment that are of nominal (advertising or promotional nature, normally less than \$100) and limited value (such as promotional or advertising pens, pencils, notepads, calendars). The same guidelines apply to you when presenting gifts or promotional items to other business associates or members. Gifts to members or applicants must not violate the rebating rules. Check with the Compliance Department for specific state limits regarding gift giving, rebating rules, or raffles.

Ask these questions before accepting a gift or gratuity:

- Is it extravagant?
- How often do I get gifts from this vendor?
- What is the context?
- Are we in the middle of contract negotiations?
- Am I the decision maker for this relationship?

ALWAYS REMAIN UNBIASED WHEN MAKING A BUSINESS DECISION.

THE BOTTOM LINE

ANTI-MONEY LAUNDERING

Money laundering is generally defined as engaging in acts designed to conceal or disguise the true origins of criminally derived proceeds so that the proceeds appear to have derived from legitimate origins or constitute legitimate assets. There are many forms of financial crimes that relate to money laundering, including forged financial documents, financial exploitation of a vulnerable person, computer intrusion and identity theft, to name a few. As a financial services institution, Modern Woodmen could become a target of illegal money laundering operations.

It is the policy of Modern Woodmen of America to prohibit and actively prevent money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities. In addition to detecting and deterring money laundering activities, Modern Woodmen also has a duty to report suspicious and certain other activities to the federal government.

Modern Woodmen has ***an Anti-Money Laundering Program*** which establishes governing principles to protect Modern Woodmen and its products from being used for money laundering activities. You should be familiar with these policies, procedures and internal controls. If you suspect money laundering or other related suspicious activity, bring it to the attention of the person to whom you report, who should then consult with the Compliance Department and/or the AML Compliance Officer, currently Annette Tephly.

**BE ALERT, BE CAUTIOUS AND ASK QUESTIONS –
THAT’S THE BEST WAY TO PREVENT MONEY LAUNDERING.**

THE BOTTOM LINE

ANTI-TRUST & COMPETITION

Modern Woodmen complies with all applicable federal and state laws that prohibit unfair or deceptive business acts and practices, and we promote free and competitive markets in our dealings with competitors, suppliers and customers. Modern Woodmen will not tolerate attempts to manipulate or tamper with markets or the prices of securities, options, futures or other financial instruments. We are committed to fair and truthful marketing and advertising practices. If you have any questions about activities that may have anti-trust risks, please contact the Legal Department.

THE ABILITY TO COMPETE HELPS EVERYONE PROSPER.

THE BOTTOM LINE

FINANCIAL STRENGTH

Protecting the funds Modern Woodmen members place with us is not only our promise, but our obligation – one we've met since 1883. Modern Woodmen's financial strength comes from:

- Protecting our Assets and Information
- Protecting our Reputation

PROTECTING ASSETS AND INFORMATION

FINANCIAL CONTROLS

Financial controls play an important role in ensuring the accuracy of reporting, eliminating fraud and protecting Modern Woodmen's resources. You play an important role in protecting Modern Woodmen by complying with applicable laws, regulations and policies, procedures, and practices.

FINANCIAL REPORTING

Modern Woodmen is committed to providing full, fair, accurate and understandable disclosures in all periodic, financial and other reports we file or publish. Modern Woodmen complies with all reporting and accounting regulations. All records and reports must be prepared with care, accuracy and honesty, and comply with accounting procedures and internal controls.

If you believe our records are inaccurate, speak up. Remember, Modern Woodmen does not tolerate retaliation against anyone who raises any good faith concern.

SIGNATURES, FORGERY, FRAUD AND BRIBERY

Modern Woodmen's business is based on legal contracts and depends on the authenticity of each signature. Properly obtaining signatures is vital.

You must not commit **forgery** by signing or initialing anyone else's name to any document. Also, you must never sign, or ask anyone to sign, a blank or incomplete form.

You must not commit **fraud** which is the intentional misrepresentation or omission of facts to gain something that may not have been provided without deception.

You must not participate in **bribery** which is offering, providing, or receiving anything of value to gain an unfair advantage. Bribery is illegal and has strict penalties that can damage Modern Woodmen's reputation. **You must report any activity that you think may be fraudulent, forgery or bribery.**

Be aware and raise questions if you see hints of any of the following:

- Theft of Modern Woodmen assets
- Embezzlement of member and/or Modern Woodmen funds
- Forgery or alteration of documents
- Authorizing or requesting a reimbursement known to be false
- Misrepresentation of facts pertaining to an insurance transaction
- Any indication of bribery

PHYSICAL, ELECTRONIC AND FINANCIAL ASSETS

Modern Woodmen has many types of assets. **Physical assets** are the material items that belong to Modern Woodmen including cash, real estate, furniture, supplies, equipment and technology assets. **Electronic assets** are anything accessed or stored in electronic form, including the network, email, data, databases, and software. **Financial assets** are assets that add value to our business including bank deposits, bonds, stocks, cash equivalents and equity instruments. **Intellectual property** includes patents, trademarks, trade secrets and copyrights.

Modern Woodmen's physical, electronic, and financial assets as well as intellectual property must be protected. You share in the responsibility to safeguard the assets of Modern Woodmen.

PROTECT MODERN WOODMEN'S ASSETS AS IF THEY WERE YOUR OWN.

THE BOTTOM LINE

INFORMATION SECURITY, CONFIDENTIALITY, AND PRIVACY

Modern Woodmen's assets include a variety of sensitive and confidential information. Technical definitions vary, but for this Code's purposes, it is easiest to think of all member and employee information, confidential business information, and records as Modern Woodmen property and assets. Modern Woodmen promises to protect these assets. Members trust us to protect their confidential information, and Modern Woodmen's financial strength and reputation rely on it.

You are responsible for protecting and securing confidential Modern Woodmen information. Confidential information can exist in many formats including electronic data, paper documents and verbal communications. You must follow ***Modern Woodmen's Information Security, Privacy, and Digital Resources policies***. You must handle confidential information with care and protect it from unauthorized use and disclosure.

Here are some of the ways you can protect confidential information:

- Follow Modern Woodmen's processes for sending secure emails.
- Access confidential information only for appropriate business purposes.
- Share confidential information in the proper settings and only with those who are authorized and need it to carry out their jobs. When in doubt, ask questions before you disclose information.
- Do not display or leave confidential information in plain view. After business hours, non-public information must be secured.
- Immediately report suspected theft or unauthorized disclosure of confidential information.

WE ALL MUST DO OUR PART TO PROTECT CONFIDENTIAL INFORMATION.

THE BOTTOM LINE

PROTECTING MODERN WOODMEN'S REPUTATION

Modern Woodmen's reputation is one of our most valuable assets. Our positive reputation attracts members, financial representatives, employees and fraternal leaders. It's the foundation of our relationships with each other and with our regulators, vendors, the media and the public at large.

Reputational harm can have an extensive, costly and lasting impact on Modern Woodmen of America. Protecting our positive reputation is vital.

COMMUNICATION

Every communication you are a part of impacts Modern Woodmen's reputation, regardless of the method or medium used. In today's world, you are continuously provided new tools and ways to communicate. The Code, and all of Modern Woodmen's policies and practices, apply to all forms of communication.

Be respectful and thoughtful when you communicate, to protect each other and to protect Modern Woodmen's reputation and financial strength.

SOCIAL MEDIA

Social media plays a valuable role in connecting and engaging with people. When you express your personal thoughts or views, make sure you are not speaking on behalf of Modern Woodmen. Practice common sense while online and engage in a way that's consistent with Modern Woodmen's values, policies and the law. Respect the rules concerning posting or commenting about products. Never use social media to harass, discriminate or engage in any form of cyberbullying or intimidation. Remember, you are responsible for everything you publish online.

MEDIA RESPONSES

Modern Woodmen aims to ensure that information communicated to and through the media is consistent and accurate. Only certain employees are authorized to speak on our behalf and, unless you are one of those authorized individuals, you should forward all media inquiries to the Enterprise Communications Department. They will work with applicable parties to help Modern Woodmen communicate on-brand messages that protect our reputation. See ***Modern Woodmen's Media Response policy*** for more information.

**COMMUNICATION IS REPUTATION –
WHETHER WRITTEN, SPOKEN OR ACTION.**

THE BOTTOM LINE

RESPECTFUL WORKPLACE

RESPECT, DIVERSITY AND INCLUSION

Modern Woodmen strives to maintain a workplace that fosters mutual respect and promotes harmonious, productive working relationships. No matter what capacity you serve Modern Woodmen in, you deserve to work in a respectful environment.

Modern Woodmen is committed to providing a respectful environment where each person's diverse opinions, attitudes, attributes and feelings are respected. You are expected to act professionally and treat each person with respect.

Modern Woodmen complies with equal employment opportunity laws and other applicable civil rights and labor laws. Modern Woodmen makes reasonable accommodations to protect the rights of people with disabilities.

DISCRIMINATION AND HARASSMENT

Modern Woodmen believes that discrimination and harassment in any form constitute misconduct that undermines the integrity of the employment relationship. Modern Woodmen will not tolerate sexual or any other form of harassment that interferes with work performance or creates a hostile or offensive work environment. Modern Woodmen will thoroughly investigate reported incidents of harassment and will not tolerate any form of retaliation against anyone who, in good faith, reports an incident or participates as a witness in the investigation.

If you have experienced or witnessed discriminatory or harassing behavior, report it to the person you report to, or anyone in this list that you are comfortable reporting it to.

- Chief Human Resources Officer 309-793-5520 or 309-793-5645
- Chief Distribution and Marketing Officer 309-793-5678
- Legal Department 309-793-5521
- Third-party, anonymous Compliance and Ethics hotline (the Hotline) available 24 hours a day, 7 days a week. The Hotline may be reached at:
 - 877-534-0372
 - www.reportlineweb.com/modernwoodmen

See Modern Woodmen's **Reporting and Protection policy** and **Policy Against Discrimination and Harassment** for additional information.

How can you help create a respectful work environment?

- Treat others and their ideas with respect. When you differ with someone on an issue, express your differences politely and professionally. Listen and be receptive to different backgrounds and points of view.
- Think about how your words or actions may affect others.
- Work together to create an environment where everyone feels valued and respected and is comfortable speaking up and contributing.
- Work to maintain a workplace free of harassment including sexual harassment, bullying and abusive conduct.
- If you witness disrespectful behavior, either at your expense, or the expense of someone else, report it. Remember, Modern Woodmen does not tolerate retaliation against anyone who reports a concern or participates in an investigation in good faith.

INAPPROPRIATE CONDUCT

It is up to each of us to treat one another with respect and dignity and hold ourselves and each other accountable for appropriate behavior. Behavior that is not consistent with the Code of Conduct or may harm Modern Woodmen's reputation and goodwill may result in disciplinary action.

My position includes managing others. What are my responsibilities if I am aware of a harassment complaint?

If you manage or supervise others, you are required to report any incident that may constitute harassment or discrimination to the appropriate authority as described in the Modern Woodmen of America Policy Against Discrimination and Harassment.

TREAT EACH OTHER WITH RESPECT AND EXPECT THE SAME IN RETURN.

THE BOTTOM LINE

SAFETY, SECURITY, AND ENVIRONMENT

Modern Woodmen is committed to providing a safe, healthy and productive workplace. Modern Woodmen complies with all federal, state and local health and safety laws and regulations, including occupational health and safety standards. We all have the responsibility to work in a way that helps ensure safety and security.

What can you do to help create a safe and secure work environment?

- Know and comply with policies designed to promote health, safety, and security.
- If you see something that is unsafe, report it so it can be addressed.
- Speak up and report any injuries, illnesses, property damage, violent acts or threats, or accidents.

DRUG-FREE WORKPLACE

Modern Woodmen maintains a workplace free from the negative influences of drugs and alcohol. Working or being on call while under the influence of, or impaired by, alcohol, marijuana, or a medically unauthorized drug or narcotic is also prohibited. Modern Woodmen will notify the appropriate law enforcement authorities if there is a good faith belief of illegal use, possession, or other drug-related activity while in any Modern Woodmen workplace.

A SAFE ENVIRONMENT IS A PRODUCTIVE ENVIRONMENT.

THE BOTTOM LINE

FRATERNALISM

FRATERNAL STATUS

Modern Woodmen is a fraternal benefit society incorporated under the laws of the State of Illinois. Section 501(c)(8) of the Internal Revenue Code classifies Modern Woodmen as a tax-exempt organization. Modern Woodmen follows all federal and state requirements applicable to fraternal benefit societies. Modern Woodmen does not exploit its fraternal status to seek a competitive and/or unfair advantage in the marketplace.

FRATERNAL PURPOSE AND MISSION

Modern Woodmen's main purpose and stated mission is to improve the quality of life for its members. Fraternal activities support our purpose and mission by:

- Bringing members together through the chapters, Summit chapters and youth service clubs for social, educational and volunteer experiences.
- Providing benefits that support members and their families in good times and times of need.

To preserve Modern Woodmen's fraternal status, it's important to communicate about fraternalism and its role in growing membership appropriately. Remember, fraternal activities, programs, and benefits are created for Modern Woodmen members, their families and their communities.

COMMON BONDS

Each fraternal benefit society has one or more common bonds that unite its members. As a general fraternal benefit society, Modern Woodmen members have three specific common bonds:

- Financial security for families.
- Quality family life.
- Community impact.

It is important to provide and support opportunities for Modern Woodmen members to join and work toward these worthy objectives.

How can I support Modern Woodmen as a fraternal?

- Treat fraternal dollars as members' dollars, when you are in a position to direct how the dollars are spent.
- Make fraternal decisions that are in the best interest of members, whether that is the members of the entire organization; a region; or the local chapter, Summit chapter or youth service club.
- Prevent fraternal programs and benefits from being used or from being perceived to be used strictly for marketing or other business purposes.
- Encourage members to participate in fraternal activities and use member benefits.

For more information, please refer to the ***Fraternal Leader Handbook and chapter and club policies*** on the Make An Impact website.

**“ALL THAT WE SEND INTO THE LIVES OF OTHERS,
COMES BACK INTO OUR OWN.”** Edwin Markham

APPENDIX: FIELD SUPPLEMENT TO THE CODE OF CONDUCT

INTRODUCTION

The Modern Woodmen of America Code of Conduct (Code) outlines the ethical and legal standards under which Modern Woodmen operates. As a field representative or field office staff member, you have unique relationships with Modern Woodmen members, and you have heightened obligations to follow in addition to those stated in the Code of Conduct.

Detailed in this Field Supplement (Supplement) to the Code of Conduct you will find additional obligations to govern your conduct. You are expected to understand and follow all additional guidelines in this Supplement.

INTEGRITY

FOLLOW THE LAW

RECORDING OF FACTS

You are expected to record all facts, data or other details fully and accurately. This may include but is not limited to information provided on:

- applications or other new business forms
- death claim or other benefit requests
- requests for fraternal benefits
- chapter report forms
- travel or expense reimbursement requests
- employment or contract records.

CHURNING

Churning is a practice that occurs when **a life insurance or annuity contract is replaced with another** so that a field representative can earn additional commissions or other benefits, and there is no objectively reasonable basis for believing that the new contract will result in an actual and demonstrable additional benefit to the contract owner. Churning is illegal, can never be justified and is strictly prohibited.

CONFLICTS OF INTEREST

In addition to your obligations under the Modern Woodmen Conflicts of Interest Policy, you should also abide by the following guidelines in your role as a field representative of Modern Woodmen.

FIDUCIARY RELATIONSHIPS

If you are considered a fiduciary under state or federal securities or insurance laws, you must follow all applicable legal and regulatory requirements of that role. Certain other fiduciary relationships with members or contract owners are prohibited unless the member or owner is part of your immediate family. This includes relationships such as:

- guardian
- attorney-in-fact under a power of attorney
- trustee or
- executor of an estate.

ADDRESSES

You may not use your business or personal addresses for any member, except for certificates issued on your life or the lives of members of your immediate family. You may not use, create or control any address of, or for, a member.

Who is considered an immediate family member for fiduciary relationships?

An immediate family member includes your spouse parents, children, and siblings, whether by blood, marriage, or adoption, and anyone who resides in your home.

ASSIGNMENTS

You may not be the assignee on any member's certificate unless the member is part of your immediate family.

LOANS

Loans to or from members (except those who are part of your immediate family) are prohibited.

NOTARY PUBLIC

You may not notarize any document which is related to a transaction for which you make a commission or receive other benefit as a field representative unless the signatory is a member of your immediate family.

FINANCIAL STRENGTH – PROTECTING ASSETS

FINANCIAL CONTROLS

REFERRAL FEES/SHARING OF COMMISSIONS

You may not accept fees or monies from businesses other than as approved by Modern Woodmen in the procurement of applications for membership, insurance, or annuities. You also may not pay fees or monies for the referral of business other than as approved by Modern Woodmen. To do so could be considered a prohibited sharing of commissions with an unaffiliated person.

FINANCIAL RESPONSIBILITY

All checks, money orders, cashier's checks, or any other items of monetary value received by you on behalf of Modern Woodmen are considered to be held in trust, and shall at once be accounted for, processed and if applicable, forwarded to the appropriate Modern Woodmen personnel.

HANDLING OF FUNDS

You must know and respect the difference between your personal funds and Modern Woodmen funds.*

- Under no circumstance should you use Modern Woodmen funds for your own personal or other unauthorized use.
- Commingling is prohibited. You may not mix or combine Modern Woodmen funds with personal funds.
- All transactions involving the transfer of funds must be processed accurately and promptly.

**Modern Woodmen funds include all monies received or handled by you concerning Modern Woodmen transactions, business, members, or chapters.*

FINANCIAL REPORTING

CHECKING ACCOUNTS

Checking accounts which are used for your business or Modern Woodmen chapter are to be titled and held in accordance with the current approved business practices concerning business checking accounts. Under no circumstance may any member funds be deposited into this type of account.

CHECKS OR CASH

All checks are to be made payable only to Modern Woodmen or other appropriately designated financial organization.

- Checks from members must not be made payable to "Cash" or to you personally.
- You may never accept cash from, or purchase a money order for, a member. You may not accept a money order from a member to make a payment on a securities product.
- You, or any organization with which you are associated, may not make premium payments on behalf of members unless they are your immediate family or you, or the organization, has an insurable interest.

PHYSICAL, ELECTRONIC AND FINANCIAL ASSETS

Modern Woodmen's physical, electronic, and financial assets as well as intellectual property must be protected. You share in the responsibility to safeguard the assets of Modern Woodmen.

To supplement details in the Code, please reference ***the Modern Woodmen of America Digital Resource Policy*** on The Resource Center.

INFORMATION SECURITY, CONFIDENTIALITY, AND PRIVACY

You are responsible for protecting and securing confidential Modern Woodmen information. Confidential information can exist in many formats including electronic data, paper documents and verbal communications. You must follow ***Modern Woodmen's Field Information Security and Privacy Policy and Guidelines*** found on The Resource Center. You must handle confidential information with care and protect it from unauthorized use and disclosure.

FINANCIAL STRENGTH - PROTECTING MODERN WOODMEN'S REPUTATION

COMMUNICATION

Every communication you are a part of impacts Modern Woodmen's reputation, regardless of the method or medium used. In today's world, you are continuously provided new tools and ways to communicate. The Code, this Supplement, the **Field Advertising Policy** on The Resource Center, and all Modern Woodmen's policies and practices, apply to all forms of communication.

SOCIAL MEDIA

Social media plays a valuable role in connecting and engaging with people. The **Field Digital Policy**, which you can reference on The Resource Center, provides the guidelines to help you remain compliant and optimize your digital presence through your use of social media. Remember, you are responsible for everything you publish online.

MEDIA RESPONSES

Modern Woodmen aims to ensure that information communicated to and through the media is consistent and accurate. Only certain employees are authorized to speak on our behalf and, unless you are one of those authorized individuals, you should forward all media inquiries to the Corporate Communications Department. See Modern Woodmen's **Media Response Policy**, as published on The Resource Center, for more information.

QUESTIONS?

If you have questions or need clarification about your additional obligations identified in this supplement, contact:

Compliance Department at 309-793-5551
ComplianceDepartment@modern-woodmen.org

Remember, you are in charge of your decisions and actions or inaction. When in doubt, speak with those who have the expertise to provide guidance.