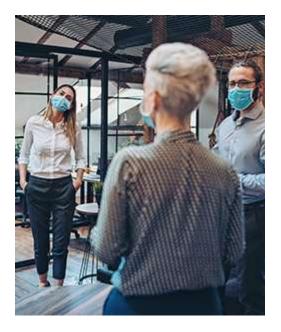
XEMPER

Employee Rights & Anti-Harassment Policy

Employee Rights

The Company is firmly committed to its policy of providing equal employment opportunity based on individual merit. Kemper prohibits discrimination against any applicant or employee based on any legally-recognized basis, including but not limited to: race, color, religion, sex (including pregnancy, lactation, childbirth or related medical conditions), sexual orientation, gender identity, age, national origin or ancestry, physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed servicemember status, or any other status protected by federal, state, or local law. Our commitment to equal opportunity employment applies to all persons involved in the Company's operations and prohibits unlawful discrimination by any employee, including managers and co-workers.

Kemper's Code of Business Conduct and Ethics contains 10 core principles that establish a cultural framework and provide guidance to all employees on how to ensure both ethical behavior and a positive work environment. Principle 6 of the Code, which outlines Kemper's commitment to provide a safe and positive work environment for all employees, plainly states the Company's goal to ensure a workplace based on the following policies:



• Hiring and Employment Practices:

Kemper is committed to making hiring and employment decisions based on an individual's qualifications, demonstrated skills, and achievements, and in full compliance with applicable federal, state, and local laws, including laws that prohibit discrimination in the workplace.

Prohibiting Harassment:

All employees are entitled to work in an environment free of harassment. Any type of harassment, including sexual harassment, will not be tolerated. Harassment can take many forms, including (as examples):

• Unwelcome remarks, gestures, or physical contact

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- Display or circulation of sexually explicit or derogatory pictures or other materials
- Sexual or derogatory jokes or comments (explicit or by innuendo)
- Verbal abuse, threats, taunting, or leering

• Reporting of Concerns:

Any employee who feels that they have been the victim of harassment should notify their supervisor, the Human Resources Department, the Company Ethics Officer, or the Kemper Corporate Responsibility Hotline. An employee who makes a good faith report of an incident of harassment or cooperates in an investigation may do so without fear of reprisal.

As noted, Principle 6 of the Code refers to Kemper's Anti-Harassment Policy, which prohibits harassment, provides examples of prohibited conduct, and outlines harassment reporting procedures:

• Policy Prohibiting Harassment:

It is the policy of the Company to provide a work environment free of harassment. Harassment is defined as behavior or conduct that degrades or shows hostility or aversion toward an individual because of age, race, color, religion, sex, sexual orientation, physical or mental disability, national origin, veteran or military status, genetic information, pregnancy, or any other status that is legally protected by local, state, or federal law. This includes conduct that (a) has the purpose or effect of unreasonably interfering with an individual's work performance, (b) has the purpose or effect of creating an intimidating, hostile, or offensive work environment, or (c) otherwise adversely affects an individual's employment opportunities. Harassment can occur in a variety of circumstances, such as face to face, by telephone, through conversations with third parties, by email or other means of electronic communication, or through online comments and postings.

Harassment of any kind will not be tolerated. A Company employee found to have engaged in harassing behavior toward a fellow employee, customer, or vendor will be subject to disciplinary action, up to and including termination. Employees should not suffer work-related harassment from coworkers or third parties (e.g., vendors) and should report any such incidents.

Harassment includes, but is not limited to, the following:

- Jokes, insults, or slurs based on an individual's age, race, physical appearance, disability, sex, sexual orientation, religion, national origin, or other protected status
- Overt threats, bullying/intimidation, or stalking behavior
- Displaying or circulating offensive written or graphic material in the workplace on walls, bulletin boards, computers, or other work locations
- Sexual Harassment:

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The Company prohibits sexual harassment. Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when (a) submission to such conduct is made either explicitly or implicitly a term or condition of employment, (b) submission to or rejection of such conduct is used as a basis for making employment decisions affecting the individual, (c) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance, or (d) such conduct has the purpose or effect of creating an intimidating, hostile, or offensive work environment. It is sometimes difficult to predict when conduct or comments might be "unwelcome," so employees should avoid such conduct and behave in a professional manner at all times. The scope of prohibited conduct includes behavior such as the following examples (this list is representative and not exhaustive):

- Unwelcome sexual advances
- Offering employment benefits in exchange for sexual favors (sometimes called "quid pro quo" harassment)
- Making or threatening reprisals after rejection of sexual advances
- Visual conduct such as leering, sexual gestures, displaying of sexually suggestive objects or pictures
- Verbal abuse of a sexual nature, graphic comments about an individual's body, sexually degrading words used to describe an individual, suggestive or obscene letters or notes
- Unwanted gifts, flowers, candy, etc.
- Physical conduct such as touching, impeding, or blocking movements



Harassment Reporting:

We put the following procedures in place to ensure a work environment that is professional and free from harassment. If an employee believes that they have been the victim of harassment, sexual or otherwise, or is aware of a violation of this policy, that employee should bring the matter to the immediate attention of their manager or, where the manager

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is implicated or where it is otherwise not practical, to the attention of Human Resources.

The facts and circumstances of any claim of harassment will be promptly and thoroughly investigated, consistent with the need to identify and terminate any improper conduct. To the extent possible, a complaining employee's concerns will be addressed in a confidential manner.

Incidents of harassment can also be reported through the independently staffed Kemper Corporate Responsibility Hotline at <u>888-695-3359</u>, directly to HR Services at <u>800-214-3553</u>, or through the link provided at <u>https://kemper.ethix360.com/#landing</u> and by entering the access ID KEMP.

Upon completion of the investigation, corrective measures will be taken against any person who has engaged in harassment in violation of this policy. Such measures may include, but are not limited to, counseling, suspension, or termination of the offending employee or employees.

No employee will be subject to, and the Company prohibits, any form of discipline or retaliation where the employee in good faith (a) reports incidents of harassment, (b) pursues any such claim, or (c) cooperates in the investigation of such reports.

• Mandatory Annual Employee Training:

In order to ensure that employees understand their rights, obligations, and the avenues of reporting concerns available to them, we conduct mandatory annual training covering, among other things, Kemper's Code of Business Conduct and Ethics and Kemper's Anti-Harassment Policy. All Kemper employees are required to complete this annual training. In addition, the Company provides supplemental mandatory anti-harassment training to all employees and/or managers in certain jurisdictions to address the unique legal requirements applicable in those jurisdictions.