thrivent[®]

Code of Conduct

It's about doing the right thing the right way

Thrivent's <u>Code of Conduct</u> focuses on principles that guide our behavior. It's up to each of us who represent Thrivent to use our best judgment to make the right decision. This includes:

- Thrivent employees, financial advisors and financial professionals as well as those who
 represent Thrivent subsidiaries and affiliates.
- Our board of directors and officers.
- Contract consultants and agencies that work on Thrivent's behalf.

See or hear something? Speak up

If you have a question or concern about a possible action, have a discussion with someone with whom you're comfortable, such as:

- Your leader or any leader.
- The Code of Conduct Office.
- External hotline.

We take it seriously when concerns are raised about ethical lapses or policy noncompliance. See our investigation process infographic to learn more.

It's important for all people leaders to create an open environment where people feel comfortable sharing concerns. Leaders should set positive workplace examples and clearly communicate expectations. All individuals covered under this policy are expected to refer allegations of fraud, suspected unlawful activity, harassment, discrimination, retaliation or workforce violence to the Code of Conduct Office or appropriate investigation unit, and should not attempt to investigate these topics themselves.

We take your concerns seriously

We thoroughly review incidents and concerns according to our investigation process. We investigate and take appropriate action based on investigation results. Under our Code of Conduct, everyone is held to the same standards. We want to know about issues so we can address them.

It's safe to speak up

Thrivent prohibits retaliation against individuals for engaging in protected activities including, but not limited to, reporting a good faith concern or assisting or participating in an investigation. Refer to Speaking Up and Non-retaliation for more information.

Want to remain anonymous?

If you prefer to report a concern anonymously, use the online form on the <u>Thrivent Business Ethics Hotline</u>, which is run by an external resource. The Hotline is available 24/7 via phone at 800-688-6046. (Be sure to check back periodically for follow-up questions and Thrivent's response.)

For more information

Thrivent Code of Conduct Office 612-844-5505 Toll-free 888-422-5737, say "directory," at the prompt and dial ext. 844-5505. BOXCodeofConduct@Thrivent.com

Independent Hotline

Available 24/7. You may choose to remain anonymous. Call toll-free 800-688-6046 or use the <u>electronic form</u>. thriventcodeofconduct.com