

# Essent Third-Party Code of Conduct

Essent seeks to be a reliable and valued counterparty by maintaining high ethical standards. We like to do business with like-minded service providers. To help potential and current service providers understand our Values we are publishing this Third Party Code of Conduct. While we know that no two businesses are alike, we encourage our service providers to review this document as a template for good corporate citizenship.

## Mission and Values

Essent is a recognized leader in the mortgage insurance industry, with a mission to serve as a trusted, best-in-class partner to the housing finance industry by responsibly offering mortgage insurance, reinsurance and risk management products to mortgage lenders and investors that support affordable homeownership. Essent is committed to operating consistent with ethical and professional standards, laws, regulations, internal policies, and our core Values.

Our culture is built on a set of shared Values that guide us:

### Integrity

We adhere to high ethical standards.

### Quality Execution

We are focused on managing risk and dedicated to serving as a strong and fair counterparty.

## Collaboration

We work with our various stakeholders to drive successful long-term outcomes.

## Citizenship

We are dedicated to responsible corporate stewardship through philanthropic, environmental and social initiatives.

## Applicability

At Essent, we expect similar standards of integrity and business conduct from business partners, suppliers, vendors, contractors, consultants, agents and other providers of goods and services (our "Third Parties") as we do our own employees. These standards are explained in this Third Party Code of Conduct ("Third Party Code"). We define Third Parties as entities (including their personnel) or individuals sub-contracted who work for or with Essent or that provide goods or services to Essent.

Essent expects Third Parties to be mindful of their ethical responsibilities and to behave in a manner consistent with this Third Party Code when working with Essent.

We acknowledge that no code of conduct can address every situation. We expect our Third Parties to be responsible and exercise good judgment and proper business conduct at all times.

If you are a Third Party to Essent and come across a situation that may be inconsistent with this Third Party Code, we encourage you to seek guidance from those within Essent designated as responsible for your services, contact Essent's Compliance Helpline at [compliance@essent.us](mailto:compliance@essent.us), or report your concern anonymously at [essent.ethicspoint.com](http://essent.ethicspoint.com). We value the courage it takes to raise concerns. As detailed in section 16 of this Third Party Code, we will review and investigate reported concerns raised by our Third Parties without retaliation for a report made in good faith.

## 1. Child Labor.

Essent is opposed to and does not tolerate any form of child labor. Third Parties should not use child labor and must employ personnel who meet the applicable minimum legal age requirement to work in the country or countries in which they operate.

## 2. Combating Corruption and Bribery.

Essent does not tolerate corruption or bribery in any form. Soliciting, accepting, offering, promising, paying bribes or making other improper payments, including facilitation payments, is strictly prohibited, whether directly or through any Third Party. Essent defines corruption as making improper payments or other inducements, illegal/criminal conduct, the abuse of entrusted power for private gain or the provision of an improper advantage. Essent defines bribery as offering, promising, giving, accepting or soliciting money, a gift or anything of value (including non-monetary value e.g., the offer of an internship or training) as an inducement or reward for doing something that is illegal, unethical, improper, a breach of trust or designed to corruptly influence the recipient's judgment or decision making. Essent defines a facilitation payment as a payment of any value, even if small, provided, in cash or kind, to active or former government officials to perform routine functions that they are otherwise obligated to perform (e.g., to expedite obtaining permits, licenses, visas, mail, or utilities). Third Parties must not engage in corruption, bribery or any activity (including improper payments) that may imply involvement in corruption or bribery when working for or with Essent. This includes facilitation payments or the giving or receiving of preferential treatment that may be perceived as a bribe for or on behalf of Essent. Third Parties must not accept or provide any gifts or favors to or from active or former government officials or commercial parties for or on behalf of Essent without obtaining prior approval from Essent.

### 3. Competing Fairly.

Essent is committed to fair competition and does not tolerate unlawful anti-competitive activity in any form. We expect Third Parties to refrain from unfair competition under applicable anti-trust and competition laws and regulations, whether alone or in combination with other entities or individuals. Specifically, Third Parties must not enter into any agreement, formally or informally, to unlawfully restrict competition, set prices, compensation or benefits; or allocate clients, markets, people, or services for or on behalf of Essent or otherwise in connection with any relationship with Essent.

### 4. Compliance with Laws and Regulations.

Third Parties must comply with applicable local and international laws and regulations. Proper policies, procedures and training should be in place to support compliance.

### 5. Confidentiality and Data Protection.

Essent respects the privacy and confidentiality of information relating or belonging to its clients, consumers, employees and others with whom it does business. Third Parties must handle and disclose personal data and confidential information that they obtain in the course of their relationships with Essent, only as authorized and directed by Essent and as required by applicable laws and regulations. Third Parties must protect personal data and confidential information against unauthorized and unlawful use, disclosure, access, loss, alteration, damage and destruction.

### 6. Conflicts of Interest and Sensitive Situations.

Essent is committed to identifying and addressing real and potential conflicts of interest and sensitive situations that may arise in the conduct of its business before accepting, commencing or continuing services. Essent defines conflicts of interests as any circumstance that could cast doubt on Essent's ability to act with objectivity when providing services in connection with Essent's business. Essent defines a sensitive situation as any circumstance that could create a serious commercial, reputational or client relationship issue for Essent. If a Third Party becomes aware of an actual or potential conflict of interest or a sensitive situation that may impact its work for or with Essent or otherwise, it must notify Essent promptly. Depending on the circumstances, Essent can work with Third Parties to put in place appropriate measures to manage/mitigate the conflict of interest or sensitive situation.

### 7. Cyber Security.

Essent is committed to protecting information entrusted to it, as well as physical and IT assets, through the development and implementation of information security controls. Third Parties may undergo an Essent review and depending on the services being provided may need to ensure security controls that meet Essent's requirements to maintain and protect information, including physical and electronic assets, obtained from Essent, Essent's clients and other third parties are in place.

### 8. Due Diligence and Monitoring.

Essent is committed to monitoring compliance against its internal standards and policies. Compliance with our standards and policies is an important component to the success of our company. We expect Third Parties to have appropriate processes and controls in place. Where appropriate, Essent conducts risk-based due diligence on Third Parties as part of assessing its relationship. We expect Third Parties to provide complete and accurate information to facilitate due diligence efforts undertaken by our company, where requested. If we determine that a Third Party has breached the Values described in this Third Party Code, we may require the Third Party to implement a remediation plan, or, in certain circumstances, we may suspend or terminate the relationship with the Third Party. Essent reserves the right to monitor, review and verify adherence to our Values, and will take action up to and including terminating its business relationship with any third-party business partner who is unwilling to comply.

### 9. Environmental Stewardship.

Essent is committed to reducing the direct and indirect environmental impacts of its operations and improving its environmental performance. We invite Third Parties to join us in developing internal programs designed to foster a culture of sustainability. We ask Third Parties to consider as appropriate greenhouse gas emissions and to engage in initiatives to promote environmental responsibility, effective waste and water management and efficient use of natural resources.

## 10. Freely Chosen Employment.

Third-party business partners are expected to maintain and promote fundamental human rights. Essent is opposed to and does not tolerate any form of human trafficking or modern slavery. Third Parties must not engage in or support human trafficking or modern slavery, including forced, bonded or involuntary labor.

## 11. Gifts.

Essent employees, officers, directors and agents are not permitted to accept gifts from Third Parties, except for certain specific situations as described in the Essent's Code of Business Conduct and Ethics. Third Parties must inform Essent management if an Essent representative requests anything of value, gift or gratuity from the Third Party while in the course of business. In addition, Essent's Third Parties must never offer any incentive to any Essent director, officer, employee or such person's family or friends in order to obtain, retain or influence Essent business, and must never offer gifts, favors or entertainment to Essent employees that would violate this Third Party Code.

## 12. Health and Safety.

Essent is committed to providing a healthy and safe working environment in line with internationally declared human rights. Third Parties must provide a healthy and safe working environment in line with internationally declared human rights. Third Parties should seek to minimize and respond to health and safety incidents and accidents occurring in the workplace and provide adequate personal protective equipment as may be applicable.

## 13. Hiring and Employment Practices.

Essent is committed to providing equal employment opportunities for all. In compliance with applicable law, Parties must not discriminate against any individual in their employment or hiring practices. This includes discrimination based on race, ethnicity, color, age, gender, gender identity or expression, sexual orientation, political beliefs, citizenship, national origin, religion, disability, parental status, economic/class status, veteran status, or any other protected status.

## 14. Insider Dealing/Trading.

Essent does not tolerate trading on, or the inappropriate disclosure of, inside information. Essent defines inside information as information about an entity (e.g., financial forecasts, merger and acquisition proposals, and key personnel changes) that has not been made public. Inside information can come from any source, not just Essent. Third Parties must not engage in insider trading, insider dealing or inappropriate procurement or disclosure of inside information regardless of whether the information was obtained in the course of working for or with Essent. A Third Party in possession of inside information about our company must not buy or sell any of our securities.

## 15. Intellectual Property.

Essent is committed to protecting its intellectual property and respecting the valid intellectual property rights of others. We expect Third Parties to respect the intellectual property rights of Essent and others. Third Parties shall not use Essent intellectual property in a manner that is not authorized by Essent nor other parties' unauthorized, unlicensed software or technology in support of or in connection with work for or with Essent.

## 16. Raising Concerns.

Essent is committed to addressing potential violations and protecting its officers, directors, employees and Third Parties against retaliation for reporting concerns in good faith. We expect Third Parties to report in good faith any concerns that may arise in connection with Essent's business and potential violations of this Third Party Code, laws, regulations or ethical or professional standards. Unless prohibited by law or regulation, we expect Third Parties to raise concerns related to this Third Party Code via any of the following channels:

- With those designated as responsible for the Third Party's service(s) with Essent;
- Through appropriate channels, including our Legal Department, Compliance Department and Human Resources Department;
- By contacting our ethics and compliance helpline at [compliance@essent.us](mailto:compliance@essent.us);
- By reporting concerns anonymously at [essent.ethicspoint.com](https://essent.ethicspoint.com).

We expect Third Parties to inform their personnel that they will not be subject to retaliation as a result of raising a concern in good faith. We will review/investigate reported concerns and may escalate the concerns to Third Parties to be managed and investigated as appropriate.

## 17. Sanctions and Export Controls.

Essent does not conduct activities nor assist any other party in violating applicable economic sanctions or export control laws and regulations. We expect Third Parties will comply with applicable economic sanctions and export control laws and regulations and avoid doing anything that would position themselves or Essent in violation of applicable economic sanctions and export controls.

## 18. Social Media.

Essent is committed to using social media platforms responsibly and being courteous and respectful in its online public communications. We expect Third Parties to refrain from disrespectful, unprofessional, harassing, defamatory, discriminatory and prohibited activity on social media platforms. Third Parties shall not act or speak on behalf of Essent, represent themselves as Essent, or express any views attributable to Essent unless expressly authorized to do so by Essent in writing.

## 19. Third Parties' Interactions with Essent Personnel.

Essent is committed to providing a safe and non-discriminatory working environment. We expect Third Parties to provide a working environment free of abusive, violent, threatening, disruptive and other improper behavior and not tolerate harassment, and other disrespectful conduct, including sexual harassment, discrimination, and bullying.

## 20. Wages and Hours.

Essent is committed to compliance with applicable wage, hour and overtime laws and regulations. We expect Third Parties to set working hours, wages and overtime pay in compliance with applicable laws and regulations in the countries in which they operate. Third Parties must pay at least the applicable minimum wage. While it is understood that overtime may be required, we expect Third Parties to carry out operations in ways that limit overtime to a level that promotes humane and productive working conditions. We also expect Third Parties to maintain working conditions that meet internationally declared human rights and standards.

## 21. Check for Updates.

Essent's Third Party Code is subject to periodic updates and revisions reflecting the company's culture of continuous improvement. Our Third Party Code may be found at [essent.us](http://essent.us) and [essentgroup.com](http://essentgroup.com).



# Locations

## Essent Group Ltd.

### Corporate Offices

Clarendon House  
2 Church Street  
Hamilton HM 11, Bermuda

## Essent Reinsurance Ltd.

### Corporate Offices

69 Pitts Bay Road  
Pembroke HM 08, Bermuda

## Essent Guaranty, Inc.

### Corporate Offices

Two Radnor Corporate Center  
100 Matsonford Road  
Radnor, PA 19087