

CODE OF CONDUCT

AT A GLANCE

It's about doing the right thing

Thrivent's [Code of Conduct](#) focuses on principles that guide the behavior of everyone who represents the enterprise and its membership. That includes:

- Thrivent's workforce – all corporate, subsidiary, affiliate and field employees, financial representatives and interns.
- Thrivent's board directors and officers.
- Contract consultants and agencies that work on Thrivent's behalf.

In situations where ethics could be in question, it's up to each of us who represent Thrivent to use our best judgment to make the right decisions. Or seek guidance from others to help us confidently do so if we're unsure.

So, before we act, it's important to ask ourselves these questions:

- Would my action conflict with Thrivent's brand promise?
- How might my behavior be perceived if it appeared in social media feeds, on the news or in tomorrow's headlines?

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. Often, your manager or another people leader is a great place to start. You can always contact the [Thrivent Code of Conduct Office](#).

It's important for all of our people leaders to create an open environment where our workforce feels comfortable sharing concerns. Managers should set positive workplace examples and clearly communicate expectations. All individuals covered under this policy are expected to escalate any 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.



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External hotline

If you prefer to report a concern anonymously, use the online form on the [Thrivent Business Ethics Hotline](#), 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.)

Investigating concerns

Thrivent investigates when concerns about business ethics or policy violations are raised. If something seems wrong, let us know.

Our [investigation process](#) focuses on fact-finding and taking appropriate action, to the extent necessary, based on the investigation. Everyone who represents Thrivent is expected to act in accordance with our [leadership competencies](#), relevant Thrivent policies and the law.

Feel safe about speaking up

Fear of retaliation is understandable. Our processes are designed to minimize the risk of retaliation. Thrivent will take swift action if someone experiences retaliation after raising good-faith concerns. Refer to our [Speaking Up](#) and [Non-retaliation](#) resources for more details.

If you believe you have experienced retaliation after raising a concern, let us know.

Doing what's best for our membership

At Thrivent, we do what's best for our membership. That means we act with integrity to be good stewards of their financial resources, protect their personal information, and act respectfully and ethically on their behalf and within the law. In other words, it's all about giving our membership reasons to trust us for the long run.

This is a summary of our Code of Conduct, which is available at Thriventcodeofconduct.com.

Contact Information

Thrivent Code of Conduct Office

612-844-5505

Toll-free 888-422-5737, say

"directory," and dial ext. 844-5505.

BOXCodeofConduct@Thrivent.com

Independent Hotline

Available 24/7 and you may choose to remain anonymous.

Call toll-free 800-688-6046 or

use the electronic form at

[Thrivent Business Ethics Hotline](#).



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