

## Third Party Code of Business Conduct

Pacific Life Insurance Company and its subsidiaries and affiliates take enormous pride in our longstanding reputation for integrity, which is vital to our success as a Company. The strength of Pacific Life's reputation is based, not only on our own conduct, but also on the actions of those with whom we do business. For that reason, we aspire to work with third parties who share our values and reflect the same high ethical standards.

This Third Party Code of Conduct has been developed to share our expectations regarding the ethical conduct of our third party service providers ("Third Party Partners"). We expect our Third Party Partners to take reasonable steps to ensure that this Third Party Code of Conduct is communicated throughout their organization and made available to their employees and subcontractors who work on Pacific Life business. We expect you, as our Third Party Partner, to share our commitment to comply with the following standards to the extent they are applicable to our business relationship.

Pacific Life expects our Third Party Partners to provide the highest total quality and:

- Provide consistent, timely, and relevant feedback.
- Be proactive in suggesting and providing business solutions.
- Suggest new processes, as well as improve quality of existing processes and services.
- Address customer needs and concerns promptly.
- Invoice accurately and in a timely manner.
- Promote continuous improvement and innovation.

Although policies are more precise than values and principle statements, the policies are not written or intended to be all-inclusive rules covering every eventuality and circumstance. When a specific fact is not addressed in this document, Pacific Life expects our Third Party Partners to use the values and principles herein to guide their actions and maintain the highest ethical standards.

### Pacific Life Values

Pacific Life's culture is based on core values that we have defined as the ***Four Principles of Integrity***. These principles are values-based and provide a framework for our responsibility to our Company, customers, business partners, and each other.

**Ethical Conduct:** To conduct business activities in accordance with the Company's high ethical standards and values of honesty, integrity, trustworthiness, and respect.

**Professional Conduct:** To provide and maintain a work environment that respects the rights of all employees, and that is free of harassment and hostile or offensive behavior. To avoid conduct that may reflect adversely on the integrity or reputation of Pacific Life.

**Protection and Proper Use of Information and Systems:** To protect and maintain the confidentiality of personal and Company information and to use this information only for Pacific Life business purposes.

**Compliance with Laws, Regulations, Policies, and Procedures:** To comply with all laws and regulations and Company policies and procedures.

Within these Four Principles of Integrity is adherence to a strict code of ethical workplace behavior and professional business conduct by our employees. Pacific Life expects our Third Party Partners and their associates to act in a similar manner. All individuals (whether Pacific Life associates or third party personnel) are expected to treat others with respect, fairness, and dignity.

## Ethical Conduct

### Conflicts of Interest

An actual conflict of interest exists when business decisions and actions are motivated by personal benefit, interests, or relationships, rather than by the best interest of Pacific Life. An apparent conflict is when business decisions and actions appear to be motivated by personal benefit, interests, or relationships.

Third Party Partners must not engage in any act which would bring into question the reputation of Pacific Life. Because it is impossible to describe every potential issue, Pacific Life relies on its Third Party Partners' commitment to exercise sound judgment, to seek advice when appropriate or when in question, and to adhere to the highest ethical standards when interacting with or representing Pacific Life. Furthermore, each Third Party Partner must act with integrity in all of its dealings, whether directly involved with Pacific Life or not.

### Gifts and Gratuities

Third Party Partners may receive gifts and gratuities as gestures of goodwill in the course of establishing and maintaining normal, ethical business relationships. Sometimes, though, gratuities cross the line of ethical business conduct and become conflicts of interest. This happens when gratuities are, or appear to be, intended to improperly influence business decisions or actions. When gratuities cross the line from common courtesies to conflicts of interest, it undermines Pacific Life's commitment to conducting business with honesty and integrity. The gratuities our Third Party Partners accept must be unsolicited, infrequent, and consistent with the concepts of common courtesy and ethical conduct. Third Party Partners must never give or accept cash and must never solicit gratuities for personal benefit.

### Community Engagement

Beyond our business commitments, Pacific Life strives to improve our communities and environment. Through its Foundation, Pacific Life has donated more than \$100 million to communities where our employees live and work, creating a positive societal change. Third Party Partners are expected to act as good corporate citizens and are encouraged to participate in community and other local support

activities. Third Party Partners are also encouraged to support community development, including participation in diversity supplier development programs.

### **Environment and Green Initiatives**

Pacific Life recognizes that environmental responsibility is essential to providing world-class products and services. Third Party Partners are expected to comply with the letter and spirit of applicable environmental laws and regulations, and conduct their activities in an environmentally responsible manner.

## **Professional Conduct**

### **Work Environment**

It is the policy and practice of Pacific Life to provide and promote equal employment opportunities for all applicants and employees. The Company is firmly committed to maintaining a workplace based on our values, which stress the quality of our products and services, the importance of teamwork, and the need for all employees to treat each other with dignity and respect. We expect our Third Party Partners to support these efforts within their own companies, in our customers, in other third parties, and in all others with whom they may interact in the course of their engagement with Pacific Life.

### **Health and Safety**

The health and safety of our people is of primary importance to Pacific Life. Our Third Party Partners must provide a safe and healthy work environment for all employees working at their sites by maintaining a focus on health and safety and complying with all applicable laws, rules and regulations.

### **Harassment, Discrimination & Equal Opportunity**

Pacific Life is committed to providing a respectful and productive work environment that is free from harassment and discrimination. In keeping with this commitment, the Company maintains a strict policy prohibiting discrimination and/or harassment based on gender, race, color, religion, national origin, ancestry, age, physical or mental disability, medical condition, marital status, military or veteran status, sexual orientation, gender identity, gender expression, or any other characteristic protected by federal or state law. The Company also prohibits sexual harassment and retaliation.

Third Party Partners are likewise expected to foster a discrimination-free environment, by seeking to eliminate all forms of workplace harassment and retaliation.

### **Workplace Violence**

Any form of violent conduct or threatening, abusive, intimidating, or hostile behavior is strictly prohibited. Possession of weapons on Company property or at Company-sponsored events is prohibited.

### **Forced Labor, Child Labor and Human Trafficking**

Third Party Partners must not participate in, or benefit from, any form of forced labor, including bonded labor, forced prison labor, slavery, involuntary servitude, or human trafficking. Third party associates involved in Pacific Life engagements must have the freedom of movement during the course of their

employment. Third Party Partners must not engage in, or benefit from, the use of child labor in any form. Child labor is defined as employing persons below the minimum age for employment in accordance with applicable national laws.

## Protection and Proper Use of Confidential Business Information

### **Customer Information**

Third Party Partners and their employees may come in contact with information about Pacific Life employees or customers, including information about their accounts, as a result of their engagement with Pacific Life. Third Party Partners have a responsibility to protect the confidentiality of information about customers, consumers, Pacific Life associates or any other individuals, that may be entrusted to them. They should not seek to access such information unless they have a legitimate business reason to do so. If legitimate access is granted, they must protect against the unauthorized release or use of this information.

### **Confidential and Proprietary Information**

All non-public information, including information that would be harmful to Pacific Life or its customers if released without authorization or that can be used by its competitors, can be used only for Pacific Life's business purposes. This information may be shared with third parties who have a need to know and who have previously received appropriate authorization. The use of this information for any reason not specified in the written agreement(s) with Pacific Life is strictly prohibited.

### **Representing Pacific Life to the Public**

Third Party Partners and their employees must never speak to the public or release documents on behalf of Pacific Life. They may freely represent their own views, as long as such statements do not negatively impact the good name and reputation of Pacific Life. Third Party Partners may not use Pacific Life's name or official logo in press releases or other outside communications without prior approval of Pacific Life. Third Party Partners may not provide project- or engagement-specific details of their support of Pacific Life to the public without prior approval of Pacific Life. Requests for such use of Pacific Life's name or official logo must be routed through Pacific Life for direction and guidance.

### **Social Media and Emerging Technologies**

Pacific Life expects our Third Party Partners to assist us in protecting the privacy, confidentiality, and interests of Pacific Life, our current and potential products, associates, partners, customers, and competitors, whether at work, at home, in the community, or online. As a valued Third Party Partner, your firm and associates are expected to use good judgment at all times, including when accessing or providing content on social media. We also expect that, while online, Third Party Partners and their associates will not mention Pacific Life work or initiatives or information relating to Pacific Life or its customers.

Third Party Partners must avoid posting items that would reflect adversely on the integrity or reputation of Pacific Life such as statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, or that could disparage customers, co-workers, or

business partners. Third Party Partners must avoid the appearance of acting on behalf of or representing the Company and respect the use of Pacific Life brands, logos, and trademarks.

### **Compliance with Laws, Regulations, Policies, and Procedures**

As a Third Party Partner working with Pacific Life, you are required to comply with all applicable laws, rules, regulations and treaties, including but not limited to laws related to anti-bribery, competition, business conduct, privacy and data protection, labor and employment, and any other laws described herein or that are otherwise applicable to the services you provide to Pacific Life in all locations in which you conduct business operations.

### **Fairness to Competitors, Customers, and Others**

Treating others fairly is one of the ways we demonstrate our commitment to doing the right thing. Fairness to competitors, customers, and others means that we treat everyone equally and without bias or partiality while providing our products and services and conducting our business in the open market. We do this not only to exemplify our values but to comply with numerous unfair competition laws.

Third Party Partners must not engage, or appear to engage, in any activity that restricts normal competition in the open marketplace. Examples include:

- Sharing or agreeing to share information regarding the pricing or design of products or other competitive marketing information with competitors.
- Participating in any arrangement with competitors to fix, rig, or coordinate prices.
- Making any agreements with competitors to boycott or refuse to deal with any third party.

Third Party Partners may not take advantage of a business opportunity that is intended for Pacific Life which arises in the course of the engagement. Third Party Partners may not act as a competitor by providing or attempting to provide similar products or services directly to Pacific Life customers.

### **Anti-Bribery**

Bribes and other improper payments destroy the fairness that is fundamental to the unfettered operation of the marketplaces in which Pacific Life and its peers conduct business. In addition to harming the markets and communities in which it occurs, bribery is illegal under federal and international law and carries with it substantial criminal sanctions as well as debilitating reputational harm to the companies and individuals involved. Third Party Partners are prohibited from offering, promising, authorizing, paying, giving, soliciting, or accepting anything of value to or from any government official or private person in order to improperly gain any regulatory, commercial, or contractual advantage.

Government bribery also includes the concept of “facilitating payments”: that is, small amounts that are paid to a government official to induce the official to expedite fulfillment of a routine duty, such as processing governmental paperwork and licenses. Such payments are illegal under certain international anti-bribery rules and are thus prohibited by this policy.

### **Insider Trading**

During the course of an engagement, Third Party Partners may come into possession of inside information concerning Pacific Life and the companies it does business with, such as vendors, customers, and other business partners. Third Party Partners must never engage in the following activities:

- Trade in the securities of any publicly traded company while aware of inside information about that company.
- Recommend or suggest that anyone buy, sell, or retain the stock or other securities of any company when we are in possession of inside information about that company.
- Disclose inside information other than for the specific business purpose for which the information is intended to be used.
- Disclose inside information if we have reason to believe that the information may be misused.

When in doubt, Third Party Partners must assume information is material and nonpublic, and must not act upon it. Third Party Partners and their associates must not take part in any trading that may appear improper.

### **Contact Information and Escalation Procedures**

Contact Pacific Life's Corporate Compliance department with any questions or to discuss business conduct and ethics issues. The Compliance department can also be used to report suspected discriminatory, unethical or illegal activities.

Phone: 949-219-1717

Email: [CorporateCompliance@PacificLife.com](mailto:CorporateCompliance@PacificLife.com)