

WHY DOES IT MATTER?

Fraud means to cheat, trick, steal, deceive, or lie. These actions are not only contrary to Pacific Life's commitment to our core value of **Integrity** but in many instances are also illegal and carry substantial civil and criminal penalties. The impact of fraud can also cause financial loss, reputational harm, and have a negative effect on the culture and morale at Pacific Life.

HOW DOES THIS APPLY TO ME?

As an employee of Pacific Life, its subsidiaries, and affiliates, you must not commit acts of fraud. The following are some examples of fraud:

- Theft of Company assets
 - o For example: Taking information, documents, code, or work product that is not publicly available from Pacific Life systems for use in a non-Pacific Life capacity can be theft. Similarly, bringing the same type of information from another company, or previous employer to Pacific Life could also be theft. If you have questions about specific uses, ask your manager or compliance!
- Embezzlement of Company or client funds
- Forgery or alteration of Company documents
- Authorizing or submitting a reimbursement request known to be false
- Misrepresentation of facts pertaining to an insurance transaction

Violation of this Anti-Fraud Policy may subject you to disciplinary action up to and including termination of employment. Pacific Life will take aggressive action against fraud whether perpetrated by an employee or any outside party.

IT STARTS WITH ME: WHAT SHOULD I DO?

Be aware of and raise questions if you see evidence of fraud. Don't put Pacific Life or yourself at risk. Speak up and report instances of fraud through one of the reporting methods below. Pick the one you feel most comfortable with and remember, there is no wrong way to speak up; the only mistake you can make is to not speak up at all.

Enterprise Compliance will coordinate the investigation of reported fraud with the Law Department, Audit, Employee Relations, Security and other appropriate parties, including law enforcement, as necessary.

WHO SHOULD I TELL?

Report fraud immediately through one of the following channels:

- **Your Manager**
- **HR Employee Relations**
- **Enterprise Compliance**
- **The Responsibility Line (for anonymity)**

RELATED POLICIES, PROCEDURES, FORMS, OR OTHER RESOURCES

- **Employee Handbook**
- **Reporting Violations Policy**

WHAT IF I HAVE QUESTIONS OR NEED MORE INFORMATION?

Contact Enterprise Compliance