

Antitrust and Unfair Competition Policy



WHY DOES IT MATTER?

At Pacific Life, treating others fairly is one of the ways we demonstrate our commitment to doing the right thing. We do this not only to exemplify our core value of, *Customer Service* but to comply with numerous antitrust laws (also referred to as competition laws) designed to ensure that fair competition exists in an open-market economy. Antitrust laws are a broad group of state and federal laws that are developed to protect consumers from predatory business practices like market allocation, bid rigging, price fixing, and monopolies.

HOW DOES THIS APPLY TO ME?

Fairness to competitors, customers, and others means that we treat everyone equally and impartially, free from self-interest, business discrimination, and favoritism, while providing our products and services and conducting our business. As an employee of Pacific Life, you must not engage in, or appear to engage in any activity that unfairly or unreasonably restricts normal competition in the marketplace.

All employees of Pacific Life, its subsidiaries and affiliates are subject to this Antitrust and Unfair Competition Policy. Violations of this policy may subject you to substantial penalties, including civil action, criminal prosecution, and disciplinary action up to and including termination of employment.

IT STARTS WITH ME: WHAT SHOULD I DO?

Avoid engaging in the following practices:

With Competitors:

- 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.
- Making false or disparaging statements about competitors or their products and services.
- Illegally obtaining the confidential information of a competitor.

With Customers:

- Requiring a customer to purchase a Pacific Life product as a condition of obtaining another Pacific Life product.
- Avoiding any attempt by a customer or potential customer to preclude Pacific Life from doing business with, or contracting with, another customer.

With Others:

- Requiring any arrangement in which a third party, such as a producer, broker-dealer, or vendor, must engage in business with Pacific Life on an exclusive basis may also be a violation of anti-trust laws.

RELATED POLICIES, PROCEDURES, FORMS, OR OTHER RESOURCES

- [Enterprise Procurement Policy – Competitive Bidding Practices and Procurement Engagement](#)
- [Reporting Violations Policy](#)
- [The Responsibility Line \(for anonymity\)](#)

WHAT IF I HAVE QUESTIONS OR NEED MORE INFORMATION?

Talk to your manager or contact Enterprise Compliance