



# **Code of Conduct & Business Ethics**

February 2023



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## GENERAL

### A Message from our CEO Laura Prieskorn

At Jackson, we believe every American deserves the opportunity to live life well, and not outlive their money. Our compelling retirement value proposition provides clarity for a confident future, and our suite of annuity products enables Americans to pursue financial freedom for life.

For more than 60 years, we have been committed to ensuring Jackson is a great place to work and our distribution partners can help Americans reach their retirement goals. Our disciplined, client-focused approach, combined with our differentiated products and industry-leading distribution network, set us apart from competitors and provide a solid platform for the future.

As a guide to prepare for new challenges, Jackson's values serve as guiding principles for how we interact with each other and our many stakeholders:

- Empower – We Think Like Owners
- Execute – We Set the Pace
- Respect – We Build Relationships
- Create – We Inspire Change



To support our mission, we are committed to always doing business in compliance with the law and with the highest levels of ethics and integrity. Simply put, we will always strive to do the right thing for all stakeholders, including our employees, customers, shareholders and the communities where we operate.

This Code of Conduct and the underlying controls at our Company are designed to support this commitment and I am proud to share it with our associates and other stakeholders.

A handwritten signature in cursive script that reads "Laura Prieskorn".

Laura Prieskorn,  
Chief Executive Officer and President  
Jackson Financial Inc.

## **Jackson's Code of Conduct & Business Ethics**

One of the great strengths of our Company is the honesty and integrity of our associates. Jackson Financial Inc. ("Jackson" or "the Company") has established this Code of Conduct & Business Ethics (the "Code") to give our associates guidance on how they are expected to conduct business and engage with stakeholders on behalf of Jackson.

This Code applies to all associates, including the Boards of Directors of Jackson and its subsidiaries. In some circumstances (particularly in areas such as anti-bribery & corruption and anti-fraud), the Code also applies to consultants and temporary workers for the Company. You are responsible for understanding this Code and for following all policies where applicable to your work at Jackson.

Jackson has a number of formal policies designed to guide you in the conduct of our business. Selected policies are referenced within this Code, and other policies or procedures exist outside of the Code. The other policies and procedures may also apply if you are associated with Jackson. Some policies apply to the actions of family members, such as those that relate to certain conflicts of interest. In many instances, vendors and contractors that do business with Jackson will also be asked to affirm that they understand and agree to comply with specific terms of engagement agreements that encompass the principles set forth in these policies.

### **General Principles**

The Code is based on the fundamental understanding that we are all responsible for conducting business ethically and in compliance with the law everywhere that we operate. No one should ever sacrifice integrity - or give the impression that they have - even if they think that it would help the Company.

If you are associated with a subsidiary of Jackson, be aware of additional requirements. Please consult your subsidiary compliance manual or contact your Legal & Compliance team for further information on applying this Code to your responsibilities at Jackson.

### **How to Report**

One of the most critical requirements of this Code is to report any observed or suspected violations of the Code, Company policies, law, or any other form of perceived or actual wrongdoing, which will enable the Company to identify, address, and mitigate any improper conduct or engagement. You may report violations or concerns through multiple channels, including your manager, the Chief Compliance Officer within your business, Human Resources, or the Enterprise Chief Ethics & Compliance Officer. If for any reason you are uncomfortable reporting a matter directly, confidential reporting is also available using the Speak Out confidential reporting system ("Speak Out"). Information reported through Speak Out will be treated as confidential. You are not required to leave your name or department when you call. Additionally, Speak Out is available to Jackson's customers, vendors, business partners, or other constituents.

<b>Speak Out Confidential Reporting Hotline</b>	844-506-0767
<b>Speak Out Confidential Reporting Website</b>	<a href="http://Jackson.ethicspoint.com">Jackson.ethicspoint.com</a>
<b>Speak Out Confidential Reporting Mobile Phone Site</b>	<a href="http://Jackson.mobile.ethicspoint.com">Jackson.mobile.ethicspoint.com</a>

**Whistleblower/Non-Retaliation/Anti-Harassment**

We encourage you to report any improper conduct observed, and we will protect you when you do. Jackson prohibits retaliation against any associate who, in good faith, makes a complaint or reports suspected misconduct.

Nothing in this Code should be viewed as limiting your ability to communicate or otherwise participate in any investigation or proceeding that may be conducted by any governmental agency, commission or body or self-regulatory organization. This includes reporting possible violations of federal securities laws or regulations to the Securities and Exchange Commission (“SEC”), making other disclosures that are protected under the whistleblower provisions of federal law or regulation or recovering any individual monetary award from the SEC or other government authority without prior notice to the Company.

A whistleblower who believes that they have been subject to discrimination, harassment or retaliation, or who observes discrimination, harassment or retaliation against another associate should immediately report the incident, either orally or in writing, to their manager, Chief Compliance Officer within their business, the Human Resources Department, the Enterprise Chief Ethics & Compliance Officer, or use the Speak-Out confidential reporting system. We will investigate any complaint of retaliation and, if verified, will take necessary remedial action.

**Administration of this Code**

This Code is administered by the Jackson Enterprise Chief Ethics & Compliance Officer and the Company’s compliance program actively oversees compliance with and adherence to this Code. The Code is meant to serve as the primary resource containing your ethical responsibilities to Jackson, but is not intended to be an exhaustive summary or listing of all policies in effect by Jackson or any subsidiary. For example, the Associate Handbook contains various employment and other policies that may be applicable to you. In addition, you will find links to various policies included below for your reference.

The Code may be updated and amended from time to time and will be reviewed as necessary to determine its effectiveness. Most importantly, you are expected to apply principles in this Code in your business practices.

Any waiver of this Code for any executive officer or director may be made only by the Jackson Board of Directors or a Committee of the Board of Directors and must be promptly disclosed in accordance with applicable law and New York Stock Exchange requirements.

## **Violations of this Code**

Any violations of this Code or its underlying policies will be addressed as appropriate, up to and including termination of employment. In some instances, violations of this Code (or related policies) may also constitute violations of law, rules or regulations, which could result in civil or criminal penalties.

## JACKSON'S VALUES



**EMPOWER**  
WE THINK LIKE OWNERS

### We think like owners

Our associates are empowered to make decisions that impact the company. We consistently seek to expand our knowledge and share with others. We are accountable to exercise sound judgment and take ownership of our actions. Integrity guides what we do—and we are committed to serving our clients, advisors and colleagues.



**EXECUTE**  
WE SET THE PACE

### We set the pace

Working smart is the company trademark. We drive results. Our work is challenging—but rewarding. We don't put off to tomorrow what can be done today. Frankly, we're setting the bar.



**RESPECT**  
WE BUILD RELATIONSHIPS

### We build relationships

With each interaction, we strive to build strong and lasting relationships. By listening and supporting all of our stakeholders and each other, we make a lasting impression and positive impact. We respect each other by working together. We value differences and our unique perspectives and capabilities make us diverse, inclusive and strong.



**CREATE**  
WE INSPIRE CHANGE

### We inspire change

We are not afraid to challenge the status quo in search of a better, smarter or faster solution. Through calculated risk-taking and forward-thinking, our associates team up to create innovative solutions. We value learning and challenge ourselves and motivate others.



## OUR ETHICS – WE DEMONSTRATE PRINCIPLED INTEGRITY

You are responsible for avoiding activities or relationships that might affect your objectivity in making decisions as a Jackson associate. While it is not possible to discuss all possible ways this can occur, the following areas are the most common.

### Conflicts of Interest

Conflicts of interest arise when your personal interests impact your duties to Jackson or other stakeholders. Potential or perceived conflicts of interest may also expose the Company to reputational and financial harm. It is therefore important that you identify and escalate all real and potential conflicts of interest and avoid or mitigate conflicts or potential conflicts that may harm the Company.

It is not possible to list every situation that could present a potential conflict, however, be particularly aware of the following:

- Your service on a board of directors (including for a non-profit)
- The giving and acceptance of gifts and entertainment
- You or your immediate family's outside financial interests, including family ventures, occupations, etc.

You may not realize right away that a particular situation may present a real or potential conflict of interest, so use good judgment and ask for help whenever you are unsure of the proper course of action.

The Company shall not, directly or indirectly, extend or maintain credit, arrange for or renew an extension of credit in the form of a personal loan to or for any director, executive officer or associate.

#### WHAT SHOULD I KNOW?

If you are faced with a potential conflict, ask yourself:

- Would public disclosure of my action (or relationship) cause me or the Company embarrassment?
- Would the action (or relationship) lead an outside observer to believe a conflict might exist, even if it does not actually exist?

If the answer to either of these questions is yes, then discuss it with your manager or Legal and Compliance. Always escalate potential conflicts of interest.

**Be alert to potential conflicts, be proactive in obtaining any necessary approvals, and be aware that you may be required to discontinue an activity if a conflict arises.**

## Outside Business Activities

Jackson associates engage in a variety of activities outside of the office. This may range from volunteer activities and family ventures, to additional employment. While in many instances, these activities present no issues, it is important to know where an outside activity may present a conflict, real or perceived, with Jackson and its other stakeholders.

Examples of outside activities include:

- Non-Jackson board memberships;
- Owning an interest or otherwise operating a private venture;
- Any activity involving a Jackson vendor, customer, or competitor; and
- Volunteerism.

Jackson has many business partners, vendors and customers, and it is important that the activities of associates should not show favoritism or appear to be at the behest of any single party. Secondary employment of an associate by a vendor or competitor, for instance, could cause a potential Conflict of Interest.

Outside activities should not:

- Interfere with your work requirements;
- Use Company resources; or
- Involve an activity that is contrary to Company values.

### WHAT SHOULD I KNOW?

- Obtain approval before participating in any Outside Business Activity that is or may be perceived as a Conflict of Interest.
- Obtain approval from Legal & Compliance before engaging in any non-work-related activity involving a customer, business partner or competitor.

**Put your responsibilities to Jackson and our stakeholders ahead of other business opportunities, not-for-profit activities, government service or a second job.**

## Personal Securities Trading

Jackson recognizes it is important for you to manage your personal finances, including using the wide array of available securities and investment opportunities. However, as part of a comprehensive financial services firm, we have adopted certain policies and procedures relating to your personal trading in an effort to minimize, mitigate, or eliminate potential conflicts of interest.

Depending on your position with the Company, you may be required to report your personal trading accounts and transactions, including those of your household members and other accounts you control. If required, it is essential that your reporting is timely and complete in order to avoid potential conflicts between your personal trading and the Company's activity.

## Inside Information

You may be in possession of material, non-public information (“MNPI”) about our Company, our customers, and other companies that conduct business with us. The terms MNPI and inside information are used interchangeably.

A company’s MNPI is information that is not known by the public, but if it were, would likely affect the market price of the company’s securities or be considered important to a reasonable investor in deciding to buy, hold, or sell those securities. MNPI may include information relating to:

- Earnings (or estimates);
- Mergers, acquisitions, or other significant Company initiatives;
- Regulatory investigations or actions; or
- Changes in senior management.

Federal securities laws prohibit trading in a company’s securities while in possession of MNPI about that company. Such misuse of that MNPI is what is called insider trading, which is illegal. Insider trading also hurts a company because of the threat that insider trading poses to investor confidence in the fairness and integrity of the securities markets.

You are prohibited from using or sharing confidential information about the Company for any other purpose except in the proper conduct of business. You also may be subject to additional requirements if you regularly are or may be in possession of MNPI or other sensitive information (“Restricted Person”). Restricted Persons may not trade in the Company’s securities during blackout periods and must obtain trade pre-clearance during open windows for trading. For certain associates, personal trading activity will be monitored and will be subject to other and trading restrictions to ensure no securities are traded in violation of Company policies.

### WHAT SHOULD I KNOW?

If you are a Restricted Person:

- Always request trade pre-clearance from the Jackson Insider Tream before buying or selling JFI securities and
- Do not trade in JFI securities during a blackout period.

Keep MNPI out of sight when not in use and follow a clear desk policy.

- Do not read confidential documents in public places or discard them where others can retrieve them.
- Do not carry confidential documents in an exposed manner.
- Do not discuss confidential matters in any place where you may be overheard.
- Do not discuss confidential business information with a spouse, partners, relatives, or friends.
- Report any actual, perceived or threatened breaches immediately.

All non-public information about the Company should be considered confidential information. The use of this information for personal investment purposes is illegal and could result in civil and/or criminal penalties.

## **Anti-Bribery & Corruption**

We must never compromise our reputation by engaging in, or appearing to engage in, bribery or any form of corruption. And we never offer or accept anything of value in order to get business, keep business, or gain an unfair advantage. The Jackson Anti-Bribery & Corruption (“ABC”) Policy is designed to identify, mitigate, or eliminate potential ABC concerns, including additional controls and oversight over areas deemed to be “high risk” throughout the Company. To supplement the ABC Policy, Jackson’s annual risk and controls self-assessment identifies and reviews the controls put in place to address those potential concerns. Additionally, the Company has controls in place to monitor and oversee ABC risks at its business partners and business critical suppliers.

Bribes come in many forms, and they are not always obvious. A gift, cash equivalents, business hospitality, the promise of a job, the offer of a trip, or a charitable or political contribution – all could be considered bribes, if offered in exchange for any decision or favorable treatment.

Special procedures apply, including pre-clearance requirements, when providing anything of value to a government official. In addition, providing anything of value indirectly through a family member, close associate, business partner or agent of the government official is considered the same as providing it to the government official directly if it is intended or could reasonably appear as intended to influence improper action or obtain some improper business advantage.

The Foreign Corrupt Practices Act (“FCPA”) prohibits offering or providing anything of value (including gifts and entertainment) to foreign officials (including their spouse, family members or staff) to influence a decision or obtain a business benefit. The FCPA prohibits many forms of payments, including those made in cash, stocks, property, or services.

We also do not permit “facilitation payments.” This includes any payment made to secure or expediate the performance of a routine or necessary action to which you or Jackson are already entitled. An example is a small payment made to a government official to speed up routine government actions like processing paperwork, delivering mail, installing phones or turning the power on. Regardless of amount, we do not pay them.

If something seems improper or may involve bribery, contact your manager, the Chief Compliance Officer within your business, the Enterprise Chief Ethics & Compliance Officer, or use the Speak-Out confidential reporting system.

## WHAT SHOULD I KNOW?

- Learn to spot a bribe.
- Be aware of heightened risks when dealing with government officials.
- If an offer is permitted by our policies, be accurate and complete in recording payments or expenses.
- Report suspicious behavior.

**Before you offer or accept anything of value, check our policies, and ask for help if you are not sure of what to do.**

### **Related Jackson Master Policies:**

- Advisory Code of Ethics
- Anti-Bribery & Corruption Policy
- Associate Handbook
- Conflicts of Interest Policy
- Gifts & Business Entertainment Policy
- Insider Trading Policy
- Outside Business Activities Policy
- Related Persons Transactions Policy
- Restricted Persons Policy

## Our Customers – We Treat Our Customers Fairly, Openly and Honestly

In addition to compliance with applicable laws and regulations, we expect you to hold yourself to the highest standards of ethical conduct. We strive to treat all customers in a fair, ethical and non-discriminatory manner and work to achieve a competitive advantage through superior products and services, never through unethical or illegal business practices.

### Anti-Money Laundering

We recognize that any involvement in money laundering will have an adverse impact on our customers and the integrity of the financial services industry. As a financial institution, we maintain a robust anti-money laundering program designed to identify and prevent potential money laundering and/or fraud events. In addition to controls and processes embedded within our program, to fulfill its know-your customer responsibilities, Jackson maintains contractual agreements with its distribution partners and incorporates oversight controls to supervise those programs.

Money laundering can include many different types of conduct but is generally understood to be the process of taking the proceeds of criminal activity and making them appear legitimate. Money laundering can result from almost any crime, including fraud, drug trafficking and terrorism.

You are strictly prohibited from engaging in the laundering of money or any activity associated with the funding of terrorist or other illegal activities. You must always be on alert for money laundering activities.

It is your responsibility to **IMMEDIATELY** report to a manager, the Anti-Money Laundering Compliance Officer (“AML Officer”), or the Enterprise Chief Ethics & Compliance Officer:

- Any suspicious activity regarding an associate’s or customer’s behavior;
- Any suspicious life insurance policy, annuity contract or other product transaction; and/or
- Suspicious activity of any financial professional (registered or independent) or affiliated person of the Company.

#### WHAT SHOULD I KNOW?

Be aware of Money Laundering Red Flags such as:

- Policy or contract that has unexplained or sudden extensive wire transfer activity, large or frequent wire transfers, or withdrawals;
- Customer or Financial Professional attempts to make large deposits of currency, insists on only dealing in cash or cash equivalents, or asks for exceptions from the Company’s policies;
- Customer or Financial Professional provides false, misleading, substantially incorrect, or suspicious information about the source of funds; or
- Customer has an inflow of funds well beyond the customer’s known occupation or resources.

**Do not alert the customer or financial professional if you become suspicious or intend to report possible or actual money laundering.**

## **Anti-Fraud**

Fraud can have a devastating effect on the Company because it could result in significant financial loss and loss of reputation and public trust.

Fraud is defined as any suspected, attempted, or known act characterized by deceit, concealment, or violation of trust that is committed by an individual or organization to:

- Obtain money, property, or services;
- Avoid payment or loss of services; or
- Secure a personal or business advantage.

Examples of fraud in our business can include the following:

- Unauthorized surrendering of a policy to obtain its cash value;
- Obtaining issuance of a policy on a person who does not exist;
- Bribery of insurance company officials or employees by other members of the company or the insurance industry; and
- Misappropriation of customer or company funds, services, or other assets.

You should be aware of the potential for fraud and do your part in preventing it and the potential loss to our customers. Watch carefully for indications of potential fraud, including identification documents that appear to have been altered or forged, applications that appear to have been altered or forged, personal identifying information provided that is inconsistent when compared against external information sources.

### **WHAT SHOULD I KNOW?**

Be aware of the potential for internal or external fraud.

Be aware of identity theft red flags, such as:

- Documents provided for identification appear to have been altered or forged;
- An application appears to have been altered or forged or gives the appearance of having been destroyed and reassembled; or
- Personal identifying information provided is inconsistent when compared against external information sources used by the Company.

If something seems improper or may involve fraud, contact your manager, the Enterprise Chief Ethics & Compliance Officer, or use the Speak-Out confidential reporting system.

## **Privacy & Confidentiality**

Protecting confidential information is critical to our reputation for integrity and our relationships with customers and ensures compliance with industry regulations. Much of Jackson's information is confidential,

and you should assume that all information you have about our Company and its business (including information concerning past, present and prospective customers) is confidential, unless the contrary is clear.

Confidential information is information that you acquire, create, develop, receive, use, learn or have access to by virtue of your employment with the Company, which is not generally known by the public. It can be written, oral, telephonic or electronic and includes a wide variety of data, from technology applications, business strategies and customer lists, to credit procedures, customer preferences and personnel information.

We recognize that our customers expect us to protect the information provided to us and to use that information responsibly. We are strongly committed to fulfilling this expectation. For that reason, if the Company shares information, it will only share information pursuant to the exceptions permitted by law and then only to execute transactions that a policyowner requests or authorizes, for policy administrative, maintenance or servicing reasons, to respond to court orders and legal investigations, or to report to credit bureaus.

At the time you were hired, you signed a confidentiality agreement. In that confidentiality agreement, you agreed not to use or disclose information regarding the Company's producers or policy/contract holders, including information such as identity and address.

## WHAT SHOULD I KNOW?

Do not share customer information with anyone outside of the Company.

Any suspicious sharing of customer information, committed either by an associate or by a non-Company individual, should be reported by submitting a [privacy incident report](#).

Do not enter into any written contract on behalf of the Company that does not contain a confidentiality provision and information security provision approved by the Legal Department.

Take steps to prevent the unauthorized access to or use of information.

Do not remove files or documents containing a customer's confidential information from Company premises, without proper authorization.

**Keep our customer information confidential!**

## Gifts & Entertainment

Offering or accepting gifts or the provision of entertainment may be common business practices, but too often can be misinterpreted or suggest the appearance of something improper, despite the intent. These activities may be acceptable in certain circumstances. However, a gift or entertainment should never be offered or accepted if it:



- Violates laws, industry-specific regulations or policies of its recipient;
- Is intended or could reasonably appear as intended to obtain an improper business advantage or be perceived as a bribe;
- Could appear to be offered with the intent of influencing someone to do something improper; or
- Would be considered lavish or inappropriate under the circumstances.

Entertainment can encompass some aspects of gift giving. It can also include entertainment activity that is primarily connected to a business relationship and where you are accompanied by a vendor or other business entity or person seeking to do (or doing) business with the Company where you have influence over whether or how the Company conducts business with the business partner.

Entertainment is considered to be customary business practice and is acceptable provided it is reasonable under the circumstances and meets the following criteria;

- It has a business purpose;
- The Business Partner is present at the event; and
- The entertainment is reasonable and appropriate.

## WHAT SHOULD I KNOW?

**Gifts** must be reported to your subsidiary compliance team in accordance with subsidiary's reporting procedures, generally including Gifts given to or received from a Business Partner. Gifts of a nominal value (generally considered to be \$50 or less) or otherwise promotional in nature may be excluded. Subject to Subsidiary policies, which may be more restrictive, **Business Entertainment** received or given with a market value of more than \$300 must be reported. Events where multiple associates attend that individually are below \$300, but in aggregate are greater than \$500 must also be reported by at least one attending associate.

**Gifts & Business Entertainment involving Government Officials** or their staff, must be approved by Jackson's Senior Vice President of Government Relations.

### Related Jackson Master Policies:

- Anti-Bribery & Corruption Policy
- Anti-Fraud Policy
- Anti-Money Laundering Policy
- Conflicts of Interest Policy
- Gifts & Business Entertainment Policy
- Information Security Policy
- Purchasing & Disposition Policy
- Privacy Policy

# OUR PEOPLE – WE RESPECT EACH OTHER BY WORKING WELL TOGETHER

## Equal Employment Opportunities

The Company is committed to a policy of equal employment opportunity. We are committed to complying with all federal and state laws and regulations relating to equal employment opportunity for all persons without regard to race, color, religion, sex (including pregnancy), gender, gender identity or expression, age, national origin, legally-recognized disability, marital status, legally-protected medical condition, genetic information (including family medical history), citizenship, ancestry, height, weight, sexual orientation, military/veteran status or any other protected characteristic. The Company is also committed to preventing retaliation against any employees who provide information about, complain about, or assist in the investigation of any complaint of discrimination, harassment or other violation of the Company's equal employment opportunity policies.

The Company's policies governing equal opportunity include the recognition that all associates are entitled to a work environment free from all forms of illegal or improper discrimination, harassment and retaliation. The Company will not tolerate discrimination, harassment or retaliation—whether committed by management, non-management associates, or others.

## Diversity & Inclusion

Our mission is to cultivate a sense of belonging at Jackson by actively appreciating and respecting each other for our unique backgrounds. This allows us to best serve our customers through inclusive and collaborative partnerships.

We view diversity and inclusion as more than policies: they are an integral part of who we are as a company. We need to attract and engage highly talented people and create an environment where we can bring our best selves to Jackson every day. Creating this environment requires all of us to do our part.

### WHAT SHOULD I KNOW?

Do not hire, terminate, promote, or otherwise base employment decisions on any protected class of individuals.

Avoid offensive or other unacceptable conduct.

If you see something out of place or occurring that could be in violation of Jackson's values, report it.

**Do your part to make Jackson a workplace that welcomes everyone.**

<b>Speak Out Confidential Reporting Hotline</b>	844-506-0767
<b>Speak Out Confidential Reporting Website</b>	<a href="https://jackson.ethicspoint.com">Jackson.ethicspoint.com</a>
<b>Speak Out Confidential Reporting Mobile Phone Site</b>	<a href="https://jackson.mobile.ethicspoint.com">Jackson.mobile.ethicspoint.com</a>

## Safe and Drug & Alcohol-Free Campus

We are committed to maintaining a safe, healthy and productive work environment for our associates and visitors.

The sale, exchange, purchase, use, consumption or possession of alcohol, illegal drugs, controlled substances or drug paraphernalia of any kind on the Company’s premises is prohibited. Exceptions for the moderate consumption or possession of alcohol may be made in connection with Company-approved events.

Jackson’s Safety, Security and Health Policies are designed to provide certain guidelines that you are expected to follow.

### WHAT SHOULD I KNOW?

Familiarize yourself with Jackson’s Safety, Security and Health Policies, including those on Emergency Procedures.

Report unsafe or hazardous working conditions to Corporate Support Services and/or your manager.

**Related Jackson Master Policies:**

- Associate Handbook
- Environmental Policy
- Health & Safety Policy
- Whistleblower Policy

## Our Company – We Protect Our Company’s Assets

The integrity of Jackson goes beyond the value of physical assets such as computers and buildings. The information we collect, about our products, our customers, and the industry has significant intrinsic value. It is your responsibility to protect all of Jackson’s assets, both physical and intangible. Further, Jackson maintains an obligation to its customers and to you to protect our assets and investigate any potential losses.

### Corporate Assets & Intellectual Property

Company assets should be used only to conduct our business. You should not expect privacy when using Company assets, including computers, mobile devices, or company email.

Company assets include, but are not limited to:

- Anything owned, created, obtained, or compiled by or on behalf of our Company;
- Physical assets, such as office furnishings, equipment, cell phones, and iPads;
- Technology assets, such as computer hardware, software, and information systems;
- Financial assets, such as cash, financial instruments, and credit cards;
- Our Company name, brand, and customer relationships;
- Your Company email address; and
- Information assets, such as intellectual property, including information about our customers, products, services, systems, and other data or similar information.

#### WHAT SHOULD I KNOW?

Do not use Company assets for outside business or other personal gain, or for anything illegal or unethical.

Do not access, download, upload, save, or send offensive materials.

Patents, copyrights, and trademarks are valuable Company assets. Remember that the Company owns any work product that you develop or design in your work with or for the Company. That ownership continues even if you leave the Company.

### Corporate Records

Accurate recordkeeping and reporting are essential to the successful operation of our Company and help us meet our legal, regulatory and business requirements. Maintaining financial integrity also reflects positively on our reputation and credibility. Each of us is responsible for ensuring the accuracy of all Company records.

Only Company approved communication channels (e.g., corporate email and Microsoft Teams) may be used to communicate business information or transmit Records. The transmission of business information

and Records through unapproved systems and means, including but not limited to text messaging, personal email, social networking, mobile-messaging applications, is prohibited.

#### WHAT SHOULD I KNOW?

**Properly classify transactions.** It is important that we never distort the true nature of any transaction. Never speed up or slow down the recording of a revenue or expense in order to meet a budgetary goal.

**Maintain high standards.** We do not falsify or mischaracterize any record, account or transaction. We cannot establish any undisclosed, unrecorded or off-the-record accounts for any purpose.

**Manage records properly.** Know and follow the policies that relate to maintenance, storage and disposal of records. Never destroy or dispose of information that might be needed for an investigation, an audit or a legal proceeding. If you receive a legal hold notice, follow the guidelines in the notification.

## Investigations

Whether initiated by a customer complaint, a regulatory inquiry, a Speak-Out referral, or any other manner, investigations can begin in a variety of ways, but each one requires the same amount of diligence and integrity. All investigations will be conducted promptly, fairly and reasonably, including those involving complaints of any activity that might be construed as unlawful discrimination, harassment or retaliation. The investigator will work toward a fair, timely and thorough investigation, resolution and closure of the matter.

The Company will determine the corrective action necessary to make victims whole and eradicate the unlawful conduct, if any. Complaints and investigations will be handled discretely. The confidentiality of complaints and investigations will be maintained to the extent possible.

Additionally, regulatory agencies may occasionally initiate investigations into the Company. It is Jackson's policy to cooperate fully with such external investigations.

#### WHAT SHOULD I KNOW?

All associates are required to cooperate with internal and external investigations, as may be applicable.

The Company will not tolerate retaliation against any individual who faithfully reports suspected unlawful discrimination, harassment, and/or retaliation, and for witnesses who provide testimony or assistance in the investigation(s) of such activities.

## Competition, Antitrust, and Tying

Competition laws, known as antitrust laws, promote and maintain the benefits of free markets. These laws vary, but share core principles that protect competitive market participants, including our Company and our customers. These laws prohibit agreements among competitors that are deemed collusive or anti-competitive.

Examples include agreements to:

- Raise, fix, stabilize or maintain prices, fees, spreads or any item that would ultimately affect price (price fixing).
- Reduce or eliminate competition in a competitive bidding process (bid rigging).
- Divide customers, territories, markets or products (allocation schemes).
- Refuse to deal with a competitor, customer or third party (group boycott).
- Agreements among employers not to recruit certain employees (no-poaching) or not to compete on terms of compensation (wage-fixing).

It is Jackson's policy to comply fully with all applicable Competition and Antitrust laws.

### WHAT SHOULD I KNOW?

When dealing with our competitors, never agree to any action that may appear to restrict or hinder the marketplace, particularly agreements to:

- Not compete, not hire or not solicit employees in certain markets;
- Divide markets or customers;
- Boycott specific groups (e.g. customers, suppliers, etc.); or
- Set prices, salaries or wages.

## Management of Financial Information

We may have fiduciary obligations to our customers and our stakeholders to act in their best interest. This means you must avoid, or otherwise address through controls, disclosures or other appropriate steps, actual or potential conflicts of interest. Never place your personal interests ahead of our customers or our stakeholders.

The accurate and timely reporting and recordkeeping of financial information is critical to the operations of the Company. We are committed to compliance with all applicable laws and regulations applicable to financial reporting.

### Related Jackson Master Policies:

- Communications Governance Policy
- Competition, Anti-Trust and Tying Policy
- Conflicts of Interest Policy
- Corporate Records Policy
- Fair Disclosure Policy

- Insider Trading Policy
- Investigations Policy
- Purchasing & Disposition Policy
- Security Policy
- Trademark and Logo Usage Policy

## OUR INDUSTRY – WE INVEST IN RELATIONSHIPS

The very nature of Jackson’s business requires interactions with various stakeholders including third-party vendors and distributors of our products, regulators, and the media. We cultivate these relationships over time and each one presents unique benefits and challenges to Jackson.

### Vendor Oversight

Jackson’s business depends in no small part on its vendors and business partners. Jackson uses vendors and third-party suppliers to allow it to focus on its core business strengths, while managing costs to achieve its business objectives. The Purchasing Team is responsible for the onboarding and vetting of all Jackson vendors, while the Third-Party Management Office (“TPMO”) is responsible for oversight and risk management as outlined by the Third Party Supply Policy. Purchasing and the TPMO work closely with Legal & Compliance to conduct appropriate due diligence both at onboarding and on an ongoing basis to confirm adherence to the Company’s principals embodied within this Code.

#### WHAT SHOULD I KNOW?

**Question:** I am interested in onboarding a vendor to build and maintain a workflow management system for our projects. There is room in my budget and I have already identified likely business partners I’d like to pursue. Can I contact them directly for quotes?

**Answer:** No. Before engaging in any contract negotiations with a Vendor or Business Partner, notify the Purchasing Team. They will assist you in properly scoping out your project, business requirements and RFP Process with any potential Vendor.

### Regulatory Communications

Generally, you should not make any verbal or written statements to a Government Official or regulatory agency on behalf of the Company, unless so authorized.

As dictated by business needs, your position may require contact with state and federal regulators. Discussions with regulators must be limited to immediate business matters. This does not supersede the Company’s Whistleblower and Non-Retaliation protections.

Our Government Relations Department is responsible for handling Non-Routine Communications with Government Officials.

#### WHAT SHOULD I KNOW?

**Question:** I received an email from a State Insurance Regulator requesting records for which I am primarily responsible? How do I proceed?



**Answer:** Refer to the Communications Governance Policy. If your job requires Ordinary Course of Business Communications with such state regulators, follow your local business unit procedures for tracking and report as required. If your job does not typically require such state regulator communications, forward the request to the Regulatory Affairs team for handling.

## **Communications to the Public, Media, Investors or Analysts**

We are committed to ensuring communications about Jackson are accurate, reflect our views, and are made by associates who are authorized to speak on our behalf.

No associate should make any public verbal or written statements on behalf of the Company unless authorized to do so.

If a member of the media contacts an associate, that associate should refrain from commenting and immediately inform the External Communications team. In addition, communicating externally on any business matters through any public medium – including speaking engagements at industry conferences or virtual events - must receive prior approval from the External Communications team.

The External Communications and Investor Relations teams have global responsibility for communications with institutional investors, credit analysts and stock analysts regarding the Company's performance, business strategy and matters pertaining to the market for Jackson Financial Inc. shares.

No associate should speak for the Company on such matters unless authorized to do so. If an associate inadvertently discloses information that could impact the market for Jackson Financial Inc. shares, or if an institutional investor or stock analyst contacts an associate, that associate should immediately inform the Investor Relations team.

Authorized associates representing the business on social media must follow company rules and regulations on handling confidential information in all circumstances and all times.

### WHAT SHOULD I KNOW?

- If authorized to participate in speaking engagements, unless otherwise applicable, it should be clear that comments are not made on behalf of Jackson.
- Complete the Speaking Engagement Approval Request form at least two weeks prior to any public event, located on JACK under the Resources tab.
- Refer all media inquiries to the External Communications team at [mediarelations@jackson.com](mailto:mediarelations@jackson.com).
- Refer all investors or analysts to the Investor Relations team at [investorrelations@jackson.com](mailto:investorrelations@jackson.com).

## Sales Practices & Marketing

How we conduct ourselves as it relates to selling and distributing our products is of the utmost importance. Our customers are better served because we adhere to strict standards of ethics and fairness. Each step along the way – from our products, to our Distribution channels – has customers’ best interests in mind.

### WHAT SHOULD I KNOW?

- Always be truthful, factual, and consistent when describing Jackson’s products or services.
- Ensure products are developed and marketed with the appropriate customer in mind.
- Listen and treat customers fully and fairly.

Since your conduct in every situation represents Jackson, be sure to espouse our values to first and foremost, and to treat the customer fairly.

### Related Jackson Master Policies:

- Associate Handbook
- Communications Governance Policy
- Contract Review Policy
- Fair Disclosure Policy
- Purchasing & Disposition Policy
- Third-Party Supply Policy

# Our COMMUNITY – WE MAKE A POSITIVE IMPACT AND IMPROVE OUR SURROUNDINGS

## Corporate Social Responsibility & Charitable Contributions

At Jackson, we believe our products, culture and associates should all contribute to the greater good of society by helping people achieve financial freedom. Leading by example, Jackson invests locally with its corporate giving programs to strengthen families and create economic opportunities. Additionally, we have the Jackson in Action program through which associates can access volunteer opportunities and donation matching. Jackson offers a one-to-one match for most 501(c)3 nonprofits and a two-to-one match for select nonprofits with the largest cumulative associate interest.

Jackson encourages you to donate money and time to charity. To safeguard our associates, it is our policy that any associate who wishes to conduct his/her own fundraiser at work must receive prior written approval from Jackson's Corporate Philanthropy team.

### WHAT SHOULD I KNOW?

**Question:** How can I access donation matching and volunteer opportunities?

**Answer:** Visit Jackson's self-service giving portal, [My Jackson in Action](#) to search volunteer opportunities and redeem donation matches. Learn more by reviewing the Frequently Asked Questions.

**Question:** What is the Jackson Grants program?

**Answer:** The Jackson Grants program allows nonprofit organizations to apply for philanthropic support from the Company. Jackson's Grants program has a priority to fund programs and organizations dedicated to strengthening families and increasing economic opportunities. Eligible nonprofits can apply [here](#).

## Political Contributions

We recognize the importance of supporting government officials from the local and state level to the highest offices in the federal government. And we support your options to freely do so. However, due to laws and regulations surrounding political activity at financial institutions, Jackson has implemented a Political Contributions Policy that requires an employee of PPM or certain associates within Jackson's other subsidiaries, known as Covered Associates, to pre-clear any proposed political contribution with your local Compliance Department.

Jackson has established two Political Action Committees ("PAC") which allow Jackson to further its goals with your support.<sup>1</sup> If you have any questions regarding either the Jackson National Federal PAC or the

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<sup>1</sup> The Political Contributions Policy pre-clearance requirement does not apply to associate contributions to the Jackson PACs.

Jackson National PAC, or your ability to donate or otherwise participate in the PACs, please contact Jackson's Senior Vice President of Government Relations.

### WHAT SHOULD I KNOW?

- For PPM and Covered Associates, all potential political contributions (including those made by spouses or members of your household) must be pre-cleared (except for contributions made to the Jackson PACs).
- Associates affiliated with PPM, JNAM and JNLD may only contribute to the Jackson National Federal PAC and are not eligible to contribute to the Jackson National PAC.

**If you are unsure of your status or have any questions as it relates to political contributions, please contact your local Legal & Compliance Team.**

## External Engagements

Through its Government Relations department, Jackson may engage with various charities and other non-profit organizations, including providing contributions or other support from corporate assets separate from the operations of the Company's corporate giving programs. This activity provides opportunities for the Company to engage Elected Officials and community organizations on a variety of issues that do or may impact the Company and the communities where we do business. We have implemented policies and procedures to ensure that this activity is consistent with our values and furthers the business objectives at Jackson.

### Related Jackson Master Policies:

- Charitable Contributions Policy
- Communications Governance Policy
- Corporate Philanthropy Policy
- External Engagements Policy
- Political Contributions Policy

# CLOSING THOUGHTS

## Our Expectations

Jackson considers you, our associates, the best in the business. Therefore, we expect you to act with the integrity and judgment of the best. We expect you to act as our eyes and ears. If something doesn't look or sound right, escalate it. If something doesn't make sense, ask.

It is simply not enough to have the policies written down on a page, we must act by them day in and day out.

## Contacts

<b>Enterprise Chief Ethics &amp; Compliance Officer</b>	JFChiefComplianceOfficer@jackson.com
<b>Speak Out Confidential Reporting Hotline</b>	844-506-0767
<b>Speak Out Confidential Reporting Website</b>	<a href="https://jackson.ethicspoint.com">Jackson.ethicspoint.com</a>
<b>Speak Out Confidential Reporting Mobile Phone Site</b>	<a href="https://jackson.mobile.ethicspoint.com">Jackson.mobile.ethicspoint.com</a>