



# **Jackson Financial Inc. Vendor Code of Business Conduct**

12/1/2023

---

## **Introduction**

This Vendor Code of Business Conduct is based on Jackson’s expectation that its associates and Vendors are conducting business ethically and in compliance with applicable laws.

In Jackson Financial Inc.’s (together with its subsidiaries, “Jackson”) Code of Conduct and Business Ethics, we emphasize the fundamental understanding that we are all responsible for conducting business ethically and in compliance with the law everywhere we operate. Jackson expects all contractors, consultants, suppliers, vendors, their personnel, and any permitted subcontractors (collectively, “Vendors”) to conduct themselves with honesty and integrity related to all Jackson related business activities.

Jackson performs due diligence on Vendors during the Vendor selection and/or screening process and on an ongoing annual basis. Jackson expects all Vendors to comply with Jackson’s requirements during due diligence and to exercise the same level of care when selecting their own vendors/suppliers. Once selected as a Vendor for Jackson, Jackson expects its Vendors to demonstrate their compliance with this Vendor Code of Business Conduct. Vendors who have violated the requirements of this Vendor Code of Business Conduct, or any other agreement with Jackson, are required to notify Jackson, as soon as reasonably practicable following discovery of such violation, and to remedy any violation in a timely and sensitive manner. The most current version of the Vendor Code of Business Conduct is available online and is effective upon the date listed in the document (“Effective Date”).

Vendors and their personnel are responsible for complying with the terms of any agreements made with Jackson in addition to the guidelines outlined herein. This Vendor Code of Business Conduct is not intended to conflict with the terms of a Vendor’s contract with Jackson. In the event of a conflict between the terms of any of a Vendor’s agreements and this Vendor Code of Business Conduct, the terms of the agreements between Vendor and Jackson will prevail to the extent that they conflict.

## **Conflicts of Interest**

Conflicts of interest arise when a Vendor’s interests impact its duties to Jackson or other stakeholders. Potential or perceived conflicts of interest may expose Jackson to reputational and financial harm. It is important that Vendors monitor, identify, and escalate all real and potential conflicts of interest to Jackson, including any measures required for the avoidance and mitigation of potential conflicts of interest that may harm Jackson.

## **Anti-Bribery and Corruption**

Jackson has a strict policy against all forms of bribery and corruption committed by Jackson employees or by Vendors acting for, or on behalf of, Jackson. Jackson expects all Vendors to have their own policies or procedures prohibiting such behavior. In addition to complying with any applicable Vendor policies, Vendors must comply with all applicable laws, including fair trade, antitrust, competition, anti-corruption, anti-bribery, and the U.S. Foreign Corrupt Practices Act.

## **Anti-Money Laundering**

It is strictly prohibited for any person associated with Jackson to engage in the laundering of money or any activity associated with the funding of terrorism or other illegal activities. Jackson is firmly committed to reporting any and all personnel who participate in, or have knowledge of, money laundering or terrorist

financing activities, and assisting in the prosecution of any and all personnel engaged in such activities. Vendors are expected to have their own anti-money laundering policies or procedures prohibiting such behavior.

## **Federal Checks**

Jackson cannot retain, engage, or contract with any individual or organization whose name appears on the Office of Foreign Assets Control (“OFAC”) Specially Designated Nationals list, or sanctions list(s). Prior to any individual or entity starting an engagement for Jackson, such individual or entity must be checked against the Specially Designated Nationals list and Sanctions list(s). Upon request from Jackson, Vendor shall remove any individual or entity whose name appears on the Specially Designated Nationals list or sanctions list(s).

The services Vendor provides to Jackson may require additional background investigations pursuant to applicable law or Jackson policies. Vendor agrees to reasonably comply with any such requirements.

## **Insider Trading**

Jackson requires its Vendors to comply with federal and state insider trading laws, which specifically prohibit insider trading, tipping, and misappropriation of confidential information about any company with whom Jackson is doing business. Vendors shall not trade in Jackson’s listed common stock if in possession of confidential information about Jackson (including material non-public information), for financial gain, avoidance of loss, or any other benefit.

## **Anti-Discrimination, Human Rights, and Fair Labor Practices**

Jackson is committed to ensuring a safe, secure, and healthy workplace, and expects its Vendors to commit to and uphold these standards. Discrimination and harassment are strictly prohibited. Vendors must fully comply with all applicable labor and workplace laws, including, but not limited to, those addressing equal pay, child labor, forced labor, slavery, human trafficking, disciplinary practices, and wage and hour laws. In addition, Jackson does not support section 14(c) exemptions of the Fair Labor Standards Act, and therefore encourages Vendors to pay fair wages no less than the federal minimum wage.

## **Information Security**

Jackson expects Vendors to develop policies, procedures, and programs designed to protect the confidentiality, integrity, and availability of all Jackson information. Vendor personnel who access Jackson’s information and systems must adhere to all applicable information security policies, standards, and procedures, as may be requested. Vendors must maintain and enforce data security controls and comply with all applicable legal and regulatory requirements in addition to any Information Security obligations contractually required by Jackson. Vendors and their personnel will notify Jackson immediately of any known or suspected unauthorized access to Vendor systems and/or Jackson systems by a third party. In addition, Vendors will provide commercially reasonable assistance to Jackson to mitigate any such unauthorized access.

## **Privacy Laws**

Jackson expects Vendors to comply with all applicable laws and obligations regarding the use and protection of personal information, including but not limited to, the Gramm-Leach-Bliley Act (“GLBA”) and the California Consumer Privacy Act (“CCPA”). In the event Vendor receives a data subject request related to a Jackson

employee or customer, Vendor will immediately notify Jackson of the request and provide commercially reasonable assistance to Jackson at its request. Under no circumstances will Vendor collect, store, use, distribute, sell, or process any personal information from Jackson, its affiliates, employees, contractors, or customers without specific written instructions from Jackson.

**Environment**

Jackson’s Vendors must comply with all applicable environmental laws and should minimize any negative environmental impact from their operations. Vendors shall obtain all required environmental permits and shall comply with the requirements of any such permits and regulations.

**External Communications**

Only designated individuals within Jackson are authorized to communicate with the media on behalf of the company. Vendors must refrain from any communication or act that may create the impression that they are communicating on behalf of, or as a representative of, Jackson.

**Reporting**

Vendors should have policies and procedures in place that allow workers to report issues such as occupational injury, illness, incidents, illegal conduct, and conflicts of interest, without fear of retaliation, as well as a policy or procedure to investigate, classify, track, and manage such reports and implement corrective actions.

Jackson prohibits retaliation against personnel who report misconduct or other concerns in good faith. If a Vendor or its personnel encounter what they believe to be any concerns, including violation of this Vendor Code of Business Conduct, local laws or regulations, or other unethical behavior, they should report it to Jackson directly or through the Speak Out Confidential Reporting system:

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