

# Code of Conduct and Business Ethics

FEBRUARY 2026

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## A message from our CEO

Jackson's compelling retirement value proposition provides clarity for a confident future, and our suite of annuity products helps Americans to pursue financial freedom for life.

We are committed to ensuring Jackson is a great place to work and our distribution partners can help Americans reach their retirement goals. Our disciplined, long-term smart approach, combined with our differentiated products, exceptional service and industry-leading distribution network, set us apart from competitors and provide a strong foundation for the future.

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

This Code of Conduct and the underlying controls at Jackson reflect our commitment to always doing business in compliance with the law and with the highest levels of ethics and integrity. I am proud to lead a company that strives to do the right thing for all stakeholders, including our employees, customers, shareholders and the communities where we operate.

A handwritten signature in black ink that reads "Laura Prieskorn". The signature is written in a cursive, flowing style.

**Laura Prieskorn**

President and Chief Executive Officer  
Jackson

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**Scott Golde**

 SVP, Chief Ethics &  
Compliance Officer


**The Code is important and sets the foundation for our collective conduct and business ethics. However, the commitment of our associates to understand the Code and align their conduct with it is even more important. We are proud that the Code is a living document at Jackson that defines how we approach our business.”**

## Code of Conduct and 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”)<sup>1</sup> has established this Code of Conduct and 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. Each associate is responsible for understanding this Code and for following all policies where applicable to your work at Jackson.

This Code applies to all Jackson associates, including our Board of Directors. 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.

Jackson has several 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. Some policies apply to the actions of family members, such as those that relate to certain conflicts of interest. If you are associated with a subsidiary of Jackson, be aware of additional requirements. Please consult your subsidiary compliance manual or contact your Legal and Compliance team for further information on applying this Code to your responsibilities at Jackson.

**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.** Further, because the Company does not tolerate misconduct of any kind, associates will not benefit from attempts to circumvent this Code or any Company policies.

<sup>1</sup>The “Company” Includes all Jackson subsidiary and affiliate entities and issued securities.

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## 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. These reports 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 and Compliance Officer. If you are uncomfortable reporting a matter directly, confidential reporting is also available using the Speak Out confidential reporting system (Speak Out). You are not required to leave your name or department when you submit a Speak Out report. Speak Out is also available to Jackson’s customers, vendors, business partners or other constituents.

# SPEAK OUT

Hotline

The Speak Out hotline is available 24/7 for **reporting** on financial irregularities, **fraud, bribery**, information security, compliance **breaches, health and safety** issues, or any other form of **wrongdoing**, violation of law, or Company policies or the **Code of Conduct**.



**1-844-506-0767**



[JACKSON.ETHICSPPOINT.COM](https://www.jackson.ethicspoint.com)



[JACKSON.MOBILE.ETHICSPPOINT.COM](https://www.jackson.mobile.ethicspoint.com)

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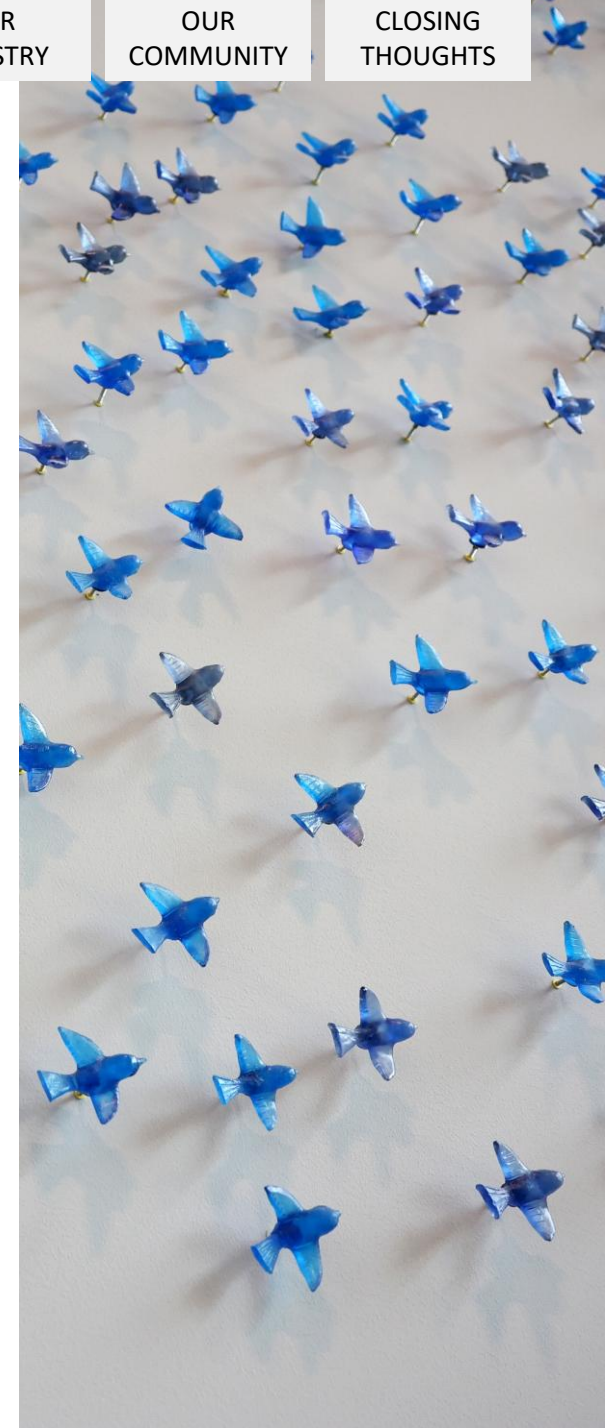
# Whistleblower/Non-Retaliation/ Anti-Harassment

**You are encouraged to report any improper conduct observed, and Jackson 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 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 U.S. Securities and Exchange Commission (SEC), making other disclosures that are protected under applicable whistleblower laws 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 and Compliance Officer, or use the Speak-Out confidential reporting system. Each complaint of retaliation will be investigated and, if verified, will take necessary remedial action.

[Whistleblower Policy](#)





## Administration of this Code

This Code is administered by the Jackson Enterprise Chief Ethics and 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. You may find various employment and other policies in the Associate Handbook that are 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. 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.

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# Our Values

## RESPECT

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 inclusive and strong.

## CREATE

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.

## EMPOWER

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

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.

# 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.

- Bribery and Corruption
- Conflicts of Interest
- Outside Business Activities
- Gifts and Entertainment
- Insider Trading

## JACKSON FINANCIAL INC. POLICIES

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



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# Bribery and Corruption

You must never compromise the Company’s reputation by engaging or appearing to engage in bribery, corruption or seeking an unfair 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.

Gifts, cash equivalents, business hospitality, job offers, trips, 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. Additionally, providing anything of value indirectly through a family member, associate, business partner or government agent is considered the same as providing it to the government official directly.

Facilitation payments are prohibited. These include illegal or unofficial payments made to secure or expediate a routine or necessary transaction to which you or Jackson are already entitled (i.e., paying a government official to speed up processing paperwork, delivering mail, installing phones or turning the power on, etc.). Regardless of amount, facilitation payments will not be paid.



## 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.**

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# Conflicts of Interest

Conflicts of interest arise when your personal interests impact your job duties 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 nonprofit)
- 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?

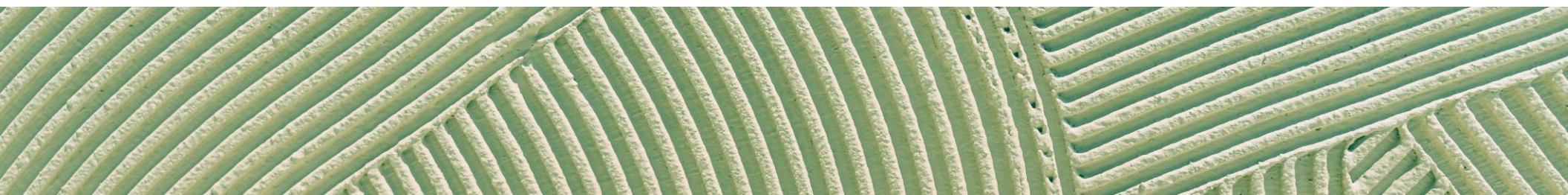
If you are faced with a potential conflict, ask yourself:

- 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.**

[Conflicts of interest Policy](#)



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# Outside Business Activities

Jackson associates engage in a variety of activities outside of the office, such as volunteer activities, family ventures or 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 (including appointments arranged through the Jackson Board Corps)
- Owning an interest or otherwise operating a private venture
- Activities involving Jackson vendors, institutional customers, or competitors
- Employment with another company (e.g., rideshare or delivery services)
- 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 work requirements
- Use Company resources
- 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, or as otherwise required by specific policies.
- Consider whether activities with Jackson customers, business partners or competitors might present a conflict of interest, and if so, disclose to Legal and Compliance as may be required.

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

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# Gifts and 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 offeror or recipient;
- Is intended or could reasonably appear as intended to obtain an improper business advantage or be perceived as a bribe, particularly if a Request for Proposal is out for the vendor who is offering a gift or entertainment;
- 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 is considered 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.



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# Insider Trading

Trading based on material, nonpublic information (MNPI) — or insider trading — is unethical and violates federal securities laws.

MNPI is Company<sup>2</sup> 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 whether 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
- Changes in senior management

If you are regularly in possession of MNPI you may be designated as a Restricted Person and will be subject to additional requirements. Restricted Persons may not trade or transact in the Company’s securities during “blackout periods” and must obtain transaction pre-clearance during an open window. For certain associates, personal trading activity will be monitored and will be subject to other trading restrictions to ensure no securities are traded in violation of Company policies.

[Advisory Code of Ethics](#)  
[Insider Trading Policy](#)

<sup>2</sup>The “Company” Includes all Jackson subsidiary and affiliate entities and issued securities.



## WHAT SHOULD I KNOW?

If you are a Restricted Person:

- Always request pre-clearance from the Jackson Insider Team before trading or transacting JFI securities; and
- Do not trade or transact 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 to your manager, the Chief Compliance Officer within your business, Human Resources, the Enterprise Chief Ethics and Compliance Officer, JFI Corporate Secretary and/or JFI General Counsel.

**The use of MNPI for personal investment purposes violates federal securities laws and could result in disciplinary action, civil and/or criminal penalties, and/or damage to the Company’s reputation.**



# Our Customers

WE TREAT OUR CUSTOMERS FAIRLY,  
OPENLY AND HONESTLY

In addition to compliance with applicable laws and regulations, you are expected to hold yourself to the highest standards of ethical conduct. 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
- Anti-Fraud
- Privacy and Information Handling
- Artificial Intelligence

# Anti-Money Laundering

You are 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:

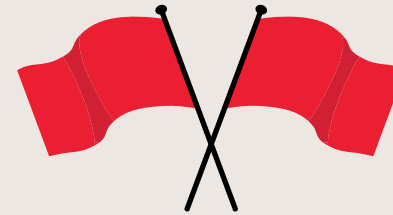
- Any suspicious activity regarding an associate’s or customer’s behavior;
- Any suspicious life insurance policy, annuity contract or other product transaction; and/or
- Suspicious activity of any financial professional (registered or independent) or affiliated person of the Company.

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, Jackson maintains contractual agreements with its distribution partners and incorporates oversight controls. These measures are all components of our program to ensure we fulfill our customer responsibilities.

[Anti-Money Laundering & Sanctions Policy](#)

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

**Be aware of money laundering red flags such as the following examples:**



Policy or contract that has unexplained or sudden extensive wire transfer activity, large or frequent wire transfers, or withdrawals.

Customer or Financial Professional provides false, misleading, substantially incorrect, or suspicious information about the source of funds.

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 has an inflow of funds well beyond the customer’s known occupation or resources.

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## Anti-Fraud

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 personal or business advantage.

Examples of fraud in our business can include:

- 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
- Misappropriation of customer or company funds, services, or other assets

Watch carefully for indications of potential fraud, including identification documents, applications that appear to have been altered or forged or personal identifying information provided that is inconsistent when compared against external information sources.

[Anti-Fraud Policy](#)



### WHAT SHOULD I KNOW?

**Be aware of the potential for internal or external fraud and do your part in preventing it and the potential loss to our customers.**

Be aware of identity theft red flags, such as:

- Documents provided for identification appear altered or forged
- An application appears altered or forged or gives the appearance it was destroyed and reassembled
- 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 and Compliance Officer, or use the Speak-Out confidential reporting system.

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# Privacy and Information Handling

**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.**

Protecting customer and business information is critical to our reputation for integrity and our relationships with stakeholders and helps to ensure compliance with industry regulations. Much of Jackson’s information is sensitive, and you should assume that all information you have about the Company and its business (including information concerning past, present and prospective customers) is considered Restricted or Strictly Confidential, in alignment with the definitions from the JFI Information Security Policy.

Our customers expect us to protect the information provided to us and to use that information responsibly. Jackson is 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.



## WHAT SHOULD I KNOW?

### Keep our customer information protected.

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 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 unauthorized access to or use of information.

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

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## Artificial Intelligence

Given our long history of utilizing technology to innovate, drive efficiencies, and support growth within our operations, Jackson recognizes the uses and benefits of Artificial Intelligence (“AI”). This technology has the potential to provide significant efficiencies, enhance decision-making, save costs and improve customer experiences. To pursue these goals and mitigate the potential risks with leveraging this technology, Jackson has developed an AI strategy designed to ensure any AI used by the Company is trustworthy and avoids bias or undesirable outcomes. The Company’s [AI Risk Management Policy](#) and associated Standard are intended to implement guiding principles that support trustworthy AI, which includes the following characteristics: (1) valid and reliable, (2) safe, (3) secure and resilient, (3) accountable and transparent, (4) explainable and interpretable, (5) privacy-enhanced, and (6) fair with harmful bias managed. Further, a cross-functional AI Oversight Working Group has been established to ensure proper oversight over the above principles.

It is important for all associates to be aware of evolving AI risks as they perform their job responsibilities, and to ensure AI capabilities have been formally approved in alignment with the AI Risk Management Policy and its supporting procedures.

[Artificial Intelligence Risk Management Policy](#)



# Our People

WE RESPECT EACH OTHER BY  
WORKING WELL TOGETHER



- Equal Employment Opportunities
- Engaged Culture
- Safe and Drug and Alcohol-Free Campus

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# 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, but not limited to, pregnancy, childbirth, the termination of a pregnancy, or a related medical condition), 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 associates who provide information about, complain about, or assist in the investigation of any complaint of discrimination, harassment, retaliation or other violation of the Company’s equal employment opportunity policies.

The Company’s policies governing equal employment 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.

[Associate Handbook](#)



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# Engaged Culture

Our growth and longevity as a company depends on a culture of respect and a belief that inclusion enables us to innovate, execute and grow. This culture is fundamental to the long-term well-being of our associates, customers, shareholders and the communities where we live.

Through many efforts, we 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.

To maintain our culture, we ensure an inclusive workplace with a robust talent pool, leverage partnerships with external organizations, and we report on our progress against our goals and objectives.

[Associate Handbook](#)



## WHAT SHOULD I KNOW?

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

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

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.



# Safe and Drug and Alcohol-Free Campus

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



## WHAT SHOULD I KNOW?

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

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

[Environmental Policy](#)  
[Health & Safety Policy](#)



# Our Company

WE PROTECT OUR COMPANY'S ASSETS

We all have a duty to protect Jackson's assets. You may gain access to Jackson's assets through your role at Jackson and work on any Jackson boards, committees, working groups or other projects. Your access may expose you to Jackson materials and information that may be sensitive or confidential in nature, including reports, working papers, and written, electronic, or oral communications. The confidentiality of Jackson assets must be maintained both internally and externally, with the exception of disclosures that are legally required, protected, or are necessary to carry out the performance of your role on behalf of Jackson.

- Corporate Assets and Intellectual Property
- Corporate Records
- Investigations
- Competition, Antitrust and Tying
- Management of Financial Information

# Corporate Assets and Intellectual Property

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

Jackson assets include, but are not limited to:

- **Physical** — Facilities, furniture, equipment (such as computer hardware, iPads, cell phones) and supplies
- **Information** — Data, reports, files, records, services, systems, information about our customers, and other similar information
- **Financial** — Cash, financial instruments, credit cards, invoices, purchase orders, and other financial information
- **Electronic** — Computer software, information systems, electronic storage devices, and other similar devices, systems and technology
- **Intellectual Property** — Company name, brand, logos, trademarks, patents, domain registrations, and any information related to customer relationships, including contact information



## WHAT SHOULD I KNOW?

Do not use Company assets for outside business activities or other personal gain, or for anything illegal or unethical. Not only are such acts against Jackson policies, but they may also be legally actionable.

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

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

Contact [JacksonTrademarks@jackson.com](mailto:JacksonTrademarks@jackson.com) for assistance registering any new trademark, logo, or website.

# 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 business records. The transmission of business information and records through unapproved systems and means, including but not limited to text messaging from an unapproved device, personal email, unapproved social networking, mobile-messaging applications, is prohibited.

## PHYSICAL RECORDS

- Desk drawers
- Filing cabinets
- File rooms
- Off-site storage
- Other storage locations



## ELECTRONIC RECORDS

- Network/shared drives
- OneDrive
- SharePoint
- Email
- Laptop/AVD
- CD/DVD/thumb drives
- Other storage repositories



### 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 revenue or expense 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.

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# Investigations

Whether initiated by a customer complaint, a regulatory inquiry, a Speak-Out referral, or any other means, investigations can begin in a variety of ways, but each one requires 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 and will take appropriate actions to remediate any findings of wrongdoing.

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 makes a good faith report of suspected unlawful discrimination, harassment, and/or retaliation, or against witnesses who provide information or assistance in connection with the investigation(s) of such circumstances.

[Investigations Policy](#)

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# Competition, Antitrust and Tying

Competition laws, also 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).
- Refrain from recruiting certain employees (no-poaching) or from competing on terms of compensation (wage-fixing).

It is Jackson's policy to comply fully with all applicable competition and antitrust laws.

[Competition, Anti-Trust, and Tying Policy](#)



## 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.

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# Management of Financial Information

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.

[Audit Committee Pre Approval Policy](#)  
[Compensation Clawback Policy](#)  
[Fair Disclosure Policy](#)  
[Insider Trading Policy](#)  
[Related Persons Transactions 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. These relationships are cultivated over time and each one presents unique benefits and challenges to Jackson.

- Vendor Oversight
- Regulatory Communications
- Communications to the Public, Media, Investors or Analysts
- Sales Practices and Marketing

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## 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 outlined by the Third-Party Supply Policy. Purchasing and, when applicable, the TPMO work closely with Legal and 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.

**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 your project, business requirements and RFP Process with any potential Vendor.

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# 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.

The Company has implemented processes to ensure that communications with regulators are accurate, complete, and properly vetted.

**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 reporting as required. If your job does not typically require such state regulator communications, forward the request to the Regulatory Affairs team for handling.

[Communications Compliance Policy](#)  
[Communications Governance Policy](#)



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# 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 oral 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 Investor Relations team has responsibility for communications with the investment community, including institutional investors, credit analysts and stock analysts regarding the Company’s performance, business strategy and matters pertaining to the market for Jackson Financial Inc. securities. No associate should speak for the Company on such matters unless authorized to do so. If an associate inadvertently discloses material, non-public information (MNPI) that could impact the market for Jackson Financial Inc. public securities, or if a participant in the investment community 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 all policies (notably, the Fair Disclosure Policy and Jackson Associate Handbook on handling MNPI and other confidential information) in all circumstances and all times.



## WHAT SHOULD I KNOW?

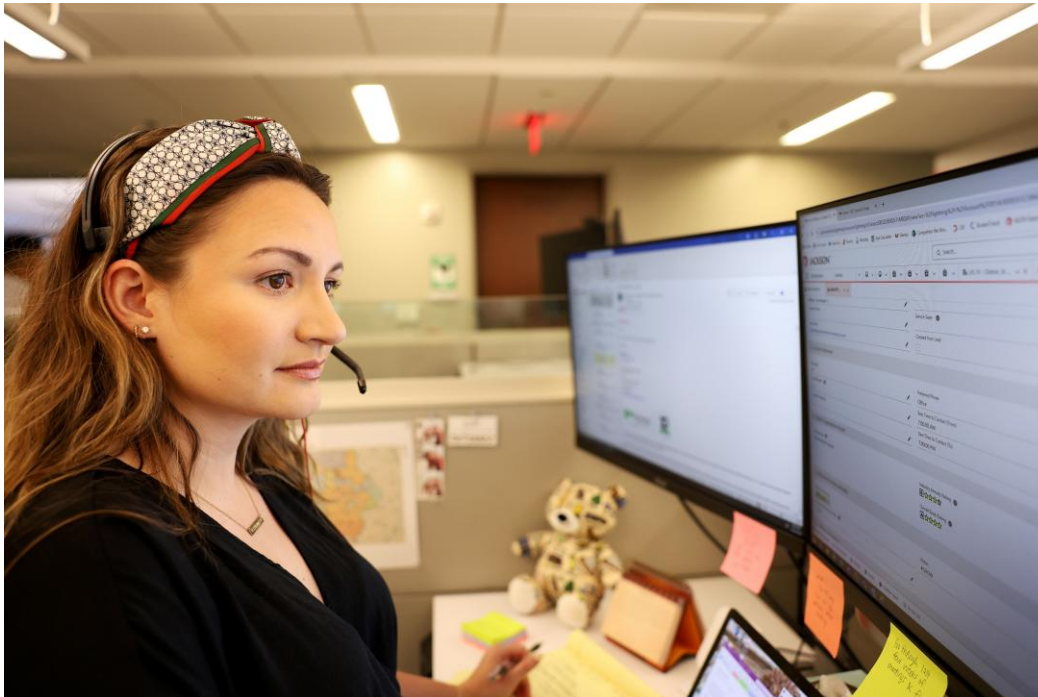
- If authorized to participate in speaking engagements, unless otherwise applicable, it should be clear that comments are not made on behalf of Jackson.
- Complete the Speaking Engagement Approval Request form at least two weeks prior to any public event, located on JACK under the Resources tab.
- Refer 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).

[Communications Governance Policy](#)  
[Fair Disclosure Policy](#)

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## Sales Practices and 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?

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.

[Associate Handbook](#)  
[Communications Governance Policy](#)  
[Fair Disclosure Policy](#)  
[Purchasing and Disposition Policy](#)  
[Third-Party Supply Policy](#)  
[Vendor Code of Business Conduct](#)



# Our Community

WE MAKE A POSITIVE IMPACT AND  
IMPROVE OUR SURROUNDINGS

- Corporate Social Responsibility and Charitable Contributions
- Political Contributions
- External Engagements

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# Corporate Responsibility and 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 where associates can access volunteer opportunities and request donation matches. 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, Corporate Philanthropy will strictly supervise any fundraising or volunteer event sponsored by the company. Any other fundraising activities are prohibited.

**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](#).



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## 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.

Separately, Jackson has established two Political Action Committees (“PAC”) which allow Jackson to further its goals with your support.<sup>3</sup> Associates’ donations to Jackson’s PACs do not require the pre-clearance process that must be taken for individual political contributions but are regulated by other policies and procedures. If you have any questions regarding either the Jackson National Federal PAC or the Jackson National PAC, or your ability to donate or otherwise participate in the PACs, please contact Jackson’s Senior Vice President of Government Relations.



[Political Contributions Policy](#)



### 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 and Compliance Team.**

<sup>3</sup>The Political Contributions Policy pre-clearance requirement does not apply to associate contributions to the Jackson PACs.

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## 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.

[External Engagements Policy](#)



# Closing Thoughts


## Expectations

Jackson expects you to Act with Integrity and judgment. 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 adhere to them every day.

## Contacts

 [EthicsandCompliance@jackson.com](mailto:EthicsandCompliance@jackson.com)

 1-844-506-0767

 [JACKSON.ETHICSPPOINT.COM](https://JACKSON.ETHICSPPOINT.COM)

 [JACKSON.MOBILE.ETHICSPPOINT.COM](https://JACKSON.MOBILE.ETHICSPPOINT.COM)