

LIVE
THE
PACIFIC *Life*
It Starts with ME



CODE OF CONDUCT



PACIFIC LIFE

At Pacific Life, our PACIFIC core values are a set of deeply held beliefs expressed in principles and behaviors that are fundamental to our identity as a company and how we operate. Our commitment to these ideals is strengthened when our employees have the courage to ask questions, voice their concerns, and work together to hold ourselves to the highest ethical standards. Pacific Life's Code of Conduct: "Live the Pacific Life, It Starts with Me" embodies this commitment.

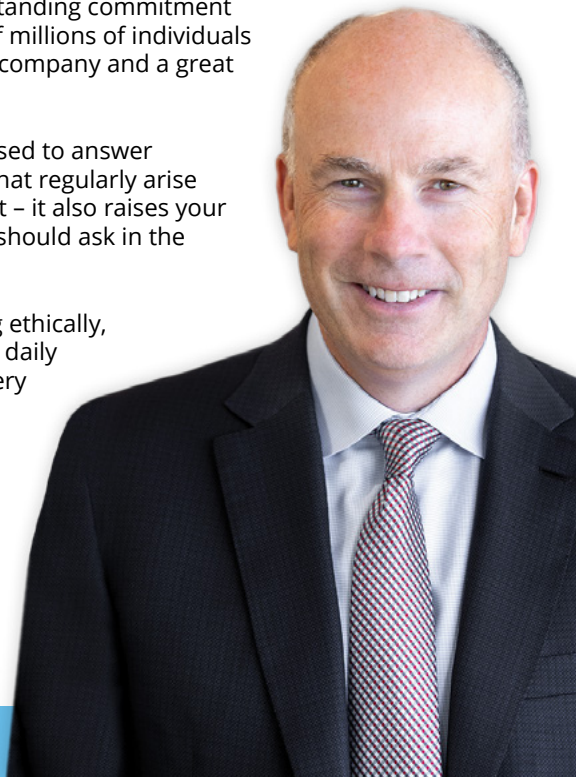
Sharing a common set of core values all focused on doing the right thing – for our customers, for our employees, for our business, and for our community – is a cornerstone of our culture and integral to our success. Not only does it enable us to fulfill our long-standing commitment of protecting the lives and financial futures of millions of individuals and families, it also makes us an exceptional company and a great place to work.

Our Code of Conduct is a guide that can be used to answer questions and share expectations on topics that regularly arise in our business. But it is much more than that – it also raises your awareness about the types of questions you should ask in the context of your job.

Thank you for taking the responsibility, acting ethically, and asking questions about decisions in your daily work. Upholding these values in our work every day will help ensure our company's success today and into the future. I am committed to Live the Pacific Life and I am proud to share this commitment with each of you.

Darryl Button

PRESIDENT AND CEO, PACIFIC LIFE



OUR CORE VALUES

For more than 150 years, Pacific Life has been helping families and businesses meet their financial needs. Our clients trust the Power of the Pacific to protect what matters most to them, their families, their businesses, their futures. You are at the heart of that Power, the employees who embody our Company's core values, Live the Pacific Life.

People

We recognize our mission of helping clients achieve financial security can only be accomplished through our people. We invest in developing the talents and expertise of our employees and foster a work environment that is challenging, inclusive, collaborative, and results oriented.

Accountability

We hold ourselves accountable by honoring our commitments, taking personal responsibility for our actions, and focusing on solutions.

Customer Focus

We meet the needs of our clients by developing carefully designed products, services, and solutions, and treat each request from customers as an opportunity to meet or exceed their expectations.

Integrity

We do the right thing in all aspects of our business, demonstrating honesty, fairness, and respect.

Financial Strength

We believe financial strength is essential to fulfilling the needs of our clients. We manage our businesses with a long-term view, focusing on consistent growth, profitability, and effective capital management.

Innovation

We actively seek out opportunities for new products, services, and creative solutions. We believe that innovation requires rigorous analysis, open-mindedness, and a clear understanding of the needs of our clients.

Community

We are active in our communities through involvement, volunteerism, and charitable giving.



Ethics and integrity are defining characteristics of Living the Pacific Life. Integrating these core values into daily decisions helps ensure that our customers are taken care of, regulators view us as partners, employees are proud of the services we provide, and Pacific Life is a strong and stable company providing long-term value. As a Pacific Life employee, your daily decisions, and the values you choose to exemplify are key to the success of the company. Pacific Life is committed to supporting you in making ethical decisions with integrity and being the best that you can. In return, we ask that you make a commitment to act in a way that aligns with Pacific Life's values.

As part of this commitment, we ask you each year to certify that you have read, understand, and will follow our Code of Conduct. Our goal is for The Code of Conduct to be an effective tool to assist you in using your best judgment when making decisions. Knowledge, the ability to ask questions, and learn from each other are all part of what makes us grow successfully.

Our team of compliance and ethics professionals at Pacific Life are always available to discuss questions or concerns. As Chief Compliance & Ethics Officer, I am committed to listening, supporting, and assisting you in Living the Pacific Life together.

Patricia Thompson

VP, CHIEF COMPLIANCE & ETHICS OFFICER

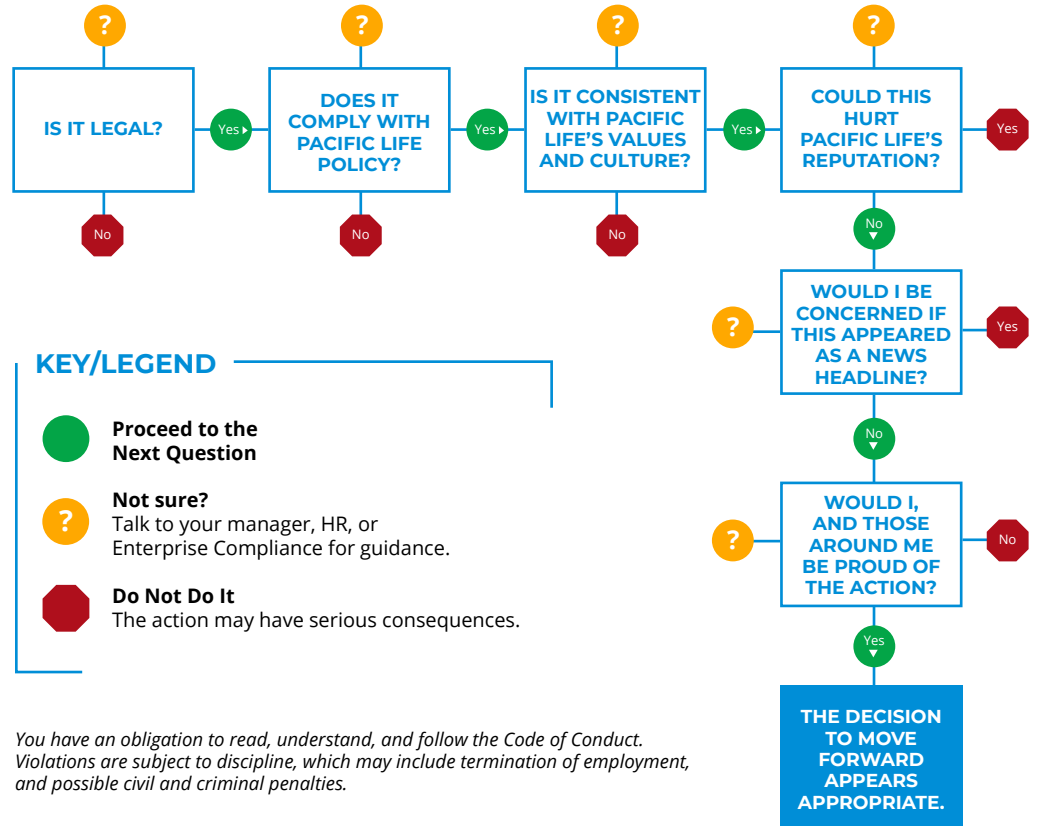
COMMITMENT & QUESTIONS

Questions about any topics included in the Code can come up on a regular basis and there are many resources available to you.

- **Coworkers**
- **Managers**
- **HR Business Partners**
- **HR Employee Relations**
(949) 219-3532
Tim.Shontere@PacificLife.com
- **Enterprise Compliance**
ItStartsWithMe@PacificLife.com
- **The Responsibility Line (for anonymity)**
(800) 376-8952
www.PLResponsibilityLine.com

COMPLIANCE AND ETHICAL DECISION-MAKING MODEL

When faced with an ethical dilemma, you have a responsibility to take the right action that complies with the law and our company policies, procedures, ethical standards, and values. Ask yourself:



People

A man with glasses and a goatee, wearing a grey button-down shirt, is smiling broadly with his hands clasped in front of him. He is sitting at a conference table. In the background, a woman and a man are clapping, suggesting a positive meeting atmosphere.

RESPECT EACH OTHER

Pacific Life fosters a work environment that is challenging, inclusive, collaborative, and results oriented. We provide equal employment opportunities for all applicants, employees, and contractors and provide respectful conditions that are free from harassment and discrimination.

- SAFE AND RESPECTFUL WORKPLACE
- ALCOHOL AND DRUGS
- WEAPONS

SAFE AND RESPECTFUL WORKPLACE

Our culture of respect starts with our commitment to a workplace free from unlawful discrimination and harassment. In addition, threatening, abusive, and/or violent conduct is strictly prohibited.



Please check the [Equal Employment Opportunity Policy](#) for more information.

ALCOHOL AND DRUGS

Pacific Life is committed to providing a safe, efficient and productive work environment. Consequently, reporting to work or engaging in Company business under the influence of alcohol or illegal drugs is prohibited.

WEAPONS

Possession of weapons on Company property or at Company-sponsored events is prohibited. Possession includes carrying a weapon on your person, storing a weapon in your workspace, or storing a weapon in a vehicle parked on Company property. Weapons include all firearms, knives with blades over four inches, batons, and tasers.

WHY DOES IT MATTER?

Workplaces with a positive culture, where employees feel supported and inspire one another, are more productive, which as a result makes the company more successful. Employees who treat one another with respect, gratitude, trust, and integrity not only bolster job satisfaction but attract the employees we want to work with.

IT STARTS WITH ME: WHAT SHOULD I DO?

- In cases of imminent danger, call 911 first, then contact Security.
- Employees who believe they have experienced or witnessed harassment, discrimination and/or retaliation must promptly report it to their manager, Human Resources, Employee Relations, or Enterprise Compliance.
- Employees who believe they have a drug or alcohol problem may seek counseling through Pacific Life's Employee Assistance Program (EAP).



Accountability



- CONFLICTS OF INTEREST
- GIFTS & GRATUITIES

YOUR DECISIONS

We hold ourselves accountable by taking responsibility for our actions. Our Company, our customers, and our business partners trust us to demonstrate values of honesty, integrity, and trustworthiness. We do so by placing the Company's interests ahead of our own personal benefit or gain.



Conflicts of interest happen when an employee's business decisions are motivated by personal benefits rather than the best interest of Pacific Life.

Gifts and gratuities, a normal gesture of goodwill and appreciation, can also cross the line from a common courtesy to a conflict of interest.

WHY DOES IT MATTER?

Whether there is an apparent or actual conflict of interest, Pacific Life's reputation can be damaged. Just the appearance of a conflict between your personal benefit and the interest of the Company undermines the Company's commitment to high ethical standards. When gifts influence Pacific Life business decisions, it can raise questions about fairness to competitors or trigger violations of Anti-Bribery laws and FINRA rules.

IT STARTS WITH ME: WHAT SHOULD I DO?

Tell us what we don't know, but should. Think about whether your outside activities/employment, business relationships, and personal interests could be seen as a conflict of interest. A good place to start for guidance if you're having trouble deciding is with your manager or Enterprise Compliance.

Ask these questions before accepting a gift or gratuity:

- **Is it extravagant?**
- **How often do I get gifts from this vendor?**
- **What is the context? Are we in the middle of contract negotiations?**
- **Am I the decision maker for this relationship?**

Certain conflicts of interest and gifts and gratuities must be disclosed and may require management's approval prior to participation.

Please check the [Conflicts of Interest Policy](#) and the [Gifts & Anti-Bribery Policy](#) to confirm your responsibilities.



Customer Focus

A man in a grey suit and light blue shirt is smiling and looking towards a woman whose back is to the camera. They are sitting at a table with a white surface. On the table, there is a clear glass jar filled with colorful markers and a red pen. The background is a bright, out-of-focus office setting with large windows.

- DATA STORAGE, MANAGEMENT & DELETION
- INSIDER TRADING

AN OPPORTUNITY TO MEET OR EXCEED EXPECTATIONS

For over 150 years, Pacific Life has focused on doing what's right for our customers. When our customers purchase life and retirement products, they're buying a promise that today, tomorrow, or ten years from now, Pacific Life will still be there. Our customers trust us and the Power of the Pacific to protect their families, businesses, and futures.

CONSUMER PRIVACY AND PROTECTING OUR ASSETS

Pacific Life maintains a wide variety of sensitive and confidential information. Technical definitions vary, but for our purposes, it is easiest to think of all personal information, confidential business information, and company records as Pacific Life property and assets.

WHY DOES IT MATTER?

As individuals, we care about protecting our personal information from inappropriate use. As employees of Pacific Life, we promise to protect our customers' and business partners' information too. Customers trust us to protect what matters most to them, and our financial strength and reputation rely on it.

DATA STORAGE, MANAGEMENT & DELETION

Data is like water and tends to find every nook and cranny to fill. This can create challenges in protecting personal and confidential information and also in managing or deleting information that Pacific Life no longer needs. Consult the Company's Information Management policies and be aware of approved places to save data. Only delete information that is not required to be maintained or needed to conduct Pacific Life Business.

Please check the [EISO Page](#) for more information on our CyberSAFE program.

IT STARTS WITH ME: WHAT SHOULD I DO?

Your role at Pacific Life includes the obligation to protect and keep non-public information confidential. Follow the policies and procedures designed specifically for your department and access level. When in doubt, ask questions before you disclose information.

To protect our business and customer information:

- Encrypt emails containing non-public information when sent outside of Pacific Life
- Do not store non-public information on a mobile computing device unless it is necessary to perform your job and the device is approved, protected, and managed by Pacific Life
- Do not display or leave confidential information in plain view. After business hours, non-public information must be stored in cabinets, bins, or drawers
- Dispose of non-public information in locked bins marked "Confidential"
- Do not share confidential business information such as trade secrets and product pricing with any unauthorized party or employee that does not need the information





RESPECT OUR BUSINESS PARTNERS

Trust and mutual respect are the foundations of a great working relationship. It's just as important to respect our customers and business partners as we do our coworkers. After all, can you trust a company that you don't respect?

WHY DOES IT MATTER?

Treating others respectfully and fairly is doing the right thing. Fairness to competitors, customers, and others means that we treat everyone equally when offering our products and services. We do this not only to illustrate our values but to comply with unfair competition laws. We also expect the highest integrity from those we partner with. Our [***Third-Party Code of Conduct***](#) provides guidance and resources to our business partners.

INSIDER TRADING

Financial markets are intended to be level playing fields where all participants operate on an equal footing. If an employee uses or shares material non-public information to trade in the securities of a business partner for personal gain, markets lose that fairness. Engaging in this activity is known as insider trading and is not only contrary to our ethical standards, but also illegal.

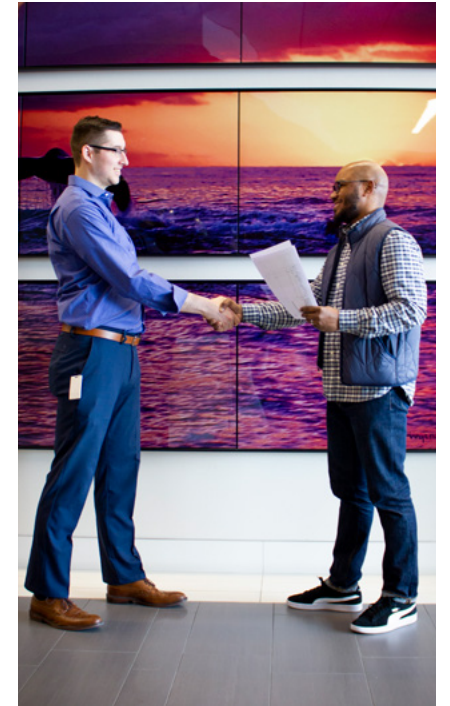
IT STARTS WITH ME: WHAT SHOULD I DO?

Never make false or misleading statements about competitors or their products and services.

To support fair competition in the marketplace, the following are prohibited:

- Requiring a producer to agree to an arrangement as a condition for further business
- Illegally obtaining confidential information about a competitor (or any other third party)
- Participating in price rigging or boycotting a third party
- Trading in the securities of any publicly traded company with inside information
- Disclosing non-public information

Please check the [***Insider Trading Policy***](#) to confirm your responsibilities.



Integrity

- RAISING CONCERNS
- ANTI-FRAUD
- ANTI-BRIBERY

YOUR VOICE

Your voice is important to Pacific Life. The Company relies on the honesty and integrity of its employees to come forward if they see something that doesn't seem right. Sometimes the only way we will find out about a concern is from our employees. You are our front-line defense and have the ability to protect Pacific Life's reputation and financial strength by speaking up.





A good faith report, telling the truth as you know it, is an important part of your job at Pacific Life regardless if you're an individual contributor or a manager.

WHY DOES IT MATTER?

Reporting is an opportunity to recognize that you are not alone in dealing with issues. The Company has a process to help you address problems in the workplace. Reporting a suspected violation in good faith allows the Company to investigate and take appropriate action.

Pacific Life will not retaliate against any employee who reports a concern or participates in an investigation. Retaliation leads to poor culture and low-morale among employees. Plus, in some cases, it's against the law. You should never fear retaliation for reporting a concern in good faith or participating in an investigation. Any sort of retaliation that accompanies a reported violation is not only against Pacific Life policy, but is also against our Core Value, Integrity.

IT STARTS WITH ME: WHAT SHOULD I DO?




Speak up! Talk to your manager, another supervisor, HR, Enterprise Compliance, or report anonymously through the Responsibility Line. You can pick the one that you feel most comfortable with or that you feel is most appropriate. There is no wrong way to speak up; the only mistake you can make is not to speak up at all.

- **Enterprise Compliance**
ItStartswithMe@PacificLife.com
- **Pacific Life Re Human Resources**
Contact your local HR Representative
- **Pacific Life Human Resources Employee Relations**
(949) 219-3532
- **The Responsibility Line**
(800) 376-8952
www.PLResponsibilityLine.com

BE TRANSPARENT

Transparency is a key indicator of ethical decision making. Living transparently is a responsibility and partnership between you and Pacific Life. We have an obligation to one another in order to make informed decisions.

INDIVIDUAL RESPONSIBILITY

-  **Raise your concerns when you have questions**
-  **Ask for help**
-  **Report violations when seen**

PACIFIC LIFE RESPONSIBILITY

-  **Educate**
-  **Listen/Receive**
-  **Investigate**
-  **Address**



DO THE RIGHT THING

“Doing the right thing is always the right thing.” When we make decisions that are good for the company, we put our co-workers, customers, and business partners first. Our actions exemplify the values of Living the Pacific Life.

Bribery is offering, providing, or receiving anything of value to gain an unfair advantage. Bribery is illegal and has strict penalties that can damage our reputation and trust with customers and third parties.

Fraud is the intentional misrepresentation or omission of facts to gain something that may not have been provided without the deception.

WHY DOES IT MATTER?

Anyone can make an honest mistake at work. Fraud and bribery, on the other hand, involve deliberate deception. These violate our core values and our commitment to honesty, integrity, and trustworthiness.

We could not maintain our long-earned reputation for ethical business conduct if we engage in acts of fraud or bribery. Fraud and bribery are illegal and carry substantial civil and criminal penalties.

IT STARTS WITH ME: WHAT SHOULD I DO?

Be aware of and raise questions if you see red flags or hints that any of the following prohibited activities are occurring:

- Theft of Company assets
- Embezzlement of Company or client funds
- Forgery or alteration of Company documents
- Authorizing or submitting a reimbursement request known to be false
- Misrepresentation of facts pertaining to an insurance transaction
- An offer, promise, authorization, payment, gift, solicitation, or acceptance of anything of value to or from any government official or private person to improperly gain any regulatory, commercial, or contractual advantage

LIVE THE PACIFIC LIFE, WITH INTEGRITY



Center of the lane

- Decision is fully transparent
- Collaborated with coworkers, others, no dissenting views



Tires on the rumble strip

- Decision is kept secret or partially secret
- May have collaborated, but there is disagreement among confidants



On the shoulder

- Decision is hidden or secret, even from those who should know about it
- Might even be actively covering up the decision
- Not comfortable asking for advice or collaboration even from trusted sources

Financial Strength

A woman in a black suit is standing and pointing at a whiteboard in a meeting room. She is smiling and appears to be presenting. There are other people sitting in chairs in the foreground, looking towards her. The room has large windows in the background.

PROTECTING OUR REPUTATION

Reputation is Pacific Life's overall character as perceived by others. It's the sum of our actions, culture, and citizenship. Simply put, are we seen by the public as the good guys? You can protect our reputation through the decisions you make every day.

- PROTECTING OUR REPUTATION
- USING RESOURCES WISELY
- SOCIAL MEDIA



PROTECTING OUR REPUTATION

Individuals and Leaders are both important components of Pacific Life's ethical reputation. Working for a company with a good reputation includes having the courage to speak up when you see something and ask questions when you are not sure.

WHY DOES IT MATTER?

Pacific Life's reputation is one of our most valuable assets. Our positive reputation attracts clients and investors and establishes good will with the regulators who are charged with overseeing our business. Reputational harm can have an extensive and lasting impact to the Company seen in lost business opportunities, time, money, and resources needed to rebuild the public's trust.

Please check the [Social Media Policy](#) to confirm your responsibilities.

IT STARTS WITH ME: WHAT SHOULD I DO?

Do the right thing! Live the Pacific Life and express our Core Values in your daily job responsibilities. Social media plays a valuable role in connecting and engaging with people. When you express your personal thoughts or views, including messages posted on social media, make sure that you are not speaking on behalf of Pacific Life.





USE RESOURCES WISELY

Company resources are provided for our use in conducting Pacific Life business. In doing our daily work, we effectively bring together many types of systems, information, hardware and employee time. Employees make Pacific Life financially strong by ensuring that we use and combine all these resources, wisely and ethically.



WHY DOES IT MATTER?

Use of Company resources helps to ensure our financial strength and longevity. Wise use of resources can mean a lot of different things. It may be as simple as leaving a lighter footprint by thinking before printing or being thoughtful about budgets. You can also be a good steward of company resources by asking probative questions, spending time checking your work, collaborating with other employees to understand risks and implementing actions we can take to appropriately protect the company. The decisions we make every day make Pacific Life financially strong, protect our consumers, protect our reputation and protect our company.

EXAMPLES OF RESOURCES:

- Time
- Knowledge
- Information/Data
- System/Subscriptions
- Computers & Other Hardware
- Office Supplies
- Physical Spaces
- Mobile Devices

IT STARTS WITH ME: WHAT SHOULD I DO?

Consider asking these “6 W’s” when using company resources:

- 1 Who needs to be involved in this task?
- 2 What is the purpose of the task I am completing?
- 3 Where should resources be located?
- 4 When does the task need to be completed or decision need to be made?
- 5 Why is this resource the best way to complete this task?
- 6 What is the risk to the Company if assigned tasks are not completed as expected and/or mistakes are made?



Financial Strength

Innovation

ETHICALLY INNOVATIVE

The innovative mindset, actively seeking opportunities, is an important and exciting focus for Pacific Life's employees and our future growth. Incorporating our ethics and values into the innovation process, fosters an environment that strengthens our long-term strategies.

■ COMMUNICATION TECHNOLOGIES

```
    @Override  
    public IButton createButton()  
    {  
        return new WinButton();  
    }  
}
```

```
public class OSXFactory implements IFactory  
{  
    @Override  
    public IButton createButton()  
    {  
        return new Button();  
    }  
}
```

```
public class WinButton implements IButton  
{  
    @Override  
    public void paint()  
    {  
        System.out.println("WinButton");  
    }  
}
```

```
public class OSXButton implements IButton  
{  
    @Override  
    public void paint()  
    {  
        System.out.println("Button");  
    }  
}
```

```
public class Main {
```

```
    public static void main(String[] args)  
    {  
        IFactory factory = new WinFactory();
```

```
        final String appearance = "OSX";
```

```
        if (appearance.equals("OSX"))  
            factory = new OSXFactory();  
        else if (appearance.equals("WIN"))  
            factory = new WinFactory();  
        else  
            throw new Exception("Invalid appearance");  
    }
```

```
        final IButton button = factory.createButton();  
        button.paint();  
    }  
}
```

```
/**  
 * THIS IS JUST FOR THE SAMPLE  
 * WITH ABSTRACT FACTORY  
 */  
@return  
*/  
public static String[] appearances = {"OSX", "WIN"};  
final String[] appearanceArray = {"OSX", "WIN"};
```

```
appearanceArray[0] = "OSX";  
appearanceArray[1] = "WIN";  
appearanceArray[2] = "WIN";  
final java.util.Random random = new java.util.Random();  
final int randomNumber = random.nextInt(2);  
return appearanceArray[randomNumber];
```



WHY DOES IT MATTER?

Innovation can drive value for Pacific Life today, while also helping position Pacific Life to be successful for the next 150 years. The dynamic business environment that we operate in and our focus on creating a long-term, sustainable strategy means that innovation must be an integral part of our business objectives and processes. As employees, we must be open-minded and incorporate sound business practices and good decision making into the core of each project, better supporting our People, Accountability, Customer Focus, Integrity, Financial Strength and Community.

IT STARTS WITH ME: WHAT SHOULD I DO?

Core to all innovation is having a clear and deep understanding of and strong desire to meet the needs of our customers and the willingness to always improve.

- Be empathetic to the needs of your customer – whether they're a consumer, financial professional, colleague or someone else, – we can always serve them better
- Be collaborative – find coworkers with diverse perspectives and brainstorm how to improve
- Challenge the status quo and be open to new ways of working. Innovation is change and change can be hard; however, we must always work to avoid defaulting to our comfort zones
- Bring a prototype of a new solution / way of working to your customers and be open to feedback. Not all innovation will hit the mark the first time, but through an iterative process it can be improved
- Engage compliance, legal and risk resources on issue spotting and solution development



COMMUNICATION IN THE 21ST CENTURY

In today's world of the next new thing, we are continuously provided new methods and technology for communication. Whether it's a new form of social media or electronic communication, our Company and employees face the challenges and opportunities of living and working with ever-evolving methods of communication.

WHY DOES IT MATTER?

Our commitment and responsibility to high standards of ethical conduct and compliance with laws, regulations, and Pacific Life policies does not change with the changing environment. We must bring along our values, principles, and policies as our compass and our map to guide us in doing the right thing.

Please check the [Social Media Policy](#) to confirm your responsibilities.

IT STARTS WITH ME: WHAT SHOULD I DO?

Apply the same standards of ethical and professional conduct regardless of how you are communicating. All our values, principles, and policies apply to all forms of communication. As employees, we are empowered with protecting our reputation regardless of the methods we use to communicate. As you engage with new methods of communication, be thoughtful, respectful and protective of each other, our assets and our reputation just as if you are communicating through more traditional means.



Innovation

Community

- PACIFIC LIFE FOUNDATION
- PACIFIC LIFE VOLUNTEERS

CORPORATE RESPONSIBILITY

The power of our giving has a meaningful impact on our communities in Orange County, CA, Omaha, NE and Lynchburg, VA. We focus our community investments in: arts & culture; civic, community & economic development; the environment; education; and health and human services.





THE PACIFIC LIFE FOUNDATION AND PACIFIC LIFE VOLUNTEERS

Together with Pacific Life, the Pacific Life Foundation has donated more than 133 million dollars to nonprofits during the last 37 years. We support a wide range of societal issues through our annual grant funding and signature programs.

Pacific Life Volunteers are hard-working and generous corporate teams made up of employees and their families. Our Company volunteers thousands of hours at hundreds of projects each year to help nonprofit organizations in our communities.

WHY DOES IT MATTER?

Through the Foundation and our PL Volunteer events, Pacific Life supports our community, our employees and our partners by responding to the needs of the areas where we work and live. To Live the Pacific Life means doing the right thing and demonstrating our Core Values through volunteer and giving efforts. It's about being committed to you, our employees, both inside and outside of the office.

IT STARTS WITH ME: WHAT SHOULD I DO?

Participate! Check out sponsored volunteer opportunities on Splash and sign up through our Community Portal for PL Volunteer events with coworkers, family or friends to make a difference in your neighborhood and support issues that matter to you. Take advantage of matching donations to qualified charities through our year-round Matching Gifts program and the United Way Campaign.

Our community is made up of the people and places where we work, live, and do business. Each of us has unlimited opportunities to influence those communities by aligning our decisions to our Core Values, Code of Business Conduct, and respect towards colleagues, business partners, and customers.



Community



TABLE OF POLICIES

For more information on any of the topics addressed in the Code of Conduct, links are provided to each of the listed policies.

- [Anti-Fraud](#)
- [Antitrust and Unfair Competition](#)
- [Conflicts of Interest](#)
- [Drugs & Alcohol](#)
- [Equal Employment Opportunity](#)
- [Gifts and Anti-Bribery](#)
- [Information Management and Company Records](#)
- [Insider Trading](#)
- [Preventing Harassment, Discrimination, and Retaliation](#)
- [Protection and Proper Use of Confidential and Restricted Information](#)
- [Reporting Violations, Seeking Help, and Raising Concerns](#)
- [Social Media](#)
- [Workplace Violence & Weapons](#)