

Third Party Code of Conduct



Corebridge Financial Third Party Code of Conduct

Introduction

Corebridge Financial, Inc., along with its subsidiaries and affiliates (collectively “Corebridge”), is committed to conducting its business in accordance with the highest ethical standards and in full compliance with all applicable laws and regulations in the United States and in other jurisdictions in which Corebridge operates or does business. As part of that commitment, Corebridge expects all companies and individuals with whom it does business to act in accordance with applicable law. Accordingly, Corebridge counts on each of its business partners including, but not limited to, suppliers, vendors, distributors, subcontractors, brokers, agents, wholesalers, consultants, third party administrators and any other third parties acting on Corebridge’s behalf (collectively “Third Parties”), to adhere to the same core values and principles as Corebridge. The requirements of this Code of Conduct extend to Third Parties, their employees, contractors and other fourth parties providing services to Corebridge. Fourth Party means any contractor engaged by a Third Party for the provision of services to Corebridge. This Third Party Code of Conduct summarizes Corebridge’s expectations for all Third Parties engaged by Corebridge.

Scope

This Third Party Code of Conduct applies to all Third Parties engaged by Corebridge anywhere in the world. A copy of this Third Party Code of Conduct shall be provided to all Third Parties engaged by Corebridge at the time of the engagement or within a reasonable time thereafter.

Standards and Expectations

1. Legal and Regulatory Compliance: Corebridge expects Third Parties to conduct business in full compliance with all applicable laws and regulations. In addition to the obligations that Third Parties assume when acting on behalf of Corebridge in contractual agreements with Corebridge, Corebridge expects all Third Parties to meet the obligations described below. To the extent more specific terms and conditions are contained in a contractual agreement, the more specific terms and conditions govern. Corebridge reserves the right to seek information and documentation from Third Parties to assess compliance with this Third Party Code of Conduct and with applicable laws and regulations.

1.1 Economic Sanctions, Anti-boycott, Export Controls:

- Comply with all applicable U.S. and international economic sanctions laws and regulations.
- Never conduct business with individuals, entities, organizations, or countries that are the targets of U.S. economic sanctions laws and regulations or other applicable economic sanctions laws and regulations.
- Never participate in any boycott or restrictive trade practice unless such boycott is endorsed by the U.S. Government.
- Comply with all applicable U.S. and international export control, re-export and import restrictions.

1.2 Antitrust and Competition Law:

- Comply with all applicable U.S. and international antitrust and competition laws and regulations.
- Compete lawfully in all markets in which the Third Party operates.
- Obtain sensitive data about Corebridge competitors only from lawful and appropriate sources.
- Never discuss with any competitor prices, bids, customer sales, bid rigging, market allocation, or other competitively sensitive information.

1.3 Anti-Money Laundering:

- Comply with all applicable U.S. and international laws and regulations pertaining to the detection, prevention, and reporting of potential money laundering and terrorist financing activities.

1.4 Anti-Corruption:

- Comply with all applicable U.S. and international anti-corruption laws, including the United States Foreign Corrupt Practices Act (FCPA), U.S. Foreign Extortion Prevention Act (“FEPA”), and all other applicable laws that prohibit corruption, extortion, kickbacks, or bribery, including the U.K. Bribery Act 2010.
- Never pay bribes or provide other improper benefits to any person to obtain or retain business or secure a business advantage.
- Never promise, offer, or authorize the payment of money or anything else of value to a government official, including employees of government-owned or government-controlled entities in order to obtain or retain business or secure a business advantage.
- Maintain books and records that accurately reflect the true nature of transactions.

1.5 Insider Trading:

- Never transact in Corebridge securities, including common stock, debt securities or any other type of securities that Corebridge may issue, while in possession of material, non-public information relating to Corebridge.
- Never transact in another company’s securities (including companies unaffiliated with Corebridge) if you are in possession of material, non-public information about that company obtained in the course of performing services for Corebridge.
- Never pass on (or “tip”) confidential or material non-public information about Corebridge or any other entity to others or recommend to anyone the purchase or sale of securities of Corebridge or any other entity if you are in possession of material non-public information about that entity learned in the course of your engagement with Corebridge.

2. Ethics and Standards of Conduct

2.1 Corebridge Property, Funds, and Information

Third Parties must handle all Corebridge property, including, but not limited to equipment, funds, documents, information (in any format, including electronic and hard copy), and communications systems, with care and according to Corebridge requirements and instructions. Third Parties must promptly report to Corebridge any suspected or actual unauthorized access to or acquisition of, misuse, theft, vulnerability, improper exploitation, loss, or sabotage of Corebridge property of which they become aware.

2.2 Records Retention and Management

Corebridge expects Third Parties that create or maintain on behalf of Corebridge records that contain information relating to Corebridge operations and administration and/or are subject to legal or regulatory retention requirements (“Corebridge Records”) to retain such Corebridge Records in accordance with all applicable legal and regulatory retention requirements. Upon termination of the relationships with Corebridge, Third Parties must work with Corebridge to determine disposition of books and records maintained by the Third Party on behalf of Corebridge. When more specific records retention and information management provisions are included in a Third Party Agreement, the terms of the agreement govern.

2.3 Conflicts of Interest

Corebridge expects Third Parties to avoid actual or potential conflicts between their personal interests and the interests of Corebridge. Third Parties shall not knowingly deal directly with a Corebridge employee whose family member or relative, including spouse or domestic partner, has a

financial interest in the Third Party. Third Parties must not act in any manner, including giving or receiving gifts or entertainment, which could be perceived as influencing business and/or which could otherwise harm the reputation of Corebridge. In the event an actual or potential conflict of interest arises in connection with Corebridge, Third Parties must immediately report it to Corebridge.

2.4 Non-Discrimination

Third Parties must not engage in discrimination on any basis prohibited by applicable law, including, without limitation, race, color, religion, age, gender, sexual orientation, gender identity and expression, national origin, disability, family or marital status, citizenship status, veteran status or military status. Corebridge embraces diversity and equal opportunity as fundamental principles and key components of its corporate strategy. We strongly encourage that all Third Parties do the same. Third Parties shall strive to foster a culture of inclusion and diversity of people, ideas, and skills, to attract, develop and retain diverse talent.

In support of Corebridge's commitment to diversity, Third Parties are encouraged to engage qualified diverse vendors and suppliers for the acquisition of goods and services.

2.5 Labor, Diversity and Human Rights

Third Parties must take reasonable steps to identify, assess and address modern slavery risks in operations and supply chains. Corebridge third parties must:

- treat workers with respect;
- protect the human rights of employees;
- conduct operations in a socially responsible manner;
- provide protection from harassment and discrimination; and
- comply with applicable laws and regulations regarding equal opportunities, child labor, working hours, human trafficking, and fair wages.

3. Sustainability

Operating as a responsible corporate citizen is central to our success as a business. Each and every day, our employees strive to make a positive impact on millions of lives – including the communities where we work, live and serve our customers.

3.1 Corporate Social Responsibility (CSR) Taking Action through Philanthropy and Volunteerism

We create charitable partnerships designed to extend financial wellness to all, support healthy and resilient communities, and develop a diverse and inclusive workforce. We offer programs that empower employees to take action in their local communities through company-wide volunteer events and paid volunteer time off. We also partner with the Foundation for Financial Planning to increase pro bono financial planning for at-risk Americans and provide various pro bono services including legal advice and counsel to low-income clients, helping them take action to help secure their financial futures.

3.2 Financial Security: Helping more People Take Action in their Financial Lives

We offer products, resources, and information to assist people with their financial planning, including access to professional guidance, financial literacy and education and online tools and resources. We also are a founding member of the Alliance for Lifetime Income, a non-profit educational organization that educates Americans about the value and importance of having protected lifetime income in retirement.

3.3 Sustainable Operations: A Focus on Sustainability

Long-term business sustainability is critical to our ability to meet our customers' needs, particularly in light of demographic trends driving the need for longer-term financial wellness. The backbone of our sustainability is a diversified, well-managed product line with a balanced and diverse approach to product distribution.

4. Protection of Corebridge Information

4.1 Confidential Information: Corebridge expects its Third Parties to keep all proprietary and sensitive information, including non-public personal information, received from, processed on behalf of, or disclosed by, Corebridge as “Confidential” and to take precautions to safeguard such information including by ensuring that employees, contractors or Fourth Parties of Third Parties are under an appropriate confidentiality obligation and adequately trained. No disclosure of such Confidential Information is permitted except as required by law or with the express written consent of Corebridge, or in accordance with written agreements between Third Parties and Corebridge. Where more specific confidentiality terms are included in a Third Party agreement, the terms of the agreement govern.

4.2 Data Privacy and Security:

- Comply with all applicable U.S. and international privacy, cyber and data protection laws and regulations, including laws and regulations regarding the cross-border transfer of personal information.
- Maintain appropriate procedures, safeguards, and controls to secure and protect all “Confidential” information including but not limited to personal information received from, disclosed by, or processed on behalf of, Corebridge.
- Notify Corebridge within 24 hours of becoming aware of or suspecting (with a reasonable degree of certainty) a Data Breach or a Cybersecurity Incident including if any personal information received from, disclosed by or processed on behalf of, Corebridge is compromised.
- Notify Corebridge promptly of any complaints or requests received from individuals relating to personal information received from, or processed on behalf of, Corebridge.

4.3 Intellectual Property, Including Use of Corebridge’s Name and Brand Trademarks:

Corebridge requires its Third Parties to protect the intellectual property of Corebridge and its business partners and suppliers (including other Third Parties). Third Parties must consult with Corebridge or the applicable IP owner in advance of using or disclosing Corebridge’s or another party’s intellectual property to other third parties without the express written consent of Corebridge or the applicable owner. Corebridge or the applicable owner shall remain the owner of such intellectual property and no rights or interests are transferred to Third Parties.

Third Parties permitted in writing to use Corebridge’s name and/or Brand Trademarks must adhere to applicable brand guidelines for using Corebridge’s name and/or Brand Trademarks to help deliver a unified, consistent, and quality Corebridge brand experience, protecting and upholding Corebridge’s reputation.

4.4 Competition, Advertising, Marketing and External Communications

Corebridge expects Third Parties to uphold fair business standards in advertising, sales, and competition. Third Parties may not reference their relationship with Corebridge, such as through the use of Corebridge’s name, logo, trademarks, or services in any vendor marketing, promotional items, social media, or other communications of any kind, whether written or verbal, without Corebridge’s prior written approval. Corebridge approved advertising materials must be truthful and accurate, with clear and conspicuous disclosure of material terms and limitation of advertised offers.

Third Parties must not make any public statement concerning Corebridge, its affiliates, partners, suppliers and advisors, and any media inquiries received by Third Parties about any of these matters should be referred to Corebridge immediately.

4.5 Artificial Intelligence (AI)

Artificial Intelligence (AI) is transforming business and reshaping our world. While these technologies offer exciting possibilities, they may contain unique risks for Corebridge and our customers. Corebridge is committed to responsible use of AI, including by its contracted third

parties in providing services to Corebridge.

Third parties leveraging AI as part of provision of services to Corebridge must comply with Corebridge's procedures relating to review, approval, and monitoring of AI use cases. Third parties must agree to Corebridge's AI contract provisions. These provisions include an explicit prohibition against releasing Corebridge data into a large language model or other base AI technology managed by a fourth party. Additionally, third parties will be expected to cooperate with audits or other inquiries to confirm its compliance with contractual and regulatory requirements relative to the AI.

If you have any questions about this message or if your team would like to seek approval for the use of an AI tool, please contact DigitalResponsibility@corebridgefinancial.com

5. Organizational Governance

5.1 Training and Competence

Corebridge expects that Third Parties will maintain a training program adequate to ensure that management and employees comply with all regulatory requirements and expectations set forth in Third Parties contracts with Corebridge and this Code.

5.2 Business Continuity, Disaster Recovery, and Incident Management

Third Parties shall develop, implement, and test appropriate business continuity plans and disaster recovery plans for operations supporting Corebridge business to validate effectiveness. This also includes the implementation of incident management plans that address how any disruption or potential disruption is managed and communicated with Corebridge.

5.3 Enterprise Risk Management

Third Parties shall maintain the appropriate risk governance structure that fosters an effective risk and control culture that encompasses the identification, measurement, and management-of all significant risk categories. This should include the appropriate level of accountability, reporting, oversight, and demonstrates how systemic risks are being managed, in financial markets due to size, interconnectedness and complexity.

5.4 Supply Chain Management

Third Parties must take all commercially reasonable steps to ensure that their vendors and suppliers are in compliance with applicable laws and regulations as well as applicable requirements in Third Party contracts with Corebridge and under this Code.

5.5 Procurement Transparency

Corebridge Global Sourcing & Procurement Services is the sole authorized organization for the conduct of procurement business on Corebridge's behalf. Accordingly, Third Parties must promptly inform their Corebridge Sourcing & Procurement Services contact whenever they are engaged by Corebridge to provide a quote, order form, statement of work, contract, or any other form of proposal for new business.

Assistance with Investigations

Third Parties must provide reasonable assistance to any investigation by Corebridge of the Third Party's suspected or actual violation of this Code. Third Parties must protect anyone who works for them, either as an employee or a contractor, from any form of retaliation for reporting suspected or actual violations.

Review by Corebridge

Corebridge reserves the right to review or audit Third Party's compliance with this Code. Third Parties are to promptly respond to requests for information from Corebridge, or a third party working on Corebridge's behalf, regarding matters covered by this Code. These may include surveys, questionnaires, requests for supporting documentation and other measures intended to increase visibility into Corebridge's Third Party relationships.

Failure to Comply

Corebridge will only do business with Third Parties that comply with all applicable U.S. and international laws when acting on Corebridge's behalf. Corebridge may endeavor to terminate, without any liability to Corebridge, any pending purchase order or contract with any Third Party that does not comply with the standards set forth in this Third Party Code of Conduct.

Reporting Violations

Corebridge expects Third Parties to raise concerns or report instances of potential non-compliance with the Third Party Code of Conduct by contacting any of the following:

- **Corebridge Corporate Compliance Team** at CorebridgeComplianceInquiries@corebridgefinancial.com
- **Corebridge Compliance Help Line** at 800-461-9330 or online at [CorebridgeFinancial.com/ComplianceHelpLine](https://www.corebridgefinancial.com/ComplianceHelpLine), or scan the QR code below, subject to local laws. The Compliance Help Line is staffed by an independent third party that provides written reports to Corebridge's Corporate Compliance Team or its delegate. Communications to the Help Line may be made anonymously, subject to local laws, and may be made in all major languages.



Nothing in this Code, any Corebridge Policy or your agreements with Corebridge restrict or prohibit you from voluntarily providing information to, or otherwise communicating in any way with, a self-regulatory authority or a government agency or entity, including the U.S. Securities and Exchange Commission, or from making any other disclosures that are protected under the whistleblower provisions of state or federal laws or regulations. You do not need the Company's prior authorization and you are not required to notify the Company.

In addition, Corebridge, including its officers, employees, contractors, consultants and agents, shall not prevent or discourage clients from reporting concerns or issues directly to regulatory or law enforcement agencies if they believe there is a potential violation of laws or regulations.