

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. 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 Data Privacy and Security:

- Comply with all applicable U.S. and international privacy 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 the confidentiality and integrity of all personal information received from, or processed on behalf of, Corebridge.
- Notify Corebridge promptly if any personal information received from, 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.

1.6 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. 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 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.

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 an Corebridge employee whose family member or relative, including spouse or domestic partner, has a financial interest in the Third Party.
4. **Intellectual Property:** 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.
5. **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. When more specific records retention and information management provisions are included in a Third Party Agreement, the terms of the agreement govern.

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.

