



## Code of Conduct

**ALL INQUIRIES RELATED TO THIS CODE OF CONDUCT SHOULD BE DIRECTED TO:**

**OWNER:**

Daniel Woodring, EVP and Chief Compliance Officer  
470-564-7681

**CONTACT(S):**

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470-564-6299  
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905-369-8100

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Dear Colleagues:

The long-term success of Primerica and its subsidiaries is based on our integrity. Every day our many stakeholders – clients, investors, regulators, employees and representatives – count on our commitment to the highest standards of business ethics and compliance.

This Code of Conduct is an expression of our values. Whatever your role, the judgments you make reflect on our reputation and we are all responsible for abiding by the standards of behavior described in our Code of Conduct. I am counting on you to drive a culture in which we aggressively grow our business consistent with our values and legal and ethical requirements in all the markets that we serve.

We should all recognize that the financial services industry is heavily regulated and that, in many cases, the rules are complex and strictly enforced. For these reasons, I expect every employee to ask questions and raise concerns as they arise to ensure that we are always comfortable with our conduct. Every manager is also responsible to create an environment where such questions and concerns are welcome.

Please take the time to read our Code of Conduct and make sure you understand it. In addition to setting out the core principles that govern all of our employees, it also identifies the many resources available to help you understand how these principles relate to your job.

Integrity must always be the foundation of our business operations and the starting point of all our decisions and actions. For our clients, our investors and our colleagues, the name Primerica must inspire the kind of trust and confidence that says — wherever we operate and whatever the situation — we will do the right thing. Each of us has an obligation to honor and uphold the legacy that has been entrusted to us. I know I can count on you to do your part.

A handwritten signature in black ink, appearing to read "Glenn Williams". The signature is fluid and cursive, with a long horizontal stroke at the end.

Glenn Williams  
Chief Executive Officer

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# 1 OVERVIEW

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## 1.1 Objective

Our Code of Conduct is designed as a guide to assist us in choosing the proper course of action, individually and as a company, in every aspect of our work lives. It is also designed to promote honest and ethical behavior and to help us avoid situations that would give even the appearance of impropriety.

## 1.2 Scope

We expect all of our employees to act in accordance with the highest standards of personal and professional integrity in all aspects of their activities, including ethical handling of actual or apparent conflicts of interest between professional and personal relationships, and to comply with all applicable laws, rules, regulations and Primerica policies. We must never compromise that integrity, either for personal benefit or for Primerica's purported benefit.

## 1.3 Target Audience

Our Code of Conduct applies to every officer and employee and member of the Board of Directors of each of Primerica, Inc. ("Primerica") and Primerica's subsidiaries, including Canadian subsidiaries, (together with Primerica, the "Company"). All such individuals are required to review and comply with our Code of Conduct. In addition, other persons performing services for the Company may be subject to our Code of Conduct by contract or other arrangement.

## 1.4 Owner

Our Code of Conduct is owned by the Primerica, Inc. Chief Compliance Officer. It, and any changes to it, must be approved by the Primerica, Inc. Chief Compliance Officer, the Chief Compliance Officer of Primerica Financial Services (Canada) Ltd. ("Primerica Canada") and the Primerica, Inc. Board of Directors.

## 1.5 Effective Date

Our Code of Conduct was originally adopted in March 2010. This Code of Conduct is effective May 21, 2026 and supersedes and replaces any Code of Conduct previously adopted by the Company or any of its subsidiaries.

## **2 POLICY**

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Our Code of Conduct provides an overview of the Company's key policies, each of which you should be familiar with. Additionally, your particular business unit may also have its own policies and procedures that you must follow. If you have any questions or concerns about our Code of Conduct or any Company policies and how they apply to you, you should discuss them with your supervisor, your business unit's legal counsel, the Human Resources Department or your business unit's chief compliance officer. If there appears to be a conflict between our Code of Conduct and any law, rule or regulation, as amended from time to time ("Law"), or if you have questions regarding the interpretation of applicable Law, you should contact your business unit's legal counsel. As a general matter, when there is a difference between Company policies and the Law, the more restrictive requirements apply.

Failure to observe the policies set forth in our Code of Conduct, the Company's other policies, or the policies and procedures applicable to your business unit, may result in disciplinary action, up to and including immediate termination of employment or other relationship with the Company at the discretion of management or the Primerica, Inc. Board of Directors. Furthermore, violations of this Code of Conduct may also be violations of the Law and may result in civil or criminal penalties for you, your supervisors and the Company.

Our Code of Conduct neither constitutes nor should be construed to constitute a contract of employment for a definite term or a guarantee of continued employment. Your employment with the Company is at-will.

### **2.1 Exception Process**

In rare circumstances, a strict application of one or more provisions of our Code of Conduct may result in a serious hardship. In these exceptional circumstances, a waiver of such provisions may be sought. Waivers for employees may be granted at the discretion of and only by both the Primerica, Inc. General Counsel and the Primerica, Inc. Chief Compliance Officer or Primerica Canada Chief Compliance Officer based on the circumstances. Any waiver of one or more provisions of our Code of Conduct for executive officers or members of the Board of Directors of Primerica, Inc. may be made only by a documented decision of the Primerica, Inc. Board of Directors or a committee thereof, and must be disclosed promptly to the public if required by Law or the listing standards of the New York Stock Exchange.

### 3 GUIDELINES AND PROCEDURES

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#### 3.1 Raising Ethical Issues and Reporting Suspected Violations

Compliance with the highest ethical standards is a critical element of your responsibilities. All employees must promptly report to the persons identified in our Code of Conduct any suspected or actual violations of our Code of Conduct, other Company policies, law, or other wrongdoings affecting the Company. Early identification and resolution of these issues is critical to maintaining the Company's commitments to its clients, employees and stockholders.

Our Code of Conduct provides an overview of the key Company policies, each of which you need to be aware. In addition, you must also be aware of the detailed policies and procedures specific to your business unit. However, the Company cannot anticipate every issue you may encounter. Situations in the workplace may arise where the proper course of action may not be clear, and it is helpful to consider some questions before you act. When faced with this type of dilemma, first ask yourself:

- Does something feel wrong about this situation?
- Would my action be consistent with our Code of Conduct, applicable policies and the Law?
- Would my actions or failure to act result in even the appearance of impropriety?
- How might my decision impact others?
- What might be the consequences of my actions or inaction?

You should use your judgment and common sense; if something seems unethical or improper to you, it may very well be. If you have any questions regarding the best course of action in a particular situation, or if you reasonably suspect or become aware of a possible violation of a Law, Company policy or ethical standard, you must promptly contact any of the following:

- Your Human Resources representative
- In the U.S., the Primerica, Inc. Chief Compliance Officer; in Canada, the Primerica Canada Chief Compliance Officer
- The Primerica, Inc. General Counsel
- Primerica Employee Ethics Email: [PrimericaEthics@SupportLinc.com](mailto:PrimericaEthics@SupportLinc.com)

**Non-employees:** call the General Ethics Hotline, a toll-free number at: (888) 554-2374 or [email Ethics@Primerica.com](mailto:email.Ethics@Primerica.com)

**Non-employees** can mail complaints to:

In the U.S.:  
Primerica Ethics Office  
1 Primerica Parkway  
Duluth, Georgia 30099-0001

In Canada:  
Chief Compliance Officer  
6985 Financial Drive  
Mississauga, ON  
L5N OA1  
Canada

Further contact information is provided at the end of our Code of Conduct. If you raise an ethical issue and you do not believe the issue has been addressed, you should raise it with another of the contacts listed.

We encourage you to communicate your concerns openly. All contacts and investigations are treated as confidentially as possible, consistent with the need to investigate and address the matter and subject to applicable Law.

Complaints may be made anonymously to the extent permitted by applicable Law. However, please be advised that if you do choose to remain anonymous, we may be unable to obtain the additional information needed to investigate or address your concern. As part of any investigation, we respect the rights that are afforded to all parties under applicable Law.

### **3.2 Protection Against Retaliation**

We prohibit retaliation against anyone who, in good faith, raises concerns or questions or reports matters regarding ethics, discrimination or harassment or suspected violations of other applicable Law or Company policies. Reporting in good faith means that you share accurate information you have about a situation that you believe to be true. Retaliation is a violation of our Code of Conduct, and individuals who retaliate will be subject to discipline, up to and including termination, consistent with applicable policies and the Law.

### **3.3 Protecting Client, Independent Contractor Representative, Employee, and Vendor Information and Confidentiality of Personal Information**

We are committed to protecting personal and confidential information about our clients, independent contractor representatives, employees and vendors ("Confidential Information") and using it appropriately. Each of us is responsible for avoiding unauthorized disclosure of and safeguarding all Confidential

Information. When we use other companies to provide services for us, we require them to protect the Confidential Information they receive.

We comply with the many laws directed toward privacy and information security, including but not limited to the requirements governing:

- U.S. — the Gramm-Leach-Bliley Act (“GLBA”), the Fair Credit Reporting Act (“FCRA”), the Health Insurance Portability and Accountability Act (“HIPAA”), the California Consumer Privacy Act (“CCPA”), and the Personal Information Protection and Electronic Documents Act (“PIPEDA”), where applicable.
- Canada — the Personal Information Protection and Electronic Documents Act, the Act Respecting the Protection of Personal Information in the Private Sector (Quebec), the Personal Information Protection Act (British Columbia), the Personal Information Protect Act (Alberta) and Canada’s Anti-Spam Legislation.

We also adhere to our own high standards, including, but not limited to, the Primerica Privacy Policy and Procedures Manual, the Primerica Technology Management Policy and our Information Security Standards.

Confidential Information of our clients should be used only in a manner that allows us to provide our clients with choices and options for products and services to better meet their financial needs and objectives. You must comply with all Company and departmental policies and guidelines relating to privacy and security of Confidential Information you handle and ensure that such information is only shared with authorized individuals. You may disclose Confidential Information of others only if disclosure is authorized by the Company or required or permitted by Law. In particular, responses to requests for Confidential Information from anyone outside the Company under any circumstances may be provided only pursuant to applicable Company policy.

Any unauthorized disclosure of Confidential Information, whether inadvertent or not, must be reported to the business unit’s Business Information Security Officer (“BISO”). Privacy and information security laws change rapidly, so you should consult your manager with any questions regarding appropriate handling of Confidential Information. You should inform your BISO of any possibility that the information may have been mishandled or disclosed in a manner not authorized.

Your obligation to protect Confidential Information continues even after you leave the Company.

See also Section 3.5, “Commitment to Our Business -- Safeguarding Personal, Proprietary and Confidential Information.”

## **Fair Treatment**

We are committed to dealing fairly with our clients, employees, independent contractor representatives, vendors (including suppliers, distributors, product providers and business partners) and competitors. No person may take unfair advantage of anyone through manipulation, concealment, abuse of confidential information, misrepresentation of material facts or other unfair dealings or practices.

### *Canada*

Our Canadian business is committed to following the Fair Treatment of Customers principles prescribed by the Canadian Council of Insurance Regulators, the Canadian Insurance Services Regulatory Organizations, and various provincial regulators. Towards that goal, we strive to act in a good faith and ethical manner to safeguard our clients' interests, including:

- Developing, marketing and selling products in a way that pays due regard to the interests of our clients;
- Providing our clients with accurate, clear, non-misleading and sufficient information before, during and after the point of sale, in order to allow them to make informed decisions;
- Minimizing the risk of sales which are not appropriate to our clients' needs;
- Dealing with our client claims, complaints and disputes in a fair and timely manner; and
- Protecting the privacy of our clients' information.

As part of our commitment to treat our clients fairly, Primerica Canada has adopted a Fair Treatment of Customers Policy applicable to all employees of Primerica Canada (and subsidiaries thereof).

## **Tied Business Dealings**

"Tying" arrangements, where clients are required to purchase one product or service as a condition for another being made available, are unlawful in certain instances. You should consult your business unit's legal counsel for advice on tying restrictions.

## **Antitrust Compliance**

The Company is subject to complex laws designed to preserve competition among enterprises and to protect consumers from unfair business arrangements and practices. As an employee or director, you are expected to be aware of and comply with these laws at all times.

Many situations create the potential for unlawful anti-competitive conduct and should be avoided. These include:

- Proposals from competitors to share price or other competitive marketing information or to allocate markets or clients;
- Attempts by vendors or potential vendors to preclude the Company from doing business with, or contracting with, another vendor; and
- Discussions at industry trade association meetings on competitively sensitive topics, such as prices, pricing policies, costs and marketing strategies.

If a competitor tries to discuss subjects with you that raise concerns about anti-competitive conduct, you should refuse to do so and ask the person to stop immediately. If necessary, you should leave or otherwise terminate the conversation and promptly report the matter to your business unit's legal counsel.

### **3.4 Commitment to Each Other**

#### **Fair Employment Practices, Diversity and Human Rights**

We strive to pursue fair employment practices in every aspect of our business. We support existing labor and employment laws in the U.S. and Canada encompassing employees' right to freedom of association and collective bargaining.

We believe that diversity of opinions, skills, backgrounds and personal experiences in our staff is critical to our success, and we seek to recruit, develop and retain the most talented people from a diverse candidate pool. Advancement at the Company is based on merit and provides a workplace free of discrimination, harassment and retaliation. We are fully committed to equal employment opportunities and compliance with the letter and spirit of all laws and fair employment practices. Please consult our Equal Employment Opportunity and Anti-Harassment Policy for more information on recognizing and responding to discrimination.

We are committed to respecting human rights and dignity and, as such, prohibit forced and compulsory child labor and human trafficking. We will not tolerate abuse of human rights in our operations or within our supply chain.

#### **Discrimination and Harassment**

We promote a work environment where diversity of opinions, skills, backgrounds and personal experiences is embraced, and where our differences are valued and respected. We prohibit discrimination, harassment or intimidation that is unlawful or otherwise violates our policies, whether committed by or against a supervisor, co-worker, client, independent contractor representative, vendor or visitor.

Sexual harassment can include but is not limited to unwelcome sexual advances, requests for sexual favors, unsolicited physical contact, propositions, unwelcome flirtations, or offensive verbal, visual or physical conduct of a sexual nature. Examples include but are not limited to suggestive or lewd remarks, unwanted touches and offensive jokes or visuals. Please consult our Equal Employment Opportunity and Anti-Harassment Policy for more information on recognizing and responding to sexual harassment.

We should all be aware of – and sensitive to – the fact that what one person may consider to be a joke or an inoffensive comment may be extremely offensive to someone else. For this reason, we must avoid any conduct that might reasonably be interpreted as violating this policy.

Discrimination and harassment, whether based on a person's race, sex, color, religious creed, religion, national origin, citizenship status, age, disability, pregnancy, ancestry, military services or veteran status, genetic or carrier status, marital status, sexual orientation, or any classification protected by applicable federal, state, provincial or local laws will not be tolerated. Such discrimination and/or harassment, whether committed by or against employees, clients, independent contractor representatives, vendors, contractors, or visitors while at work or outside of work will not be tolerated. Retaliation against individuals for raising claims of discrimination or harassment in good faith is also prohibited.

If you believe that you are being subjected to discrimination or harassment in violation of this policy, or if you observe or receive a complaint regarding such behavior, you must report it to:

In the U.S., to:

- Your Human Resources Department representative;
- The Primerica, Inc. Chief Compliance Officer;
- The Primerica, Inc. General Counsel; or
- The Ethics Hotline

In Canada, to:

- Your Human Resources Department representative;
- The Primerica Canada Chief Compliance Officer);
- The Primerica, Inc. General Counsel;
- The Primerica Canada General Counsel; or
- The Ethics Hotline

(See Useful Addresses and Telephone Numbers at the end of this Code of Conduct.)

The Company will promptly investigate all allegations of harassment or discrimination and will take appropriate corrective action to the fullest extent permitted by law.

We will not tolerate the use of our systems, including e-mail services, telephones or cellular phones, and intranet/internet services or social media to create a discriminatory, hostile or offensive work environment. This includes transmitting or exchanging “jokes,” pictures, videos or other communications and stories that are harassing, demeaning or offensive to any individual or group. If you receive an inappropriate communication from another employee, you should report it immediately, just as you would any other violation of policy that you observe. If you receive an inappropriate communication from an external source, you should delete it immediately and advise the sender to not forward you similar communications in the future. Do not forward any inappropriate communications to another employee, other than to Human Resources or your BISO for purposes of reporting. In addition, do not forward any inappropriate communication to any external address, even if it is only to your home computer.

You must never use Company systems to initiate, download, transmit or exchange electronic images or texts of a sexual nature or containing ethnic slurs, racial epithets or any other material of a harassing, offensive or lewd nature.

### **Health and Safety**

The Company understands the importance of maintaining a healthy, productive, and safe work environment. Our commitment to health and safety is a team effort and we expect you to report any suspected health, safety or security risk. You should always follow safety, fire and security procedures and help third parties to act in a manner consistent with our safety requirements. You are expected to immediately report anyone who uses threats or intimidation or is violent as such actions endanger our employees and undermine our standards of personal and professional integrity.

You may never work or attend work-related events while under the influence of alcohol, illegal drugs, misused prescription drugs or controlled substances. In addition, you may never use, possess, transfer, or sell alcohol or illegal drugs while performing work-related duties or on company premises. Notwithstanding the foregoing, it shall be permissible for employees of legal drinking age to consume alcohol at company events or when entertaining others on company business, subject to applicable law, so long as such alcohol usage is reasonable and does not interfere with your ability to exercise good judgment.

## **Social Media**

The Company's Social Media Policy establishes a set of rules and guidelines for any activity and participation in "social media" by all employees. Employees are encouraged to refer to the Social Media Policy or contact their manager or the Human Resources Department for specific details of the policy.

### **3.5 Commitment to Our Business**

#### **Escalation of Business Concerns**

It is critical to our business and to the Company's reputation that we exercise appropriate judgment and common sense in every action we take, and that we consider all aspects of the potential impact of transactions in which we engage. It is your responsibility to escalate any concerns regarding potential franchise or reputation risks to the Primerica, Inc. General Counsel or Primerica Canada General Counsel.

#### **Investigations**

You are required to cooperate fully with any authorized internal or external investigations, including, but not limited to, those involving ethical issues or complaints of discrimination or harassment. You should never withhold, tamper with or fail to communicate relevant information. Making false statements to or otherwise misleading internal or external auditors, investigators, counsel, Company representatives or regulators may be grounds for immediate termination of employment or other relationship with the Company and may also be a criminal act that can result in severe penalties.

#### **Protecting Primerica Assets**

You are responsible for safeguarding the tangible and intangible assets of the Company and any assets owned by our clients or vendors that are under your control. Company assets may be used only for appropriate business purposes. Assets include cash, securities, physical property, services (whether provided by the company or its vendors), business plans, client, independent contractor representative and employee information, vendor information, intellectual property (trademarks, computer software, models, domain names and other items) and all other personal, proprietary and confidential information. Lists of clients and independent contractor representatives are also trade secrets of the company.

The U.S. Defend Trade Secrets Act of 2016 grants employees immunity from liability for confidential disclosure of a trade secret to the government, to an attorney or in a court filing if disclosed in the manner required by the law: An employee shall not be held criminally or civilly liable under any federal or state

trade secret law for the disclosure of a trade secret that is: (a) made (i) in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney and (ii) solely for the purpose of reporting or investigating a suspected violation of law; or (b) made to the employee's attorney in relation to a lawsuit for retaliation against the employee for reporting a suspected violation of law; or (c) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal.

Before commencing employment with the Company, you should disclose to your manager the existence of rights or interests you have in any invention or technology that may in any way relate to your employment with the Company. You may be asked to assign those rights to the Company. Likewise, you are required to disclose and assign to the Company all interests in any invention, creation, improvement, discovery, know-how, design, copyright work or work of authorship made or conceived by you or a group, including that which arises out of or in connection or relationship with your employment. You are required to assist the Company with any effort to perfect such assignment and to secure appropriate intellectual property protection for any of the foregoing. If your relationship terminates for any reason, all rights to property and information generated or obtained as part of your relationship will remain the exclusive property of the Company.

Misuse, misappropriation or unauthorized disclosure of Company assets is a breach of your duty to the Company and may constitute an act of fraud against the Company. Similarly, carelessness, waste or unauthorized use in regard to Company assets is also a breach of your duty to the Company.

### **Electronic Communications**

The Company's equipment and services, including but not limited to computers, PDAs, tablets, flash and thumb drives, fobs, cellular phones, telephones, voicemail, fax machines, video-conferencing equipment, scanners and other electronic communication devices, mail room service, Internet access, e-mail, SMS messages and instant messaging, are provided for business purposes and to enable you to perform tasks related to your job. Accordingly, to the extent permitted by applicable law, the Company may at any time monitor and record your use of its equipment, systems and services and the data transmitted. Therefore, you should not have any expectation of personal privacy when you use Company equipment, systems or services.

You may not use Company equipment, systems or services in a manner that could be harmful to the Company or in violation of any Company policies or any law. Personal use of Company equipment, systems and services must be kept to a minimum unless further restricted by applicable law or your business unit's policies. Use of the intranet/Internet must be in compliance with all applicable laws and the terms of use of Company sites and any third-party sites accessed. The Company's intranet/Internet servers may not be used for

the unauthorized downloading or use of any copyrighted or unlicensed material. This includes the downloading of music and the unauthorized downloading of unlicensed software, copyrighted images, video or printed material. The Internet may not be accessed from a Company server to view, download, store, transmit or post illegal, harassing, demeaning, offensive or inappropriate material.

Copying, selling, using or distributing information, software and other forms of intellectual property in violation of intellectual property laws, license agreements or Company policies is prohibited.

### **Safeguarding Personal, Proprietary and Confidential Information**

While working for the Company, you have an obligation to safeguard and not disclose personal, proprietary and confidential information that you have access to, obtain or create in connection with your activities for the Company, regardless of its form.

Your obligation to safeguard personal, proprietary or confidential information, including, but not limited to, personal and confidential information of clients, independent contractor representatives, other employees and vendors, includes protecting it from misuse, using it only for the performance of your assigned job duties and not using such information or permitting such information to be used for unauthorized purposes. You must not disclose personal, proprietary or confidential information about any client, independent contractor representative, employee or vendor to any unauthorized person (including other Company employees). Such information must not be shared or discussed outside the Company, except where permitted or required by applicable law, or pursuant to a subpoena or order issued by a court of competent jurisdiction or requested by a judicial or administrative body.

Examples of such information include:

- any system, information or process that gives the Company an opportunity to obtain an advantage over our competitors;
- nonpublic information about the Company's technology, systems and products
- nonpublic information about the Company's finances, operations, results, strategies or projections;
- nonpublic information about the Company's business plans or business processes, as well as nonpublic information about the Company's clients, independent contractor representatives, employees, or vendors;
- Confidential Information relating to individuals, including clients, employees, independent contractor representatives or vendors; and
- information that is subject to regulatory or contractual restrictions.

You must take precautionary measures to prevent unauthorized disclosure of personal, proprietary and confidential information. Accordingly, you should also take steps to ensure that business-related documents are produced, copied, scanned, faxed, emailed, transported, filed, stored and disposed of by means designed to prevent unauthorized access to such information. You should also ensure that access to work areas and computers is properly controlled in accordance with our Information Security Standards. You should not discuss sensitive matters or personal, proprietary or confidential information in public places, such as elevators, hallways, cafeterias, restaurants, restrooms and public transportation, or on the Internet or any other electronic media (including blogs and social networking sites); and you should be cautious when using mobile phones or other communication devices or messaging services. Great care should be exercised when discussing such information in open workplace areas, such as cubicles or when using speaker phones.

Your obligation to safeguard personal, proprietary and confidential information extends to all situations in which you may use such information, including when you are away from work or working remotely.

You are also responsible for ensuring that you are in compliance with all Company policies and guidelines relating to the safeguarding of personal, proprietary and confidential information, including, but not limited to, our Information Security Standards and the Primerica Records Management Policy and Standards. These obligations are in addition to the requirements set forth in Section 3.3, "Protecting Client, Independent Contractor Representative, Employee, and Vendor Information and Confidentiality of Personal Information

Once your employment or association with the Company ends, you may not divulge or use the Company's personal, proprietary or confidential information and must immediately return any copies of such information in all forms to the Company.

Additionally, you may not bring to the Company personal, proprietary or confidential information of any former employer, or use such information to aid the business of the Company, without the prior consent of your former employer and the Company.

### **Use of Company Names, Facilities or Relationships**

You should not use the Company's name, trademarks, logos, ticker symbol (including on letterhead or personal websites), facilities, services or relationships for personal benefit or for outside work.

## **Continuity of Business**

The Company maintains continuity of business plans to minimize financial losses and respond to market and clients' needs when a man-made or natural disaster (e.g., power outage, fire), crisis, disruption or emergency occurs. To be successful, the Company must be prepared to respond to any event that may affect normal business operations. You should be familiar with the crisis management procedures for your business.

For more information, see the Company's Business Continuity Policy.

## **Anti-Money Laundering ("AML") Compliance**

Money laundering is a global problem with potentially devastating consequences. Money laundering is defined as the process of converting illegal proceeds so that funds are made to appear legitimate and thereby enter the stream of commerce. It is not limited to cash transactions.

The Company and its employees must act diligently to prevent our products and services from being used to further money laundering and to detect and report related concerns. Toward that end, we have established standards to protect the Company from being used to launder the proceeds of illicit activity.

The Company's U.S. AML Procedures and Guidelines and the Primerica Canada AML Policies & Procedures (collectively referred to as "Primerica's AML Programs") require that the Company's businesses develop and implement effective AML programs to comply with applicable law and to protect the Company from being used for money laundering.

The Company's AML Programs are designed to protect the Company's businesses from being used to launder money or fund terrorism and to establish standards and procedures for detecting, deterring, and preventing money laundering/terrorist financing. All Company businesses, employees and independent contractor representatives are required to comply with the Company's AML Programs regardless of the country in which they are located. If not located in the U.S. or Canada, this Code of Conduct requires that you comply with the U.S. AML program.

To ensure the appropriate level of governance, senior management of the Company's businesses must be well informed regarding key areas of AML compliance and risk management on a regular basis, including any potential deficiencies and corrective actions. The Company tests the effectiveness of the Company's AML Programs as part of their Operational Assessment Program and through internal and external audits. Any identified deficiencies are reported to management and escalated to senior management as needed.

Employees are required to follow the applicable AML Program and their business unit's specific AML program and procedures, including those requiring appropriate diligence for accepting client relationships and, where applicable, individual transactions. No client relationship is worth compromising our commitment to combating money laundering, terrorist financing or other crimes. We are committed to cooperating with these efforts to the fullest extent permitted by law.

### ***U.S. AML Program***

Annually, the Anti-Money Laundering Compliance Officer ("AMLCO") or his/her designee, completes an AML/Terrorist Financing Risk Assessment to evaluate PFS Investments Inc.'s ("PFSI") and Primerica Brokerage Services, Inc.'s ("PBSI") inherent money laundering and terrorist financing risks to determine whether their controls are reasonably designed. PFSI's and PBSI's inherent risks are broken down into four distinct subsections: (1) Channels, (2) Customers, (3) Product Selection, and (4) Geographies, all of which are currently rated low risk. These risk assessments are issued to senior management including PFSI's and PBSI's Chief Executive Officer, Chief Operating Officer and Chief Compliance Officer.

The AMLCO and members of the AML team attend ongoing AML training, including but not limited to industry conferences, webinars, and certification courses. The AML Department provides training at least annually to specific departments, such as New Business and Business Review, that are involved with AML related tasks. All employees and independent contractor representatives are required to complete AML training annually through the Annual Compliance Meeting. In the U.S., certain of Primerica's AML Programs are audited by an independent party with a working knowledge of applicable rules and regulations.

All Company businesses must immediately report potentially suspicious activity to the AMLCO, or to his or her designee. We prohibit money laundering and terrorist financing. Every employee and independent contractor representative bears responsibility for protecting the Company from being used to launder money, facilitate terrorist financing, facilitate any activity using funds derived from illegal activity, or assist in disguising the true identity of assets. Company businesses promptly refer activity that is identified as unusual, questionable, or potentially suspicious to the AMLCO, or to his or her designee. Failure to timely report such activity could subject the firm to significant civil and criminal penalties.

In the U.S., questions regarding the Company's AML and anti-terrorist financing efforts may be directed to the AML Compliance Officer or to the chief compliance officer of your business unit. For more information, see the Company's U.S. AML Procedures and Guidelines.

## **Canada AML Program**

The Company maintains an AML Program in Canada, which is the same in many respects as the US AML Program and is consistent with Canadian AML and Anti-Terrorist Financing (ATF) requirements. The Company's Canada's AML Program also includes an AML/ATF Risk Assessment, annual training obligations for employees and independent contractor representatives, review by an independent party and mandatory suspicious transaction reporting.

In Canada, questions regarding AML and ATF efforts may be directed to the Regulatory Compliance Department or the Chief Anti-Money Laundering Officer . For more information, see Primerica Canada's AML Policies & Procedures.

## **Suspicious Activity Reporting**

In the U.S., Canada and many countries, financial institutions are required to identify and report to government authorities any suspicious accounts or transactions that may be related to possible violations of law, including money laundering, terrorist financing, insider trading and insider abuse, fraud and misappropriation of funds, among others. We require all our businesses to implement procedures to monitor for suspicious activity with regard to accounts and transactions so that, when required, the suspicious activity can be reported to the appropriate government authorities. You are responsible for understanding and following the specific AML program and reporting procedures adopted in your business area. This is of particular importance if you deal with clients, independent contractor representatives, transactions or financial records. If you are unclear as to your responsibilities, contact the AML compliance officer for your business unit. In Canada, you may contact the Regulatory Compliance Department or the Chief Anti-Money Laundering Officer (CAMLO).

All Company U.S clients are entered into an enterprise system that is used to conduct ongoing comparison of the Company's clients to Sanctions Lists issued by the Office of Foreign Assets Control ("OFAC") and certain reports issued by the U.S. Treasury Financial Crimes Enforcement Network ("FinCEN"). Potential matches are reviewed to determine if there are reporting requirements. Sanctions screening is also performed with respect to Primerica Canada clients.

Potentially suspicious activity may be identified through red flags, notification of client complaints, new business reviews, matches with FinCEN reports, positive OFAC matches, registered representative investigations, and through surveillance exception reports reviewed by the Business Review Department or the transfer agent.

If potentially suspicious activity is detected, employees are required to notify their immediate supervisor who will notify the AMLCO or in Canada, the CAMLO, or

his or her designee, of the activity. Department procedures indicate the reporting process.

## **Gifts and Entertainment**

### ***Accepting Gifts and Entertainment***

In general, you may not accept gifts of anything of value (including entertainment, services, loans or preferential treatment) from current or prospective Company clients, independent contractor representatives or vendors. You may never accept a gift under circumstances in which it could even appear to others that your business judgment may be compromised. Similarly, you may not accept or allow a close family member to accept gifts, services, loans or preferential treatment from anyone—clients, independent contractor representatives, vendors or others—in exchange for a past, current or future business relationship with the Company.

Cash gifts or their equivalent (e.g., gift cards or vouchers) may not be accepted under any circumstances. Noncash gifts may be accepted when permitted under applicable law only as follows, unless otherwise approved by the Primerica, Inc. General Counsel:

- (1) they are nominal in value (i.e., less than or equal to \$250 or, in the case of employees associated with a broker-dealer, less than or equal to \$100 if the noncash gift is from any vendor, other outside provider, securities offeror, other broker-dealer or anyone associated with an offeror or broker-dealer);
- (2) they are appropriate, customary and reasonable meals and entertainment at which the giver is present, such as an occasional business meal or entertainment or sporting event; or
- (3) they are appropriate, customary and reasonable gifts based on family or personal relationships, and clearly not meant to influence Company business.

Vendors occasionally sponsor events where raffles or prizes are awarded to attendees. The criteria for selecting winners and the value of these prizes can vary greatly, and could raise the appearance of impropriety. If you have any questions about the appropriateness of accepting a gift, invitation, raffle or other prize, you should discuss the matter with your supervisor or your business unit's legal counsel.

In certain situations, it may be appropriate to accept a gift and place it on display at the Company or donate the item to a charity in the name of the Company, or make a donation to charity in an amount equal to the gift's "fair-market value." In the U.S., consult your business unit's legal counsel for further guidance. In Canada, consult the Primerica Financial Services (Canada) Ltd. Charitable Gifts

Policy and Procedures, which sets out specific policies and procedures that pertain to the Canadian business.

### ***Giving Gifts and Providing Entertainment***

In certain circumstances, the giving of gifts and entertainment may be seen to others as a conflict of interest or, in extreme cases, bribery. If giving any gift or entertainment could be seen as consideration for corporate or government business or for any governmental favor, you must not give the gift or provide the entertainment. Appropriate gifts and entertainment may be offered to clients, by persons authorized to do so, subject to the procedures applicable to your business unit.

The ability to provide gifts or entertainment to government officials is severely limited by both Company policies and by law. Many countries, states, provinces and local jurisdictions have laws restricting gifts and entertainment (e.g., meals, entertainment, transportation, lodging or other things of value) that may be provided to government officials. In addition, you may be required to report participation of government officials in Company events. It is your responsibility to become familiar with gift and entertainment restrictions applicable to you and to comply with all pre-approval and reporting requirements.

### **Foreign Corrupt Practices Act and Anti-Bribery Laws**

All Company businesses are subject to anti-bribery laws. In the U.S., the Foreign Corrupt Practices Act of 1977 (“FCPA”) prohibits bribery, which includes any improper payment, or promise of payment, or the provision of anything of value, to foreign officials (including any person employed by or representing a foreign government, officials of a foreign political party, officials of public international organizations, candidates for foreign office and employees of state-owned enterprises). Under no circumstances may you offer anything of value to a government official (or to members of the official’s family, or to a charitable organization suggested by the official) for the purpose of influencing the recipient to take or refrain from taking any official action, or to induce the recipient to conduct business with the Company. In Canada, the Corruption of Foreign Public Officials Act (“CFPOA”) makes it a criminal offense for persons or companies to bribe foreign public officials to obtain or retain a business advantage.

Improper payments for the benefit of a government official, even if made indirectly through a consultant, contractor or other intermediary, are prohibited. In addition to payments and gifts, offering employment opportunities to a government official or a family member of an official may also violate anti-bribery laws. “Facilitating payments” are small payments to low-level government officials to expedite or secure performance of a nondiscretionary, routine governmental action. Facilitating payments may not be made without specific

prior approval of the business unit's legal counsel and then only when such payments do not violate local law and are properly reported.

To ensure compliance with the FCPA and CFPOA, it is your responsibility to comply with all pre-approval and reporting requirements.

### **Information and Records Creation and Management**

Information and records, as defined by Primerica's Records Management Policy and Primerica's Records Management Procedures that are owned, collected, used or managed by the Company must be accurate and complete. You are responsible for the integrity of the data and information, including reports and documents under your control. Records must be maintained in sufficient detail as to accurately reflect all Company transactions. This includes appropriate accounting and internal financial controls.

You must use common sense and observe professional standards regarding content and language when creating business records and other documents including e-mail, SMS messages and instant messaging that may be viewed, used or retained by the Company or a third party. You should keep in mind that at a future date, the Company or a third party may rely on or interpret the document solely as it appears, without the benefit of other recollections or context. You are prohibited from destroying or altering any records that are potentially relevant to a violation of law, legal claim or any litigation, or to any pending, threatened or foreseeable government investigation or proceeding.

Records must be identified, classified, retained and disposed of in accordance with Primerica's Records Management Policy and Primerica's Records Management Procedures.

### **Financial and Tax Reporting**

Financial statements must always be prepared in accordance with applicable accounting principles and fairly present, in all material respects, the Company's financial condition and results.

The Company is also committed to accuracy in tax-related records, and to tax reporting in compliance with the overall intent and letter of applicable laws.

Employees and executive officers of each company must ensure full, fair, accurate, timely and understandable disclosures are made in reports created for the Primerica, Inc. Board of Directors, Primerica Life Insurance Company of Canada Board of Directors, or to be filed by the Company with any regulatory or governmental entity.

For more information, see Primerica's Financial Code of Ethics.

## **Vendor Relationships**

We expect our vendors to follow and abide by principles and standards consistent with those set forth in our Code of Conduct in conducting business ethically and in compliance with all applicable laws and regulations.

To make the best use of the Company's assets and to leverage our buying power with the goal of delivering value to our clients and stockholders, the Company purchases all goods and services on the basis of price, quality, availability, terms and service. When the Company deals with an affiliate, such transactions must be consistent with arm's-length market terms and applicable law.

If you are responsible for a vendor relationship, you must never lead a vendor to believe that they can inappropriately influence any procurement decisions with the Company. In connection with offering or pitching business to a vendor, you may not offer any "quid pro quo" or suggest that any business or service may be withdrawn or awarded in return for business. Real or perceived conflicts of interest in the procurement process should be avoided but, if they occur, should be promptly disclosed to your business unit compliance officer.

Information pertaining to the Company's procurement of goods and services, including communications thereof, is subject to Company policies regarding proprietary and confidential information and applicable law and regulations. It can be shared internally only with others who have been designated by authorized personnel. Such information should not be communicated outside the Company except as expressly authorized. Primerica employees are encouraged to refer to the Third-Party Risk Management Policy.

## **Political Activities and Contributions**

You may have an interest in the governmental process or influencing or developing relationships with public officials. However, participating in such governmental processes may raise legal implications and liability for the Company. Depending on the jurisdiction, this may be the case even if you are acting in a personal capacity and not as a representative of the Company.

There are a variety of laws that regulate political activities of the Company. Any unauthorized political activity by you could result in a legal violation, civil or criminal penalty, a ban on doing business and reputational risk for the Company.

For these purposes, political activity includes:

- (1) Making corporate political contributions to, using Company funds or resources (such as facilities or personnel) for, or, during company time, soliciting political contributions or volunteering personal services on behalf

of a candidate campaigning for public office, a political party committee or a political committee;

- (2) Lobbying or engaging in any outreach to public officials, including attempts to influence legislation, which, depending on the jurisdiction, may also include attempts to influence agency rulemaking or the awarding of government contracts; and,
- (3) Seeking, accepting or holding any political office associated with the government, including any government board, commission or other similar organization.

To avoid any legal violation by the Company and to ensure proper regulatory disclosures are filed for the Company and its employees, the political activities described above require pre-approval by the Company's Government Relations Department unless you are otherwise subject to a more restrictive policy for your business unit. Since making personal political contributions to candidates holding or running for a government office may also require pre-approval in certain jurisdictions, please consult your business unit's specific policy, Primerica's Government Relations Department or your business unit's legal counsel for further guidance.

Primerica's Government Relations Department represents all of the Company's businesses when it comes to influencing legislation or rulemaking. Under no circumstance should a non-government relations employee represent himself or herself as a government relations representative or include a government relations title on his/her Company letterhead or business card.

Please consult Primerica's Policy on Activities Involving U.S. Public Officials for more information on political activities and contributions. In Canada, employees should consult the Primerica Canada Policy on Lobbying and Political Contributions.

### **Insider Trading**

Company policy and the laws of the United States and Canada prohibit trading in the securities (including equity securities, convertible securities, options, bonds and any stock index containing the security) of any company while in possession of material, nonpublic information (also known as "inside information") regarding that company. This prohibition applies to Company securities, as well as to the securities of other companies. It applies to transactions for any Company account, client account or personal account. A personal account is any account in which you have a financial or beneficial interest or for which you have the power to affect or ability to influence trading or investment decisions, either directly or indirectly. Personal accounts typically include accounts of spouses, domestic partners, children and other members of your household, and accounts over which you have investment discretion.

If you believe you have come into possession of inside information, you may not execute any trade in the securities of the subject company without first consulting with Primerica's Chief Governance and Risk Officer, who will then determine whether such trade would violate Company policy or applicable laws. The definition of "material, nonpublic information" is broad. Information is "material" (and hence, potentially subject to the prohibition on insider trading) if there is a substantial likelihood that a reasonable investor would consider the information important in determining whether to trade in a security, or if the information, if made public, likely would affect the market price of a company's securities. Information may be material even if it relates to future, speculative or contingent events, and even if it is significant only when considered in combination with publicly available information. Information is considered to be nonpublic unless it has been publicly disclosed by the subject company and adequate time has passed for the securities markets to digest the information. Examples of adequate disclosure include public filings with securities regulatory authorities and the broad dissemination of press releases.

It is also illegal to "tip" or pass on inside information to any other person if you know or reasonably suspect that the person receiving such information from you will misuse such information by trading in securities or passing such information on further, even if you do not receive any monetary benefit from the tippee. Trading on or conveying material nonpublic information may also breach contractual obligations assumed by the Company to or on behalf of vendors. Consequences for insider trading violations can be severe, including termination of employment, civil and criminal penalties for you, the tippee(s) and the Company, as well as irreparable damage to our reputation and public trust.

For more information, see the Company's Insider Trading Policy.

### **Personal Investments in Primerica and Other Securities**

Investments in Company securities for personal accounts should be made with a long-term orientation and as part of a broader investment strategy.

You are prohibited from trading in publicly traded securities (including Company securities) for your personal accounts if you possess material nonpublic information about the security or the issuer (including the Company). See Section 3.4, "Commitment to Our Business—Insider Trading" for a definition of material, nonpublic information and a definition of personal accounts.

Employees, executive officers and other representatives of certain Company businesses may be subject to additional restrictions and policies regarding personal trading of securities (including Company securities). These may include preclearance, reporting requirements and blackout periods. In addition, members of the Primerica, Inc. Board of Directors and Primerica's executive officers are subject to periodic reporting and other legal restrictions regarding their personal trading of Primerica securities. You are responsible for knowing and abiding by

any Company or business unit policies that may be applicable to you regarding securities.

You must not make any personal investment in an enterprise if the investment might affect or appear to affect your ability to make unbiased business decisions for the Company. If you made such an investment before joining the Company, or your position at the Company changes in such a way as to create a conflict of interest or the appearance of such a conflict, you must promptly report the facts to your supervisor, senior business manager or other person designated by your business unit. Investments subject to this provision include investments in a public or private company that is a vendor or competitor of the Company, or otherwise does business with or is doing a transaction with the Company.

This provision will not apply to personal investments in enterprises having a business relationship with the Company that is solely that of a client of the Company's products available to similarly situated clients on substantially the same basis, or to investments of under 1% of the outstanding equity securities of a public company. Investments in non-Company securities may, in some circumstances, raise concerns about conflicts of interest. See Section 3.5, "Commitment to our Business – Employee Conflicts of Interest" for more information about conflicts of interest relating to personal investments.

### **Employee Conflicts of Interest**

You must be sensitive to any activities, interests or relationships that might interfere with, or even appear to interfere with, your ability to act in the best interests of the Company and our clients and independent contractor representatives. The topics below are only some of the areas in which real or perceived conflicts of interest may arise. Because it is impossible to describe every potential conflict, the Company necessarily relies on your commitment to exercise sound judgment, to seek advice when appropriate and to adhere to the highest ethical standards. Various business units may have specific policies regarding potential conflicts of interest. You are responsible for knowing and complying with the relevant policies applicable to you.

In the event of any material interest or affiliation by an employee that presents, or is likely to create, a conflict of interest, that person should report the matter to the Primerica, Inc. General Counsel or Primerica Canada General Counsel who will then assess the potential conflict for appropriate reporting within the company.

### **Outside Directorships and Outside Business Activities**

When a Company employee serves as a director of an unaffiliated, publicly traded for-profit company (an "Outside Directorship"), there is a risk of liability for the individual as a director, as well as the risk that he or she will be required to spend large amounts of time attending to the affairs of the public company, thereby interfering with the employee's responsibilities at the Company. For these and

other reasons, Primerica prohibits employees from seeking or accepting outside directorships unless advance written approval is obtained from the employee's immediate supervisor, Primerica Inc.'s Chief Compliance Officer, Primerica, Inc.'s Chief Governance and Risk Officer and Primerica Inc.'s Chief Executive Officer.

In addition, Primerica's Outside Directorships and Business Interests Policy states that Company employees may not engage in other outside business activities, including not-for-profit activities or employment, if a real or perceived conflict of interest exists or could exist. You are also required to comply with any applicable laws and Company and business unit policies. You are responsible for identifying and raising any such activity or relationship that may pose an apparent or potential conflict of interest and to evaluate with your supervisor and your business unit compliance officer the possible conflicts that could result. For this reason, employees are required to obtain advance written approval for outside business activities from their immediate supervisor and the compliance officer designated by the Company to review and approve outside business activities for employees. For more information, refer to the full version of the Primerica Outside Directorships and Business Interests Policy.

### **Corporate Opportunities**

You owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises. You may not take for yourself a potential corporate opportunity that is discovered in the course of your employment with the Company or representation or through the use of corporate property, information or position, nor may you compete against the Company during the duration of employment. In some circumstances, you may also be subject to additional restrictive covenants as set forth in a separate agreement with the Company.

### **Related Party Business Dealings**

You must notify your supervisor of any business relationship or proposed business transaction the Company may have with any company in which you or a related party has a direct or indirect interest or from which you or a related party may derive a benefit, or where a related party member is employed, if such a relationship or transaction might give rise to the appearance of a conflict of interest (for example, if you or a family member owns or controls property of significant value that the Company is either purchasing or leasing).

This requirement generally does not apply if the interest exists solely as a result of your ownership of less than 1% of the outstanding publicly traded equity securities of such company. It also excludes a business relationship consisting solely of the provision of a Company product, such as a life insurance policy or securities product that is typically offered to other parties on the same terms.

## **Personal Business Dealings**

The Company's personnel and their families are encouraged to use the Company for their personal financial services needs. Such services, however, are to be provided on the same terms that they are provided to all other similarly situated persons. Any nonstandard business arrangements between Company personnel and the Company must be pre-approved by your supervisor, senior business manager and your business unit compliance officer. Similarly, you should not receive preferential treatment from vendors without pre-approval from your senior business manager and your business unit compliance officer, unless such preferential treatment is available on the same terms to all similarly situated persons.

## **Fair and Free Markets**

We are committed to promoting free and competitive markets. Any attempt by a Company officer, director or employee to manipulate or tamper with the markets or the prices of securities, options, futures or other financial instruments will not be tolerated. The Company's goal is to ensure candor and honesty in all its dealings, including those with any U.S. or Canadian federal, state, or provincial or local governmental body or non-U.S. or non-Canadian body, any self-regulatory organization of which the Company or any of its affiliates is a member, and the public.

## **Required Employee Reporting**

Company businesses regulated by the U.S. Securities and Exchange Commission (the "SEC"), FINRA, the Provincial Securities Commissions, Canadian Securities Administrators ("CSA"), Canadian Investments Regulatory Organization ("CIRO"), Ombudsman for Banking Services and Investments ("OBSI"), the Office of the Superintendent Financial Institutions Canada ("OSFI"), Financial Services Regulatory Authority of Ontario ("FSRA") and various state or provincial insurance or securities commissions may be prohibited from employing individuals who have been convicted of certain crimes or who have been the subject of legal or regulatory proceedings related to the financial services industry. Because of these requirements, and except where otherwise prohibited by applicable law, employees holding a regulatory license or registration are responsible for ensuring disclosures, including any changes to previously disclosed information, are promptly and accurately made. Such employees must immediately notify their manager and the Human Resources Department if any of the following events occur:

- An arrest, summons, subpoena, arraignment, indictment, a plea of guilty or no contest, or a conviction for any criminal offense, including any participation for such offense in a pretrial diversion program or similar program;

- An investigation, proceeding or finding of guilt by any governmental or securities industry self-regulatory body, including any request for testimony before such bodies;
- A refusal of registration, injunction, censure, fine, suspension, expulsion or other disciplinary action by any governmental or securities industry self-regulatory body;
- An association with a broker/dealer or other institution that was suspended, expelled or had its registration denied or revoked by any governmental or securities industry self-regulatory body;
- A client complaint or disciplinary action by another broker/dealer;
- A compromise with one or more of your creditors;
- A bankruptcy or contempt proceeding, cease and desist order, lien, injunction or a civil judgment as a party defendant; or
- Any securities or commodities-related lawsuit or arbitration or a request to testify in any securities or commodities-related lawsuit or arbitration.

Except as otherwise provided by law, all employees must immediately notify their manager and the Human Resources Department if they have been charged with a felony or any crime involving dishonesty or breach of trust. A criminal conviction is not an automatic bar to continued employment. Factors such as legal and regulatory requirements, the relationship of the offense to the job responsibilities, the length of time since the conviction, and the nature of the offense will be taken into account. Employees should review the full content of the Disclosure Requirements policy in the respective Employee Handbook for U.S. and Canadian employees.

Depending on business and position requirements, and to comply with certain laws, you may be subject to broader background check requirements during the course of employment to include criminal background checks or consumer reports. Your manager will notify you if you are subject to these requirements. If so, we will obtain certain authorizations required by law before performing background checks or obtaining consumer reports.

### **Undertaking to Repay Legal Expenses**

If you expect to pay legal expenses to defend yourself in a civil or criminal action, suit or proceeding arising from your service as an employee, officer or a director of any Company subsidiary, you may ask the Company to provide counsel to represent you. If management determines, based on governing documents and applicable law, that you are entitled to representation, but for any reason a Company -designated attorney cannot represent you (for example, if there is a conflict of interest), the Company may advance fees and expenses for outside counsel hired to represent you. By making the request, you agree that you will repay all these expenses to the Company if it ultimately

turns out that you are not entitled to indemnification. The determination of whether you were entitled to indemnification will be made by the Primerica, Inc. Board of Directors.

### **Compensation Plans, Programs and Arrangements**

All Company compensation plans, programs and arrangements and any compensation payable thereunder are subject to all applicable laws. Accordingly, to the extent permitted by applicable law, the Company may make changes to your compensation plans, programs and arrangements as it deems necessary, in its sole discretion, for among other reasons, to allow it to comply with or satisfy any legal, regulatory, or governmental requirements or directives or to qualify for any government loan, investment, subsidy or other program.

### **Media Interaction and Public Appearances**

You must refer all inquiries from the media relating to the Company to the Primerica Corporate Communications Department. Only individuals officially designated by the Primerica Corporate Communications Department may provide comments on behalf of the Company to the media, either on or off the record, or materials for publication. This includes all interaction with the media, however formal or informal, and irrespective of the subject matter. If a member of the media contacts you for a statement on behalf of the Company or relating to your affiliation with the Company, you must refer them to the Primerica Corporate Communications Department.

The Primerica Corporate Communications Department is the sole organization authorized to issue press releases or public statements on behalf of the Company. Employees may not consent to or engage in any public relations activity relating to or on behalf of the Company with clients, independent contractor representatives, vendors, or others without prior approval from the Primerica Corporate Communications Department.

Before publishing or posting any material in written or electronic format (including books, articles, podcasts, webcasts, blogs, website postings, photos, videos or other media), making speeches, giving interviews or making public appearances that mention or are on behalf of the Company, our operations, clients, independent contractor representatives, employees or services, you must get approval from your supervisor and the Primerica Corporate Communications Department. Approval is required regardless of whether or not Company equipment is used.

You may not make statements to the media, whether individually or on behalf of the Company, which are defamatory, threatening, or violate the Company's Equal Employment Opportunity and Anti-Harassment Policy.

The Company's Regulation FD (Fair Disclosure) Policy helps ensure that employees do not violate public disclosure requirements when communicating with stockholders, analysts or the press. This policy is part of the Company's commitment to full compliance with the SEC's Regulation FD and all employees are required to comply with it. To ensure compliance with this policy, you should consult with the Primerica Investor Relations Department prior to arranging or participating in any investor or analyst meetings.

### **Anti-Boycott Laws**

The following requirements apply to all Company employees, including Canadian employees. U.S. law prohibits U.S. persons from taking actions or entering into agreements that have the effect of furthering any boycott not approved by the U.S. through the following actions: (1) refusing to do business with other persons or companies (because of their nationality, for example); (2) discriminating in employment practices; (3) furnishing information on the race, religion, gender or national origin of any U.S. person; (4) furnishing information about any person's affiliations or business relationships with a boycotted country or with any person believed to be blacklisted by a boycotting country; or (5) utilizing letters of credit that contain prohibited boycott provisions. The Company is required to report any request to take action, or any attempt to reach agreement on such action in furtherance of an unsanctioned boycott. You should also be alert to the fact that boycott-related requests can be subtle and indirect. Contact the Primerica, Inc. General Counsel should any such issue arise.

### **Embargoes and Sanctions**

The Company complies with U.S. and Canadian economic sanctions and embargoes restricting U.S. and Canadian persons, corporations and, in some cases, foreign subsidiaries from doing business with certain countries, groups and individuals, including organizations associated with terrorist activity and narcotics trafficking. Unless expressly permitted by the U.S. Treasury Department's Office of Foreign Assets Control, or Canada's similar office, the law prohibits doing business of any kind with targeted governments and organizations, as well as individuals and entities that act on their behalf. Sanction prohibitions also may restrict investment in a targeted country, as well as trading in goods, technology and services (including financial services) with a targeted country. U.S. persons may not approve or facilitate transactions by a third party that the U.S. person could not do directly. Questions should be directed to the Primerica, Inc. General Counsel.

### **Environmental Responsibility**

We continue to identify opportunities to reduce waste and use energy more efficiently in our business, in an effort to limit our impact on climate change.

## **Conclusion**

We are committed to operating our businesses with the highest level of ethical conduct. This includes compliance with both the letter and the spirit of the various laws that regulate our businesses. As such, the Company (including its directors, officers and employees) is expected to be aware of and remain in compliance with all Company policies.

We aspire to the highest standards of ethical and professional conduct— working to earn and maintain our clients' trust, day in and day out. In the thousands of decisions we make and actions we take every day, we affirm our commitment to our Code of Conduct and to deliver value to our clients, our independent contractor representatives, our workforce, our stockholders and our communities.

Our Code of Conduct summarizes key policies of which you need to be aware.

You are encouraged to seek additional guidance or help from your Supervisor or business unit compliance officer, the Human Resources Department, the Office of the General Counsel, or any of the resources listed below:

## **Useful Addresses and Telephone Numbers**

### **U.S.**

General Counsel  
1 Primerica Parkway  
Duluth, GA 30099-0001  
(470) 564-6136

Anti-Money Laundering/AML Compliance Office  
1 Primerica Parkway  
Duluth, GA 30099-0001  
(470) 564-6465

Compliance Office  
1 Primerica Parkway  
Duluth, GA 30099-0001  
(470) 564-6823

### **Canada**

General Counsel  
6985 Financial Dr.  
Mississauga, Ontario L5N OA1  
(905) 369-8100

Chief Compliance Officer

Regulatory and Anti-Money Laundering Compliance  
P.O. Box 174  
Streetsville, Ontario LM5 2B8  
(905) 369-8100

**Primerica Ethics Hotlines**

[E-mail:PrimericaEthics@SupportLinc.com](mailto:PrimericaEthics@SupportLinc.com)

Sales Force Ethics Hotline: (888) 554-2374

[Email: ethics@primerica.com](mailto:ethics@primerica.com)

**Non-Employee Mail:**

Primerica Ethics Office  
1 Primerica Parkway  
Duluth, GA 30099-0001

**Available 24 hours a day, seven days a week**

## **APPENDIX A: CONTACTS**

### **U.S. Contacts:**

- Daniel Woodring 470-564-7681
- Alex Cunningham 470-564-6299

### **Canada Contacts:**

- David Grad 905-369-8100
- Noel Brackney 905-369-8137
- John Adams 905-813-5345