

Our Shared Commitment to Integrity

A Message from Genworth's President and Chief Executive Officer

As Genworth and CareScout associates, we are driven by a shared commitment to empowering families to navigate the aging journey with confidence. We strive to be compassionate and experienced allies for the millions of families who rely on us to help them through particularly challenging times—and our ability to succeed in this vital work depends on our collective ability to do the right thing.

Integrity First, our Code of Ethics, is the core of our company's ethical foundation and guides us in our work. It outlines the responsibilities of associates at all levels of the organization in upholding the policies and principles that govern our work. Every associate is asked to acknowledge the Code each year, but our expectation is that the contents of the Code are demonstrated in every decision, every day.

The best way we can protect our Code is for associates to hold themselves and each other accountable to its guidance and raise any concerns that might arise. We do not tolerate any form of retaliation, or even the threat of retaliation, for reporting a concern, so associates should feel empowered to speak up.

Thank you for joining me in this commitment to upholding *Integrity First* in every decision, every day.

Thank you very much,



Tom McInerney
President and Chief Executive Officer of Genworth Financial, Inc.





Integrity First: Every Decision. Every Day.

Genworth Code of Ethics

Our Code In Action

Integrity First. Every Decision. Every Day.

No matter who we are or in which business we work, this is the charge we accept, and the commitment that we make each and every day. This document guides each of us to make decisions that are rooted in integrity.

It's simple. It's straightforward. It's instructive. It exemplifies what we stand for as a company and represents the way we conduct business.

Integrity First is the Code of Ethics of Genworth Financial, Inc., our affiliates and subsidiaries, including Enact and CareScout (hereafter collectively referred to as the "Company"). This Code includes both our Guiding Principles and the policies that help us to implement them. It contains the basic information we must understand to comply with applicable laws, employ a consistent approach to key integrity issues, and conduct ourselves appropriately.

The principles and policies in *Integrity First* do not address every situation that you will encounter. If you are unsure about a specific policy or situation, you are expected to seek guidance from your manager or the next level of management, a human resources manager, a Company ombudsperson, a compliance officer or other compliance resource, internal legal counsel, or a Company auditor.

Integrity First has guided us through seasons of great triumph as well as great challenges. It is the foundation that enables us to be resilient — a source of inspiration, agility, and fortitude. With focus, energy, and commitment to our purpose, vision, and values, we remain committed to always conducting business with the highest integrity.

Defining Who We Are

About this Document

Genworth's Code of Ethics, *Integrity First*, and its implementing procedures, apply not only to our Genworth, CareScout, and Enact associates, but also to members of our Board, our suppliers, and other third parties who work on our behalf.

About Us

Genworth Financial, Inc. (NYSE: GNW) is focused on empowering families to navigate the aging journey with confidence, now and in the future. Headquartered in Richmond, Virginia, Genworth and its CareScout businesses provide guidance, products, and services that help people understand their caregiving options and fund their long-term care needs. Genworth is also the parent company and majority-owner of publicly traded Enact Holdings, Inc. (Nasdaq: ACT), a leading U.S. mortgage insurance provider (together with its subsidiaries and affiliates, "Enact").

Genworth's Purpose, Vision, and Values

Our Purpose: We empower families to navigate the aging journey with confidence.

Our Vision: We are compassionate, experienced allies for those navigating care now and in the future, with guidance, products, and services that meet families where they are in the aging journey.

Our Values:

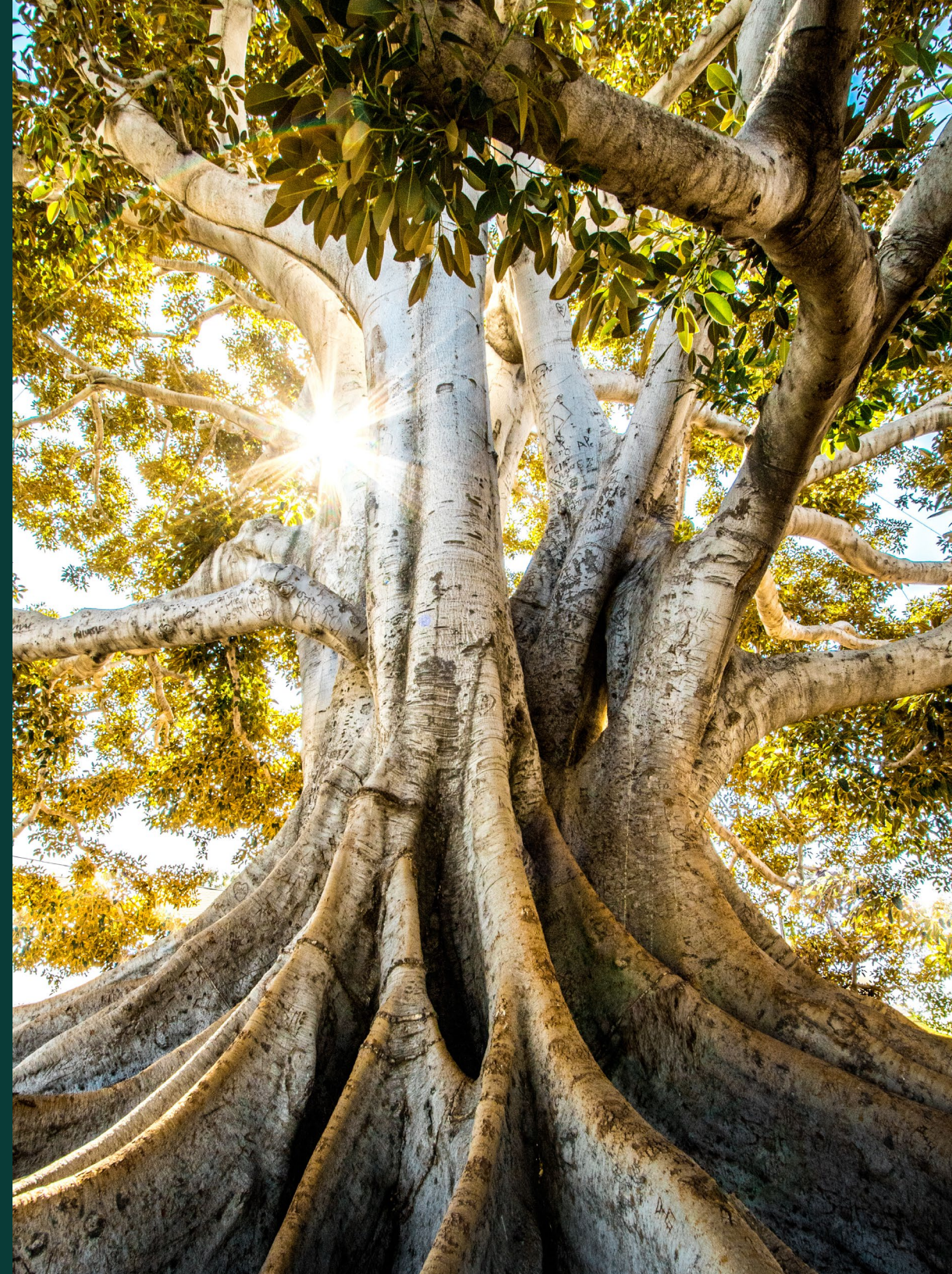
- **Make it human:** We instill compassion and empathy in our products, services, and interactions. We care about the people that make up our customers, colleagues, and communities.
- **Make it about others:** We lead with what's best for our customers. We collaborate as one team to drive our shared progress.
- **Make it happen:** We work with intention and a sense of ownership toward a common purpose. We forge ways forward, together, when obstacles appear.
- **Make it better:** We learn from the world and each other. We look for and build better ways.

Defining How We Work

Our Guiding Principles

At our Company, we expect our associates to put Integrity First — in Every Decision, Every Day. We are committed to the highest standards of ethical behavior embodied in these basic Guiding Principles:

- ① *Obey the applicable laws and regulations governing our business conduct worldwide.*
- ② *Sustain a culture where ethical conduct is recognized, valued, and exemplified by all associates.*
- ③ *Be honest, fair, and trustworthy in all Company activities and relationships.*
- ④ *Foster an atmosphere in which fair employment practices extend to every member of our diverse Company community.*
- ⑤ *Avoid all conflicts of interest between work and personal affairs.*
- ⑥ *Strive to create a safe workplace, protect the environment and conduct our business operations with the highest regard for the fundamental rights of each person in our workplace, in our communities, and in our world.*



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Every Decision. Every Day: The Basics

Integrity First is the core of our ethical foundation and forms the basis for how we make decisions at every level of the organization, from our senior leadership to all the branches of our organization. Each associate understands that they play a role in cultivating a strong culture of compliance.

Our Ground Rules

Who Must Follow Our Company's Policies

Your Responsibilities

Additional Responsibilities for Leaders

Your Obligation to Report Concerns

How to Raise a Concern

How Concerns Are Reviewed

Our Company's Prohibition on Retaliation

Penalties for Violations

Your Annual *Integrity First* Acknowledgment

Helpful Resources

Waivers

No Creation of Rights

Fostering a Culture of Compliance

Who Must Follow Our Company’s Policies

Those Who Work for Us

All Company Associates Around the World

Those Who Work with Us

Company Directors

Subsidiaries and Other Controlled Affiliates

Subsidiaries and other controlled affiliates (entities in which Genworth owns more than 50 percent of the voting rights or otherwise has the right to control) must adopt and follow Company policies, including *Integrity First*, our Code of Ethics.

Non-Controlled Affiliates

Non-controlled affiliates are encouraged to adopt and follow Company policies to the extent possible.

Those Who Work on Our Behalf

Third Parties Representing Our Company

Third parties representing our Company such as consultants, agents, external attorneys, sales representatives, distributors, and independent contractors — must agree to adopt and comply with the relevant aspects of the Company’s policies.

Leaders and associates who work with third parties must (1) provide information and training on applicable policy requirements, and (2) take necessary action, up to and including terminating a contract, if a third party fails to honor its agreement to comply with our Company’s policies.

Company Suppliers

Company suppliers also may be required to adopt and comply with the relevant aspects of our policies.

Additional requirements that apply to certain third parties appear in the contractor version of *Integrity First*.



Your Responsibilities

Our Company's commitment to the highest standards of ethical behavior begins with you – our associates. Further, third-parties who represent or perform work on behalf of our Company must agree to adopt and comply with the relevant aspects of *Integrity First* and other Company policies.

In addition to the specific responsibilities articulated in each of the *Integrity First* policies, each Company associate is charged with the following basic responsibilities:

- Always conduct yourself in a responsible, professional manner in the workplace;
- Comply with all (1) applicable laws and regulations that govern our business, and (2) Company policies and procedures;
- Develop a working knowledge of all the policies in the Code of Ethics, and a detailed understanding of those policies that apply to your specific job responsibilities. Check the Company's intranet portal for additional information about *Integrity First* as well as other compliance-related materials and policies that may pertain to your job;
- Understand and utilize the Company's channels available to you to promptly raise integrity concerns or to ask policy questions of your manager or the next level of management, a human resources manager, a Company ombudsperson, a compliance officer or other Company compliance resource, internal legal counsel, or a Company auditor;
- If you raise an integrity concern and the issue is not resolved, pursue the matter through another Company channel;
- Fully cooperate and be truthful during Company investigations of concerns about a Company policy or other integrity issues; and
- Remember — there is no substitute for common sense and good judgment — you should apply both to every decision you make.



Additional Responsibilities for Leaders

Leaders lay the foundation for our Company's culture of compliance and ethics and are expected to cultivate an environment of trust and respect. As a leader, you must be actively engaged in compliance efforts and help associates understand their compliance responsibilities. You also must:

- Lead by example and exhibit behaviors that others can model;
- Demonstrate that business results are never more important than compliance;
- Encourage associates to ask questions or report integrity concerns using one of the available Company channels;
- Comply with and enforce the Company's prohibition on retaliation; and
- Consider ethical behaviors and compliance efforts in evaluating and rewarding associates.

In addition, leaders develop and maintain the infrastructure that supports the core elements of the Company's compliance programs — the ability to prevent, detect, and respond to key compliance concerns.

Prevent Compliance Concerns by:

- Identifying compliance risks;

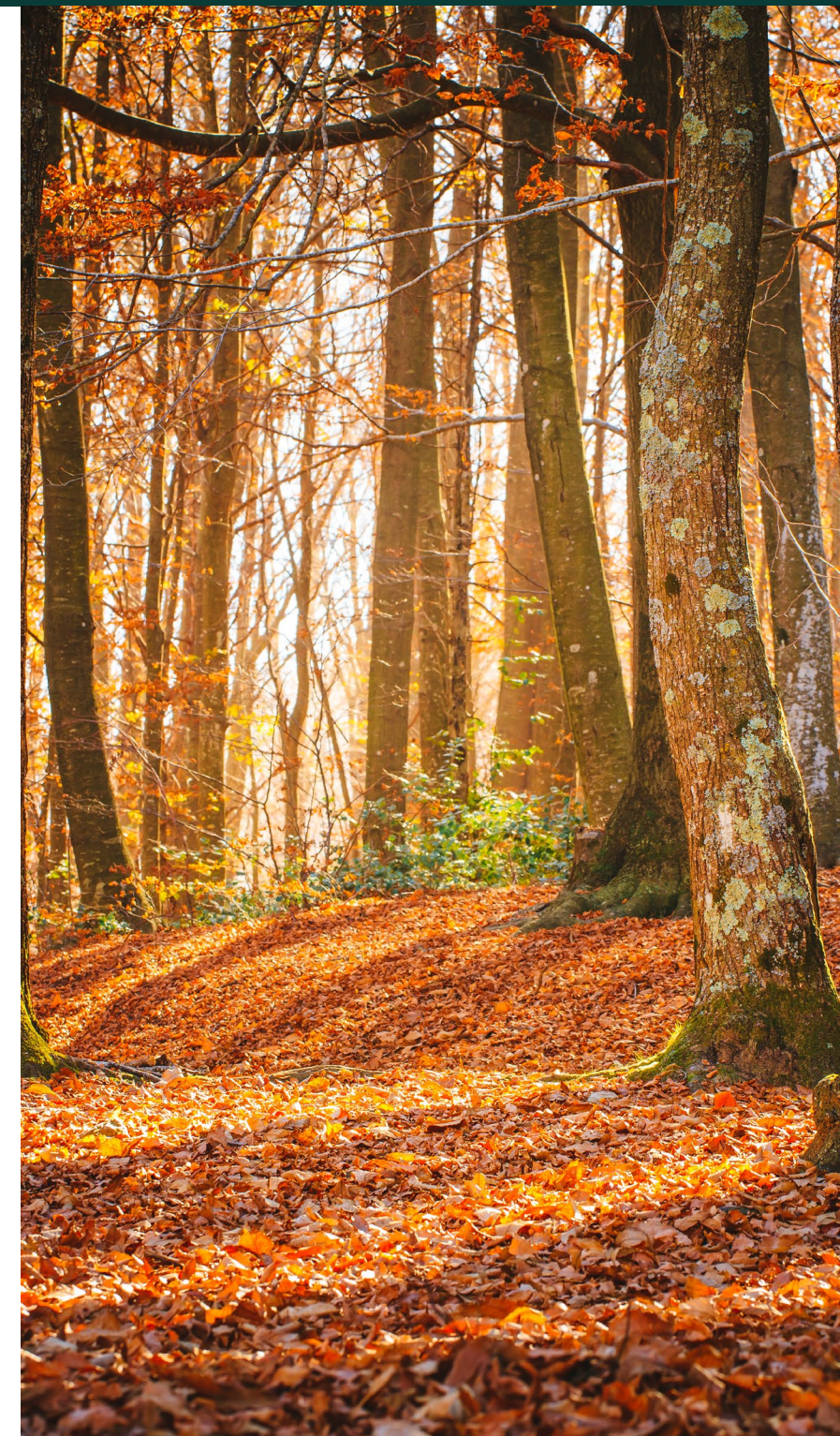
- Establishing and communicating processes to mitigate the risks; and
- Educating associates, and, where appropriate, third parties on the requirements of Company policies and applicable law.

Detect Compliance Concerns by:

- Implementing appropriate control measures in business processes to detect significant compliance risks and/or violations;
- Promoting an effective ombudsperson system that permits associates to raise concerns without fear of retaliation; and
- Ensuring that periodic compliance reviews are conducted, with assistance from compliance or auditing resources, where appropriate, to assess the effectiveness of the business' compliance measures and to identify potential improvements.

Respond to Compliance Concerns by:

- Initiating prompt corrective action to address any identified weaknesses in business processes or compliance measures;
- Taking appropriate disciplinary action; and
- Consulting with internal legal counsel before making disclosures to regulators, law enforcement authorities, or other external parties.



Your Obligation to Report Concerns

Ombuds Program

Your obligation to report integrity concerns through the Company’s available channels is among the most important responsibilities you have as a Company associate.

You are the organization’s eyes and ears, and you must speak up whenever you observe, or have good reason to suspect, a violation of a Company policy or the law.

Our Company is counting on you to act. Sometimes it may seem difficult to come forward, but the consequences can be severe if you don’t. The Company also could incur fines/penalties, or experience a loss of confidence from consumers, customers, stockholders, governments, or associates.

We ask only that you provide truthful information and act in good faith.

How to Raise a Concern

You have choices. You may report a concern orally or in writing. You also may elect to report a concern anonymously.

Our Company offers many different channels to receive integrity concerns and respond to questions. You should choose the channel in which you feel most comfortable.

Within Your Business

- Your supervisor or manager
- Next level of management
- A human resources manager
- A compliance officer or another compliance resource
- Internal legal counsel
- An auditing resource

Our Company Ombudsperson
Corporate Ombuds Office
888 251.4332

Ombudsperson
Genworth Financial, Inc.
11011 West Broad Street
Glen Allen, VA, 23060 USA

OmbudsOffice.Genworth@genworth.com

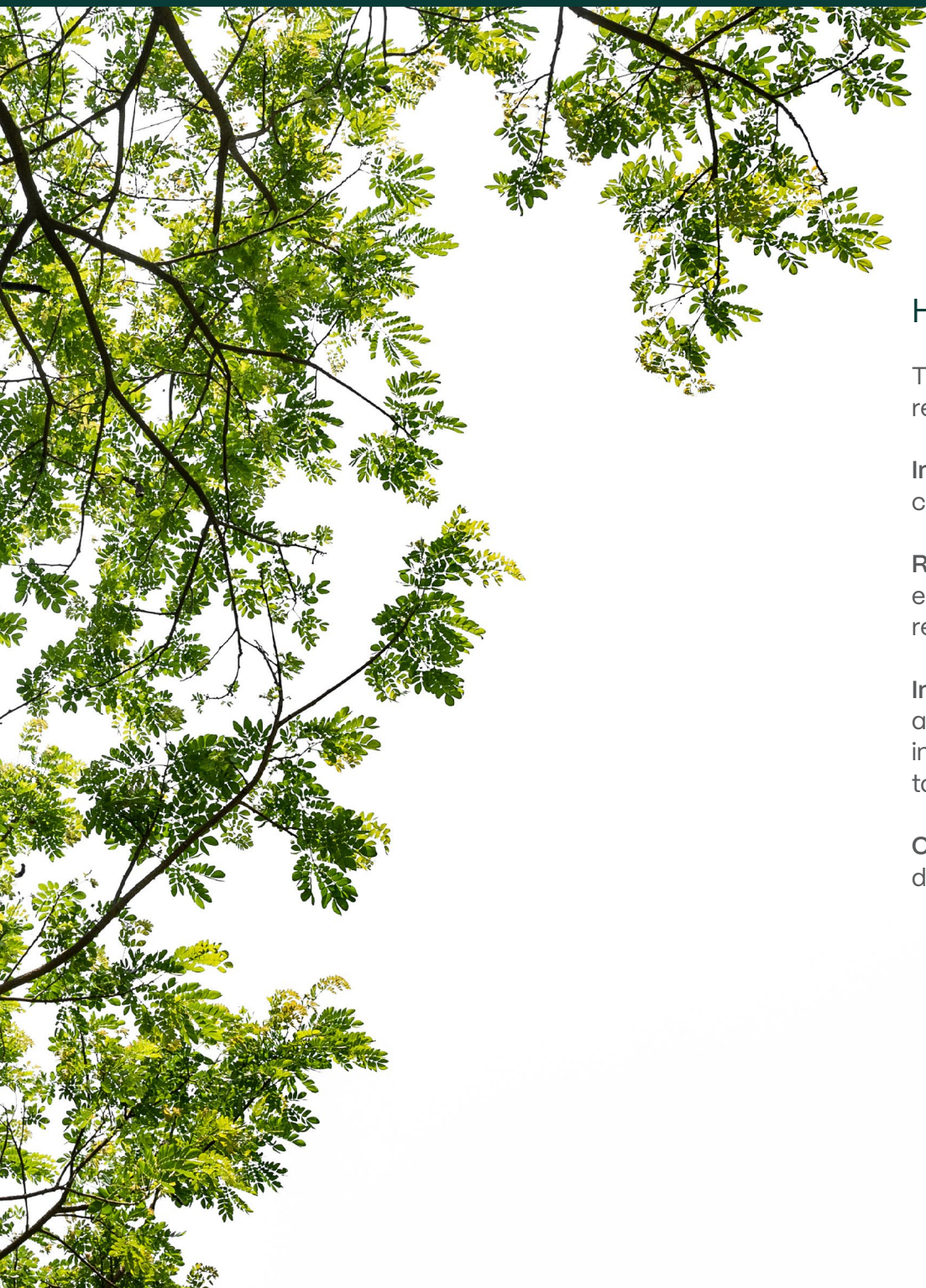
(Individuals who wish to remain anonymous should contact the Company’s ombudsperson either by telephone or by mail.)

Other Members of the Ombuds Network

- CareScout
888 251.4332
OmbudsOffice.Genworth@genworth.com
- Enact (United States)
800 274.2728
Ombudsperson@enactmi.com
- Genworth India
888 251.4332
OmbudsOffice.Genworth@genworth.com
- Mortgage Insurance (Mexico)
52 55 3000 6186
OmbudsOffice.Genworth@genworth.com or Patricia.Lomelin@genworth.com
- US Life Insurance
888 251.4332
OmbudsOffice.Genworth@genworth.com
- Genworth Board of Directors
866 717.3594

The Board of Directors Genworth Financial, Inc. c/o
Corporate Secretary 11011 West Broad Street
Glen Allen, VA, 23060 USA

Directors@genworth.com



How Concerns Are Reviewed

The nature of the issue dictates the way a concern will be reviewed. Generally, the basic steps include:

Intake: Obtaining relevant information from the complainant about the concern;

Resourcing: Determining who will lead the review and engaging subject matter expert(s) to participate, if required;

Investigation: Fact-gathering through document review and witness interviews, with due consideration to all involved (all investigations are conducted confidentially to the extent practicable);

Outcomes: Identifying facts that have been established during the investigation;

Corrective Action: Recommendations for disciplinary or other corrective action, if appropriate; and

Follow-Up: Notifying the complainant and other necessary parties upon completion of a review, and, where appropriate, providing general information about the outcome. Please note that specific information about an investigation may be considered private or confidential, and, under these circumstances, will not be disclosed.

(If you report anonymously, we will be unable to provide follow-up information to you.)

Our Company's Prohibition on Retaliation

Our Company strictly prohibits retaliation or the threat of retaliation against any associate for raising or helping to resolve a concern.

We will not tolerate any adverse action or a threat of adverse action against you for reporting a concern in good faith or participating in a Company investigation. Retaliatory conduct and/or a threat of retaliatory conduct violate *Integrity First* and may result in disciplinary action, up to and including termination of employment.

Penalties for Violations

Any associate who violates the spirit or letter of the Company's policies may be subject to disciplinary action, up to and including termination of employment. The following are examples of conduct that may result in discipline:

- Conduct that violates a Company policy;
- Suggesting or requiring that others violate a Company policy;
- Failure to raise a known or suspected violation of a Company policy promptly;
- Failure to cooperate in Company investigations of possible violations of a Company policy;
- Retaliation or a threat of retaliation against another associate for reporting an integrity concern; and
- Failure to demonstrate the leadership and diligence needed to ensure compliance with Company policies and applicable law.

Violation of a Company policy can also be a violation of law, subjecting you or the Company to criminal penalties (fines or jail sentences) or civil sanctions (damage awards or fines).

Your Annual Integrity First Acknowledgment

Each year, you will be asked to acknowledge your understanding of and compliance with the responsibilities and policies in *Integrity First*, including your obligation to report possible violations of law or a Company policy through one of the available Company channels.

Completion of this annual requirement is a condition of employment, to the extent permitted by applicable law. Your failure to read *Integrity First* or to complete the annual Acknowledgment does not exempt you from your obligation to comply with its policies.

Helpful Resources

Other materials are available on the Company intranet to help you understand and apply the provisions of the Code of Ethics to your specific job responsibilities. Please feel free to utilize these resources as you put *Integrity First* in every decision every day.

Waivers

The provisions of this Code apply to all associates, regardless of function or organizational level and, where applicable, to third parties. According to applicable rules, any waiver of Genworth's Code of Ethics for a director or executive officer would have to be approved by the Genworth Financial, Inc. Board of Directors or one of its committees and disclosed promptly to stockholders. However, Genworth's Governance Principles do not permit any waiver of any ethics policy for any director or executive officer.

No Creation of Rights

The *Integrity First* document is not a contract. It does not create or convey any contractual rights and does not guarantee employment for any specific period of time.

Fostering a Culture of Compliance

Regulatory Compliance

Our Company conducts business in multiple jurisdictions (domestic and international) and has associates at each location. As a result, our business operations are governed by the laws and regulations of various countries, provinces, states, municipalities, and organizations. Because our products and services are subject to considerable regulatory oversight, every associate must be mindful of our obligations in this regard.

Genworth Financial, Inc., the parent company, is a corporation organized in the United States (U.S.). The laws of the U.S. frequently extend to the operations of Genworth and its controlled affiliates as well as the business activities of Company associates wherever they live and work. Likewise, other countries may apply their own laws outside their borders to their own citizens and to corporations that are organized under their laws, such as Genworth subsidiaries or other controlled affiliates.

As stated in our Guiding Principles, each Company associate must seek to obey all applicable laws and regulations governing our business conduct worldwide. In some instances, there may be a conflict between the applicable laws of two or more countries. When you encounter a conflict of this kind, it is especially important to consult internal legal counsel to understand how to resolve it.

Each business must develop appropriate guidelines for their associates that identify, manage, and mitigate regulatory risks, including the identification of applicable new laws and regulations and/or changes to current laws and regulations.



Every Decision. Every Day: Around the Globe

We embrace *Integrity First* no matter where we operate. Though we may be working across the globe, each decision we make is strongly rooted in our code of ethics and our core values. We strive to maintain strength while adapting to new ways of working.

Our Interactions with Governments and Regulators

International Financial Transactions

Anti-Corruption

Working with Governments

Money Laundering Prevention

International Financial Transactions

What It Is

Our Company operates internationally. Our participation in the international marketplace is both important and complex.

Laws that govern international financial transactions and trade apply to imports and/or exports of goods, services, and technologies.

Why It's Important

Many countries regulate international financial transactions and trade, for a variety of reasons, including foreign policy and national security (largely to combat terrorist financing). For our Company and its affiliates to conduct business in today's global environment, we must understand and comply with the applicable laws and regulations.

In addition, the U.S. prohibits any cooperation with boycotts against countries friendly to the U.S. or firms which may be "blacklisted" by certain groups or countries.

Due to the complexity of these laws, you may be faced with conflicting legal requirements. You should speak with your direct manager and internal legal counsel under these circumstances.

Your Responsibilities

If you are involved in the sale or shipment of products, technologies, or services across country borders:

Business Procedures: Understand and follow the procedures implemented by your business to comply with the regulations governing international transactions and trade.

U.S. Regulations: Be familiar with the extent to which U.S. financial transaction or trade controls extend to your business activities, even outside the U.S.

Screening: Make sure all parties and transactions are screened to comply with applicable laws and regulations that restrict dealings with certain countries, entities, persons, and prohibited end-users.

Export Classification: Assign and verify the export classifications of all software, technology, or products to determine whether a special authorization is required.

Restrictive Trade Practices/Boycotts: Do not cooperate with any restrictive trade practice or boycott prohibited or penalized under U.S. or applicable local laws. Notify your manager if you become aware of boycott-related requests, including requests for information.

Conflicting Laws: Consult with your manager and your local internal legal counsel if a conflict arises between

U.S. law and the law of another country or region, such as the laws blocking certain U.S. restrictions adopted by Mexico.

Leader Responsibilities

Establish and implement procedures that comply with trade restrictions related to financial transactions and importing or exporting technology, software, services, and goods.

Speak Up

If something seems questionable, take action. Should you encounter any of the following issues or any other conduct that seems questionable, (1) scrutinize, (2) question, and/or (3) escalate, using the Company channel of your choice:

Suspect Transactions

- Transactions with individuals or entities identified as "restricted or prohibited parties" on applicable government or regulatory lists;
- Transactions involving (1) an embargoed country, (2) a citizen or representative of an embargoed country, or (3) an individual or entity subject to government sanction; or

Insufficient Information

- Incomplete answers about sources of funds, income, or identifying information.

Anti-Corruption

What It Is

We play fairly, and we follow the rules. We achieve our business results through ingenuity, innovation, hard work, and the exercise of conscious integrity. Bribery, or any other form of corruption, has no place at our Company or in our business activities.

Bribery involves an “improper payment” of some kind, defined as payments of money or anything of value, directly or indirectly, to a government official, customer or potential customer, political party, political party official, candidate for political office, or anyone acting on behalf of a public international organization (1) to influence any act or decision (including a decision not to act) of the official, or (2) to induce the official to use his or her influence to (a) affect a government act or decision, (b) obtain or retain business, or (c) direct business to any person.

Improper payments are not limited to cash or gifts. They also can include travel, entertainment, employment, and political or charitable contributions, just to name a few.

Reasonable and appropriate expenditures for (1) customer travel (related to the promotion of products/ services or execution of a contract), (2) gifts, (3) entertainment, or (4) political activity may be permissible, subject to applicable law, business guidelines, and the customer or potential customer’s own rules in this regard.

You also should understand “facilitating payments.” Sometimes known as “grease” payments, these are gratuities or other payments to government officials or employees to expedite a service or routine administrative action. These types of payments are prohibited in many countries.

Why It’s Important

More than one hundred countries have laws against bribery and corruption. These laws prohibit bribery of their own public officials, and, in many instances, the officials of other countries. In some countries these prohibitions also extend to the private sector, making bribery and corruption illegal in private business transactions.

Our Company doesn’t permit improper payments in any of our business dealings, whether with government officials or in the private sector, and will not tolerate business practices that involve bribery or corruption in any form. We strive to avoid even the appearance of impropriety in this regard. Anyone who works on our behalf (e.g., any third-party representative – such as a consultant, agent, external attorney, sales representative, distributor, or independent contractor) also must comply with (1) all applicable anti-corruption laws, (2) this policy, and (3) our Company’s implementing procedures.

Your Responsibilities

Payments or Other Offers: Never give, offer, or authorize an offer of anything of value (directly or indirectly) to a customer, government official, private sector employee, political party or candidate, or anyone acting on behalf of a public international organization to obtain or retain any improper advantage.

Facilitating Payments: Never give a gratuity or any other payment to a government official/employee to expedite a routine administrative action without consulting the local internal legal counsel/compliance officer.

Political Contributions: Never contribute Company funds or other Company assets for political purposes without strictly adhering to all applicable Company policies and procedures related to political contributions and expenditures.

Third Party Due Diligence: Exercise due diligence when selecting persons or firms to represent our Company. Only do business with reputable, qualified individuals and firms.

Third Party Compliance: Require any person or firm who represents our Company to comply with this policy, any applicable procedures, and related laws.

Sound Record–Keeping: Maintain timely, accurate, and complete records of all expenditures of Company funds as required by the *Controllership* policy on page 32.

Leader Responsibilities

Implement or adopt procedures to implement this policy.

Establish processes to ensure that all payments, expenses, and transactions are accurately recorded and reflected in the appropriate books and records, with special attention to documentation of facilitating payments.

Establish a system of internal accounting controls to provide reasonable assurances that transactions are appropriately authorized, recorded, and reconciled.

Conduct periodic reviews of third-party representatives.

For additional information, see the other applicable Company policies and procedures related to anti-corruption/improper payments.

Speak Up

If something seems questionable, take action. Should you encounter any of the following issues or any other conduct that seems questionable, (1) scrutinize, (2) question, and/or (3) escalate, using the Company channel of your choice:

Red Flags

Information that suggests an existing or potential third party representative:

- Has been accused of improper business practices, corruption, or misconduct;
- Has a familial or other relationship that could improperly influence the decision of a customer or government official;
- Cannot explain or inadequately explains termination by another company;
- Touts an alleged “special arrangement” with a government official or customer that might be beneficial to our Company in securing business;
- Requests a commission payment before the announcement of an award decision;
- Asks our Company to direct commission or other payments to someone and/or someplace unrelated to the transaction; or
- Assesses a commission charge that appears disproportionate to the services rendered.



Know Your Code

Question:

A consultant, working on our Company’s behalf in another country, has asked you to consider making a small payment to expedite the approval process for a required license. What should you do?

Answer:

Remember, facilitating payments are illegal in many countries. You should consult the local internal legal counsel or compliance officer immediately, who will consider whether facilitating payments are customary and legally permissible in the applicable country, in addition to other factors. In the unlikely event that the payment is approved, it must be clearly reflected in financial records.

Working with Governments

What It Is

We take great pride in the work that we do each day, as well as the way we achieve business results.

We operate in a highly regulated industry and often must communicate with government agencies, ministries, officials, and public international agencies/organizations about products, services, and business operations. In some instances, we also may conduct business with local, state, provincial, and national governments (including government-owned enterprises).

Why It's Important

Special requirements often are associated with government interactions and transactions. We must ensure that we understand and abide by them. Company associates must adhere to the highest ethical standards and comply with all applicable laws and regulations in their interactions with governments.

Moreover, Company associates always must be truthful and accurate when dealing with government officials, representatives, or agencies that regulate the markets in which we do business.

Your Responsibilities

Government Interactions: Adhere to the highest standards of honesty and integrity, and abide by all laws and regulations applicable to interactions with the government.

Special Requirements: Before engaging in discussions on our Company's behalf with any local, state, national, or international government official, representative or agency, understand any special rules and/or other non-commercial regulations that may apply. These may include:

- Compliance obligations associated with supplying goods or services to a government;
- Applicable laws and regulations governing any gifts or entertainment to officials or employees of any government — local, state, provincial, or national — or government-controlled companies (See the *Anti-Corruption* policy on page 16);
- Gratuity restrictions, recruiting prohibitions, non-commercial contract requirements, or certification procedures; or
- Recordkeeping requirements regarding meetings and conversations with government officials.

Note: You should contact internal legal counsel before you attempt to bid on any government business.

Third Party Representatives: Require any person or firm who provides services to or interacts with a government on our Company's behalf – such as consultants, agents, external attorneys, sales representatives, distributors, and independent contractors – to comply with this policy and the *Anti-Corruption* policy on page 16.

Communications: Provide truthful, accurate, and complete information (communications, reports, certifications, representations, statements, proposals, and claims etc.), whether oral or written, to government agencies and/or officials.

Leader Responsibilities

Implement or adopt reliable business processes to provide accurate and complete data for government submissions.

Speak Up

If something seems questionable, take action.

Potential Special Requirements

Watch for special requirements associated with government transactions, including “commercial” transactions financed by government and international agencies such as the The World Bank Group, the European Union, the European Bank for Reconstruction and Development, the Export/Import Bank of the United States, or the Overseas Private Investment Corporation.

Bids for Government Business

You should not engage in the behavior described below. However, should you encounter it or any other conduct that seems questionable, (1) scrutinize, (2) question, and/or (3) escalate, using the Company channel of your choice:

- Submitting a bid for any government business before contacting internal legal counsel;
- Providing inaccurate or incomplete cost or pricing data in response to a government requirement for its submission; or
- Accepting information related to the government’s competitive selection of a supplier, or a competitor’s bid or proposal, unless the contracting officer or head of the agency has specifically and lawfully authorized release of such information.



Money Laundering Prevention

What It Is

Some individuals involved in criminal activity (for example, narcotics, bribery, tax-evasion, fraud, or terrorism) may try to “launder” the proceeds of illicit activities to conceal or disguise their true origins and make them appear legitimate. Others attempt to use legitimate funds to finance crime or terrorism. Our Company does not intend to permit these individuals to use transactions with our Company to accomplish either.

Why It’s Important

More than one hundred countries have laws to prevent money laundering, which also make it a crime to knowingly engage in a financial transaction that involves the proceeds of criminal activity.

Our Company is committed to full compliance with all applicable anti-money laundering (AML) laws throughout the world. Our failure to detect customer relationships and transactions that place us at risk in this regard could result in severe damage both to our reputation and our brand.

Your Responsibilities

Compliance: Comply with all applicable laws and regulations that prohibit money laundering, and/or funding terrorist activities.

Business Procedures: Follow the AML standards, processes, and procedures adopted by your business.

Suspicious Transactions/Activities: Pay attention to unusual or suspicious transactions or other suspect activities.

Special Notice Requirements: Refer concerns about suspicious activity to either (1) designated personnel within your business, (2) the business AML Compliance Officer, or (3) the Company Chief Compliance Officer. These individuals will evaluate your concern, investigate as appropriate, document the resolution, and provide additional direction.

Leader Responsibilities

Conduct business only with reputable customers who are involved in lawful business activities and whose funds are derived from legitimate sources.

Implement appropriate “Know-Your-Customer” procedures to obtain sufficient information and documentation to make reasonable determinations about the legitimacy of prospective customers, business partners, and/or affiliates.

Designate a money-laundering prevention compliance resource.

Establish, implement, and document comprehensive, risk-based standards, processes, and procedures to:

- Designate acceptable sources of funds and forms of payment;
- Detect transactions or payments that may be associated with money laundering; and
- Report cash or suspicious transactions to government authorities, as required by applicable laws.

Develop and implement a risk-based monitoring system to identify unacceptable sources of funds/forms of payment.

Note: A risk-based approach permits consideration of product features, nature and size of transactions, distribution channel, or other factors to determine which procedures, controls, and training should be implemented.

Identify associates and distributors who require AML training and provide it as required.

For additional information, see the other applicable Company policies and procedures related to money laundering prevention. These documents are available on our intranet site, GenCentral, and can be found by going to About Us > Corporate Policies and Procedures > Compliance or contact your business AML Compliance Officer.

Speak Up

If something seems questionable, take action. Should you encounter any of the following issues or any other conduct that seems questionable, (1) scrutinize, (2) question, and/or (3) escalate, using the Company channel of your choice:

Suspicious Behavior

- Any customer, agent, or proposed business partner who (1) provides insufficient, false, or suspicious information, (2) seems reluctant to provide complete information, or (3) attempts to avoid a reporting or record-keeping requirement;
- Purchase or payment terms that seem odd for a customer’s particular trade or business;
- Involvement of unknown or unnecessary intermediaries or third parties;
- No apparent relationship between the owner of a policy and the insured or annuitant;
- Where applicable, greater interest in early surrender or cancellation provisions of an insurance or investment product than its potential long-term performance or the economic impact;
- Transactions involving locations identified as tax/secretcy havens or areas of known criminal activity — for example — terrorism, drug trafficking, or money laundering activity;

Unusual Forms of Payment, Payment Structures, or Transfer Requests

- Payments using monetary instruments that (1) are not consistent with the business activities of the customer, (2) appear to have no identifiable link to the customer, or (3) have been identified with money-laundering mechanisms;
- Attempts to pay in cash;
- Early repayment of a loan in cash or cash equivalents;
- Unusual fund transfers to or from foreign countries that seem unrelated to the transaction or illogical for the customer;
- Wire transfer activity that is not consistent with the business activities of the customer, or which originates or terminates with parties unrelated to the transaction;
- Requests to transfer money or return deposits to (1) third parties, or (2) unknown or unrecognized accounts;

Unnecessary Complexity

- Unusually complex deal structures and payment patterns with (1) no obvious legitimate business purpose, or (2) exceptionally favorable payment terms; or
- Transactions structured to evade record-keeping or reporting requirements (such as multiple transactions below the reportable threshold amounts).





Every Decision. Every Day: In the Marketplace

We approach all interactions with parties outside the walls of our company from a place of integrity. We strive to build relationships that enable us to be resilient in the face of challenges. We are focused on growing sustainably while maintaining strongly rooted in our core values.

Our Interactions with Consumers, Customers, Competitors, Stockholders, and Suppliers

Safeguarding Information

Complying with Competition Laws

Insider Trading and Stock Tipping

Intellectual Property

Controllership

Supplier Relationships

Safeguarding Information

What It Is

Given the speed at which we now transfer and share information globally, privacy and data security are critical concerns, often making headlines. "Privacy" refers to the ability to safeguard sensitive, personally identifiable information (e.g., consumer, medical, and/or financial information). "Data Security" focuses on protecting this information from unauthorized access, breaches and cyber threats. Together, privacy and data security ensure that sensitive information remains both confidential and protected from misuse.

Why It's Important

Our customers, distributors, associates, and other individuals have entrusted sensitive personal data to us with the full expectation that we will exercise the appropriate degree of care in handling and storing it.

Moreover, the laws of several countries now regulate the collection and use of personally identifiable information (PII), which includes, but is not limited to, name, physical address, credit card or government ID numbers. Laws in the U.S. provide additional protections, most notably to personal health information (PHI). (References in this policy to "sensitive personal data" include both PII and PHI.)

Many of us have access to information that is sensitive in nature and confidential. Confidential information

includes non-public information that might be useful to our competitors, or harmful to the Company or its customers, if disclosed (e.g. associate data, company financial data, business strategies) . (See the *Complying with Competition Laws* policy on page 26, the *Insider Trading and Stock Tipping* policy on page 28, and the *Intellectual Property* policy on page 30).

Our Company is committed to (1) handling and storing all sensitive personal data responsibly and in full compliance with applicable privacy laws, and (2) maintaining the confidentiality of proprietary or other sensitive information, as appropriate.

Your Responsibilities

Compliance: Comply with all applicable (1) privacy / data protection laws and regulations (in locations where sensitive personal data is collected, received, or maintained), and (2) contract obligations related to data privacy.

Business Procedures: Learn and follow your business' implementing procedures for privacy and data security.

Access and Use: Access and use sensitive personal data and confidential information only for legitimate business purposes.

Protection: Safeguard sensitive personal data and

confidential information at all times and exercise care to prevent unintended or unauthorized disclosure. Adhere to all data security protocols, including exclusive use of authorized connections and storage devices. Never reveal sensitive personal data or confidential information on a social media site.

Artificial Intelligence (AI): When using AI tools on Company devices and to create work product, it is essential that all associates use these resources responsibly and in accordance with the Company's AI policy and governance framework, laws and regulatory requirements. Please remember that any AI tools provided or approved by the Company are designed to ensure the confidentiality, security, and integrity of our data. Under no circumstances should you share or input sensitive, proprietary, or confidential Company information into unapproved AI platforms or external tools. To the extent that you share any AI-generated output either internally or externally, you must attribute it in accordance with Company guidelines – indicating that the content was created with reliance on an AI tool. See the Email, Internet and Social Media Usage Guidelines on the Genworth Intranet for more information about attribution requirements and standards.

Third Party Disclosure: If the Company will need to disclose sensitive personal data to a supplier or other third party, partner with an internal legal counsel, a compliance officer, data security team member, or

a sourcing representative to (1) assess the supplier’s security safeguards, and (2) include adequate legal protections. (See the *Supplier Relationships* policy on page 34). Disclosures to a third party should be limited to the minimum necessary to accomplish the intended purpose.

Notice: Immediately notify your manager and internal legal counsel, a compliance officer, or the data security team if you suspect that sensitive personal data has been disclosed inappropriately.

Confidential Information: Unless otherwise authorized or legally mandated, disclose confidential information only to those who have a legitimate business need to know.

While you should exercise sound judgment to identify and protect confidential information, Company documents, communications or information labeled “confidential, confidential – internal use only, or restricted” generally should not be disclosed. (See the *Insider Trading* and *Stock Tipping* policy on page 28 and the *Intellectual Property* policy on page 30).

Leader Responsibilities
Establish and implement fair and reasonable data security controls and monitor compliance.

Clearly identify proprietary and other sensitive information that should be considered confidential.

Where required, provide notices of relevant privacy practices to individual consumers and those with whom we do business.

Confer with internal legal counsel or a compliance officer before establishing or updating any system, process, or procedure to collect, maintain, use, disclose, or transmit sensitive personal data.

For additional information see the other applicable Company policies and procedures related to privacy and data security. Data privacy provisions applicable to associates are discussed in the *Fair Employment Practices* policy on page 37.

Speak Up
If something seems questionable, take action. You should not engage in the behavior described below. However, should you encounter it or any other conduct that seems questionable, (1) scrutinize, (2) question, and/or (3) escalate, using the Company channel of your choice:

The Possibility of Inadvertent Disclosure

- Implementing business or marketing plans that involve inappropriate or unauthorized collection, use, or disclosure of sensitive personal data, even between affiliated companies;
- Disclosing (or requests to disclose) sensitive personal data to unaffiliated third parties who are not properly authorized to receive the information;
- Transferring sensitive personal data between countries, before considering the applicable privacy laws of both;
- Sharing sensitive personal data with vendors, suppliers, or other third-parties before verifying appropriate security safeguards or use restrictions; or
- Inattention to security controls for sensitive personal data — for example, (1) using unencrypted emails or unauthorized storage devices to send or store sensitive personal data, (2) improper handling of hard copy documents containing this information, or (3) including sensitive personal data (for example, Social Security or National Identification numbers) in reports or spreadsheets when this information is not necessary.



Know Your Code

Question:

You have engaged a supplier (vendor) to coordinate a mass mailing of required consumer notices. You just learned that one of your colleagues inadvertently sent the supplier an unencrypted data file that included the gender, age, and telephone numbers of the consumers, in addition to their mailing addresses (which already were required for the supplier to coordinate the mailing). You are thinking that the problem is not too serious since government ID numbers were not disclosed. Should you report this incident?

Answer:

Yes. The information disclosed is sensitive personal data in its own right. Anytime that you suspect that sensitive personal data has been disclosed inappropriately, you should immediately report the concern to your manager, internal legal counsel, or the data security team. Two other points of note: (1) Remember, you should always encrypt emails that contain sensitive personal data; and (2) although not at issue in this scenario, the supplier's security safeguards for sensitive personal data should have been evaluated prior to engagement.

Question:

You are a member of a team working on a major project requiring input from various team members. The project has an upcoming deadline and your section is due. Your company laptop shuts down and you want to forward the document to your personal email account for completion. Is this acceptable?

Answer:

No. All work product created for, or related to, the Company must be completed on Company Computer Systems and distributed via Company networks and/or email accounts. The use of personal email accounts or personal computers, regardless of if they are accessible via Company networks, for any Company business, is strictly prohibited.

Complying with Competition Laws

What It Is

We think. We innovate. We plan. We outperform. As a result, we are poised to compete and to win business based on the value our products and services create for customers and consumers.

Competition laws (known in the U.S. as the antitrust laws) protect and promote a free and open marketplace and ensure that competition thrives by (1) prohibiting any agreement or conduct that restrains trade, (2) monitoring positions of market dominance, and (3) regulating mergers, acquisitions or other business arrangements that could significantly reduce competition.

Why It's Important

We will vigorously pursue business opportunities, but will always deal fairly and forthrightly, in full compliance with applicable competition laws, and never seek to take advantage through concealment, abuse of confidential information, misrepresentation of material facts, or any other manner of unfair dealing.

Most of the countries in which we operate have competition laws. They often are quite complex and require careful consideration. Violations of competition laws can lead to significant penalties both to our companies and to individuals.

Keep in mind that a "competitor" does not always need to be a company that offers the same types of products to the market. For example, we may also compete for talent with businesses in other industries.

Your Responsibilities

Always comply with:

All applicable competition laws, policies, treaties, decrees and orders, including federal and state antitrust laws of the U.S. and the competition laws of other countries where our companies do business.

The *Genworth Antitrust Compliance Guidelines for Collection of Competitive Intelligence* which provides focused guidance on gathering and using intelligence on our competitors, including specific procedures governing, (1) competitor contacts, (2) obtaining or handling business intelligence, and (3) participation in trade associations, professional societies, standards development or product certification organizations. A copy of this Guideline document is available on the Compliance page of the internal Company portal.

Competitor Contacts:

There are many considerations to take into account when you come into contact with a competitor as outlined in the *Genworth Antitrust Compliance for Collection of*

Competitive Intelligence. Some of these are highlighted below:

- Do not propose or enter into any agreements or understandings — expressed or implied, formal or informal, written or oral — with a competitor regarding any aspect of the competitive process for sales, for example prices, bid coordination, products, services, terms or conditions of sales, sales volume, sales territories, market share, distribution channels, cost structures, profits, and profit margins;
- Do not propose or enter into any arrangements involving exclusivity, product or service bundling, selective discounting, rebating, or distribution with competitors; and
- Immediately stop and withdraw from any discussion with a competitor that you deem questionable and promptly inform internal legal counsel or a compliance officer.

Leader Responsibilities

Ensure that your teams are aware of internal policies and procedures, including the *Genworth Antitrust Compliance Guidelines for Collection of Competitive Intelligence*, which relate to our compliance with applicable competition laws.



Drive compliant procedures for (1) competitor contacts, (2) obtaining or handling business intelligence, and (3) participation in trade associations, professional societies, standards development or product certification organizations.

Include an appropriate legal review of competition issues in the processes used by your business for new product or service development.

Consult with internal legal counsel early in the process of evaluating any proposed merger, acquisition, joint venture, or other business arrangement. Keep in mind that competition law issues may arise in the case of both relationships with competitors, and with other companies within a supply chain.

Speak Up

If something seems questionable, take action. Should you encounter any conduct that seems questionable, (1) scrutinize, (2) question, and/or (3) escalate, using the Company channel of your choice. Examples of topics to which you should pay particularly close attention include the following:

Conversations with Competitors and Suppliers

Discussions or agreements with competitors or suppliers about competitively sensitive topics, such as

- Marketing, sales, distribution, product or operational strategies,
- Customer, competitor, or supplier exclusions, and pricing.

The Appearance of Impropriety

- Any contacts with competitors that could create the appearance of an improper agreement or understanding, or even the appearance of just an invitation for that competitor to agree to engage in improper, anti-competitive conduct, whether the contact is in person, in writing, by telephone, through e-mail, or through other means of electronic communication; or
- Public statements on competitively sensitive topics which are likely to be heard by competitors and could be viewed as an improper invitation to collude on an aspect of competition; or
- Agreements to add a Company associate to another entity's board of directors (See the *Conflicts of Interest* policy on page 41).

Former Employer Competitive Information: Do not ask a Company associate or contractor to disclose competitively sensitive information about a prior employer. (See the *Intellectual Property* policy on page 30.)

Insider Trading and Stock Tipping

What It Is

It's the stuff movies are made of — secrets, profits, and intrigue. The circumstances are not always quite so dramatic, but, nonetheless, the plot centers around **inside information** — material non-public information about anything, positive or negative, that could affect the price of any company's stock or other security. In essence, (1) the public is unaware of the information, but, (2) if this non-public information were generally known, it would be considered important to a reasonable investor in making a decision to buy, sell, or hold a particular security.

Inside information could be related to our Company, or any other company, including our Company's suppliers or customers. Examples of **inside information** include a pending merger, acquisition, disposition or joint venture, a significant cybersecurity incident, an earnings announcement, a substantial lawsuit, a new product development, a major contract award or termination, the gain or loss of a significant customer, major loss on investment, or a regulatory investigation or development.

Insider trading is buying or selling stock or other securities of any company while in possession of **inside information**.

Stock tipping is sharing **inside information** about a company with a third party, possibly a family member, colleague, or friend, to enable that person to buy, sell,

or hold stock or other securities of *any company* on the basis of such information.

Why It's Important

Our Company is committed to the principle of fair and open markets for publicly traded securities throughout the world, so that every investor has an equal chance to succeed. In most countries where our Company does business, insider trading and stock tipping are criminal offenses. Penalties for insider trading or stock tipping can be severe, both for the individuals involved and their employers, and may include jail terms, criminal fines, and/or civil penalties. Therefore, Company associates must fully comply with the laws prohibiting insider trading and stock tipping and the obligations under our Company's Insider Trading Policy.

You may well have access to inside information about our Company or another company simply as a result of your job responsibilities, so it's important that you understand your obligations.

Your Responsibilities

Trading Securities: Do not buy or sell the stock or other securities of *any company* while you are aware of **inside information**. This requirement also applies to decisions relating to investments in Company stock through the Company's 401(k) program (or any other plan or

arrangement involving Company stock or rights based upon the price of Company stock).

Trading Securities (Additional Restrictions): Directors, executive officers, and certain other individuals must comply with additional restrictions.

Stock Tips: Do not recommend or suggest that anyone else buy, sell, or hold stock or other securities of any company while you are aware of inside information.

Inside Information: Reference or disclose inside information only to those individuals who (1) have a legitimate business need to know, and (2) understand the obligations and restrictions that come with knowledge of inside information.

Confidential Information: Unless otherwise authorized or legally mandated, disclose confidential information only to those who have a legitimate business need to know. While you should exercise sound judgment to identify and protect all confidential information, Company documents labeled "confidential" or communications/information described as "confidential" generally should not be disclosed. Never disclose proprietary or confidential information on social media sites. (See the *Safeguarding Information* policy on page 23 and the *Intellectual Property* policy on page 30.)



Questions: Contact your business compliance officer, internal legal counsel, or a Company ombudsperson if you are unsure about your obligations.

Leader Responsibilities
Protect the confidentiality of non-public information. Remind associates of their responsibilities when they are in possession of inside information.

Speak Up
If something seems questionable, take action. You should not engage in the behavior described below. However, you should encounter it or any other conduct that seems questionable, (1) scrutinize, (2) question, and/or (3) escalate, using the Company channel of your choice:

- Questionable Trades**
- Trading that coincides with a significant Company announcement or event;
 - For individuals subject to special requirements, trading outside of "quarterly window periods";

- Unintended Disclosures**
- Sharing detailed information with family members or friends about work assignments or projects; or
 - Discussing sensitive information in open or general access areas while at work, such as break rooms or hallways.

 Know Your Code

Question:
I work in a unit that supports the sales activity generated by one of our Company’s business partners – a well-known, publicly traded company. My team leader recently notified the unit, confidentially, that the business partner is modifying its product offerings and that our relationship with the company soon will end. I have contacted a few people in the industry to tell them the news and to see if they know anything more. I don’t do much in the stock market, so this shouldn’t create a problem, right?

Answer:
Wrong! The business partner’s modification of its product offerings may not yet be public knowledge and potentially could affect an investment choice about the company. It also may be competitively sensitive information. See the *Complying with Competition Laws* policy on page 27.

You should contact internal legal counsel, a compliance officer, or a Company ombudsperson to provide detailed information about the conversations that you have had with others about this topic and respond to any additional requests for information that our Company may have about your discussions. You should not discuss the matter further unless internal legal counsel advises you that you are permitted to do so.

Intellectual Property

What It Is

Intellectual property is the general term for legal rights that attach to ideas of the mind and is considered one of our Company's most valuable assets. It includes:

- **Patents:** the ownership right to a novel or non-obvious invention or advancement.
- **Trade secrets:** information that (a) is strictly protected (kept secret), such as proprietary processes, formulas, techniques etc. and (b) provides a competitive advantage;
- **Trademarks:** symbols, words, or phrases that indicate the source of a product or service and distinguishes it from others; and
- **Copyrights:** original works of authorship, such as marketing materials and unique software code.

Many of us have access to information that is not included in the definition of "intellectual property," but is still sensitive in nature and should be considered confidential. Confidential information includes all non-public information that might be useful to our competitors, or harmful to our Company or its customers, if disclosed. Customer data should also be considered confidential and disclosed only in strict compliance with applicable law and Company policy. (See the

Safeguarding Information policy on page 23 and the *Insider Trading and Stock Tipping* policy on page 28.)

Why It's Important

Intellectual property is one of the key drivers of our Company's competitive market position.

Our Company will establish, protect, maintain, and defend its rights in all commercially significant intellectual property and will exercise these rights in responsible ways. Likewise, our Company respects the valid intellectual property rights of others.

Unauthorized use of the intellectual property rights of others could potentially expose you and the Company to civil lawsuits as well as damages, fines, and criminal penalties.

Your Responsibilities

Protecting our Company's Intellectual Property: Take all necessary steps to safeguard our Company's intellectual property assets.

Protecting the Intellectual Property of Others: Respect valid patents, copyrighted materials, and the other protected intellectual property of others. Consult with internal legal counsel concerning necessary licenses or approvals to use the intellectual property rights of others.

New Inventions and Ideas: Understand your responsibilities to our Company regarding (1) new inventions and ideas that you may develop while a Company associate, and (2) other Company confidential information. Comply with the terms of the Proprietary Information and Innovations Agreement (PIIA). Consult with internal legal counsel if you have any questions about these responsibilities or about the PIIA associates must sign.

Protecting Confidential Information: Unless otherwise authorized or legally mandated, only disclose confidential information to those who have a legitimate business need to know. While you should exercise sound judgment to identify and protect confidential information, Company documents labeled "confidential" or "internal use only" or communications/information described as "confidential" or "internal use only" should generally not be disclosed. Never disclose proprietary or confidential information on social media sites. (See the *Safeguarding Information* policy on page 23 and the *Insider Trading and Stock Tipping* policy on page 28.)

Consultation with Internal Legal Counsel before:

- Soliciting, accepting, or using proprietary information of external parties, for example, former employers of any Company associate;

- Disclosing Company proprietary information to outsiders;
- Permitting external parties to use Company intellectual property;
- Entering into a contract that includes intellectual property terms and conditions; or
- Altering or changing the name of a product or service.

Company Trademarks: Comply with the guidelines for use of the Company primary trademarks and trade names available on the Company intranet.

Leader Responsibilities

Establish procedures and controls to ensure that new Company products, services, processes, and software are appropriately evaluated for possible infringement issues in a timely manner.

Identify and protect commercially significant Company intellectual property.

Where appropriate, require confidentiality/non-disclosure agreements to maintain the confidential nature of business initiatives, plans, or discussions.

Speak Up

If something seems questionable, take action. You should not engage in the behavior described below. However, should you encounter it or any other conduct that seems questionable, (1) scrutinize, (2) question, and/or (3) escalate, using the Company channel of your choice:

Inappropriate Disclosures

- Discussing our Company’s confidential proprietary information with customers or suppliers;
- Sharing proprietary or confidential information on social media sites;
- Introducing a new product or service, or altering/ changing the name of a product or service, before checking for potential patent or trademark issues;
- Introducing or disclosing information about a new product or service before patent applications have been filed or before a definitive decision is reached not to file a patent application;

Receiving Inappropriate Information

- Accepting proprietary information that belongs to a third-party, without first consulting internal legal counsel;
- Failing to put safeguards in place to prevent a new associate or contractor from inadvertently disclosing or using proprietary information belonging to a previous employer, particularly a competitor;
- Loading unlicensed software onto a Company computer (See the *Controllership* policy on page 32);

Acting Before Consulting with Internal Legal Counsel

- Submitting an outsider’s suggestion for a new product, product feature, service, or name for technical or leadership review, without first consulting with internal legal counsel; or
- Threatening anyone suspected of infringing any Company intellectual property, without first consulting with internal legal counsel.



Controllershship

What It Is

At its core, controllershship is a system of checks and balances that enables us to provide accurate and complete information about our operations and financial performance.

Controllershship includes three foundational components:

- **Rigorous business processes, systems, and internal controls** to (a) record and classify transactions and events accurately, (b) require sound economic and operational analyses (including a prudent consideration of risks) to inform business decisions, and (c) safeguard and optimally utilize our Company’s physical, financial, and intellectual assets.
- **High-quality financial reporting, disclosures, and communications** that provide all stakeholders with financial information that is accurate, complete, understandable, and unbiased; and
- **Preservation of required documents and records**, including all documents that are relevant to pending or reasonably foreseeable litigation, audits, or investigations.

Why It’s Important

Our credibility is on the line.

Our stockholders and our other constituents expect prudent management of our assets and affairs. They

rely on the information we provide to understand our Company’s results, decisions, plans, opportunities, and risks.

Our Company is committed to compliance with all applicable laws and regulations that govern the way we record, retain, and report financial and other information. In the end, it boils down to accountability, transparency, and trust.

Your Responsibilities

Standard Accounting Principles and Procedures: Follow our Company’s General Accounting Procedures, as well as all generally accepted accounting principles (GAAP) and other accounting standards, laws, and regulations applicable to accounting and financial reporting.

Documentation: Maintain complete and accurate records and accounts that reflect all transactions and events.

Notice and Reporting:

- Provide timely, candid forecasts and assessments to leadership.
- Report financial and non-financial information and operating metrics accurately and timely.

Sound Business Decisions: Conduct appropriate economic and operational analyses, that include prudent

consideration of risks, to make sound business decisions.

Asset Utilization and Protection: Adhere to controls to safeguard our Company’s physical, financial, and intellectual assets. (This includes limited personal use of Company equipment according to the terms identified in the applicable Company policies and procedures. Please be reminded that the Company will employ appropriate measures to safeguard its assets, including but not limited to access controls and electronic monitoring, in accordance with applicable law).

Document Management: Follow our Company’s applicable policies and procedures for record management and retention.

Document Preservation: Preserve documents and records that are relevant to pending or foreseeable litigation, audits, or investigations, and as directed by internal legal counsel.

Additional Responsibilities for Leaders

Adopt processes and controls that:

- Align with our Company's General Accounting Procedures, as well as all GAAP, other accounting standards, laws and regulations for accounting and financial reporting transactions; and
- Properly account for and protect Company assets.
- Manage the release or disclosure of financial information to parties outside of our Company.

Speak Up

If something seems questionable, take action. You should avoid the situations described below. However, should you encounter them or any other conduct that seems questionable, (1) scrutinize, (2) question, and/or escalate, using the Company channel of your choice:

Inaccuracy and Inconsistency

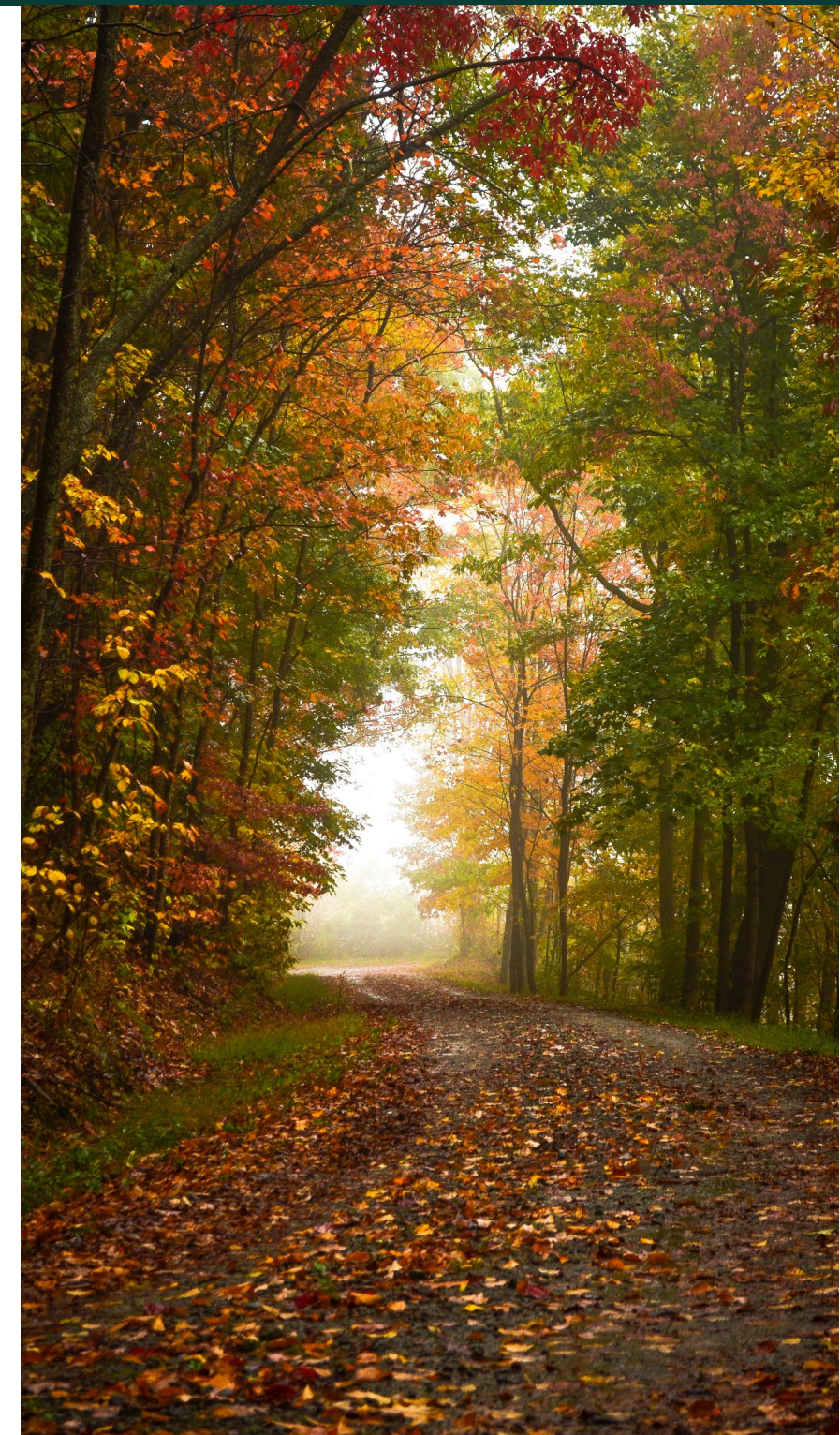
- Financial results that seem inconsistent with underlying performance;
- Inaccurate financial records, such as overstated travel expense reports, or erroneous time sheets or invoices;
- Transactions that are inconsistent with sound business economics;
- False, exaggerated, or misleading statements, whether oral or written (in email, reports, presentations, or other documents);
- Circumventing internal controls, such as review and approval procedures;

Inadequate Controls

- Absence of controls to protect assets from risk of loss;
- Underutilized physical assets or other resources that could be reallocated or eliminated;
- Inadequate procedures and controls at newly acquired businesses or at remote and/or minimally-staffed sites;

Careless Document Handling

- Inadequate procedures and controls to preserve documents (including email) for pending or reasonably foreseeable litigation, audits, and investigation; or
- Careless disposal of documents, without regard to what is being discarded or whether the documents are subject to any legal preservation requirement.



Supplier Relationships

What It Is

Our Company obtains goods and services from third parties, commonly referred to as suppliers.

Our Company will use only lawful, and fair practices in establishing and managing relationships with suppliers. We will not seek to gain an unfair advantage over anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other manner of unfair dealing.

Likewise, we expect our suppliers to adhere to applicable legal requirements in their business relationships, including those with their employees, their local communities, and with us.

Why It's Important

The selection of our suppliers and the management of these relationships are critically important to our business operations and require diligent oversight. Our suppliers often are integral to our ability to meet customer needs. We recognize that the quality of their products and services may well affect our own.

Your Responsibilities

Compliance: Comply with applicable laws and regulations governing supplier relationships. Only

consider engaging suppliers who also comply with applicable laws and regulations as well as the relevant aspects of any additional Company policy or standard.

Competitive Opportunity: Encourage competitive bidding and selection, which means considering a broad and diverse group of vendors when selecting suppliers.

Personal Relationships: Disclose the existence of a familial or personal relationship with anyone who is affiliated with an existing or potential supplier. (See the *Conflicts of Interest* policy on page 40).

Gifts or Favors: Do not accept gifts that exceed nominal value or any other improper personal benefit (either personally or through an intermediary) from a supplier, particularly if you are or could be in a position to influence Company business decisions related to them. (See the *Conflicts of Interest* policy on page 40) and other applicable Company policies.

Protecting Confidential/Proprietary Information: If confidential or proprietary information may be disclosed to or received from a supplier, partner with a sourcing representative or internal legal counsel to include adequate legal protections. (See the *Intellectual Property* policy on page 30).

Protecting Personally Identifiable Information: If our Company will need to disclose personally identifiable information to a supplier, obtain the appropriate business approval and then partner with a sourcing representative, internal legal counsel, a compliance officer, and/or a data security team member to (1) assess the supplier's security safeguards, and (2) include adequate legal protections. (See the *Safeguarding Information* policy on page 23).

Leader Responsibilities

Encourage associates to follow the Sourcing and Supplier Management Policy in dealings with suppliers.

Speak Up

If something seems questionable, take action. You should not engage in any of the behavior described below. However, should you encounter it or any other conduct that seems questionable, (1) scrutinize, (2) question, and/or (3) escalate, using the Company channel of your choice:

Bias in Decision-Making

- Supplier selection based on factors that do not promote the overall best value for our Company.
- Potential conflicts of interest in supplier selection, including (1) accepting gifts or other items of value in violation of Company policy, and (2) directing business to a supplier owned or managed by a relative or close friend (See the *Conflicts of Interest* policy on page 40).

Inappropriate Disclosures

- Disclosing personally identifiable information without appropriate business approval, due diligence, and/or other legal protections (See the *Safeguarding Information* policy on page 23);

Supplier Facilities

Watch for:

- Unsafe conditions in supplier facilities, or workers who appear to be underage or subject to coercion; or
- Apparent disregard for basic human rights and environmental standards in supplier facilities.



Every Decision. Every Day: In the Workplace

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Our collective ability to sustain our ethical foundation depends on the choice each associate makes to act with integrity in every decision, every day. The way we interact with each other in the workplace – both in the big moments and in the everyday interactions – forms the basis of our culture of compliance.

Our Interactions with Each Other

Fair Employment Practices: Equal Employment Opportunity

Conflicts of Interest

Fair Employment Practices: Equal Employment Opportunity

Our Company is an Equal Opportunity Employer.

This means that the Company provides equal access to employment opportunities for all applicants and associates in accordance with applicable federal, state, and local laws, without regard to race, color, national origin, religion, gender, age, disability, veteran status, genetic information, amnesty, status as a covered veteran, or any other characteristic protected by federal law, sexual orientation, gender identity, marital status, or any other characteristic protected by state law.

Discrimination on any of these bases is strictly prohibited.

Our Company prohibits workplace harassment, which is unwelcome verbal or physical conduct based on one of the protected categories listed above or behavior that (1) has the purpose or effect of unreasonably interfering with an individual's work performance, or (2) creates an intimidating, hostile, or offensive work environment.

Sexual harassment is a specific form of workplace harassment based on gender and includes, in addition to the conduct described above, unwelcome sexual advances or requests for sexual favors where (1) submission is either directly or indirectly a term or condition of obtaining or keeping employment, or (2) submission to or rejection of the conduct is the basis for employment-related decisions affecting the individual.

Our Company respects the privacy rights of associates by using, maintaining, and transferring personal data in the manner described in applicable Company policies and procedures related to data handling and security.

Note: Our Company reserves the right to monitor use of Company property and resources (for example, computers, electronic mail, instant messaging, phones, voice mail, proprietary information, etc.), in accordance with applicable law.

What It Is

We ask you to give your best every day — to colleagues, to customers and consumers, and to stockholders. In return, you should expect:

- Employment-related decisions at our Company to be based solely on relevant job qualifications (education, experience, knowledge etc.) and individual merit (achievements, performance, demonstrated competencies, conduct etc.);
- A respectful work environment, free of unlawful harassment or discrimination, and with respect for basic human rights; and
- Appropriate handling of your personal information.

Why It's Important

Because **YOU** are our most valuable asset.

Our Company is committed to observing all applicable labor and employment laws in every location where the Company has facilities, including those laws that pertain to freedom of association; privacy; collective bargaining; prohibition of forced, compulsory, and child labor; and employment discrimination. However, equally as important, we strive to create a work environment in which you can learn, grow, and feel valued.

We believe that our commitment to fair employment practices promotes a culture of inclusion, tolerance, and respect, qualities that are essential to both our success in the marketplace and our ability to impact the communities where we live and work.

Your Responsibilities

Employment-Related Decisions:

- Use relevant qualifications (for example, education, experience, or competencies), other job-related criteria, and individual merit (achievements, performance, demonstrated competencies, conduct etc.) as the sole basis for all employment-related decisions affecting associates and applicants.
- Make all employment-related decisions without regard to race, color, national origin, religion, gender, age, disability, veteran status, genetic information, amnesty, status as a covered veteran, or any other characteristic protected by federal law, sexual orientation, gender identity, marital status, or any other characteristic protected by state law.

Unlawful Harassment: Foster a work environment free from unlawful harassment.

Reporting Workplace Harassment (Complaint Procedures): Any associate who feels that she or he has been a victim of workplace harassment, including sexual harassment (or has reason to believe that someone else has been a victim of harassment), is required to report the concern immediately using one of several Company

channels including a manager, a human resources representative, a Company ombudsperson, or internal legal counsel — all without fear of reprisal.

Our Company will investigate these complaints promptly, thoroughly, and, to the fullest extent feasible, confidentially. All associates are required to be cooperative and truthful during Company investigations. Retaliation against any person for (1) raising a complaint of harassment based upon an honest perception of events, or (2) cooperating in the investigation of the complaint is strictly prohibited.

Associate Privacy: Safeguard associate personal data by adhering to all applicable Company policies and procedures related to data handling and security. (See the *Safeguarding Information* policy on page 23).

Conflicts with Customs: If a conflict arises between the requirements of this policy and the laws, customs, or practices of a particular area, consult with leadership and internal legal counsel to determine the most appropriate course of action.

Leader Responsibilities

Adopt processes and procedures to receive and resolve reports of unlawful harassment.

Take prompt remedial action in response to a finding of workplace harassment, as defined in this policy.

Speak Up

If something seems questionable, take action. You should not engage in the behavior described below. However, should you encounter it or any other conduct that seems questionable, (1) scrutinize, (2) question, and/or (3) escalate, using the Company channel of your choice:

Employment-Related Decisions

- Refusal to work or cooperate with a person based on his/her race, gender, religion, or any other protected characteristic;
- Unwelcome sexual advances directed toward an associate or person with whom you work;
- Jokes, pictures, or objects that ridicule or reasonably would offend individuals of a particular gender, race, ethnic group etc.;
- Retaliation or a threat of retaliation against any associate for reporting a concern or participating in the review of a concern; or

Associate Privacy

Unauthorized disclosure of employment data to a person who does not have a legitimate business need for the information.

Know Your Code

Question:

I have an interview for a new role in which I have had an interest for quite some time. However, my spouse and I are in the process of adopting a child, who we expect to bring home in the next six months. I plan to use all of the leave time available to me when the child arrives. I am nervous about telling the hiring manager about my adoption plans. What should I do?

Answer:

You should feel free to share this exciting news with the hiring manager. Your adoption plans will not be considered in evaluating your candidacy for the new job. Employment decisions at our Company are based on relevant qualifications and individual merit, not on any other inappropriate factor.



Conflicts of Interest

What It Is

Simply put, a conflict of interest occurs when your activities outside of work actually interfere or reasonably appear to interfere with either your Company responsibilities or the Company's interests. Any outside activity or interest that could affect your ability to perform your Company responsibilities objectively and effectively may create a conflict issue.

Examples include (1) use of Company time for personal endeavors, or (2) outside activities that potentially could influence your business judgment.

Actual or potential conflicts can emerge from several different kinds of activities – outside financial interests, familial/personal relationships, and personal enterprises, just to name a few.

Why It's Important

We each have an obligation to the Company to perform our job responsibilities effectively and to advance the Company's legitimate interests. None of your outside activities should reflect negatively on the Company or cause damage to the Company's reputation or good name.

Your Responsibilities

Disclosure: Disclose in writing any outside activities, financial interests, or relationships that may present a possible conflict of interest (or the appearance of a conflict) to your manager and business compliance officer, Company ombudsperson, or internal legal counsel.

(You should use the appropriate Conflict of Interest questionnaire).

Questionable Activities: Exercise good judgment in your personal affairs and avoid actions or relationships that potentially could (1) interfere or appear to interfere with your job responsibilities, or (2) compete or appear to compete with the Company's interests.

Company Assets: Use Company resources, intellectual property, time, and facilities (including office equipment, e-mail, and computer systems) appropriately — none of these should be used for personal gain. (See the *Intellectual Property* policy on page 30 and the *Controllership* policy on page 32.)

Gifts or Favors: Do not accept gifts that exceed nominal value or any other improper personal benefit (either

personally or through an intermediary) from a competitor, customer, or supplier, particularly if you are or could be in a position to influence the Company's business decisions related to them. (See the *Supplier Relationships* policy on page 34 and other applicable Company policies).

Corporate Opportunities: Do not take personal advantage of opportunities that (1) you discover by using the Company's property, information, or position, and (2) the Company potentially may have an interest in pursuing.

Approvals: Obtain approvals from your manager and local compliance officer before accepting any position as an officer or director of an outside business concern. Obtain approvals from your manager and local compliance officer before accepting a board position with a not-for profit entity, when there may be a Company business relationship with the entity, or an expectation of financial or other support from the Company.

Leader Responsibilities

Ensure that all potential conflicts are vetted and appropriately resolved when disclosed.

Speak Up

If Something Seems Questionable, Take Action. You should avoid the situations described below. However, should you encounter them or any other conduct that seems questionable, (1) scrutinize, (2) question, and/or escalate, using the Company channel of your choice:

Divergent Interests

- Holding or pursuing a financial interest in a company or initiative, when you are in a position to affect the Company’s business decisions related to that company or initiative.
- Taking a second job that interferes with your normal Company work hours or negatively affects your job performance;
- Using Company equipment or material in furtherance of your personal interests;
- Misusing Company resources, your position, or influence to promote or assist an outside business or not-for-profit activity;

Gifts or Favors

- Receiving gifts that exceed nominal value from competitors, customers, or suppliers while you are in a position to influence Company business decisions related to them;
- Receiving personal discounts or other benefits from competitors, customers, or suppliers that are not available to the general public or a Company peer;

Personal Relationships

- Directing business to a supplier that (1) is owned, (2) managed by, or (3) employs a family member or close friend.
- Supervising or influencing employment decisions (for example, hire, promotion, or compensation) related to a family member or close personal friend; or
- Engaging in personal relationships that may appear to interfere with your Company responsibilities or compromise the Company’s interests.

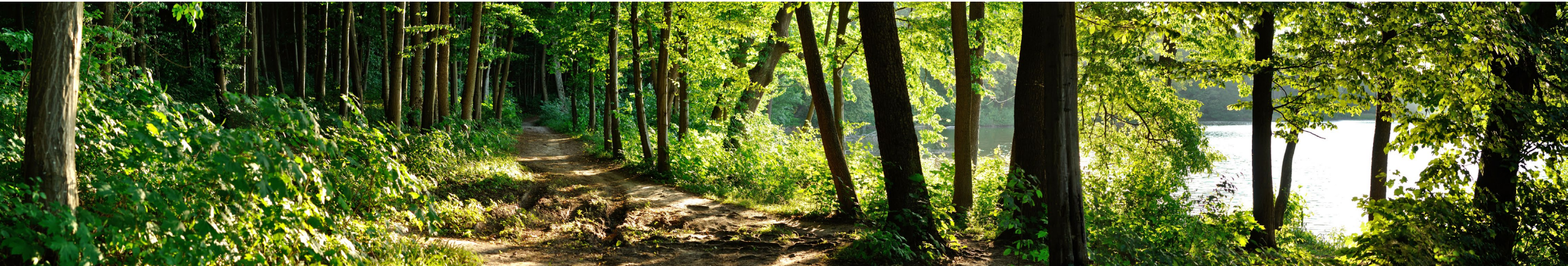
 Know Your Code

Question:

You need to engage a temporary resource to manage a three-month project. Your spouse is a relationship manager at a staffing company that the Company frequently uses. Should you work directly with your spouse to address your Company resource need?

Answer:

No. You should follow the normal Human Resources processes to secure temporary resources. Working directly with your spouse, under these circumstances, is an actual conflict of interest. Moreover, you should disclose that your spouse works for a staffing company that is a Company supplier.



Concluding Thoughts

Integrity First is the core of our ethical foundation. We hope this document gives you the information you need to feel empowered to understand, to inquire, and to act.

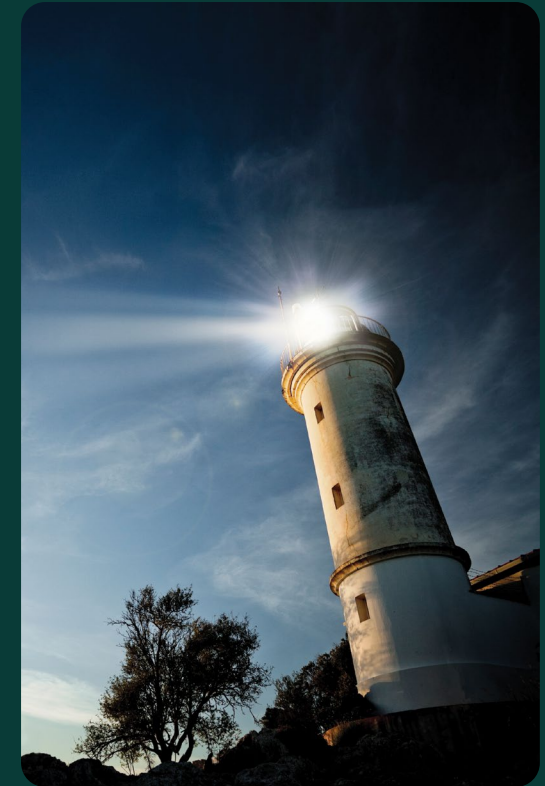
Our Company has several different channels available to respond to your questions and hear your concerns.

If you encounter or become aware of a situation that does not seem right, you should attempt to assess the issue reasonably and ask questions to clarify. However, you should not hesitate to report the concern through one of the available Company channels if you remain uneasy.

Remember, there is no substitute for common sense and good judgment. Apply both to every decision every day.

We are counting on you.

Integrity First: Every Decision. Every Day.



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