



Third Party Code of Conduct

Globe Life Inc., along with its subsidiaries and affiliates (collectively “Globe Life” or “Company”), is committed to ensuring that its business is conducted with integrity and in accordance with the highest ethical standards and in full compliance with all applicable laws and regulations in the United States (U.S.) and in other jurisdictions in which Globe Life operates or conducts business. Globe Life is committed to maintaining a business atmosphere and working environment based on honesty, fair dealing and sound business ethics.

The Globe Life Third Party Code of Conduct (“the Code”) applies to all suppliers/vendors doing business with Globe Life (“Third Parties”, or “Third Party”, as the context so requires). The Code is being furnished to Third Parties to provide an understanding of the standards of integrity and business conduct that Globe Life expects every Third Party to uphold and follow. Third Parties are expected to communicate this Code to their representatives who provide products or services in support of Globe Life’s business operations.

Globe Life may take appropriate actions with respect to any Third Party who violates, or is suspected of violating, this Code, including the termination of business relationships with the Third Party subject to the applicable terms of any contractual agreement(s) between Globe Life and such Third Party. The obligations in this Code are in addition to any obligations set forth in any such agreement(s) between Globe Life and the Third Party, as well as the internal Code of Conduct of such Third Party, as applicable.

Standards and Expectations

A. Legal and Regulatory Compliance

Globe Life expects all Third Parties to conduct business in full compliance with applicable laws and regulations, including but not limited to the following:

1. Economic Sanctions, Anti-boycott, Export Controls:
 - a. Comply with all applicable U.S. and international economic sanctions laws and regulations.
 - b. Never conduct business with individuals, entities, organizations or countries that are the targets of U.S. economic sanctions laws and regulations or other applicable economic sanctions laws and regulations.
 - c. Never participate in any boycott or restrictive trade practice, unless such boycott is endorsed by the U.S. Government.
2. Antitrust and Competition Law:
 - a. Comply with all applicable U.S. and international antitrust and competition laws and regulations.
 - b. Compete lawfully in all markets in which the Third Party operates.
 - c. Obtain sensitive data about competitors only from lawful and appropriate sources.
 - d. Never discuss prices, bids, customer sales, market allocation, or other competitively sensitive information with any competitor.
 - e. All marketing communications to customers should fairly and accurately represent the products or services the Third Party provides.
3. Anti-Money Laundering:
 - a. Comply with all applicable U.S. and international laws and regulations pertaining to the detection, prevention, and reporting of potential money laundering and terrorist financing activities.
4. Anti-Corruption:
 - a. Comply with all applicable U.S. and international anti-corruption laws, including the Foreign Corrupt Practices Act of 1977 ("FCPA"), and all other applicable laws that prohibit corruption, extortion, kickbacks, or bribery.
 - b. Never pay bribes or provide other improper benefits to any person to obtain or retain business or secure a business advantage.
 - c. Never promise, offer, or authorize the payment of money or anything of value to a government official in order to obtain or retain business or secure a business advantage.
 - d. Maintain books and records that accurately reflect the true nature of transactions.
5. Data Privacy and Security:
 - a. Comply with all applicable U.S. and international privacy and data protection laws and regulations, including laws and regulations regarding the cross-border transfer of non-public information.

- b. Maintain appropriate procedures, safeguards and controls to secure and protect the confidentiality, availability, and integrity of all non-public information received from, or processed on behalf of Globe Life.
- c. Notify Globe Life promptly if any non-public information received from or processed on behalf of Globe Life is compromised.
- d. Notify Globe Life promptly of any complaints or requests received from individuals relating to non-public information received from or processed on behalf of Globe Life.

B. Insider Trading

Third Parties who are furnished or otherwise obtain access to Globe Life's confidential information are not permitted to use or share such information for stock trading purposes or for any other purpose except in furtherance of the business relationship(s) between Globe Life and such Third Parties. All non-public information about the Company should be considered confidential information.

C. Human Rights

Globe Life is committed to an inclusive culture that values the contributions of each of its employees. Maintaining a fair, diverse, healthy, and safe workplace helps to ensure that employees remain engaged and productive. Third Parties are expected to promote a similar culture and must observe all applicable labor and employment laws (the list below is not an exhaustive list).

- **Child Labor.** As defined by the International Labor Organization (ILO), child labor is any "work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development¹." Third Parties must follow applicable child labor laws.
- **Forced Labor.** Forced Labor is "all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily²." Third Parties must not participate in forced or slave labor or human trafficking.
- **Harassment.** Third Parties should treat employees fairly and create a workplace culture where employees feel comfortable and safe.
- **Discrimination.** Third Parties should treat their workers with respect and dignity and comply with applicable laws regarding discrimination in hiring and employment practices. Third Parties should maintain a workplace free from discrimination based on one's race, sex, marital status, age, color, religion, creed, national origin, physical, sensory or mental disability, veteran status, sexual orientation, gender identity, gender expression, or other protected status or characteristic protected by law.

¹ International Labour Organization, International Programme on the Elimination of Child Labour (IPEC), What is Child Labour, n.d. <http://www.ilo.org/ipec/facts/lang--en/index.htm>, October 31, 2019

² International Labour Organization, ILO Forced Labour Convention, 1930 (No. 29), <https://www.ilo.org/global/topics/forced-labour/definition/lang--en/index.htm>, October 31, 2019

- **Compensation and Work Hours.** Third Parties must comply with local wage and working hour laws. No employee shall receive wages below the legal minimum.
- **Freedom of Association and Collective Bargaining.** Third Parties should acknowledge and respect the rights of employees to freedom of association and collective bargaining, to the extent required by law.
- **Health and Safety.** Third Parties should proactively develop and maintain a healthy and safe workplace for employees.

D. Ethics

- **Competition and Fair Dealing.** In its dealings with Globe Life, Third Parties should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice.
- **Gifts.** Globe Life believes that giving and/or receiving business-related gifts is not appropriate if doing so creates, or appears to create, an obligation or bias, or if the gift is given with the intent to influence a business decision. We ask Third Parties to help us maintain our integrity by not offering gifts to Globe Life employees unless it: (1) is not a cash gift, (2) is consistent with customary business practices, (3) is not excessive in value, (4) cannot be construed as a bribe or payoff, and (5) does not violate any laws or regulations.
- **Bribery.** It is our position that bribes, kickbacks, and other similar payments are unacceptable practices. Globe Life prohibits these payments in all circumstances.
- **Conflicts of Interest.** Third Parties should not enter into any business relationship that represents a conflict of interest with its obligations set forth in the Third Party agreement entered into with Globe Life.

E. Monitoring and Reporting

The Code should be made readily available to all representatives of the Third Party who provide products or services in support of Globe Life's business operations. Third Parties should monitor their own operations and maintain documentation indicating compliance with this Code.

If you are aware of an event or action that could in any way be a violation of law or this Code, the violation may be confidentially reported to Globe Life using our toll-free number 877-854-0033, which is monitored by an independent third-party reporting service.