

Anti-Bribery and Corruption Policy

Version 2.0

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1.0 Glossary

Anti-Bribery and Corruption Glossary	
Term	Definitions
Bribe(s)/Bribery	Refers to the offering, giving, soliciting, or receiving of any item of value as a means of influencing the actions of an individual holding a public or legal duty.
Corrupt/Corruption	Involves a breach of public trust and/or abuse of position by federal, state, or local officials and their private sector accomplices. By broad definition, a government official, whether elected, appointed or hired, may violate federal law when he/she asks, demands, solicits, accepts, or agrees to receive anything of value in return for being influenced in the performance of their official duties.
Domestic Concern(s)	Any individual who is a citizen, national, or resident of the United States, or any corporation, partnership, association, joint-stock company, business trust, unincorporated organization, or sole proprietorship that is organized under the laws of the United States or its states, territories, possessions, or commonwealths or that has its principal place of business in the United States.
Foreign Official(s)	Any officer or employee of a foreign government or any department, agency, or instrumentality thereof, or of a public international organization, or any person acting in an official capacity for or on behalf of any such government or department, agency, or instrumentality, or for or on behalf of any such public international organization.
Gift(s)	Voluntary transfer of a benefit without the need for any compensation. Includes but is not limited to invitations given or received to social functions, sporting events, meals and entertainment, or customary tokens of appreciation.
Intermediary(ies)	An individual or group who is engaged to negotiate a matter between two parties and who is considered to represent either or both such parties, as applicable. Examples include but are not limited to agents, distributors, consultants, sales representatives, implementation partners, and sales partners.
Issuer(s)	Any company with a class of securities listed on a national securities exchange in the United States, or any company with a class of securities quoted in the over-the-counter market in the United States and required to file periodic reports with SEC.
Kickback(s)	Refers to a misappropriation of funds that enriches a person of power or influence who uses the power or influence to make a different individual, organization, or company richer. Often, kickbacks result from a corrupt bidding scheme.
Public Official(s)	Officials or employees of any government or other public body, agency or legal entity, at any level, including officers or employees of state-owned enterprises and officers or employees of enterprises which are mandated by a public body or a state-owned enterprise to administer public functions.
Shall	Indicates a control that is mandatory for implementation and is to be followed in order to comply with a given Compliance policy or standards; similar to a “must” statement.
Should	Indicates a control that is a recommended best practice where applicable and within reasonable constraints but is not currently mandatory.
Team Member(s)	Employees, third party vendors, and contractors.
Third Party(ies)	An individual or entity that provides services to the Company and maintains, processes, or otherwise is permitted access to Company information through its provision of services to the Company.

2.0 Overview

The U.S. Foreign Corrupt Practices Act of 1977 (the “FCPA”) was enacted in response to revelations of widespread Bribery of Foreign Officials by U.S. companies with the intent of halting Corrupt practices, creating a level playing field for businesses, and restoring public confidence in the integrity of the marketplace. The FCPA applies to payments, offers, or promises made for the purpose of: (i) influencing any act or decision of a foreign official in his official capacity, (ii) inducing a foreign official to do or omit to do any act in violation of the lawful duty of such official, (iii) securing any improper advantage; or (iv) inducing a foreign official to use his influence with a foreign government or instrumentality thereof to affect or influence any act or decision of such government or instrumentality. The FCPA’s anti-bribery provision applies to three categories: (1) Issuers and their officers, directors, employees, agents, and shareholders; (2) Domestic Concerns and their officers, directors, employees, agents, and shareholders; and (3) certain persons and entities, other than Issuers and Domestic Concerns, acting while in the territory of the United States. The U.S. Department of Justice (“DOJ”) and the U.S. Securities & Exchange Commission (“SEC”) enforce the FCPA.

Globe Life Inc. is considered an Issuer under the FCPA and its subsidiary companies are considered Domestic Concerns under the FCPA.

As a result, Globe Life Inc. and its subsidiary companies (collectively the “Company”) are required to comply with the FCPA’s anti-bribery provisions and accounting provisions, which include:

- The prohibition of Bribery to Foreign Officials and
- Making and keeping accurate and complete books, records and accounts, and maintaining a system of adequate internal accounting controls.

Please contact the office of the Chief Compliance Officer at askcompliance@globe.life if you have any questions regarding this policy.

3.0 Purpose

This document formalizes the Company’s policy to prohibit Bribery and other improper payments in the course of the Company’s business operations and to provide Team Members guidance and inform them of their responsibilities to uphold the Company’s prohibition against Bribery and Corruption.

4.0 Scope

All Team Members are subject to this policy unless explicitly stated otherwise.

5.0 Anti-Bribery and Corruption Policy

This policy is intended to principally align with the regulatory requirements set forth in Appendix A.

5.1 General Prohibition

The Company Shall prohibit all forms of Bribery or Corruption in all of its business activities. This prohibition applies to all business activities, anywhere in the world. A Bribe or other improper payment

to secure a business advantage is never acceptable and can expose individuals and the Company to possible criminal prosecution, reputational harm and/or other serious consequences.

Improper payments prohibited by this policy include but are not limited to receiving or giving Bribes, Kickbacks, excessive Gifts or entertainment, or any other payment made or offered to obtain an undue business advantage. These payments Should not be confused with reasonable and limited expenditures for Gifts, business entertainment and other legitimate activities directly related to the conduct of the Company's business. Please refer to Section 4.13.3 Acceptance of Gifts in the Globe Life Employee Handbook and the Globe Life Inc. Code of Business Conduct and Ethics for further details.

5.2 Prohibited Payments

The Company prohibits offering, promising, or giving "anything of value" to a Third Party, Intermediary, Public Official, Foreign Official, any foreign political party or official thereof, or any candidate for foreign political office to gain an improper business advantage in order to influence the foreign official in his or her official capacity, induce the foreign official to do or omit to do an act in violation of his or her lawful duty, or to secure any improper advantage in order to assist in obtaining or retaining business for or with, or directing business to, any person. The FCPA broadly applies to corrupt payments to "any" officer or employee of a foreign government and to those acting on the foreign government's behalf thus covers corrupt payments to low-ranking employees and high-level officials alike. In addition to cash payments, "anything of value" may include:

- Gifts, entertainment or other business promotional activities;
 - Covering or reimbursing a Public or Foreign Official's expenses;
 - Offers of employment or other benefits to a family member or friend of a Public or Foreign Official;
 - Political party and candidate contributions; or
 - Charitable donations and sponsorships.
- a) Other less obvious items provided to a Foreign Official can also violate anti-bribery laws. Examples include in-kind contributions, investment opportunities, stock options or positions in joint ventures, and favorable or steered subcontracts. The prohibition applies whether an item would benefit the Public or Foreign Official directly or, indirectly such as a family member, friend or business associate to a foreign official.
- b) The FCPA expressly prohibits Corrupt payments made through Third Parties or Intermediaries because it may cover payments made to any person, while knowing that all or a portion of such money or thing of value will be offered, given, or promised, directly or indirectly to a Foreign Official. Common suspected violations associated with Third Parties or Intermediaries include:
- Excessive commissions to Third Party agents or consultants;
 - Unreasonably large discounts to Third Party distributors;
 - Third Party "consulting agreements" that include only vaguely described services;
 - The Third Party consultant is in a different line of business than that for which it has been engaged;
 - The Third Party is related to or closely associated with the Foreign Official;

- The Third Party became part of the transaction at the express request or insistence of the Foreign Official;
- The Third Party is merely a shell company incorporated in an offshore jurisdiction; or
- The Third Party requests payment to offshore bank accounts.

5.3 Responsibilities of Team Members

- a) The Company or any Team Members can be held liable for improper payments by a Third Party or other Intermediary if there is actual knowledge or reason to know that a Bribe will be paid. Willful ignorance – which includes not making reasonable inquiry when there are suspicious circumstances – is not a defense, regardless whether the Intermediary is itself subject to anti-bribery laws.
- b) Each Team Member of the Company has a personal responsibility and obligation to conduct the Company’s business activities ethically and in compliance with applicable laws, based on the countries where the Company conducts business.
- c) Under federal law, individuals or companies that aid or abet a crime, including an FCPA violation, are as guilty as if they had directly committed the offense themselves. The aiding and abetting statute provides that whoever “commits an offense against the United States or aids, abets, counsels, commands, induces or procures its commission,” or “willfully causes an act to be done which if directly performed by him or another would be an offense against the United States,” is punishable as a principal.

As a first line of defense, all Team Members have an obligation to:

- Be familiar with applicable aspects of this policy and communicate them to subordinates;
 - Ask questions if this policy or action required to take in a particular situation is unclear;
 - Properly manage and monitor business activities conducted through Third Parties;
 - Be alert to indications or evidence of possible wrongdoing; and
 - Promptly report violations or suspected violations to askcompliance@Globe.Life.
- d) Procurement personnel Should monitor Third Party business agreements to ensure that the Company is not engaged in any improper payment or business activity.

5.4 Record-Keeping, Accounting, and Internal Controls

The Company is required to establish effective accounting controls over all of its business transactions. This Sarbanes-Oxley Act requirement is satisfied by devising and maintaining a system of internal accounting controls detailed below.

- a) The Company Shall make and keep books, records, and accounts that, in reasonable detail, accurately and fairly reflect the Company’s transactions and dispositions of the Company’s assets. These requirements are implemented through the Company’s standard accounting practices and procedures, which include but are not limited to:
 - Compliance with the accounting requirements of Section 802 of Sarbanes-Oxley Act, which prohibits altering, destroying, mutilating, concealing, or falsifying records, documents, or tangible objects with the intent to obstruct, impede, or influence a

potential or actual federal investigation. This section also prohibits any accountant from knowingly and willfully violating the requirement that all audit or review papers be maintained for a period of five years.

- Exercising special care when transactions may involve payments to Foreign Officials.
 - Off-the-books accounts Shall never be used. Requests for false invoices or payment of expenses that are unusual, excessive or inadequately described must be rejected and promptly reported.
- b) The Company Shall maintain a system of internal accounting controls sufficient to assure management’s control, authority, and responsibility over the Company’s assets, which may include:
- Preparation of financial statements in conformity with generally accepted accounting principles or any other criteria applicable to such statements, and maintaining accountability for assets;
 - Access to assets is permitted only in accordance with management’s general or specific authorization; and
 - Recorded accountability for assets is compared with the existing assets at reasonable intervals and appropriate action is taken with respect to any differences.

6.0 Non-Compliance

Retaliation in any form against a Team Member who has, in good faith, reported a violation or possible violation of this policy is strictly prohibited. Team Members who violate this policy may be subject to disciplinary action, up to and including dismissal of employment and/or contractual agreement. Violations can also result in prosecution by law enforcement authorities and serious criminal and civil penalties. To seek additional guidance and/or report any concerns, you may contact askcompliance@Globe.Life.

7.0 Compliance Oversight

Compliance with this policy is overseen by:

- Regulatory Compliance – through development, governance, and management of the Company’s Anti-Bribery and Corruption Program.
- Internal Audit (IA) – through audits and compliance testing.
- Human Resources (HR) – through ensuring acknowledgment of all job-relevant policies during the hiring, onboarding, and termination (voluntary or involuntary) of all Team Members.
- Legal – through the rendering of legal advice related hereto.

8.0 Version History

Effective Date: 1/1/2020 - Version 2.0				
Version	Date	Authored by:	Reviewed by:	Description of Revisions
1.0	1/1/2020	Regulatory Compliance	Regulatory Compliance	Adopted policy
2.0	5/6/2022	Regulatory Compliance	Regulatory Compliance	Included additional information regarding FCPA applicability, improper business advantage, corrupt payments, aiding and abetting, and willful acts; consolidated the team member responsibilities into the section titled, Team Member Responsibilities; changed the word from should to shall regarding keeping off-the-books accounts, and updated the New Zealand Regulatory requirement to the New Zealand Crimes Act of 1961

Appendix A Regulatory Requirements

The Company's Anti-Bribery and Corruption Policy is written to principally align with the following statutory and regulatory requirements and guidance:

- US: Foreign Corrupt Practices Act
- Canada: Corruption of Foreign Public Officials Act
- New Zealand: Crimes Act of 1961