Globe Life Inc.

Code of Business Conduct and Ethics

Message from the Co-Chairmen and Chief Executive Officers

As each of us works to meet individual and company-wide business goals here at Globe Life, we must all ensure that the work we perform and the business each of us conducts is done with integrity and in accordance with the highest ethical standards. Globe Life Inc. and its subsidiaries (the Company) are committed to maintaining a business atmosphere and working environment based on honesty, fair dealing and sound business ethics.

This Code of Conduct expresses the standards of integrity and business conduct that every Company employee, contractor, officer and director must uphold and follow. The Code is being provided to you to help you understand what the Company expects of you and should be read carefully. While this Code cannot address all questionable situations, it provides procedures for you to obtain guidance from your supervisors or the Legal Department.

Adherence to honesty and integrity in all our actions will only further enhance the Company's good business reputation and result in benefit to you, the Company, its policyholders and shareholders.

J. Matthew Darden and Frank M. Svoboda
Co-Chairmen and Chief Executive Officers

Table of Contents

Introduction	1
Compliance with Laws, Rules and Regulations	1
Conflicts of Interest	1
Insider Trading	2
Prediction Market and Event Contracts	3
Corporate Disclosure	3
Corporate Opportunities	4
Competition and Fair Dealing	4
Equal Opportunity	4
Health and Safety	5
Public Company Reporting	5
Record-Keeping	5
Confidentiality	6
Protection and Proper Use of Company Assets	6
Payments to Government Personnel	6
Reporting Illegal or Unethical Behavior; Non-Retaliation	7
Escalation of Potentially Material Ethical Complaints or Concerns	7
Amendment, Modification and Waiver of the Code	8
Compliance Procedures	8

This Code of Business Conduct and Ethics sets out the guiding principles by which we operate Globe Life Inc. and its subsidiaries (the "Company") and conduct our daily business with our shareholders, policyholders, suppliers, regulatory authorities and with each other. These principles apply to all of the directors, officers, employees and contractors of the Company. Accordingly, this Code has been formally adopted by the Boards of Directors of Globe Life Inc. and each of its principal insurance subsidiaries.

While this Code covers a wide range of business practices and procedures, it does not include all of the policies and procedures of the Company. It does not cover every issue that may arise, but sets out basic principles to guide all employees, officers, directors and contractors of the Company in making sound judgments regarding compliance with the law and ethical business conduct.

It is your responsibility to carefully read this Code and conduct yourself in accordance with it. You should seek to avoid even the appearance of improper behavior. If a law conflicts with a policy in this Code, you must comply with the law. You should seek guidance from your supervisor or the Legal Department if you have any questions about this Code or about a situation in which you are unsure about how to proceed.

Additionally, if you are aware of an event or action that could in any way be a violation of law or this Code, it is your responsibility to report it immediately to your supervisor or the General Counsel or other appropriate contact in the Company's Legal Department. You may also report a potential violation by using a toll-free number (1-877-854-0033) which is monitored by an independent third-party reporting service. The Company will investigate the reported violation. Anyone who in good faith reports a possible violation of law, this Code or Company policies will be protected from retaliation. Violations of this Code, including retaliation against any person who reports a suspected illegal or improper action, will constitute grounds for corrective action, up to and including termination.

1. Compliance with Laws, Rules and Regulations

All directors, officers, employees and contractors of the Company are expected to understand, respect and comply, in letter and spirit, with all of the laws, rules and regulations that apply to them in their respective positions at the Company. Although such persons are not expected to have detailed knowledge of each of these laws, rules and regulations, it is important to know enough to determine when to seek additional information, training or advice from supervisors, managers and other appropriate personnel.

2. Conflicts of Interest

All directors, officers, employees and contractors of the Company should be scrupulous in avoiding any action or interest that conflicts or gives the appearance of a conflict with the Company's interests. A "conflict of interest" exists whenever an individual's private interests interfere or conflict in any way (or even appear to interfere or conflict) with the interests of the Company. A conflict situation can arise when an employee, officer, director or contractor takes actions or has interests that may make it difficult to perform his or her work for the Company objectively and effectively. Conflicts

of interest may also arise when a director, officer, employee or contractor or member of his or her family receives improper personal benefits as a result of his or her position with the Company, whether from a third party or from the Company. It is almost always a conflict of interest for Company personnel to work simultaneously for a competitor, customer or service provider. You are not allowed to work for a competitor as a consultant or board member. It is best to avoid any direct or indirect business connection with our customers, service providers or competitors except on the Company's behalf.

Conflicts of interest are prohibited as a matter of Company policy, except under guidelines approved via a resolution adopted by the Globe Life Inc. Board of Directors. These guidelines also have been separately adopted by the Boards of Directors of Globe Life Inc.'s insurance subsidiaries. Pursuant to that resolution, annually all directors, officers and certain key personnel of Globe Life Inc. and its subsidiaries will complete and submit a Conflict of Interest Questionnaire.

Conflicts of interest may not always be clear-cut, so if you have a question you should obtain a copy of the Board resolution from the Legal Department and/or consult with management or the Company's Legal Department. Any employee, officer, director or contractor who becomes aware of a conflict or potential conflict should bring it to the attention of the Legal Department, a supervisor, manager, or other appropriate personnel. Notwithstanding the foregoing, if a conflict arises by virtue of the permitted representation of an unaffiliated insurer or insurance agency by a non-captive insurance agent appointed by one or more of Globe Life Inc.'s insurance subsidiaries, these conflict of interest prohibitions shall not apply.

3. Insider Trading

Directors, officers, employees and contractors and any persons residing with any such person or whose transactions in Company securities are directed by such person (collectively, "Covered Persons") are not permitted to engage in any transactions in the Company's securities while in possession of "Material Nonpublic Information" or tip Material Nonpublic Information to others who may trade in the Company's securities. Material Nonpublic Information generally means information that a reasonable investor would consider important in making a decision to purchase, hold, or sell securities that has not been widely disseminated to the marketplace (e.g., by press release, webcast conference or a filing with the Securities and Exchange Commission). To use Material Nonpublic Information for personal financial benefit or to "tip" others who might make an investment decision on the basis of this information is not only unethical but also illegal.

In order to assist with compliance with laws against insider trading, the Company has adopted a separate policy governing trading in securities of Globe Life Inc. that is applicable to all directors, officers, employees and contractors of the Company (the "Insider Trading Policy"). If you have any questions concerning this policy, you should contact either the General Counsel or the Corporate Secretary.

The following is a summary of certain terms of the Insider Trading Policy. Please review the Insider Trading Policy in full prior to engaging in any transactions in Company securities.

(a) Covered Persons who are aware of Material Nonpublic Information may not engage in any transactions in Company Securities during any period commencing on the date such person first possesses the Material Nonpublic Information and ending on the earlier of (a) the beginning of the second market trading day after the public disclosure of that Material Nonpublic Information or (b) such time as that Material Nonpublic Information is no longer material.

(b) Covered Persons also may not engage in transactions in another company's securities while in possession of Material Nonpublic Information concerning that company when that information was obtained in the course of employment with, or the performance of services on behalf of, the Company.

(c) In addition, Covered Persons may not disclose any Material Nonpublic Information concerning the Company with others or recommend to anyone the purchase or sale of Globe Life Securities when in possession of Material Nonpublic Information relating to the Company.

(d) The policy prohibits short sales and pledging or hedging of the Company's securities.

(e) Specific additional legal restrictions such as trading only during certain windows, refraining from trading when notified by the Company, and obtaining mandatory preclearance of any transaction in Company Securities apply to directors and certain officers and other persons specially designated by the Company, who have been notified by the Company.

4. Prediction Market and Event Contracts

Prediction Markets are online platforms where people can bet on the outcome of future real-world events, such as sports, elections, and corporate announcements or results. Covered Persons are not permitted to engage in trading or other activity involving prediction markets contracts, event contracts, binary options or similar instruments that is based on, references, or is reasonably expected to be influenced by the Company's operations, financial results, guidance, capitalization, dividends, stock price performance, or any other event, outcome, or contingency primarily related to the Company's business, operations, or prospects. Additionally, this prohibition relates to prediction market contracts, event contracts, binary options, or similar instruments relating to customers, suppliers, competitors, counterparties, regulators, or other third parties where the Covered Person obtained information relating to the subject of the prediction market contract or event contract through their role with the Company.

This prohibition is absolute and applies regardless of whether the Covered Person has Material Nonpublic Information.

5. Corporate Disclosure

Only authorized spokespersons are permitted to disclose material information and to speak on behalf of the Company. If you are contacted by the media, investment analysts, stockbrokers, or anyone looking for any information about the Company, do not engage in any way. Immediately forward any contact, correspondence or information to the Executive Vice President and Chief Marketing Officer or their designee.

If you mistakenly disclose or if you discover that someone else has disclosed material nonpublic information about the Company, you must immediately contact the General Counsel.

6. Corporate Opportunities

Employees, officers, directors and contractors are prohibited from taking for themselves personally opportunities that are discovered through the use of corporate property, information or position without the consent of the Board of Directors. No employee, officer, director or contractor may use corporate property, information, or position for personal gain, and no employee, officer, director or captive insurance agent may compete with the Company directly or indirectly. Employees, officers, directors and contractors owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.

7. Competition and Fair Dealing

We seek to outperform our competition fairly and honestly. The Company seeks competitive advantages through superior performance, never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited. You should endeavor to respect the rights of and deal fairly with the Company's customers, suppliers, competitors, employees and contractors. You 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.

Business entertainment and gifts in a work-related setting should only be used to create good will and sound working relationships, not to gain an unfair advantage over actual or potential competitors or with customers or suppliers. No gift or entertainment should ever be offered, given, provided or accepted by any Company employee, family member of an employee or agent unless it: (i) is not a cash gift, (ii) is consistent with customary business practices, (iii) is not excessive in value, (iv) cannot be construed as a bribe or payoff and (v) does not violate any laws or regulations. Please discuss with your supervisor or the Legal Department any gifts or proposed gifts to be given or received which you are not certain are appropriate.

8. Equal Opportunity

The Company has a policy of equal opportunity free from discrimination because of 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. The Company is morally and legally committed to giving all persons equal opportunities based solely on their individual qualifications and the valid requirements of the position. The Company is committed to providing an inclusive and welcoming environment for all members of our community and to ensuring that employment, promotion and workplace advancement decisions are based on the individual's abilities and qualifications. This policy ensures that only relevant factors are considered and that equitable and consistent standards of conduct and

performance are applied.

9. Health and Safety

The Company strives to provide a safe and healthy work environment. Each of us has a responsibility to help maintain a safe and healthy workplace for everyone by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions.

Violence and threatening behavior are not permitted. You should report to work in condition to perform your duties, free from the influence of illegal drugs or alcohol. The use of illegal drugs in the workplace will not be tolerated.

10. Public Company Reporting

As a public company, it is of critical importance that Globe Life Inc.'s filings with the Securities and Exchange Commission be accurate and timely. Depending on your position with the Company, as an employee, officer, director or contractor, you may be called upon to provide necessary information to assure that Globe Life Inc.'s public reports are complete, fair and understandable. The Company expects employees, officers, directors and contractors to take this responsibility very seriously and to provide prompt accurate answers to inquiries related to Globe Life Inc.'s public disclosure requirements. The Company will not permit its employees, officers, directors or contractors to improperly influence the audit process or the accuracy of its financial statements, which are part of Globe Life Inc.'s public reports.

11. Record-Keeping

The Company requires honest and accurate recording and reporting of all information in order to make responsible business decisions. For example, only the true and actual number of hours worked should be reported for compensation purposes and use of business expense accounts should be documented and recorded accurately.

All of the Company's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the Company's transactions and must conform both to applicable legal requirements and to the Company's system of internal controls. Unrecorded or "off the books" funds or assets should not be maintained unless permitted by applicable law or regulation.

Business records and communications often become public, and you should avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that can be misunderstood. This applies equally to email, internal memos, and formal reports. Records should always be retained or destroyed according to the Company's record retention policies. Notwithstanding anything to the contrary herein, records may be required to be retained as a result of litigation or governmental investigation. Should you have any questions, please consult with the Company's Legal Department.

12. Confidentiality

Directors, officers, employees and contractors must maintain the confidentiality of confidential information entrusted to them by the Company or its suppliers or customers, except when disclosure is specifically authorized by the Legal Department or required by laws, regulations or legal proceedings. Confidential information includes all non-public information that might be of use to our competitors or harmful to the Company, its customers or personnel, if disclosed. It also includes information that suppliers and customers have entrusted to us.

Notwithstanding the foregoing, nothing herein shall prohibit a director, officer, employee or contractor of the Company from reporting possible violations of federal law or regulation to any governmental agency or entity or making other disclosures that are protected pursuant to federal law or regulation. Prior authorization from the Legal Department is not required in order to make any such reports or disclosures and the reporting individual is not required to notify the Company that such reports or disclosures have been made.

IMMUNITY NOTICE. Pursuant to the Defend Trade Secrets Act of 2016, an individual may not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that is made in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney; and solely for the purpose of reporting or investigating a suspected violation of the law; or is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal. Should any provision in this Code of Business Conduct and Ethics conflict with this provision, this provision shall control.

13. Protection and Proper Use of Company Assets

All directors, officers, employees and contractors should endeavor to protect the Company's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the Company's profitability. Any suspected incident of fraud or theft should be immediately reported for investigation. Company equipment should not be used for non-Company business, though incidental personal use may be permitted.

Your obligation to protect the Company's assets includes its proprietary information. Proprietary information includes intellectual property such as trade secrets, trademarks and service marks, as well as business, marketing and service plans, databases, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information violates Company policy. It may also be illegal and may result in civil or even criminal penalties.

14. Payments to Government Personnel

The U.S. Foreign Corrupt Practices Act prohibits giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business. It is strictly prohibited to make illegal payments to government officials of any country.

In addition, the U.S. government has a number of laws and regulations regarding business gratuities which may be accepted by U.S. government personnel, as well as

gifts or payments to political parties or political candidates. The promise, offer or delivery to an official or employee of the U.S. government of a gift, favor or other gratuity in violation of these rules not only violates Company policy but could also be a criminal offense. State and local governments, as well as foreign governments, may have similar rules. The Company's Legal Department can provide guidance to you in this area.

15. Reporting Illegal or Unethical Behavior; Non-Retaliation

Employees, officers, directors and contractors who suspect or know of violations of this Code or illegal or unethical business or workplace conduct by employees, officers, directors or contractors have an obligation to contact either their supervisor or superiors or the appropriate contact in the Company's Legal Department or the Human Resources Department. If the individual to whom such information is conveyed is not responsive, or if there is reason to believe that reporting to such individuals is inappropriate in particular cases, then the employee, officer, director or contractor may contact the General Counsel of the Company. Such communications will be kept confidential to the extent feasible. If you are still not satisfied with the response, you may contact the Audit Committee of the Board of Directors of Globe Life Inc. by telephoning a toll-free number (1-877-854-0033) that is monitored by an independent third-party reporting service. If concerns or complaints require confidentiality, then this confidentiality will be protected to the extent feasible, subject to applicable law.

You should read the Company's *Employee Complaint Procedures for Accounting and Auditing Matters*, located on the Company's website on the Investors page under Employee Complaint Procedures or obtain a written copy from the Corporate Secretary's Office. It describes the Company's procedures for the receipt, retention and treatment of complaints regarding accounting, internal accounting controls or auditing matters. You may submit a good faith concern regarding questionable accounting or auditing matters under this policy without fear of dismissal or retaliation.

The Company prohibits retaliation of any kind against individuals who have made good faith reports or complaints of violations of this Code or other known or suspected illegal or unethical conduct. You are expected to cooperate in internal investigations of misconduct.

16. Escalation of Potentially Material Ethical Complaints or Concerns

As noted in this Code, ethical complaints or concerns may be reported to a supervisor, manager, appropriate contact in the Company's Legal Department or the Human Resources Department, or submitted via the toll-free number (1-877-854-0033) that is monitored by an independent third-party reporting service, as appropriate.

Any potentially *material* ethical complaints or concerns should be escalated promptly by the party receiving the complaint to a member of the Company's Ethics Committee, comprised of the following individuals:

- **Brian Mitchell**, Executive Vice President, General Counsel and Chief Risk Officer bmitchell@globe.life or 972-569-4020
- **Rebecca Zorn**, Executive Vice President and Chief Talent Officer rezorn@globe.life or 972-569-3279

- **Shane Henrie**, Corporate Senior Vice President and Chief Accounting Officer shenrie@globe.life or 972-569-3671

17. Amendment, Modification and Waiver of the Code

This Code may be amended or modified by the Board of Directors of Globe Life Inc. Waivers of this Code may only be granted by the Board of Directors or a committee of the Board with specific delegated authority. Waivers will be disclosed to shareholders as required by the Securities and Exchange Act of 1934 and the rules thereunder and the applicable rules of the New York Stock Exchange.

18. Compliance Procedures

We must all work to ensure prompt and consistent action against violations of this Code. However, in some situations it is difficult to know if a violation has occurred. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are the steps to keep in mind:

- Make sure you have all the facts. In order to reach the right solutions, we must be as fully informed as possible.
- Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
- Clarify your responsibility and role. In most situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the problem.
- Discuss the problem with your supervisor. This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the question and will appreciate being brought into the decision-making process. Remember that it is your supervisor's responsibility to help solve problems.
- Seek help from Company resources. In a case where it may not be appropriate to discuss an issue with your supervisor, or where you do not feel comfortable approaching your supervisor with your question, you may discuss it with a manager, an appropriate contact in the Legal Department or the Human Resources Department, or you may call the toll-free number (1-877-854-0033) which is monitored by an independent third-party reporting service.
- You may report ethical violations in confidence and without fear of retaliation. If your situation requires that your identity be kept secret, your anonymity will be protected. The Company does not permit retaliation of any kind against employees for good faith reports of ethical violations.
- Always ask first, act later. If you are unsure of what to do in any situation, seek guidance *before* you act.