

# Code of Conduct



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When used in this Code, 'Corebridge' refers to Corebridge Financial, Inc. and its subsidiaries worldwide. Business units and jurisdictions may have other Codes consistent with or more stringent than this Code. These Codes may impose additional responsibilities on employees in those business units and jurisdictions. Concerns regarding potential conflicts between a provision of this Code and local laws should be escalated to the compliance officer.

## A Message from our Chief Executive Officer



**Dear colleagues,**

Operating with ethics and integrity is at the heart of everything we do at Corebridge Financial, Inc. (Corebridge), which is why our Code of Conduct is so important. Always doing the right thing and maintaining a safe environment for colleagues to raise concerns is paramount to earn and preserve the trust of our stakeholders.

Corebridge's culture is grounded in collaboration, transparency and excellent decision making. Our individual and collective decisions have the potential to significantly impact Corebridge's reputation, which is one of our most valuable assets.

The Corebridge Code of Conduct outlines standards and policies that apply to all colleagues and provides guidelines about how we work with each other, our clients, distribution partners, regulators and other stakeholders. This Code, along with your sound judgment, will guide your actions and decisions.

If you have questions or concerns about our Code of Conduct, please talk to your manager, Human Resources or Compliance.

Thank you for your commitment to upholding the highest levels of ethics and integrity at Corebridge.

A handwritten signature in black ink, appearing to read 'KHogan'.

**Kevin Hogan**  
Chief Executive Officer

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## A Message from our Chief Compliance Officer



**Dear colleagues,**

The Corebridge Code of Conduct contains the rules and guidelines that each of us should keep in mind as we engage in our daily activities.

The Code reflects Corebridge's values and outlines the laws and regulations by which we as a corporation are governed. By complying with these standards, we uphold Corebridge's reputation for transparency and fostering a culture of integrity.

This Code of Conduct is designed to help you do the right thing. While it provides guidance for most situations, it is not an all-encompassing resource.

If you have questions related to a specific situation, business or function that may be unclear, please reach out and ask your manager, HR business partner or Compliance partner. Also, please speak up if you see something that does not appear to align with the principles outlined in the Code.

Thank you for continuing to uphold Corebridge's strong culture of integrity and for your continued adherence to the principles of Corebridge's Code of Conduct. Our efforts give our clients, policyholders, distribution partners, regulators and other stakeholders confidence in the strength and reliability of Corebridge.

A handwritten signature in black ink, appearing to read 'KJennings'.

**Kyle L. Jennings**  
Chief Compliance Officer

# Delivering on Our Commitments

At the core of Corebridge's business is a promise that we will stand behind our products and services. Personal and organizational integrity are critical to delivering on this promise and protecting our reputation.

Delivering on our commitments is vitally important to our employees, clients, distribution and other business partners, regulators, shareholders, and the communities in which we live and do business.

# Delivering on Our Commitments

## Why Do We Have a Code?

The Corebridge Code of Conduct (“the Code”) provides ethical guidelines for conducting business across Corebridge. The Code is a resource for all Corebridge officers and employees.

This Code *cannot* address every issue that we may encounter but it does provide guidance and resources for those times when the right choice is not clear. Additional information, including relevant rules and policies, may be found in links throughout this document as well as in our corporate policies.

This Code is organized based on the commitments we deliver to each of the following groups:

- Our fellow employees trust us to value and respect them.
- Our clients, and distribution and business partners trust our integrity.
- Our regulators expect us to be transparent and act with integrity.
- Our shareholders trust our stewardship.
- Communities around the world rely *on* us to be responsible corporate citizens.

## To Whom Does the Code Apply?

The Code applies to all Corebridge officers and employees. Certain Corebridge business partners, such as agents and consultants, represent Corebridge to the public, and they are expected to adhere to the spirit of the Code, the Corebridge Third Party Code of Conduct, and to any applicable contractual provisions when working *on behalf* of Corebridge companies.

Corebridge is a vast organization, and yet we are united by our commitment to deliver on our promises. Each of us has a responsibility to earn the trust that is placed in us.





# Delivering on Our Commitments

## Individual Responsibilities

Meeting our responsibilities enables our business to succeed and grow, today and in the future. Each of us is expected to:

- Understand and act in accordance with this Code, Corebridge's policies, and applicable laws and regulations.
- Seek guidance from management, compliance personnel or Corebridge's legal counsel when you have questions.
- Promptly report concerns about possible violations of this Code, Corebridge's policies or applicable laws and regulations to management or to one of the resources listed on the next page.
- Participate in ethics and compliance training to keep up to date on current standards and expectations.
- Fully cooperate with any internal investigations.

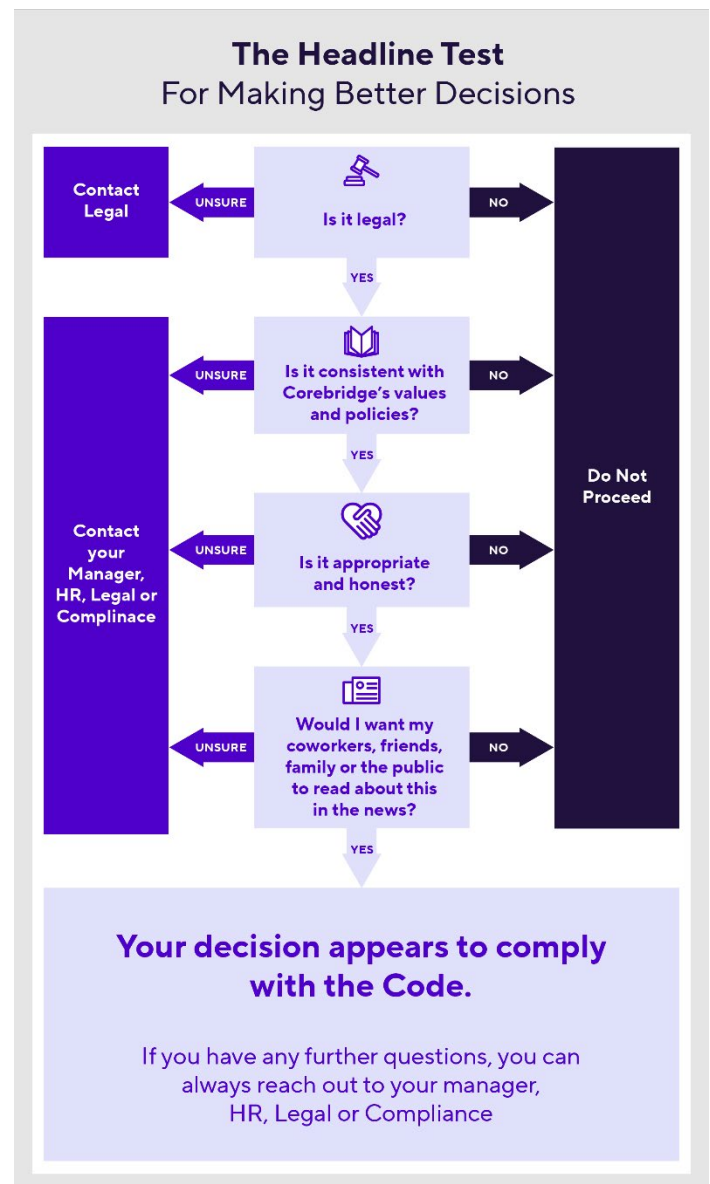
No reason, including the desire to meet business goals, can ever be an excuse for violating this Code, Corebridge policies, laws or regulations.

## Additional Responsibilities for Managers

Each manager is expected to fulfill the following additional responsibilities:

- Serve as a role model by demonstrating the highest ethical standards and create and sustain a culture of trust, honesty, integrity and respect.
- Be a resource for employees. Ensure that they are aware of, understand, and know how to apply this Code, Corebridge's policies and applicable laws and regulations in their daily work.
- Make yourself available to employees to present issues, complaints or grievances in a safe and secure environment and reinforce Corebridge's non-retaliation policy. Ensure such matters are addressed in a fair and timely manner.
- Seek assistance from other managers or Corebridge's legal counsel, compliance officers or human resource professionals when unsure of the appropriate response to any given situation or report it through the Corebridge Compliance Help Line.

- Be proactive. Take reasonable actions to prevent and identify misconduct. Report situations that might impact the ability of employees to act ethically on behalf of Corebridge.



# Delivering on Our Commitments

## Asking Questions & Raising Concerns

Most concerns likely to be faced at work can be resolved by talking to and working with management, Human Resources, Employee Relations or your designated compliance officer. In addition, you may ask questions, raise concerns or report instances of non-compliance with this Code, Corebridge policies, or applicable laws and regulations by contacting any of the following:

- **Corebridge's Corporate Compliance Team** at [CorebridgeComplianceInquiries@corebridgefinancial.com](mailto:CorebridgeComplianceInquiries@corebridgefinancial.com).
- **Corebridge Compliance Help Line** at 800-461-9330 or online at [CorebridgeFinancial.com/ComplianceHelpLine](https://CorebridgeFinancial.com/ComplianceHelpLine), or scan the QR code below, subject to local laws. The Compliance Help Line is staffed by an independent third party that provides written reports to Corebridge's Corporate Compliance Team. Communications to the Help Line may be made anonymously, subject to local laws, and may be made in all major languages.

For concerns related to accounting, internal accounting controls or auditing matters, employees may contact either of the above (anonymously through the Help Line), subject to local laws, or may bring the concern to the attention of the Chair of the Audit Committee of Corebridge's Board of Directors by email at [corebridgebod@corebridgefinancial.com](mailto:corebridgebod@corebridgefinancial.com) or in writing to: Chair of the Audit Committee, Corebridge, 2919 Allen Parkway, Woodson Tower L4-01, Houston, TX 77019.



# Delivering on Our Commitments

## Q&A

### Asking Questions and Raising Concerns

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**Q** *What happens when I make a report to the Corebridge Compliance Help Line?*

**A** After taking the call, an outside service provider will forward a report to Corebridge's Corporate Compliance Team. If the report is submitted online, the outside service provider will send the report directly to the Corporate Compliance Team.

1. If you request advice, you will be contacted about the issue and provided with guidance and interpretation so that you can make the right decision.
2. If you want to report a suspected violation, the outside service provider will take down any relevant information and will forward a report to the Corporate Compliance Team. Any reports regarding questionable accounting, internal accounting controls, and auditing matters will be reviewed with representatives of the Corebridge Investigations Group and then, if necessary, reported to the Audit Committee of the Corebridge Board of Directors.
3. If the matter would be more appropriately addressed by another internal organization with Corebridge (e.g., Legal, Internal Audit, Corporate Security or Human Resources), the Corporate Compliance Team may send the report to that organization for handling.

**Q** *Can I report a violation and still remain anonymous?*

**A** Corebridge encourages employees making reports to identify themselves so that the information can be investigated promptly and thoroughly. Our ability to directly contact an employee who has raised a concern will expedite any investigation. However, subject to local law or labor agreement, you may choose to remain anonymous when reporting a matter to the Corebridge Compliance Help Line.

**Q** *What about confidentiality and retaliation?*

**A** Every reasonable effort will be made, consistent with law and Corebridge policy, to maintain the confidentiality of any employee who reports a violation or suspected violation in good faith and Corebridge prohibits retaliation against any employee for making a good faith report of actual or suspected violations of this Code, other Corebridge policy, or applicable laws or regulations.



# Delivering on Our Commitments

## Non-Retaliation Policy

Corebridge prohibits retaliation against any employee for making a good faith report of actual or suspected violations of this Code, other Corebridge policy, or applicable laws or regulations, and violation of this non-retaliation policy may result in corrective action, up to and including termination.

## Corrective Action

Violating this Code, other Corebridge policy, or applicable laws or regulations, or encouraging others to do so, puts Corebridge's reputation at risk and therefore may result in corrective action. Failing to promptly report known violations by others also may be a violation of this Code. Corrective action may include termination of employment and loss of employment-related benefits.

## Waivers of the Code

From time to time, Corebridge may amend or waive certain provisions of this Code. Any employee who believes that a waiver may be appropriate should discuss the matter with their designated compliance officer. Only the Corebridge Board of Directors or its Nominating and Corporate Governance Committee may grant a waiver of a specific provision of the Code for an executive officer of Corebridge.



# Delivering on Our Commitments

## Q&A

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**Q** *My Business Unit sets various goals that we are supposed to achieve. Sometimes I feel pressured to violate the Code to achieve these goals. Is this acceptable?*

**A** No. While successful businesses often set high goals and strive to achieve them, you must never violate the Code or other Corebridge policies to achieve your goals.

**Q** *Our manager typically does nothing when concerns about potential misconduct are brought to her attention. She has made things difficult for co-workers who have raised issues. Now I have a problem: a co-worker is doing something wrong. What should I do?*

**A** Speak up. Our Code says that you should report misconduct and that you can do so without fear of retaliation. While starting with your direct manager is often the best way to get concerns addressed, if you do not believe that is appropriate, you should talk to another member of management, human resources, or to your designated compliance officer. Additionally, you may call or submit an online report to Corebridge's Compliance Help Line.

**Q** *If I think that a local law conflicts with this Code, what should I do?*

**A** If you believe local laws conflict with the Code, please discuss the issue with your compliance officer.

# Our Commitments to Each Other

We believe in the power of diverse, talented people to create value and perform for clients, distribution partners, shareholders and other stakeholders.

# Our Commitments to Each Other

## Diversity, Equity and Inclusion

Corebridge is committed to inclusion and diversity of people, ideas, and skills, as described in the [Corebridge Human Resources Policy](#).

Corebridge seeks to hire and promote the best talent by providing a dynamic environment that brings people with diverse skills and ideas together. An inclusive, diverse and equitable workforce fosters innovation and enhances our position as a market leader.

Corebridge relies on the contributions of local people who best understand the cultures in the countries and jurisdictions in which we do business. Corebridge has always been committed to hiring local expertise and providing local talent with a professional business environment, leadership opportunities, and fair compensation.

Corebridge provides employees with opportunities to learn, excel at their jobs, grow with the organization and profit financially.

## Respecting Others

Treating others with respect means that we do not discriminate on the basis of age, ethnicity, gender, gender identity or expression, language differences, nationality or national origin, pregnancy, family or marital status, physical, mental and development abilities, race, religion or belief, sexual orientation, skin color, social or economic class, education, work and behavioral styles, political affiliation, military service, caste, and any other status that is protected under applicable local law.

Respect also means valuing each other's differences. We respect each other's opinions and treat all of our colleagues with fairness and dignity.

## Respecting Human Rights

Corebridge respects human rights and is committed to ensuring that no practices of child labor, modern slavery or human trafficking take place within Corebridge.

## Delivering on Our Commitments

### Respecting Others

- Provide colleagues with opportunities based on performance and objective standards that are relevant to job performance.
- Abide by local labor and employment laws including those addressing discrimination, workplace bullying and harassment.
- Provide a work environment free of harassment, including sexual harassment, workplace bullying and discrimination.



# Our Commitments to Each Other

## A Work Environment Free from Harassment and Intimidation

Corebridge will not tolerate intimidating or bullying behavior which can occur as a single instance or repeated inappropriate behavior. Bullying or intimidation can be direct or indirect, intentional, or unintentional conducted by one or more persons against another or others, at the place of work and/or in the course of employment. Bullying or intimidation can manifest itself verbally, non-verbally, online/cyber, physically, in gestures, and in exclusionary behavior.

## Safe, Healthy and Secure Workplace

Corebridge is committed to conducting business in a manner that protects the health, safety and security of employees and clients while they are on Corebridge premises. Situations that may pose a health, safety, security or environmental hazard must be reported promptly to management or Corporate Security.

Maintaining a safe and secure workplace requires that all employees remain vigilant in the office and wherever they may be carrying out business on behalf of Corebridge. Notify management or Corporate Security of any issue that may impact Corebridge's security, emergency readiness, or fire and life safety preparedness.

Corebridge recognizes the health and wellness of our employees is essential to the organizational health of our Company and impacts how we better serve our clients, business partners, shareholders, community and each other. We are dedicated to fostering a workplace culture that promotes the physical, mental and social well-being of our employees and will not tolerate actions that compromise this commitment.

## Alcohol and Drug Use

Using, selling, possessing or working under the influence of illegal drugs at Corebridge is prohibited. Excessive or inappropriate use of alcohol while conducting business for Corebridge is also prohibited. Inappropriate behavior is not excused or justified due to being under the influence of alcohol or other substances.

### Prohibited Conduct

#### Harassment

- Unwelcome gestures or physical contact.
- The display of sexually explicit or offensive pictures or other materials.
- Slurs, inappropriate jokes or disparaging comments (explicit or by innuendo).

#### Violence and Intimidation

- Acts or threats of intimidation and/or violence against employees, clients, or visitors either on Company premises or through its communications channels.
- Acts or threats of intimidation and/or violence committed by Corebridge employees while doing business on behalf of the Company.



# Our Commitments to Each Other

## Employee Privacy

Corebridge respects the personal information and property of employees. However, Corebridge must take steps:

- (1) to prevent, detect or investigate crime, money laundering, fraud, financial crime and/or other breaches of applicable law;
- (2) to comply with applicable laws and regulations, and any applicable Corebridge policies and procedures, including this Code;
- (3) to safeguard against the loss, theft, unauthorized or unlawful collection, use, disclosure, destruction or other processing or misuse of Corebridge Company Information;
- (4) to prevent, detect or investigate unauthorized use of Corebridge Information Technology Systems ("IT Systems") and Corebridge IT System data;
- (5) to ensure the effective operation of Corebridge IT Systems (including telephones, email, and Internet);
- (6) for security or health and safety purposes;
- (7) for administration purposes;
- (8) to assist with investigations, complaints, regulatory requests, litigation, arbitration, mediation or other legal proceedings or obligations or requests from individuals;
- (9) to establish the existence of facts (e.g., keeping records of transactions);
- (10) to ascertain compliance with regulatory or self-regulatory practices or procedures that relate to Corebridge;
- (11) to ascertain or demonstrate standards that are achieved or ought to be achieved by persons using Corebridge IT Systems, including compliance with this Code and other Corebridge policies, standards, processes, guidelines or any terms of use associated with use of Corebridge IT Systems, including without limitation those relating to information security and cybersecurity;
- (12) in the course of the operational support and development of our businesses, such as to evaluate the quality of customer service, efficiency, cost, and risk management purposes; or
- (13) for any other purpose for which Corebridge may be entitled to monitor, as permitted under applicable law.

For further information on the topic, please see the [Employee Privacy Notice](#).

For these referenced purposes, Corebridge may monitor your access to and use of Corebridge IT Systems and any data moving through and residing on Corebridge IT Systems. For further information, please see the [Corebridge Monitoring Notice](#).

Subject to applicable law, employees should have no expectation of privacy with regard to their use of Corebridge's IT Systems or with regard to any items or information within a Corebridge system. Please read the Corebridge IT System Logon Notice (available for review and acceptance when you log on to the Corebridge IT System) for further information.

Corebridge may also monitor and review security video live footage and recordings, and access records, that may be associated with Corebridge premises and other facilities to which employees and visitors have access.

Additionally, Corebridge may inspect, review, copy and retain documents, and other items, within Corebridge premises and other facilities (such as at workstations, in offices, desks, filing cabinets and other storage locations).

Subject to applicable law, employees should have no expectation of privacy with regard to their use of Corebridge's premises or other facilities, or with regard to any items or information within a Corebridge premise or other facility.

# Our Commitments to Each Other

## What is Corebridge Company Information?

Corebridge's Company information refers to information that is classified as Highly Confidential, Confidential, or Internal, as defined in the [Corebridge Information Handling Policy](#) and [Standards](#). These categories include both Personal Information and Business Information.

**Examples of Corebridge Company Information include but are not limited to the following:**

### Highly Confidential

#### Sensitive Personal Information

- Name and government-issued identification number, financial account number or medical or health information

#### Business Information

- Non-Public Corebridge sensitive financial information
- Board of Directors meeting information
- Trade secrets
- Non-Public proposed business activities
- Attorney-client privileged communications, attorney work product and other privileged documents

### Confidential

#### Personal Information

- Name and compensation data or personal contact details not made available for publication to the workforce

#### Business Information

- Commercial client list
- Insurance policy or claims information of a commercial insured or claimant
- Market research and risk analysis

### Internal

#### Personal Information

- Name
- Employee
- Identification Number

#### Business Information

- Non-sensitive internal correspondence amongst workers
- Non-sensitive marketing plans or techniques
- Information maintained on the Corebridge intranet



# Our Commitments to Each Other

## Q&A

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**Q** *My manager and several of my colleagues tell jokes with a sexual overtone that I find very offensive. I have not complained because I know they will tell me to mind my own business or that I'm making trouble over nothing. Would they be right?*

**A** No, they would be wrong. Offensive jokes of a sexual nature, even in private conversations that may be overheard by others, can be a form of harassment. First, you should try to talk to your manager and colleagues. If this does not work, or you are uncomfortable doing so, talk to a Human Resources representative, contact your designated compliance officer, or contact HR Shared Services at [HRSS@corebridgefinancial.com](mailto:HRSS@corebridgefinancial.com).

**Q** *Why include diversity in the Code?*

**A** Diversity is a worldwide issue. We have always worked together to utilize the unique talents and perspectives of our diverse workforce. Diversity is one of the key contributors to Corebridge's success. To make good decisions and serve our clients, we need a broad spectrum of perspectives and backgrounds.

**Q** *I overheard my manager discussing with one of her peers some private information contained in a co-worker's medical records. What should I do?*

**A** Medical or health information is Highly Confidential Sensitive Personal Information and must be kept strictly confidential. Inappropriate sharing of such information is a violation of the Corebridge Information Handling policy. You must raise this issue with the appropriate management personnel. If you are uncomfortable raising this issue with management, then report the matter to Human Resources or your designated compliance officer. Additionally, you may contact Corebridge's Compliance Help Line, subject to local laws.

# Our Commitments in the Marketplace

Corebridge is known for being a market leader. We compete vigorously to create new opportunities for our clients and other stakeholders. We seek competitive advantages only through legal and ethical business practices.

# Our Commitments in the Marketplace

## Client Privacy and Data Security

Our clients expect us to carefully handle and safeguard the information they share with us. Never compromise a client's trust by disclosing a client's Highly Confidential or Confidential Information, including Personal Information, in a manner contrary to Corebridge's privacy policies and notices or to those without a legitimate business need for such information.

The classification of information as Personal Information may differ by country. Employees who handle client information are responsible for knowing and complying with applicable data privacy and information security laws. In all cases we must maintain appropriate physical, administrative and technical safeguards for a client's Highly Confidential or Confidential Information, including Personal Information.

We must be especially vigilant in following laws, regulations and policies when sharing Personal Information with other parties (even for legitimate business purposes) and transferring Personal Information across country borders, especially to law enforcement or government bodies in foreign jurisdictions. If you have any questions about data privacy and/or information security, consult your manager, business unit legal counsel, privacy officer, designated compliance officer or the Privacy Office.

Employees must immediately report incidents involving compromise of the confidentiality, integrity or availability of Personal Information, or the increased risk of such compromise ("Privacy Risk Incidents"), including those that involve Third Parties, to the appropriate Corebridge Privacy Team and, if the incident relates to IT, or could pose an information security risk to information other than just Personal Information, also the Cyber-Risk Defense Center.

For additional information on this topic, please see the [Corebridge Information Handling Policy](#) and [Standards](#).





# Our Commitments in the Marketplace

## Conflicts of Interest

Your position at Corebridge cannot be used for inappropriate personal gain or advantage to you or a member of your family. Any situation that creates, or even appears to create, a conflict of interest between personal interests and the interests of Corebridge must be avoided. [Corebridge's Conflict of Interest Policy](#) outlines examples to assist employees in identifying potential conflicts and sets forth procedures for reporting such potential conflicts.

Potential conflicts of interest should be reported to management, who will work with your designated compliance officer, to determine how best to handle the situation.

Employees must not engage in any action (e.g., accept the outside position, accept gift(s) or entertainment at issue, run for public office, etc.) until they receive written approval to do so by both their manager and the appropriate Compliance Officer, as specified in the Policy.

### Delivering on Our Commitments

#### Conflicts of Interest

- Always make decisions in the best interest of Corebridge and our clients - not to advance personal interest.
- Remain aware of how personal activities can lead to potential conflicts, such as taking a second job with or making an investment in a Corebridge client, vendor or competitor.
- Discuss with your manager any situation that could be perceived as a potential conflict of interest.
- Proactively address situations that may put your interests or those of a family member or friend in potential conflict with Corebridge.

## Corporate Opportunities

Employees are prohibited from taking for themselves or directing to a third party a business opportunity that is discovered through the use of Corebridge corporate property, information or position, unless Corebridge has already been offered and declined the opportunity. Employees are prohibited from using corporate property, information or position for personal gain to the exclusion of Corebridge and from engaging in an outside business that competes with any business of Corebridge.

## Personal Relationships

Employees are expected to manage personal relationships in the workplace (e.g., employment of relatives, intimate relationships) in a manner which avoids any actual or perceived conflict between personal/family relationships and work responsibilities and productivity.

Immediate family members, members of your household and individuals with whom you have a close personal relationship must never improperly influence business decisions.

For additional information on this topic, please see the [Corebridge Human Resources Policy](#), which must be read in conjunction with local employee handbooks and standards (where available). If you have any questions or disclosures, please contact Human Resources, Employee Relations or your designated compliance officer.

## Outside Activities

Corebridge respects the privacy of all its employees; however, unless you are located in a country where such reporting is prohibited by local law, you must disclose and receive both managerial and Compliance approval for engagement in specific types of outside activities, including, but not limited to, the following activities:

- **Service with an outside business or trade association, as an employee, owner, board member, officer, trustee, partner or consultant**, regardless of whether the business currently does or seeks to do business with Corebridge, the business competes or seeks to compete with Corebridge, or you are compensated; prior written approval from your manager and designated compliance officer is required before engaging in this type of outside activity. Managerial and Compliance approval must be renewed on an annual basis and at any point there is a change in relevant facts upon which the original approval was granted.

# Our Commitments in the Marketplace

- **Service with a foundation, charity or non-profit organization where you will be paid for your service, or where you hold a position of financial or fiduciary responsibility** (e.g., serve as Treasurer, a member of the Audit Committee or a member of the Investment Committee of the organization's Board of Directors); prior written approval from your manager and designated compliance officer is required before engaging in this type of outside activity. Managerial and Compliance approval must be renewed on an annual basis and at any point there is a change in relevant facts upon which the original approval was granted. This provision does not apply to service on the board of a co-op, condominium association or similar entity in which you reside, or a holding company, trust or similar entity that is established solely for you or your family's estate or tax planning. This provision does not apply to "Volunteer Time Off" activities which are subject to the Corebridge Volunteer Time Program Guidelines.
- **A presentation, talk, or service on a panel in which you are offered a fee, royalty, honorarium, or other payment;** prior written approval from your manager and designated compliance officer is required before accepting any fees and you may be required to turn the fees received over to Corebridge. In addition, any materials to be used during the presentation, talk or panel may need to be reviewed before the presentation in accordance with business unit or Corebridge policy.
- **Serving as a public official (e.g., member, officer, director or employee of a governmental entity including any agency, authority or advisory board), as an appointee of a governmental entity or running for elected office;** prior written approval must be obtained from Corebridge's Chief Compliance Officer or his/her designee as well as your manager. Approval must be renewed whenever the term expires and before reelection or reappointment is sought.

To avoid even the appearance of any conflict with Corebridge's interests, whenever you participate in community support efforts outside of Corebridge-sponsored programs you should never imply Corebridge endorsement of the effort.

## Gifts and Entertainment

Modest gifts and appropriate entertainment can help strengthen business relationships, but these business courtesies, whether given or received by employees, must never improperly influence business decisions.

A gift is any item of monetary value presented to or by an employee, for or from, a non-Corebridge employee where there is, or potentially may be, a business relationship between the parties. Entertainment is an event with a specific business purpose that includes the presence of both a Corebridge employee and a non-Corebridge employee. If only a Corebridge employee is present at the event, the Corebridge employee must consider the event a gift subject to the applicable monetary value limitations.

If you are offered a gift or entertainment that does not meet the criteria set forth in the [Corebridge's Conflict of Interest Policy](#), politely decline the gift or entertainment. If declining a gift would be offensive or hurt a business relationship, accept the gift on behalf of Corebridge and forward it to your manager who, together with your designated compliance officer, will determine the appropriate disposition of the gift.

Cash or cash equivalents, including gift certificates, checks, traveler's checks or money orders, investment securities, negotiable instruments, payment of credit card charges or similar items, cannot be accepted or offered as gifts - regardless of the amount.

Business units or regions/localities may impose additional gift and entertainment restrictions and reporting requirements. Employees are responsible for understanding and complying with all Policy documents applicable to them.



# Our Commitments in the Marketplace

Appropriate gifts or entertainment, whether given or received, should:

- Have a specific business purpose.
- Be in good taste and not extravagant, excessive, or lavish.
- Be reasonable in frequency with the same source.
- Be permitted by Corebridge's and the recipient organization's policies.
- Be reasonable, ordinary, customary and lawful in the country or region where they are exchanged.
- Not be intended to improperly influence business decisions.
- Not to be solicited by Corebridge employees.
- Not be cash or cash equivalents (e.g., gift certificates), regardless of amount.
- If a gift, not be valued greater than \$150 USD.

## Gifts and Entertainment to Government Officials

Corebridge engages in business with many government-owned or controlled clients. These may include central banks, finance ministries, pension funds and other enterprises (including airlines and commercial banks). Many of the representatives of these clients may be deemed to be government officials pursuant to applicable local or international anti-corruption laws. As a result, employees who have contact with government clients must be aware of the potential issues and risks that may arise in dealings with such clients.

Special care must be taken when providing gifts and entertainment to such clients. Any gifts, entertainment or travel must be consistent with the [Corebridge Anti-Corruption Policy](#) and local laws. Many of the countries with or in which Corebridge conducts business limit the value of gifts, entertainment and travel that their respective government officials may accept.

In addition to complying with the [Corebridge Anti-Corruption Policy](#), all travel, gifts, and entertainment provided to a government official must comply with the [Corebridge Expense Management Policy](#) and any applicable local business policies.

## Delivering on Our Commitments

### Gifts and Entertainment

- Never allow business gifts and entertainment, whether given or received, to improperly influence business decisions.
- Remember if the donor is not present, then the entertainment is subject to gifts policies.
- Respect local and cultural sensitivities when exchanging business gifts and entertainment.
- Never provide or accept extravagant gifts or lavish entertainment.
- Do not solicit gifts, favors or entertainment.
- Report any gifts offered to you or received that are valued at more than \$150 USD to your manager and designated compliance officer and turn it over to them for disposition.
- Prior written approval from your manager and designated compliance officer is required before providing a gift valued at more than \$150 USD to any non-government official.
- Never offer anything that would be considered a bribe or other improper payment or gift. When providing gifts or entertainment to government officials, comply with the [Corebridge Anti-Corruption Policy](#). Prior written approval from your manager and designated compliance officer is required before providing: a meal involving a government official valued at more than \$50 USD or a gift, travel or other hospitality to a government official of any amount.

# Our Commitments in the Marketplace

## Relationships with Our Business Partners

Our business partners serve as extensions of Corebridge. When working on behalf of Corebridge, business partners are expected to adhere to the spirit of the Code, the [Corebridge Third Party and Supplier Codes of Conduct](#) and to any applicable contractual provisions.

Business partners must not act in a way that is prohibited or considered improper for an employee. We must all ensure that clients, producers, agents, and suppliers do not exploit their relationship with Corebridge or use Corebridge's name in connection with any fraudulent, unethical or dishonest transaction.

Corebridge business partners are expected not to create incentives for employees or others who do business with Corebridge to violate the Codes' standards.

## Supplier Diversity

Corebridge is committed to the inclusion, consideration and engagement of Diverse Suppliers, as defined and outlined in the [Corebridge Supplier Diversity Policy](#). Corebridge seeks supplier partnerships with diverse businesses. We particularly value suppliers that share Corebridge's dedication and commitment to inclusion, diversity and work to ensure the growth and support of environmental, social, and governance commitments.

Each of us is expected to support [Corebridge's Supplier Diversity Policy](#) by promoting the use of suppliers that meet the qualifications.

## Delivering on Our Commitments

### Relationships with Our Business Partners

- Be aware of business practices of Corebridge agents and other representatives to ensure that proper means are used to deliver our services.
- Perform appropriate due diligence regarding potential agents, consultants, independent contractors, and suppliers prior to engaging their services.
- Never pressure or encourage Corebridge suppliers or agents to engage in improper activities.
- Treat suppliers, agents, and other representatives with respect and consideration.



# Our Commitments in the Marketplace

## Fair Dealing

Corebridge seeks competitive advantages only through legal and ethical business practices. Each of us must conduct business in a fair manner with our clients, service providers, suppliers and competitors. Do not disparage competitors or their products and services. Improperly taking advantage of anyone through manipulation, concealment, abuse of privileged information, intentional misrepresentation of facts or any other unfair practice is not tolerated at Corebridge.

### Delivering on Our Commitments

#### Fair Dealing

- Conduct business with clients and suppliers in a manner that demonstrates our commitment to fair competition.
- Provide truthful and accurate marketing information.
- Gather information about competitors only according to legal and proper means and in a manner that reinforces Corebridge's integrity.
- Never use improper or questionable methods to gather information about competitors.
- Never misrepresent yourself or your purpose in business interactions with a potential or current Corebridge client or business partner.

## Warning Signs

### Antitrust and Fair Competition

Antitrust and competition laws vary among countries and states. These variations result in certain actions being permitted in some countries or states and prohibited in others. If you encounter any of the activities set forth below and are not sure whether these activities are lawful, contact your designated compliance officer for advice on how to proceed:

- Attempts to dictate or control a client's resale prices.
- Making the sale of any product or service conditional on a client's purchase of another product or service.
- Offering a client prices or terms more favorable than those offered to a similarly situated competitor of the client.
- Restricting a client or supplier from dealing with a competitor.
- Selling products or services below cost or other unfair pricing or promotion practices.





# Our Commitments in the Marketplace

## Antitrust and Fair Competition

Corebridge competes vigorously and fairly around the world. We seek to maintain and grow our business through superior products and services - not through improper or anticompetitive practices. We strive to understand and comply with competition and antitrust laws.

These laws are complex. Employees who are unsure of appropriate practices should consult with their designated compliance officer for additional information and clarification. The following guidelines will help ensure fair business conduct and appropriate competition. For additional information on this topic, please see the [Corebridge Antitrust and Competition Policy](#).

 DO	 DO NOT
<ul style="list-style-type: none"><li>• Compete vigorously and lawfully in every market in which Corebridge participates, making all business decisions in the best interest of Corebridge.</li><li>• Obtain information about Corebridge’s competitors only from lawful and appropriate sources.</li><li>• Comment on competitors or their products or services based only on factual information.</li></ul>	<ul style="list-style-type: none"><li>• Agree formally or informally with a competitor to fix prices or other terms of sale, rig bids, set production or sales levels, or allocate clients, markets, or territories.</li><li>• Discuss any of the following with a competitor: prices, bids, client sales, commissions, and terms of sale, profits, margins, costs, production, inventories, supplies, marketing plans or other competitively sensitive information.</li><li>• Attend meetings with competitors at which sensitive information, including the subjects mentioned in the above two bullets, is discussed.</li><li>• Agree with others outside of Corebridge as to the suppliers or clients with which to do business.</li><li>• Make unsubstantiated or untruthful comparisons to competitors, their products or services.</li><li>• Obtain competitively sensitive information from Corebridge’s competitors or those known to have a duty of confidentiality to such competitors.</li><li>• Agree formally or initially, with a third party not to recruit, solicit or hire each other’s employees.</li></ul>

# Our Commitments in the Marketplace



## Competitive Information

Corebridge prohibits using illegal or unethical means to obtain competitor or supplier confidential information, including trade secrets. You may obtain information about Corebridge's competitors only from lawful and appropriate sources. You must not obtain competitively sensitive information from Corebridge's competitors or those known to have a duty of confidentiality to such competitors.

Never improperly obtain, disclose or use others' trade secrets. Offers of confidential information that may have been obtained improperly must be immediately reported to your designated compliance officer.

## Warning Signs

### Use Caution When Obtaining Competitive Intelligence, Such As:

- Retaining documents or computer records from prior employers.
- Pressuring or encouraging new employees to discuss confidential information from previous employers.
- Obtaining information through any behavior that could be construed as "espionage" or "spying," or in a manner in which you would not be willing to fully disclose.
- Unreasonably relying on third parties' claims that business intelligence was obtained properly.

# Our Commitments in the Marketplace

## Q&A

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**Q** *Do data privacy laws cover only Sensitive Personal Information, such as medical data, Social Security numbers, credit card numbers and financial account numbers?*

**A** No. Data privacy laws potentially apply to all information that identifies or relates to an identifiable individual. For example, contact details, preferences, internet protocol ("IP") address, voice and image may be considered Personal Information protected by applicable data privacy laws when such information can be linked to an identifiable individual.

**Q** *What is meant by a valid business purpose for accepting gifts or entertainment?*

**A** Employees are paid by Corebridge to act in its best interests. An example of a valid business purpose for accepting entertainment would be lunch from a business partner to discuss business issues and build a stronger working relationship. In contrast, accepting gifts of personal items such as jewelry does not further a business interest of Corebridge. Such gifts should be declined as they may compromise employee loyalty or create an obligation to the giver.

**Q** *To help me do a better job at Corebridge, I kept several documents from my previous employer. These documents describe marketing initiatives my prior employer used. Can I use these documents at Corebridge?*

**A** If the documents contain your former employer's confidential or proprietary information, then you cannot use or share this information. Corebridge expects all employees to honor any disclosure or use restrictions on confidential information obtained from former employers or other third parties. You may not use or share this information until you have consulted with your designated compliance officer.

# Our Commitments to Our Shareholders

Shareholders entrust their assets to us. Corebridge safeguards these assets by acting with integrity in all our business practices.

# Our Commitments to Our Shareholders

## Financial and Tax Reporting

Shareholders, business partners, regulators, analysts, and the general public rely on the integrity of our financial reports and tax records to evaluate the operational results and financial position of Corebridge and support their decisions.

Our financial reports must be truthful, complete, timely, fair, accurate and understandable. To ensure that we consistently meet these standards, only authorized employees may provide financial reports to external parties.

We must submit tax disclosures in compliance with applicable tax laws in the jurisdictions in which we operate, and they must be accurate and complete. We will not facilitate any activity by any person intending to breach applicable tax laws, which includes evading the payment of taxes or concealing information from tax authorities. Further, only authorized employees and agents may provide information regarding Corebridge's tax affairs to external parties.

## Accurate Business Records

Business records must always be prepared honestly and accurately. Information on business records must never be falsified or altered. We must never be dishonest or deceptive in maintaining Corebridge records, or otherwise attempt to mislead Corebridge's management, auditors, regulators or shareholders. Business records include information in any medium, including hard copies, electronic records, emails, instant messages, video and electronic storage media.

## Records Management

We must always comply with the [Corebridge Records & Information Management Policy](#) and all other applicable records and information management policies, standards, guidelines and procedures. These documents govern the retention and disposition of all information created, received or maintained by Corebridge in any medium, including but not limited to hard copies, electronic records, emails, instant messages, video and electronic storage media.

We must maintain information that has appreciable value to Corebridge operations and administration and/or information that is subject to legal, regulatory, or business retention requirements ("Company Records") for the period specified in the appropriate retention schedule ("Retention Schedule").

However, non-Company Records, including duplicates, drafts, transitory information and Company Records whose retention period has expired according to the applicable Retention Schedule, should be disposed of so long as they are not subject to a Preservation Notice.

A "Preservation Notice" (sometimes referred to as a legal hold) is a directive to employees from internal Corebridge legal counsel to preserve documents or information - whether in paper or electronic form and wherever stored or maintained - that concerns a pending or reasonably anticipated litigation.

When you receive a Preservation Notice you must take immediate steps to preserve - and must not delete, destroy, or otherwise alter in any manner - any documents and information that fall under the categories specified in the Preservation Notice until you receive written notice from internal Corebridge legal counsel that the Preservation Notice is no longer in effect, regardless of whether the retention period in the applicable Retention Schedule has expired. Questions about Preservation Notices should be directed to the individual who issued the Preservation Notice.





# Our Commitments to Our Shareholders

## Safeguarding Corebridge Resources

The protection of people and property are paramount to Corebridge. Corporate Security's role within the company was founded on principles designed to support the protection and safety of Corebridge personnel, clients, and physical assets.

### Physical Property

Corebridge property, including real estate, data, infrastructure, equipment and supplies, must be protected from misuse, damage, theft or other improper handling.

### Personal Security

Corporate Security works to identify and mitigate risk to Corebridge employees, assets and property through training, technology and the expertise of its staff; comprised of a diverse regional security team positioned with backgrounds in law enforcement, military and private sector security.

The Global Security Operations Center collects and analyzes security risk data while proactively responding to safety and security incidents

Employees should be vigilant with regards to security and should immediately report anything suspicious to [Corebridge\\_GSOC@corebridgefinancial.com](mailto:Corebridge_GSOC@corebridgefinancial.com) or their respective Regional Security Manager.

### Travel Security

Corebridge Security actively supports employees traveling on business to ensure appropriate risk mitigation measures are in place. Staff must comply with the [Corebridge Expense Management Policy](#) and book travel with the preferred Corebridge Online Booking Tools or Travel Management Companies. This enables the Security Operations Team to be aware of employee travel plans; thus, enabling resilient response to provide assistance during an emergency.

Direct questions to [Corebridge\\_GSOC@corebridgefinancial.com](mailto:Corebridge_GSOC@corebridgefinancial.com) or your respective Regional Security Manager for assistance.

## Intellectual Property

Corebridge intellectual property may include but is not limited to creative works, processes or inventions, typically having commercial value. There are five categories of intellectual property relevant to Corebridge's business: trademarks and service marks, copyrights, domain names, patents and trade secrets. Each of us is required to safeguard the intellectual property belonging to Corebridge and its business partners and to respect the intellectual property of third parties.

Subject to local law, employees may be required to assign any invention (patented or not) developed at Corebridge or with Corebridge proprietary information, to Corebridge.

## Delivering on Our Commitments

### Intellectual Property

- Never improperly use Corebridge intellectual property.
- Never disclose non-public intellectual property, without approval.
- Protect Corebridge intellectual property by obtaining, or helping others obtain, patents, trademarks, service marks or copyrights as appropriate.
- Never use a previous employer's intellectual property without permission.
- Never use or copy software or documentation, except as specified in the licensing agreement. Corebridge respects the use restrictions placed upon software by the developer or distributor.

# Our Commitments to Our Shareholders

## Proprietary Information/Trade Secrets/Confidential Information

After you leave the Company, you may not use or disclose any proprietary information, trade secrets, or confidential information that you had access to or obtained as a result of being employed by the Company. This information includes, but is not limited to, business plans, client information, vendor information, pricing information, competitive data and employee information.

You may not, for example, forward confidential information to your personal, non-Corebridge email address, computer or other device in anticipation of leaving Corebridge. You must return any confidential information before your termination of employment date. This provision supplements and does not supersede any confidentiality obligation you may have pursuant to any individual non-disclosure covenant in any agreement you have executed with Corebridge.

Your confidentiality obligation does not prevent you from raising actual or suspected Code, legal or regulatory violations to Corebridge or with a government agency (without notifying Corebridge) during or after your employment with Corebridge. You are not restricted from filing a complaint, communicating with, providing information to, or participating in an investigation or proceeding before a government agency.

### Warning Signs

#### Avoid the following to Protect Our Sensitive Information

- Discussing confidential information loudly or openly when others might be able to hear.
- Discussing Corebridge proprietary information with third parties without authorization and a non-disclosure agreement in place.
- Discussing Corebridge proprietary information with clients or suppliers without proper approval and knowledge of the status of the relationship as confidential or non-confidential.
- Improperly discarding confidential drafts and notes.

## Funds

Corebridge funds are to be used responsibly and solely for Corebridge business. Corporate credit cards issued to employees for payment of business expenses may not be used for personal expenses. Each of us has a responsibility to safeguard Corebridge funds from misuse or theft and ensure that Corebridge receives value when spending Corebridge funds. We may only seek reimbursement for actual, reasonable and authorized business expenses.

## Corebridge Technology Resources

Corebridge's Technology Resources, and the information accessible through them, are valuable assets of Corebridge. Each of us has responsibility to protect Corebridge's Technology Resources (whether the assets are used in an Corebridge office, at home or in any other location), and the information stored on them, from unauthorized access, damage, loss or theft, and to comply with all applicable Corebridge policies when using Corebridge Technology Resources. You are expected to use good business judgement when using Corebridge's Technology Resources, and to use Corebridge's Technology Resources in ways that promote ethical business practices.

When conducting business on behalf of Corebridge, employees must use only Corebridge's Technology Resources, and Corebridge Technology Resources must be used primarily for legitimate Corebridge business purposes. For the avoidance of doubt, non Corebridge electronic messaging accounts and voice mailboxes must not be used for Corebridge related business communications. Unless prohibited by Corebridge policy or applicable law or labor agreement, occasional, incidental, and appropriate personal use of Corebridge Technology Resources (such as to make or receive a limited number of personal telephone calls) may be permitted if the use does not interfere with your work performance, have undue impact on the operation of Corebridge's Technology Resources, introduce additional risk to Corebridge, or violate any other Corebridge policy, guideline, standard or applicable law.

# Our Commitments to Our Shareholders

Corebridge's Technology Resources must not be used to: (1) create, store, or transmit information that is hostile, malicious, unlawful, sexually explicit, discriminatory, harassing, threatening, profane, abusive or derogatory; (2) intentionally access Internet websites or other online services that contain similar content; (3) access an online platform to upload, provide, or otherwise use Corebridge Company Information unless the platform has been approved through the technology, legal, compliance, and other due diligence process required by Corebridge policies and standards; (4) upload or download any third-party intellectual property (e.g., software, movies, music, images, etc.) unless Corebridge has appropriate rights to such content; or (5) conduct non-Corebridge related business or personal political activity.

Subject to applicable legal requirements, when you use Corebridge's Technology Resources you have no expectation of privacy as such systems may be subject to monitoring by Corebridge for the legitimate purposes summarized in the Employee Privacy section of this Code, the applicable Corebridge Employee Handbook, if any, and outlined in the Corebridge Monitoring Notice, the Corebridge IT System Logon Notice and applicable Employee Privacy Notice.

**Corebridge Technology Resources** means and includes any (1) Corebridge-provided or approved computer, computer network, computer application, imaging device, storage device or media, mobile computing device or any other information technology hardware or software; and (2) other company information technology resources, such as telephones, Internet access through a Corebridge network, Closed Circuit Television and building access systems, and, in each case, the data, information, files, and/or records contained on such resources. Examples of Corebridge Technology Resources include, but are not limited to, the following:

- Laptops, desktops and WYSE terminals
- Corebridge-provided or approved software applications
- Corebridge-provided or approved mobile phones, or the Corebridge container on personal mobile phones enrolled in Corebridge's BYOD program
- Corebridge-provided or approved tablets (e.g., iPads, Microsoft Surface tablets), or the Corebridge container on personal tablets enrolled in Corebridge's Bring Your Own Device (BYOD) program
- OneDrive and SharePoint
- Voice mail, email, SMS, text, and instant message services and messages
- Intranet (Connect) and Intranet
- Documents, spreadsheets, and other data, information, files, and/or records



# Our Commitments to Our Shareholders

## Q&A

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**Q** *I think I found an error in a financial summary that will be submitted for inclusion in a public disclosure. How should I raise my concern?*

**A** It is critical that you notify someone with the authority to address the issue. The error could be serious. You have a responsibility to raise your concern with appropriate individuals immediately. If unsure, contact your manager, the designated compliance officer, the Compliance Help Line at 800-461-9330 or email the Accounting Hotline at [accountinghotline@aig.com](mailto:accountinghotline@aig.com).

**Q** *My manager asked me to prepare a purchase order for services that cost \$30,000 USD. Her spending authority is only \$25,000 USD. Can I divide the order into two purchase orders to avoid getting higher-level approval?*

**A** No, you may not. Not getting the proper approvals violates Corebridge policy, which is designed to ensure that adequate internal accounting controls are maintained and operating effectively. If you are uncomfortable telling your manager, alert your designated compliance officer.

**Q** *I was attending a meeting with several other Corebridge managers in a hotel conference room. At lunchtime, everyone left their laptops in the unlocked room. I felt uneasy, but I did the same. Should I have done something else?*

**A** Yes, the situation should have been handled differently. The laptops and the information on them are Corebridge property and frequently include Corebridge Company Information. You have a responsibility to ensure that the equipment and information is protected from loss, theft or inadvertent disclosure. You and your co-workers should have either secured the equipment/ room or chosen someone to stay with the equipment.

**Q** *I just learned that employees of a vendor have been given broad access to our networks. I don't think they need that type of access to do their work. Isn't this putting Corebridge information at risk? What should I do?*

**A** You may be right, but you may not have all the information. You should first discuss the situation with your manager. If further actions are required, you or your manager should contact your designated compliance officer.

# Our Commitments as Corporate Citizens

Through our products, services and responsible business practices, Corebridge works to improve communities where we work, live and serve our clients. Corebridge complies with laws and regulations that apply to our businesses.



# Our Commitments as Corporate Citizens

## Sustainability

Corebridge seeks to act responsibly as we do business, to help forge a better, fairer, more sustainable world. Each and every day, our employees strive to make a positive impact on millions of lives – including the individuals and institutions we serve, as well as the communities where we live and work.

### **Community Resilience: Giving back through philanthropy and volunteerism**

We align our charitable giving with building financial security and resilience. We also support programs that leverage our employees' passion for giving back through company-wide employee volunteer events, pro-bono programs and paid volunteer time off.

### **Financial Security: Helping people achieve financial wellness and sustainability**

As part of our commitment to promoting financial security and resilience, we partner with the Foundation for Financial Planning to increase pro bono financial planning for at-risk Americans. We are a proud founding member of the Alliance for Lifetime Income, a non-profit organization that educates Americans about the value and importance of having protected lifetime income in retirement and we advocate for solutions and policies that help bring financial health and opportunity within reach for all.

### **Sustainable Operations: Keeping sustainability at the core of our business model**

Long-term business sustainability is critical to our ability to meet our customers' needs. The backbone of our sustainability is a diversified, well-managed product line with a balanced and diverse approach to product distribution.

## Corporate Citizenship

Corebridge is committed to giving back to the communities we serve through programs and partnerships that leverage the skills, experience, knowledge and enthusiasm of our employees.

Through the Corebridge Volunteer Time Off Program, Corebridge employees can take up to 16 hours off per calendar year in hourly increments to volunteer with nonprofit/charitable organizations, including schools. Corebridge is also proud to support employees' generosity through the Corebridge Matching Grants Program. Corebridge matches employee donations 2:1 with a contribution up to \$10,000, per calendar year made by an eligible employee and/or their spouse/partner to a qualifying organization.

The Corebridge Compassionate Colleagues Fund enables employees to make donations that are used to help fellow Corebridge colleagues, who satisfy the eligibility requirements, overcome serious financial hardships. Corebridge takes local partnerships and community investments seriously, and the range of our nonprofit collaborations reflects the diversity of our people. Corebridge helps nonprofit partners advance their mission while connecting colleagues with the charitable sector. At this time, Corebridge does not accept unsolicited proposals for grants.

Employees participating in these programs or making contributions on behalf of Corebridge are responsible for certifying that they understand and abide by the requirements as outlined in the Program Guidelines and Corebridge's Employee Handbook. Corebridge treats employees' philanthropic endeavors as personal and private and no pressure should be applied to employees to volunteer, make donations, or utilize the Matching Grants Program. Any questions regarding these programs should be directed to Corebridge Corporate Citizenship. Corporate Citizenship Policies, Standards, Guidelines and Procedures apply to all employees to ensure we uphold the standards that best benefit Corebridge's brand and provide employees with the opportunity to drive meaningful societal impact.

For additional information regarding Corebridge's Corporate Citizenship efforts, please visit the [Corebridge Corporate Citizenship website](#).



# Our Commitments as Corporate Citizens

## Political Activities

Laws and regulations governing corporate political activities, lobbying, and contributions are complex. Corebridge's Government Affairs Groups (U.S. Federal, U.S. State, and International) ensure which activities are permitted and consistent with Corebridge's business strategy. The restrictions on political activities are detailed in the [Corebridge Policy on Lobbying and Political Activity](#).

- No employee should contact elected or appointed government officials in connection with political activities or lobbying on behalf of Corebridge without prior clearance from and coordination with the appropriate Government Affairs Group or legal department, as noted in the policy.
- Corebridge funds or assets are never to be used for political purposes without first consulting the appropriate Government Affairs Group.
- Only authorized representatives can contribute to candidates for public office on behalf of Corebridge.

Personal political activities or interests must not conflict with Corebridge responsibilities or imply Corebridge's support. Throughout voluntary political activity, no employee shall use Corebridge's name to imply sponsorship or endorsement or use corporate resources except as permitted by law. Corebridge employees considering candidacy for an elected public office must first obtain written approval from Corebridge's Chief Compliance Officer and should not use Corebridge's name other than identifying Corebridge as their employer.

## Trading in Securities

In conducting Corebridge business, employees often learn material information about Corebridge or other companies before the information is available to the public.

Transacting in securities while in possession of material nonpublic information, or "tipping" this information to others, is against Corebridge policy and violates the law.

The restrictions on the trading of securities - both Corebridge securities and those of other companies - are detailed in the [Corebridge Insider Trading Policy](#) (which applies to all employees and their immediate family members). Generally:

- You may not purchase, sell, or otherwise transact in Corebridge securities while in possession of material nonpublic information relating to Corebridge.

- You may not purchase or sell securities of another company, directly or indirectly, if you are in possession of material nonpublic information about that company obtained during the course of your employment with Corebridge.
- When you are in possession of material nonpublic or confidential information about Corebridge, or about any other company if such information was obtained in the course of your employment with Corebridge, you may not pass on (or "tip") that information to others or recommend that anyone purchase or sell the securities of Corebridge or that company.

All employees and immediate family members are prohibited from engaging in the following:

- Hedging transactions with respect to Corebridge securities;
- "Short selling" of Corebridge securities;
- Trading derivative securities, such as "put" or "call" options, forward contracts, equity swaps or collars related to Corebridge securities.
- Using Corebridge securities to support a margin debt, loan, or other extension of credit; and
- Pledging Corebridge securities.

There are additional restrictions on employees who are "Designated Officers" and "Access Persons" as those terms are defined in the [Corebridge Insider Trading Policy](#).

Prior to engaging in any securities trading activity, consult the [Corebridge Insider Trading Policy](#) to determine whether your transaction is permissible under the Policy. In addition, employees of certain Corebridge subsidiaries may also be subject to other insider trading policies, including pre-clearance and reporting obligations in regard to their personal trading activities.

Any questions about the [Corebridge Insider Trading Policy](#) or the rules and restrictions described above, should be directed to [AIGtradingpreapproval@aig.com](mailto:AIGtradingpreapproval@aig.com).

# Our Commitments as Corporate Citizens

## Money Laundering Prevention

Corebridge is committed to meeting its responsibilities to help prevent money laundering and terrorist financing. These responsibilities generally include identifying clients, monitoring client activity and reporting suspicious or unusual activity consistent with applicable laws. Employees are required to abide by anti-money laundering policies established by Corebridge and its business units. Suspicious activity reporting requirements are time sensitive. Contact your manager or designated compliance officer as soon as you have a concern that an activity might be unusual or suspicious. For more information on this topic, please see the [Corebridge Anti-Money Laundering Policy](#).



## Economic Sanctions, Anti-boycott, and Export Control Laws

In compliance with U.S. and other applicable economic sanctions programs, employees are prohibited from conducting business with or benefiting: (1) designated individuals or entities (involved in or connected to certain activities, including terrorism, weapons proliferation or narcotics trafficking); (2) certain countries, their governments (including government agents and government-owned entities) as well as nationals and private entities located in those countries; and (3) any entity in which one or more sanctioned persons - directly or indirectly - owns a 50% or greater interest. To determine if a party is subject to these prohibitions, consult with your designated compliance officer. Matters involving a confirmed sanctioned party, or where an employee is unsure, must be referred to Corporate Compliance's Financial Crimes Group ("FCG").

Corebridge employees may be required to follow economic sanctions or embargo laws of multiple jurisdictions. Because countries' laws may conflict, in such a situation it is important that you contact FCG.

Employees are prohibited from participating in boycotts that are not supported by the U.S. Government. If you are asked to participate in, or to provide information that may be used for the furtherance of such a boycott, report the matter immediately to your designated compliance officer.

Employees must also comply with applicable export control laws. To determine if exports or reexports, or insurance cover for such exports or reexports, are subject to controls or prohibitions, consult with your designated compliance officer.

For more information on these topics, please see the [Corebridge Economic Sanctions Policy](#), the [Corebridge Anti-Boycott Policy](#), and the [Corebridge Export Controls Policy](#).



# Our Commitments as Corporate Citizens

## Communicating with the Public

Only persons who are authorized to do so may speak on behalf of Corebridge, and the information they provide must be full, fair, accurate, timely and understandable. All requests from the media must be referred without comment to Corebridge's Corporate Communications Department or to the communications team supporting the Business Units in question. Employees are not permitted to make statements to or answer questions from the media without authorization.

All inquiries from broker-dealers, analysts, investment managers, other securities market professionals and security holders of Corebridge, must be immediately referred without comment to Corebridge Corporate Investor Relations.

If any material nonpublic information with respect to Corebridge is inadvertently disclosed in any external communication, the Corebridge General Counsel must be notified immediately so that public disclosure can be made promptly.

When communicating with the public on behalf of Corebridge, all Corebridge businesses and Employees must promote accessibility of information and services to the public, including but not limited to, information provided through websites, forms or other communication devices. It is the obligation of each international country market, Corebridge Business Unit and Corporate Function to ensure compliance with this Policy through the implementation and maintenance of controls in accordance with applicable country, state and local accessibility laws, including the Americans with Disabilities Act of 1990.

## Communicating with Regulators and Other Government Officials and Law Firms

Inquiries from regulators and government officials - outside the normal course of Corebridge's regulatory relationships - must be reported immediately to a Corebridge Legal Compliance & Regulatory representative (e.g., designated compliance officer, assigned business unit lawyer or regulatory group) before a response is made. Responses to regulators must contain complete, factual and accurate information. During a regulatory inspection or examination, documents must never be concealed, destroyed or altered, nor should lies or misleading statements be made to regulators.

## Social Media

Social media usage can have an effect on Corebridge's reputation. Social media, or websites and online tools that allow users to interact with each other, may lead to disclosure of Corebridge's confidential or proprietary information, the transmittal of unlawfully harassing, threatening, defamatory or discriminatory comments about Corebridge, its employees and/ or clients, or violate local, state or federal laws, or the rules of self-regulatory organizations. Even though some social media sites are inaccessible through Corebridge's IT Systems, Corebridge has an interest in your use of social media both at and outside of work. Unless you have been expressly authorized by management to speak on behalf of Corebridge, when using social media, you must make it clear that the views expressed are yours alone; in no event should you ever give the impression that you are speaking on behalf of Corebridge. Any questions about the use of social media, or the applicable [policies](#) or [guidelines](#) governing the use of social media, should be directed to your designated compliance officer, Corebridge Corporate Communications, or Employee Relations.

## Government Business

Doing business with governments may present different risks than business in the commercial marketplace. Laws relating to contracting with international, federal, state, and local agencies generally are more stringent and complex. Certain conduct and practices that might be acceptable in the commercial setting may be prohibited in the public sector. You should therefore consult with management or your designated compliance officer before you make any decision about doing business with government entities.

# Our Commitments as Corporate Citizens



## Anti-Corruption and Bribery

We must never use improper means to influence another's business judgment. No employee, agent or third party acting on Corebridge's behalf may provide bribes or other improper benefits to another person in order to obtain or retain business or an unfair advantage in any business interaction.

Payments or promises to pay something of value to obtain or retain business or otherwise secure an improper advantage must never be made to a government official or employee. Government officials may include employees of enterprises that are controlled or owned in whole or in part by a government.

Anti-Corruption laws also prohibit the creation of inaccurate or false books and records, and they require companies to develop and maintain adequate controls regarding corporate assets and accounting. All employees and officers, no matter where they are located, are required to comply with the U.S. Foreign Corrupt Practices Act, in addition to the anti-corruption laws of the country in which they are located.

Any employee who has knowledge of, or in good faith suspects, a violation of any of these laws, regulations, or policies must report them promptly to their designated compliance officer. For more information on this topic, please see the [Corebridge Anti-Corruption Policy](#).



# Our Commitments as Corporate Citizens

## Q&A

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**Q** *I heard from my manager that a new supplier is being used in connection with a newly developed product that will be announced to the public in four weeks. Investing in that supplier seems like a great investment idea. Can I let others know?*

**A** No. This type of information is considered material nonpublic information. You cannot trade while possessing it, nor should you share it with others.

**Q** *If I am asked to comment about Corebridge's financial outlook by a member of the media, may I give my opinion if I state it as such?*

**A** No. You may not provide any comments or personal opinion to the press without prior approval from Corebridge Corporate Communications. Refer all media requests for information without comment immediately to Corporate Communications.

**Q** *An executive of a state-owned company has suggested that if we make a donation to a local charity, he believes our sales efforts in his country would be more favorably received. I'm uncomfortable with this. What should I do?*

**A** You are right to be uncomfortable. The payment may be a violation of anti-bribery laws. Discuss the situation with your designated compliance officer.



The Corebridge Code of Conduct is not an employment contract. Nothing in the Code should be construed as a promise of any kind or as creating a contract regarding wages or any other working conditions. Employees have the unqualified right to terminate their relationship at any time for any reason, subject to any written employment arrangement. Likewise, subject to any applicable laws and any written employment arrangement, Corebridge has the right to discharge or discipline any employee with or without just cause or prior warning.

Employees can reference Corebridge Corporate Policies on Corebridge's intranet.

2023