



Leading with integrity and accountability

# Code of Conduct

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# A Message from Tony Cheng



Dear colleagues,

RGA became an industry leader by being an innovative and trustworthy partner. Our clients know that they can count on RGA to do the right thing, keep our promises, and deliver on our commitments to all of our stakeholders. We have to earn that reputation every day, with every client, and in every interaction because in our industry there can be no success without trust, and no growth without a solid foundation of shared values and behaviors.

At RGA, we are guided by our values: Accountable, Client-Centric, Innovative, Inclusive, Purpose-Driven, and Trustworthy. We must be vigilant in protecting RGA's reputation and securing our success by incorporating these values into how we conduct business and how we treat each other.

The principles and rules contained in this Code of Conduct are informed by these values and serve as guidelines for operating according to the highest ethical standards. Each of us is a guardian of RGA's reputation; therefore, each of us must take personal responsibility and use our best judgment in all business endeavors and relationships. Never underestimate the importance of your actions and how they affect you, your colleagues, and RGA.

For more than 50 years, RGA has been building a legacy of trust. By staying true to our values and pursuing company goals honestly and ethically, we can continue that legacy into the future. Through this culture of integrity, honesty, and cooperation, everyone contributes to achieving RGA's purpose of making financial protection accessible to all.

A handwritten signature in blue ink, appearing to read 'Tony Cheng', written in a cursive style.

**Tony Cheng**  
President and CEO  
Reinsurance Group of America, Inc.

# Values and Principles

**Rule to Remember >>** RGA's values define who we are.

## Our Values

### **Accountable**

We demonstrate commitment and responsibility to our clients, colleagues, communities, and other stakeholders.

### **Purpose Driven**

We pursue our purpose by boldly striving for superior organizational performance and personal learning and development in all situations.

### **Client-Centric**

We place client needs at the center of everything we do as an organization.

### **Trustworthy**

We demonstrate integrity by keeping our commitments and modeling ethical behavior at all times.

### **Innovative**

We are curious and creative, challenging the status quo to develop inventive solutions that optimize performance.

### **Inclusive**

We build a safe and welcoming environment where diverse viewpoints, resources, and expertise are actively shared and sought. We actively collaborate in pursuit of common goals.



# Rules to Remember

The Rules to Remember are expectations that expand upon our Values and outline the standards by which we expect RGA's business operations to be conducted. The RGA Code of Conduct does not address all workplace conduct; thus, workforce members are expected to consult other applicable RGA policies and guidelines that may provide additional guidance or address topics not covered by the Code of Conduct.

Here is a list of Rules to Remember featured throughout the Code of Conduct. For additional guidance, check out the Policy Portal intranet site.

## Speak-Up

Workforce members have a responsibility to speak up and voice any concerns.

## Non-Retaliation

Workforce members can raise concerns without fear of retaliation, direct or indirect.

## Human and Labor Rights

RGA maintains an inclusive work environment where all workforce members are treated with dignity and respect.

## Workplace Safety and Health

RGA commits to providing a safe and healthy environment in the workplace.

## Insider Trading

RGA prohibits workforce members from using or sharing material, non-public information about RGA and other companies.

## Conflicts of Interest

Workforce members must avoid all real or potential conflicts between their own interests and those of RGA or its clients.

## Antitrust and Fair Competition

RGA competes legally and ethically by following all antitrust and competition laws.

## Economic Sanctions

Workforce members must ensure that RGA is not part of any RGA financial transactions involving a blocked entity.

## Bribery and Corruption

Workforce members should never allow acts of bribery or corruption to influence business decisions made on behalf of RGA.

## Anti-Fraud

Workforce members have a responsibility to report suspected incidents of fraud and to conduct their work in such a way as to prevent fraud from occurring in the workplace.

## Gifts and Entertainment

Workforce members must not give or receive any inappropriate gifts or entertainment.

## Protection of RGA Assets

Workforce members have a responsibility to protect RGA's physical assets as well as the personal and sensitive data RGA hosts on its systems.

## Statements and Records

Workforce members are honest and accurate in communications and recordkeeping on behalf of RGA.

# RGA Resources

At times, we may encounter situations in which the right choice is not clear. If you need to ask a question or speak up about a concern, your direct manager or supervisor is likely the best resource to speak to because he or she knows your business function, team, and situation.

However, you are always encouraged to contact any of the following resources to seek guidance or report your concerns:

- RGA's Speak-Up Hotline
- Global Human Resources
- Global Ethics and Compliance
- Global Risk Services
- RGA Legal Counsel
- Global Information Technology
- Global Internal Audit
- Global Security and Privacy Office



# Code of Conduct Introduction

**Rule to Remember >>** Any individual representing or acting on behalf of RGA must follow RGA's Code of Conduct.

## RGA Code of Conduct

- **The Code of Conduct applies globally to all workforce members throughout Reinsurance Group of America, Incorporated, and all of its subsidiaries and affiliates (RGA).** Workforce members include any regular or temporary employee, contingent worker, contractor, consultant, or individuals representing or acting on behalf of RGA.
- **The essential elements of professional ethical conduct** include honesty, fairness, and respect for not only the individual but also respect for property.
- **RGA's Code of Conduct translates these essential elements of ethical conduct** into a set of practical rules and standards to serve as a guide for conducting business on RGA's behalf.
- **RGA's Code of Conduct is based on our core values and principles** and serves as a foundation for RGA policies, standards, and procedures.
- **Because the Code of Conduct cannot cover all situations,** the rules and standards outlined are not a substitute for sound judgment and personal accountability.
- **The Code of Conduct supplements,** but does not replace, any applicable RGA policies, standards, or procedures that are in place or implemented in the future.

## Your Role

- **RGA expects you to read and gain a basic understanding** of the ethical standards described in the Code of Conduct.
- **You must comply with the Code of Conduct,** RGA policies, and any applicable laws of the countries in which RGA operates.
- **You are responsible for conducting yourself with the highest degree of integrity** at all locations and situations where RGA business is conducted as well as all company-sponsored events.
- **The Code of Conduct cannot cover every possible situation,** which is why RGA relies on you to use good judgment and promptly speak up when questions or concerns arise.
- **If during the course of your employment with RGA,** you become aware of or suspect a violation of the Code of Conduct, RGA policies, or applicable laws, you must report it to your direct supervisor, a member of the Global Ethics and Compliance office, or through the Speak-Up Hotline.

## The Role of Our Leaders

Leaders include any person(s) having responsibility for achieving the business objectives of RGA and the authority to establish strategies and make decisions designed to reach those objectives.

Leaders must not only behave ethically but also take affirmative steps to influence and encourage their direct reports to do the same.

As an RGA leader, you have the following additional responsibilities:

- **Reinforce** the Code of Conduct by complying with all standards of the Code of Conduct, applicable laws or regulations, and RGA policies.
- **Encourage** a culture of ethical compliance through leadership that demonstrates the highest professional standards at RGA.
- **Monitor** your direct reports' compliance with the Code of Conduct and hold them accountable to RGA's high ethical standards and expectations.
- **Champion** the Code of Conduct and RGA policies and serve as a resource for direct reports when they have questions or require guidance.
- **Take a stand** against any form of retaliation.

# Speak Up

**Rule to Remember >>** Workforce members have a responsibility to speak up and voice any concerns.

## Our Policy

- **RGA's reputation for integrity is one of our most important assets.** Protecting that reputation is the responsibility and obligation of every workforce member by speaking up and reporting an issue, whether observed or suspected.
- **Regardless of which resource you contact to report an issue,** RGA will handle the concern appropriately and promptly.
- **RGA maintains a strict non-retaliation policy** for factual issues raised in good faith.
- **RGA maintains compliance with applicable whistleblower laws** in the jurisdictions in which it operates.
- **Depending on local privacy and whistleblower laws in individual countries,** the Speak-Up Hotline may not always be permitted to allow anonymity or may limit specific topics that can be reported to accounting, financial, auditing, and bribery matters only.
- **When you file a report through the Speak-Up hotline,** the appropriate individuals will promptly review the concerns and determine if an investigation is required.

## Your Role

- If you witness or suspect illegal or unethical behavior involving RGA activities or need help making an ethical decision, **you have multiple resources available at RGA, including:**
  - Direct Managers or Supervisors
  - Human Resources Department
  - Global Ethics and Compliance
  - RGA Legal Counsel
- **When you are not comfortable seeking advice or guidance** from your direct supervisor or another leader, you have the option to use the Speak-Up Hotline, which is managed by a third party.
- **Visit the Speak-Up Hotline website** for more information about reporting an issue.
- **What can you report?** Examples include, but are not limited, to the following:
  - Discrimination or Harassment
  - Misstatement of Financial or Non-Financial Records
  - Bribery, Corruption, or Kickbacks
  - Conflicts of Interest
  - Violation of applicable law, rule, regulation, RGA Policies, or the Code of Conduct
- **When you contact the Speak-Up Hotline,** it is critical to provide as many details as possible (e.g., who, what, when, where). The more information you can provide, the more efficient any investigation will be.

## What You Should Know

### Question: What happens when I file a report through the Speak-Up Hotline?

The Speak-Up Hotline is available 24 hours a day, 7 days a week at [www.rgare.com](http://www.rgare.com), or through RGA's intranet homepage. The Speak-Up Hotline is operated by an independent third party who will receive your concerns and forward the information to Global Ethics & Compliance for handling. You can file a report online or by phone.

When you file a report through the Speak-Up Hotline, the appropriate individuals within RGA will promptly review the concerns and determine if an investigation is required.

Regardless of whether you choose to provide your name, the information you provide to RGA will be treated as confidential to the extent possible.

If an investigation is required, the department assigned to investigate the issue will receive the reported information, and if you have provided your name, may contact you for additional information.

# Non-Retaliation

**Rule to Remember >>** Workforce members can raise concerns without fear of retaliation, direct or indirect.

## Our Policy

- **RGA values and relies on you to identify potential issues and raise concerns** that may need to be addressed. RGA does not tolerate acts of retaliation against any person who reports an issue honestly and in good faith.
- **RGA's commitment to non-retaliation** assures you that raising concerns, reporting misconduct, or cooperating in any investigation will not result in suffering adverse consequences.
- **RGA will not tolerate retaliation** in any form, at any level of the organization. Retaliatory behavior perpetuates an environment of fear and places you at risk for disciplinary action.
- **Parties involved in the investigation of a suspected violation** will make every reasonable effort to maintain your confidentiality.

## Your Role

- **As a reminder, reports of suspected violations of the Code of Conduct**, RGA policies, or laws and regulations are treated seriously and promptly reviewed.
- **Regardless of your role at RGA, if you suspect retaliation** is occurring or has occurred against you or others, you must contact the local Human Resources representative, Global Ethics and Compliance, or RGA Legal Counsel.
- **Should you discover the identity of an individual** who spoke up, or is involved in an investigation, you must respect their need for confidentiality.
- **You are expected to cooperate** in internal investigations, audits, or directions from an RGA staff member involved with a lawsuit or governmental investigative proceeding.

## What You Should Know

**Question:** What is considered an act of retaliation?

**Answer:** Retaliation includes threatening or taking actions such as termination of employment, denial of promotion, or negative performance assessments resulting from a workforce member raising an issue or reporting misconduct.

An act of retaliation can also include the denial of favorable assignments or educational opportunities, being excluded from meetings, or being the subject of negative comments and rumors.

RGA does not tolerate retaliation in any form.

# Human and Labor Rights

**Rule to Remember >>** RGA maintains an inclusive work environment where all workforce members are treated with dignity and respect.

## Our Policy

- **RGA recognizes the importance of maintaining and promoting fundamental human rights** everywhere we operate and do business.
- **RGA complies with all applicable employment and labor laws**, including those related to compensation, hiring, hours worked, and working conditions, as well as laws prohibiting the use of forced and compulsory labor, or any form of human trafficking.
- **RGA provides equal employment opportunities** by not discriminating based on race, color, religion, age, gender, gender identity or expression, sexual orientation, genetic information, marital status, national origin, ancestry, disability, medical condition, veteran status, or any characteristic protected by law.
- **RGA does not tolerate harassment or bullying** in any form. Acts of harassment and intimidation which create a threatening, hostile, or offensive environment are prohibited, whether in physical, verbal, or written form (e.g., email, text messages, and social media posts).
- **RGA has zero-tolerance for retaliation** against a workforce member who filed a complaint, or reported suspected or actual misconduct, or participated in an investigation.

## Your Role

- **Create a positive work environment** by never engaging in any act of harassment, bullying, or discrimination against a workforce member.
- **Conduct yourself in an appropriate, professional manner** in all dealings with others in the workplace.
- **Value all individuals in our diverse workforce** and recognize the importance of understanding, appreciating, and embracing individual differences.
- **Recruit, hire, compensate, and award promotions** based on the requirements of the role and the individual's qualifications, relevant job performance, experience, ethical conduct, and other role-related factors.
- **Be thoughtful and sensitive** to how others in your work environment might perceive your actions and comments.
- **Be vigilant in recognizing signs that others may be experiencing harassment or discrimination.** If you or someone else is the subject of any bullying, discrimination, or harassment, contact your Human Resources representative or call the Speak-Up Hotline immediately.

## What You Should Know

**Sexual harassment** includes verbal, visual, or physical conduct of a sexual nature that is unwelcome and makes someone feel uncomfortable. This may include, but is not limited to, the following:

- Repeated offensive sexual advances, flirtations, or propositions
- Sexually oriented jokes, pictures, texts, or email messages
- Display of sexually suggestive pictures or pornography in the workplace

**Question:** A co-worker frequently makes comments about my appearance that make me uncomfortable. I have asked this individual to stop on more than one occasion, but the comments continue. What can I do about it?

**Answer:** Harassment is not always obvious and does not require intent to offend. Inappropriate conduct meant as a joke or compliment can lead or contribute to harassment. You can – and should – report this conduct to your direct supervisor, another leader, or your local Human Resources representative. If you feel uncomfortable speaking about this topic to those resources, you can always call or report this online to the Speak-Up Hotline.

# Workplace Safety and Health

**Rule to Remember >>** RGA commits to providing a safe and healthy environment in the workplace.

## Our Policy

- **RGA fosters a work environment that is free of safety hazards** and promotes the health and safety of all workforce members and visitors, as well as the communities where we work.
- **RGA does not tolerate any workplace violence** committed by or against workforce members. You are prohibited from making threats or engaging in violent activities in the workplace.
- **RGA prohibits the unlawful sale, possession, purchase, transfer, or use of illegal drugs or controlled substances** on RGA premises.
- **RGA may permit the controlled serving and drinking of alcoholic beverages** at RGA-sponsored functions, which may take place offsite or be scheduled after business hours during the week or weekends.
- **RGA shall investigate all reported violations** and will disclose information obtained to others only on a need-to-know basis. At the conclusion of the investigation, RGA will take appropriate corrective action.

## Your Role

- **Conduct your business for RGA** in a sober and clear-headed manner and never under the influence of alcohol or illegal drugs.
- **Follow all health, safety, and security-related policies**, procedures, and applicable laws or regulations to keep the RGA work environment safe.
- **Use good judgment and maintain professional conduct** during instances where alcoholic beverages are served at RGA-sponsored functions as this does not constitute an excuse for unprofessional behavior or conduct.
- **You are responsible for understanding your own alcohol tolerance level** and managing your own consumption at company events.
- **You should never engage in the following**, which are examples of prohibited conduct:
  - Causing physical injury to another person
  - Communicating threats of potential violence
  - Displaying aggressive or hostile behavior
  - Making unwanted sexual advances
  - Bringing a weapon onto RGA property or possessing a weapon while conducting business on behalf of RGA.
- **Reporting is the key to enforcement.** Without knowledge, there is little RGA can do to investigate such actions. Any suspected or witnessed acts of violence or substance abuse in the workplace must be immediately reported to a direct supervisor.

## What You Should Know

**Weapons include, but are not limited to, the following:**

- A firearm or any device from which a projectile may be fired by an explosive
- Any real or simulated firearm operated by gas or compressed air
- A knife or any instrument that can be used as a weapon or poses a reasonable risk of injury
- Any other weapon which is readily capable of severe or lethal harm

**Question:** I suspect that a fellow workforce member occasionally comes to work drunk and may be drinking on the job. I am concerned for this co-worker's health and safety. What can I

**Answer:** You should consult with your direct supervisor, who will take the correct steps to involve the right professionals to address the situation. If you are not comfortable discussing the matter with your supervisor, contact another leader, your Human Resources representative, or the Speak-Up Hotline.

# Insider Trading

**Rule to Remember >>** RGA prohibits workforce members from using or sharing material, non-public information about RGA, and other companies with which RGA does business.

## Our Policy

- **In the course of your work at RGA, you may encounter “inside information,”** which is material, non-public information about RGA, such as revenues, earnings, acquisition or divestiture plans, new products, or other significant developments and similar sensitive information about other companies with which RGA does business.
- **As a publicly-traded company, specific laws** govern how RGA announces its financial results and other significant developments. Those laws also limit how that information can be used or shared before it is made available to the public.
- **Laws, regulations, and RGA policies also prohibit you from buying, selling, or suggesting** to others that they buy or sell RGA securities, or the securities of any other company with which RGA does business, with knowledge of non-public information.
- **Consequences of these violations are severe,** including termination of employment, civil or criminal penalties for you or RGA, and irreparable damage to our reputation and public trust in our company.

## Your Role

- **Do not disclose material, non-public information.** Such information must be kept confidential to prevent potential penalties and reputational risks to RGA.
- **Never buy or sell securities** when you are aware of material, non-public information. Such conduct is called **“insider trading”** and is subject to federal, state, and foreign securities laws, as well as RGA policies.
- **Under no circumstances should you discuss trades or “tip” others** to trade if you are aware of the material, non-public information about RGA, or another company with which RGA does business.
- **If subject to a blackout period, do not trade RGA securities** until RGA lifts the restriction. If a broker inadvertently buys or sells on your behalf during the blackout period, you must immediately report it to RGA Legal Counsel.

## What You Should Know

### What is Material and Non-Public Information?

- **“Material information”** generally is defined as information that:
  - A reasonable investor is substantially likely to consider important in making an investment decision to buy, hold, or sell securities.
  - A reasonable investor will view as significantly altering the “total mix” of information made available.
- **Information is “non-public”** until it has been effectively communicated to the marketplace. One must be able to point to some facts to show that the information is widely disseminated.
- **If you inadvertently disclose material, non-public information** to a person inside or outside RGA who is not obligated to keep the information confidential, you must immediately report it to RGA Legal Counsel.

# Conflicts of Interest

**Rule to Remember >>** Workforce members must avoid all real or potential conflicts between their own interests and those of RGA or its clients.

## Our Policy

- **RGA prohibits undisclosed conflicts of interest** or even the appearance of a conflict of interest. Our goal is to avoid any relationship, influence, or activity that might impair or appear to reduce our ability to make objective and fair decisions in conducting our business.
- **A conflict of interest may occur when personal interests or activities conflict or appear to conflict** with our judgment or responsibility to RGA. Or when we use our position with RGA or information, we have acquired during employment, in a way that creates a conflict between our interests and the interests of RGA.
- **Even the appearance of a conflict of interest** can cause harm to RGA's reputation. The appearance of conflict occurs whenever your interests could be questioned as potentially affecting your judgment and conflicting with RGA's interests.

## Your Role

- **You are required to disclose actual or potential conflicts of interest** to RGA, and you should remove yourself from making any decisions that might be affected by the conflict.
- **Avoid situations where your loyalty to RGA** could be questioned because of outside interests.
- **You must consistently exercise sound, independent judgment**, and act in the best interest of RGA.
- **Never put yourself in a position** where close personal or family relationships could influence decision-making or actions.
- **Having your own business or other jobs** is acceptable if these activities do not interfere with your job responsibilities or performance, and do not compete with RGA's interests.

## What You Should Know

**Question:** A current RGA third-party vendor offers a bonus for referring one of its contractors for a position that would not directly report to you. Would a referral of the contractor create a conflict of interest?

**Answer:** Yes, such a referral situation involving a vendor's contractor may cause the appearance of placing your personal financial interests ahead of RGA's interests.

**Question:** My sister recently took a job with a vendor that RGA utilizes. What should I do?

**Answer:** It is always important to disclose a potential conflict of interest as soon as you become aware of the situation. The Global Ethics and Compliance team will evaluate potential conflicts and provide advice on how best to resolve an issue should it be determined an actual conflict of interest exists. You should contact your manager or the Global Compliance and Ethics office to start this process.

# Antitrust and Fair Competition

**Rule to Remember >>** RGA competes legally and ethically by following all antitrust and competition laws.

## Our Policy

- **RGA's dealings with customers and competitors** must be based on honest, legal, and fair practices to uphold our reputation for integrity.
- **RGA must not partner with competing companies** to set terms offered to customers or purposefully manipulate prices for services or products.
- **Noncompliance with state, federal, and international antitrust or fair competition laws** may result in severe legal penalties for RGA and criminal charges for the parties involved.
- **Advertising is considered deceptive if it contains an untrue or misleading statement**, or omits information resulting in content that is likely to mislead clients.
- **Advertising or business practices are considered unfair** if they cause or are likely to cause financial or reputational harm.

## Your Role

- **Be aggressive but fair in competition** by complying with all laws and regulations that govern our competitive conduct.
- **Fully honor your commitments** to our customers, treat all customers fairly, and ensure any provided services represent appropriate value.
- **Gather appropriate information** about RGA's competitors by only using channels through which information is publicly available.
- **Never make any false or misleading advertising claims**, or any misrepresentations or other kinds of statements that might create unreasonable expectations, and do not make any untruthful or misleading statements about our competitors or their products or services.
- **Report any suspicious activities** that may not comply with RGA's fair competition policies or applicable laws and regulations to RGA Legal Counsel.

## What You Should Know

### What Is Antitrust Law?

- Antitrust Law is a collection of state, federal, and international government laws that regulates the conduct and organization of business corporations, generally to promote fair competition for the benefit of consumers.

**Question:** Can I pretend to be a customer to get pricing information from RGA's competitors?

**Answer:** No. Obtaining information about a competitor by misrepresenting your identity or by inducing an employee of the competitor or a third party to divulge confidential information is inappropriate.

Gathering information about our competitors is a legitimate business activity when done lawfully and ethically.

# Economic Sanctions

**Rule to Remember >>** Workforce members must not facilitate any RGA financial transactions involving a blocked entity.

## Our Policy

- **RGA and all RGA operations worldwide must comply** with the U.S. Office of Foreign Assets Control (OFAC) economic sanctions program.
- **RGA is firmly committed to complying with OFAC** and all applicable local economic sanction laws, regulations and government guidance, and to preventing the participation in or facilitation of financial transactions involving blocked entities.
- **Depending on where a particular RGA operation is based**, it may also be subject to the compliance requirements of a local economic sanctions program.
- **Failure to comply with economic sanctions programs** could result in severe criminal and civil penalties for RGA and its workforce members, including fines and imprisonment. It would damage RGA's good name and reputation.

## Your Role

- **Comply fully with applicable economic sanction laws, regulations, and government guidance**, including local laws in countries in which RGA operates.
- **Do not conduct business with third-party vendors** that are blocked under any applicable economic sanctions program.
- **Do not conduct business with, reinsure policies, or pay claims** that relate to policy owners, insureds, or beneficiaries that are blocked under any applicable economic sanctions program.
- **While you may never be in the position to violate economic sanction laws**, you should be alert for irregularities or "red flags" in the payment process, including but not limited to, the following:
  - Attempts to make substantial payments in cash
  - Payments made by a party who has not been involved in the RGA business contract
  - Requests to pay more than listed in the agreement
  - Payments made in currencies other than those specified in the contract
  - Payments received from an unusual source or non-business related account

## What You Should Know

### What is OFAC?

- The Office of Foreign Assets Control ("OFAC") administers and enforces economic sanctions against individuals, entities, companies, and countries, including terrorists and narcotics traffickers.
- The sanctions can be either comprehensive or selective in nature. Such sanctions include blocking assets and implementing trade restrictions to achieve foreign policy and national security goals.
- RGA utilizes the list of blocked governments, persons, entities, and companies maintained by OFAC and other sanctions programs.

**Question:** A foreign organization recently contacted your department to arrange for the purchase of certain services. The organization is headquartered in a country in which RGA has never done business. What should your department do?

**Answer:** Before discussing business with this organization, the department must check with the Global Ethics and Compliance office to determine if you will be doing business in a country or with an individual or organization that is the subject of any applicable economic sanctions.

# Bribery and Corruption

**Rule to Remember >>** Workforce members should never allow acts of bribery or corruption to influence business decisions made on behalf of RGA.

## Our Policy

- **RGA prohibits any business decision**, with customers, vendors, government officials, or other third parties, that are influenced by bribery or corruption.
- **A bribe occurs when someone gives or promises** another person anything of value to obtain favorable treatment in return.
- **Corruption refers to obtaining or attempting** to receive a personal benefit or business advantage through improper or illegal means.
- **RGA is committed to conducting business ethically** and in compliance with all applicable laws and regulations, including the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act, and similar laws that prohibit improper payments from gaining a business advantage.
- **Engaging in acts of bribery and corruption not only violates this Code of Conduct and RGA policy**, but may also expose RGA or yourself to substantial fines, reputational damage, criminal prosecution, and imprisonment.
- **RGA's Chief Compliance Officer maintains oversight** of the global anti-corruption policy and controls.

## Your Role

- **You must not influence or attempt to control others** to act improperly by giving or trying to provide them with anything of value, or by **receiving** anything of value to gain a competitive business advantage.
- **You must avoid giving or receiving anything of value** that could create the appearance of impropriety.
- **Be aware of corruption risks inherent in interactions** with government officials – ask your direct supervisor or Global Ethics and Compliance to provide insight into such a situation.
- **You must abide by all applicable laws** that prohibit bribery of business partners or government officials in the countries where RGA operates. Facilitation payments to government officials to expedite a routine administrative process are prohibited and must be avoided in all circumstances.
- **Understand the role you play in anti-bribery and corruption compliance.** If you become aware of any potential or actual arrangement or agreement that may involve bribery or corruption, immediately report the situation to Global Ethics and Compliance or the Speak-Up Hotline.

## What You Should Know

### What is a “kickback”?

- A kickback is a form of corruption that involves two parties agreeing that a portion of sales or profits will be improperly given in exchange for making a business deal.

### What is “Anything of Value”?

- This phrase means anything that might have value, including cash, business opportunities, offers of employment, and more.
- There is no monetary threshold; any amount could be seen as a bribe.

### Who is considered a “Government Official”?

- Employees of any government or government-controlled entity, including government-controlled health care providers
- Political party members, political office candidates, or political party officials
- Employees of public international organizations (e.g., United Nations)
- It is your responsibility to understand whether someone is a government official. When in doubt, consult Global Ethics and Compliance for guidance.

# Anti-Fraud

**Rule to Remember >>** Workforce members have a responsibility to report suspected incidents of fraud and to conduct their work in such a way as to prevent fraud from occurring in the workplace.

## Our Policy

- **RGA is committed to conducting business with honesty and transparency.** RGA has established the appropriate controls for fraud prevention, detection, and reporting.
- **Fraud is defined as a knowing misrepresentation or concealment** of a material fact, a willful or deliberate act - or failure to act - with the intention of obtaining financial or other benefits to avoid an obligation.
- **All workforce members are expected to understand the signs of potential fraudulent activity** and to promptly report any concerns.
- **Engaging in acts of fraud violates this Code of Conduct and RGA policy** and exposes RGA or yourself to potential financial losses, administrative or regulatory actions, operational risks, and reputational harm.

## Your Role

- **Understand the various types of fraud schemes** and the indicators that may signal fraudulent behaviors.
- **Be alert to signs of fraud** and promptly report any suspicious activity.
- **Potential cases of fraud should be reported** to your manager, a direct supervisor, to Global Ethics & Compliance, or through the Speak-Up Hotline.
- **You must abide by all applicable laws, rules, and regulations related to anti-fraud** in the countries where RGA operates.

## What You Should Know

Examples of common fraud scenarios and potential indicators may include:

- **Financial Statement Fraud:** Financial statement data is intentionally misstated or omitted.
- **Asset Fraud:** The Company's assets are used without permission for personal gain.
- **Procurement Fraud:** Payments are made to a vendor or supplier for goods or services that do not exist, overpriced, or unnecessary.
- **Expense Fraud:** Additional compensation is received by submitting personal expenses for reimbursement, double billing or inflating business expenses.
- **Conflicts of Interest:** An employee has an undisclosed financial interest in a consulting firm or vendor engaged by the company.
- **Claims Fraud:** A policyholder or beneficiary deliberately submits falsified paperwork to secure monetary gain through their insurance policy.

# Gifts and Entertainment

**Rule to Remember >>** Workforce members must not give or receive any inappropriate gifts or entertainment.

## Our Policy

- **RGA prohibits workforce members from giving or receiving gifts** and entertainment that may be deemed inappropriate or excessive from current or prospective customers, vendors, business partners, or government officials.
- **Such conduct may influence RGA-related business decisions** or give the appearance of affecting our ability to make objective business decisions.
- **Receiving cash gifts from customers, vendors, business partners, or government officials is always prohibited**, as it could be viewed as excessive in nature, construed as a bribe or payoff, perceived as an attempt to improperly influence fair and impartial judgment, and/or may violate a law or regulation. Soliciting gifts in any form or amount is always prohibited.
- **Under certain conditions, workforce members may accept gifts and entertainment** if they are determined to be reasonable, customary, infrequent, and are presented openly and transparently.
- **In addition to being reasonable, gifts given to or received from commercial partners exceeding \$250 (USD)** per person require pre-approval from your manager. Regardless of the amount, gifts to a government official require pre-approval from your manager.

## Your Role

- **You must not accept or receive any gifts or entertainment** intended to influence your or another individual's behavior.
- **Avoid accepting gifts or entertainment from people with whom we do business** – or people who are trying to do business with us – unless it is in connection with a legitimate business purpose and is first brought to the attention of your direct supervisor.
- **Practice moderation and common sense** when entertaining or giving gifts on behalf of RGA.
- **Acceptance of ordinary business entertainment** (e.g., lunch, dinner, or a sporting event) from a third party may be appropriate when reasonable and for a bona fide business purpose.
- **Entertainment accepted by others must be on the same level of propriety** and integrity as that required of workforce members in the course of business.
- **As representatives of RGA**, you must not do anything that would put others outside RGA in a position where they have a conflict of interest relative to their responsibilities to their employer.
- **Contact Global Ethics and Compliance** with any questions or guidance about gifts or entertainment.

## What You Should Know

**Question:** Our team is traveling to an industry event and will meet with a potential business partner while there. We've been asked to cover their travel and lodging expenses during the event. Is this permissible?

**Answer:** This is permissible only in certain limited circumstances and requires your manager's pre-approval if these expenses exceed \$250 (USD) per person for commercial partners. RGA's Managing Counsel must approve travel and lodging expenses for government officials or commercial partners and all requests must be made in writing.

**Question:** An RGA commercial partner is seeking RGA's help to support a charitable cause/entity. How should this be handled?

**Answer:** All requests must be made in writing and submitted to Human Resources. RGA's Managing Counsel and Corporate Social Responsibility office must approve all charitable donation requests.

# Protection of RGA Assets

**Rule to Remember >>** Workforce members have a responsibility to protect RGA's physical assets as well as the personal and sensitive data RGA hosts on its systems.

## Our Policy

- **RGA prohibits the unauthorized or improper use of RGA property**, including its intangible property and technology assets, such as data, systems, and intellectual property. Workforce members must respect the intellectual property of others.
- **RGA is committed to complying with applicable security and privacy laws** in the countries where we conduct business, including regulations regarding the cross-border transfer of specific categories of data.
- **Any intellectual property that is created by a workforce member** within the scope of their employment at RGA, including but not limited to, new business methods, brochures, and internally developed software, belongs exclusively to RGA.
- **Use of RGA's email and internet services should be used for legitimate business purposes**, but incidental and occasional personal use of email and internet is acceptable.
- **RGA reserves the right to monitor or audit any of RGA's information or physical assets** in compliance with applicable laws and regulations.

## Your Role

- **Except as expressly authorized by RGA**, you may not use, disclose, or distribute RGA's information or physical assets, whether intentionally or negligently. RGA strictly prohibits such unauthorized acts. In some cases, such acts could also be illegal.
- **Avoid unauthorized copying or use** of any licensed or copyrighted materials such as computer software or computer storage media.
- **You may not send, and should not receive**, any inappropriate electronic communications over RGA communications systems.
- **You are prohibited from forwarding business-related emails and information** to your personal (e.g., Gmail or Hotmail) email addresses, as such an action does not allow for the appropriate protection of information, which may include personal data or proprietary information in the email.
- **Follow the applicable security and privacy laws and regulations** of countries in which RGA operates.
- **You must report any witnessed or suspected misuse** of RGA's physical or information assets.

## What You Should Know

### Categories of RGA Assets

RGA's physical and information assets are provided to conduct authorized business on behalf of RGA.

- **Physical assets** include tangible items such as real estate, equipment and systems, office equipment, and supplies.
- **Information assets** include material, non-public information, trade secrets, patents, data, applications, databases, electronic storage locations, trademarks, business plans, and other innovative or creative ideas.

**Question:** I run a small sport betting pool with my friends that I want to expand with workforce members at RGA. Can I use my RGA email account to distribute bracket information to coworkers?

**Answer:** No, the RGA email system should not be used to support or advance gambling. Given the complicated laws surrounding betting at work, allowing these emails may place RGA in a position with unwanted consequences. Such non-business activity can have a negative effect on the performance and availability of our computer network, which is an important RGA resource.

# Statements and Records

**Rule to Remember >>** Workforce members are honest and accurate in communications and recordkeeping on behalf of RGA.

## Our Policy

- RGA requires that workforce members **create and maintain records** accurately and completely.
- RGA must maintain strict compliance with **both the spirit and the letter of all laws** and regulations governing disclosure, financial reporting and records, and exercise responsible use of and control over financial assets.
- **Any email, voicemail, or other communication sent by a person** having apparent authority to speak for RGA (for instance, an email sent over RGA's enterprise servers), is considered official communication from RGA to an outside person or entity.
- **Employees must direct all inquiries from the media to RGA's Corporate Communications department** for review before responding to the press.
- **Social media containing inaccurate or misleading statements** could lead to misunderstandings, violate commercial contracts or confidentiality agreements, result in liability for RGA and its staff, damage relationships, or break the law.

## Your Role

- **Workforce members must never falsify, misrepresent, or conceal records.**
- **Always comply with record requests** by regulatory authorities or RGA auditors.
- **Do not act or speak for RGA** except strictly within the boundaries of your authority.
- **Be knowledgeable before posting on social media.** Follow all RGA policies, applicable laws, including copyright, data protection, libel, and slander.
- **You must receive approval from Corporate Communications** before posting on behalf of RGA for company purposes.
- **Do not divulge or discuss confidential information about RGA** or share information about your colleagues on any form of social media.
- **You alone are responsible for what you post on social media.** State that any opinions you express, especially about RGA, are your own and do not reflect those of RGA. Respect yourself and your peers.

## What You Should Know

### Examples of Social Media

- Social networking sites (**Facebook, Twitter**)
- Professional networking sites (**LinkedIn**)
- Video and photo-sharing sites (**Instagram, Snapchat, TikTok**)
- Blogs and microblogging sites (**Tumblr**)
- Online forum and discussion boards (**Reddit**)
- Streaming services (**YouTube**)
- Question-and-answer forums (**Yahoo! Answers**)

**Question:** I ordered some software and my supervisor is asking me to record the charge against another expense category because our budget for software has been exceeded. What should I do?

**Answer:** Remind your supervisor that no one should knowingly make an incorrect record in the books and records of RGA. If your supervisor persists, contact another leader, the Global Ethics and Compliance office, or the Speak-Up hotline.



For questions or more information,  
please contact Global Ethics &  
Compliance at [compliance@rgare.com](mailto:compliance@rgare.com).

