Guardian

July 2024

Code of Conduct

Fulfilling our purpose by living our values

Everyday champions of well-being

Our values

We do the right thing

- We deliver on our promises.
- We are fair and ethical.
- We act with honesty and compassion.

We believe people count

- We treat people with care and respect.
- We create an environment of continuous learning.
- We actively seek and listen to diverse perspectives.

We courageously shape our future together

- We openly challenge assumptions.
- We move with a sense of urgency.
- We try new things, learn from failure, and welcome challenges.
- We act as one team.

We go above and beyond for the people we serve

- We are committed to understanding our consumers' needs and dreams.
- We strive to deliver value that wows our consumers.
- We proactively identify ways to enhance well-being.

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This Code of Conduct (Code) establishes standards for our daily behavior as we serve the interests of Guardian and our customers. It outlines our ethical principles and provides guidance in decision-making. It complements, but does not supercede, the policies covered in your respective Colleague Handbook. Our Code of Conduct reflects our values and directs the way we conduct our business. The Colleague Handbook is more specific — it defines the rules for our actions and activities. For example, in the Code of Conduct, we talk about respect for co-workers. In the Colleague Handbook, we detail specific policies against discrimination and harassment.

This Code applies to all Guardian colleagues, including temporary workers[1]. It is provided for information and guidance and is not intended to create a contract of employment. Violating our Code or any other company policy can lead to disciplinary action, up to and including termination. Disciplinary action may also be taken against colleagues who fail to take appropriate action against illegal or unethical conduct. Your agreement to comply with the Code's provisions is a condition of your employment with Guardian. Nonreceipt of the Code does not absolve you of its requirements. As a colleague, you are required to attest to the Code annually.

Temporary workers[2]: As a Guardian temporary worker, it is important that you understand what is expected of Guardian colleagues and that you hold yourself to the same standards. Your obligation to act in accordance with this Code does not alter your employment status.

Local law or culture may present unique or location-specific requirements in addition to, or in place of, the guidelines contained in this Code. Remember to refer to any policies and procedures that apply to your specific location for more information on a particular topic.

A message from Andrew McMahon

Dear Colleagues,

In a single day, every one of us has countless interactions and decisions to make. Taken collectively, these moments define how we show up — as individuals and as a company. They are a display of our values and purpose in action, demonstrating to our stakeholders who we are and what we stand for.

As we courageously shape our future together, our continued success and reputation depend on each of us acting ethically and responsibly. Our Code of Conduct represents a commitment that each of us makes to protect and strengthen the culture we've established and the trust we've earned.

Throughout the Code, you'll see the ways in which our values guide how we run our business, serve our customers, and support our communities. I encourage you to consult the Code of Conduct regularly, ask questions, and speak up if you have concerns.

Thank you for your dedication to maintaining Guardian's legacy as a trusted partner and to **inspire well-being™** for those we serve.

Best regards,

Andrew

Andrew McMahon
Chief Executive Officer and President
The Guardian Life Insurance Company of America

Living our values with each other

What is expected of each of us

Our Speak Up culture

This Code of Conduct can't address every situation you may face in your daily activities. Remember, you own ethics. If you become aware of or suspect a possible violation of law, rules, regulations, or this Code, courageously speak up and report your concerns immediately. You can always seek guidance from:

- Your manager
- Your human resources business partner
- The head of compliance for your business line
- The Corporate Compliance Department
- The Law Department

To report potential violations (anonymously, if you wish), go to **ethicspoint.com** or call 866 ETHICSP.

Issues reported via Ethics Point are only accessed by Guardian's Chief Legal Officer, Chief Ethics & Compliance Officer, Chief Audit Executive, Corporate Secretary, and The Head of Ethics. The CEO and the Chair of the Board of Directors' Audit & Risk Committee are informed about reports, as appropriate. All reports are handled with discretion.

Guardian supports honest and open communication. We will not tolerate retaliation against any individual who, in good faith, reports actual or suspected violations or participates in an investigation. We will also fully investigate any false reports. Both retaliation and false reporting are considered violations of our Code and are discussed more fully in your respective Colleague Handbook.

Make the call (or click)

Local contacts are provided on the last page.

Contact EthicsPoint
ethicspoint.com
866 ETHICSP

Make good decisions

Our business decisions must be consistent with our values. If you are faced with a difficult issue, use this decision tool to help you navigate gray areas and make good choices:

Can I do it?	Should I do it?	How will I do it?
Is it legal? If the answer is no, **stop.** If you're not sure, ask the Law Department.	Is it ethical and consistent with our Code? If the answer is no, **stop.** If you're not sure, ask Compliance or HR.	Will it enhance our reputation and serve customers? If the answer is no, **stop.** If you're not sure, ask your manager.

Respect each other

A Guardian core value, "we believe people count," is more than just words on paper. It is built into the way we run our business and the way we interact with each other.

We are committed to providing an inclusive environment, where opinions, attributes, and feelings are treated with fairness and respect. We are committed to maintaining a diverse culture where individuals are empowered to succeed, where differences are celebrated, and where unique perspectives work together to generate innovative solutions.

Your conduct toward your colleagues sets an example. Our workplace respect policies, such as those on harassment, violence, use of drugs and alcohol, and equal opportunity employment, are discussed in more detail in your respective Colleague Handbook. If you suspect, see, or are a victim of a violation of a workplace respect policy, let someone know (see the Our Speak Up culture section of this Code).

Special expectations of our leaders

While all colleagues are required to act with integrity, show respect, and build trust, if you are a leader of people, you are a role model to your team.

If approached with a question or concern related to the Code, listen carefully, and give the colleague your complete attention. Ask for clarification and additional information. Answer any questions if you can, but do not feel that you must give an immediate response. Seek help if you need it. If a colleague raises a concern that may require investigation under the Code, contact the head of compliance for your business line, the Law Department, or Corporate Compliance.

Your role as a leader comes with special responsibilities:

- Ensuring that the people you supervise understand their responsibilities under the Code and Guardian policies;
- Making opportunities to discuss the Code and reinforce the importance of ethics and compliance with colleagues;
- Creating an environment where colleagues feel comfortable raising concerns without fear of retaliation;
- Committing to ensuring diverse thinking is both heard and validated;
- Considering conduct in relation to the Code and other Guardian policies when evaluating colleagues;
- Never encouraging or directing colleagues to achieve business results at the expense of ethical conduct or compliance with the Code or the law; and
- Always acting to stop violations of the Code or the law by those you supervise.

Living our values in our company

How we deal with company records, assets, and information

Confidential and proprietary information

Confidential and proprietary information is nonpublic information that may be of use to competitors or harmful to Guardian, our customers, or our colleagues, if inappropriately disclosed. It includes information that suppliers and customers have entrusted to us and that should be treated with the utmost care.

You must maintain the confidentiality of information entrusted to you by Guardian or that you become aware of during your employment, except when disclosure is authorized in writing or legally required. This confidentiality obligation continues even after you leave Guardian, as Guardian owns all intellectual property rights in anything created by colleagues. You are expected to respect all Guardian and third-party intellectual property, including by not using any intellectual property without the express permission of the owner.

Before sending confidential information outside the Company, ask yourself whether there is a business need for the recipient to have the information you are sending. Some communications may require extra safeguards in transmission, such as the email "send secure" feature.

To achieve Guardian's high standards of information protection and security, you must:

- Be accountable for your actions;
- Be diligent about information security;
- Use information assets and systems in a manner consistent with your job;
- Safeguard your access credentials to systems and applications (never share your personal passwords);
- Adhere to Guardian operational risk and security policies, standards, guidelines, and procedures;
- Complete required training;
- Abide by applicable laws, regulatory requirements, legal obligations, contractual agreements, and licensing obligations;
- Not intentionally attempt to bypass technical, administrative, or physical safeguards and controls;
- Use systems and third parties that are approved for Guardian business and for the classification of data you are processing (e.g., privacy data).

Examples of confidential and proprietary information

- Pricing information
- Business plans
- Processes and procedures
- Strategies
- Potential investments and divestitures
- Contracts
- Computer source code
- Colleague information
- Provider or customer data

For more information, refer to the following:

- Information Classification and Protection Policy & Standards
- The Non-Disclosure Policy within the Colleague Handbook
- Privacy Policies

Artificial intelligence (AI) and models

Guardian views AI as a catalyst for re-imagining how our work is done; how we can better serve our customers, improve our products and processes, and mobilize stakeholders from across our businesses to deliver a shared strategy and vision. In light of this vision, Guardian has developed Model Risk Principles that align with Guardian's core values and focuses on the responsible use of AI and other predictive models. All such models must be robust, explainable, transparent, fair, secure and compliant with applicable laws and regulations

Use of company resources and information

Guardian resources are provided to you to perform the requirements of your job. We must all use business resources responsibly, only for business purposes, and maintain a high level of professionalism. All business resources have an economic value, so use them effectively and under the following expectations.

1. Use business resources for Guardian business — this includes money, equipment, materials, information, and time.
2. Only use resources that you are authorized to use, namely Guardian Electronic Services (GES) — approved platforms for Guardian Business Communications.
3. Use resources responsibly and effectively — never for personal interest or gain, illegal activities, or distributing spam or malware.
4. Be professional: Do not access, send, or download information that could be insulting or offensive to another person, such as sexually explicit messages, cartoons, or jokes, unwelcome propositions, hate speech, and ethnic or racial slurs. Avoid exaggeration, legal conclusions, and inappropriate characterizations of others.
5. Don't engage in personal activities during work hours that interfere with you fulfilling your job responsibilities.
6. Take reasonable steps to protect Guardian resources and assets from damage or theft.
7. Use business resources in line with all Guardian policies, including but not limited to our confidentiality and privacy policies, as well as in compliance with the books and records provisions of the federal securities laws and the expectations of regulatory and law enforcement agencies.
8. Return resources at the end of your employment.
9. When traveling internationally, remember that bringing Guardian devices to countries with targeted or comprehensive sanctions is prohibited.

Use of Guardian resources is not private

Your messages and computer are considered Guardian property. You should not expect privacy when using any Guardian electronic systems, including accessing the internet, email, telephone, voicemail, or instant messaging.

Guardian monitors communications and equipment, including colleagues using business GES via a personal device, and may disclose information for business purposes. Business records and communications sometimes become public through legal or regulatory investigations or the media. Use good judgment, and do not access, send, or store information that you would not want to be seen or heard by others.

Personal devices

If you are authorized to work from home, bring work home, and use personally owned devices, such as smartphones, tablets, computers, and portable storage devices to perform Guardian business[3], you must adhere to all Guardian policies. When your employment or contract with Guardian ends, you must purge and return any Guardian information.

For more information, consult the Electronic Communications, the Internet, and Other Electronic Services Policy in the Colleague Handbook and the Personal Mobile Device Policy.

Common business resources

- IT resources and computer equipment, including access to electronic information, networks, software, internet, systems, and equipment such as laptops, phones, and mobile devices
- Business-related travel
- Budgets, expenditure, and company credit cards
- Office furniture, equipment, and supplies
- Branded material and official Guardian images and content
- Guardian-provided vehicles and parking areas

Accuracy of company records

Guardian is required to create and maintain accurate and complete books and records. Our records are created in many different forms, including paper documents, email, electronic documents, voicemails, and instant messages. Honest and accurate recording and reporting of information is critical to our ability to make responsible business decisions.

Financial records

Guardian's accounting records must accurately reflect transactions and comply with regulations, accounting standards, and our internal controls. These records are used to produce reports for our management, policyholders, creditors, governmental agencies, and others.

You must ensure that Guardian's records do not contain false, misclassified, or misleading entries. All transactions, including individual employee and third-party vendor expenses, must be supported by accurate documentation in reasonable detail and recorded in the correct account and accounting period.

Records management

Company records, as defined by the Records and Information Lifecycle Management Policy, that are owned, collected, used, and managed by Guardian must be accurate and complete. You are responsible for the integrity of data and information, including reports and documents, under your control.

All Company records must be identified, classified, and retained as indicated on the Record Retention Schedule. Records are only eligible for destruction once the retention period has expired and there are no other reasons to continue retaining the information, including any applicable Records Hold Orders. IT Application Owners are responsible for ensuring all new (and existing) Guardian applications have purge enabled in time to meet retention requirements pursuant to Guardian's Records Retention Schedule.

Corporate procurement

If your job duties require that you acquire goods or services on behalf of Guardian, or approve these purchases, read the Sourcing & Procurement Policy. This policy covers the purchase of products and services, and provides parameters around category planning, sourcing, contracting, ordering, receiving, and paying.

Vendor contracts

Engagements with vendors must receive appropriate legal review prior to execution. A team of attorneys and contract specialists in the Law Department's Corporate Initiatives Advisory and Transactions Group facilitate the legal review of vendor agreements for goods and services for all lines of business. For more information, refer to the Vendor Contracting Policy, the Vendor Contracting Policy - India, and Approval and Signature Authority Policy.

Do not destroy or alter records relevant to:

- a violation of law, legal claim, or litigation
- a potential internal or external investigation or audit
- a government investigation or proceeding
- a records hold order

Living our values around the globe

How we operate in our world and industry

Guardian does business around the globe and is subject to many regulations. Compliance with both the letter and spirit of laws, rules, and regulations is critical to our reputation and continued success. Be familiar with and comply with all applicable laws and Guardian policies, including the Foreign Country Engagement Policy, and avoid even the appearance of impropriety. Illegal or unethical conduct, despite potential local or cultural pressures, is never justified.

In addition, we must deal fairly with our customers, suppliers, and competitors. That means not taking unfair advantage of anyone through illegal conduct, fraud, manipulation, concealment, abuse of privileged information, disparagement, misrepresentation of material facts, or any other type of unfair dealing. Be familiar with the Solicitation and Distribution Policy in the Colleague Handbook.

Money laundering

Money laundering is the process by which individuals disguise the original source of criminal proceeds to make them appear legitimate. The nature of the services and products offered by the financial services industry makes it vulnerable to abuse by money launderers. Annually, hundreds of billions of dollars of criminal proceeds are laundered through financial institutions like Guardian.

Under United States law, money laundering includes offenses such as tax evasion and embezzlement[4].

An Anti-Money Laundering (AML) Program is the set of policies, procedures, and controls designed to identify potential money laundering, and report suspicious activity. Guardian colleagues serve as the first line of defense in detecting, preventing, and reporting money laundering.

Guardian employees should be diligent in helping detect and combat money laundering, terrorist financing, and other crimes. Report suspicious financial transactions or activities to your manager or the Anti-Financial Crimes Unit. Your role may also require that you complete Anti-Money Laundering training.

Economic sanctions

Guardian must comply with economic sanctions regulations issued by the U.S. Treasury Department's Office of Foreign Assets Control (OFAC). In sum, Guardian must ensure that it does not transmit or receive funds to or from individuals or entities on OFAC's Specially Designated Nationals list, and we must not conduct business in violation of OFAC sanctions targeting specific countries. If you have questions, refer to **OFAC's sanction resource center** or contact Guardian's AML Officer in the Anti-Financial Crimes Unit.

Corruption and bribery

Guardian continues to expand its operations internationally and is bound by the anti-corruption and anti-bribery laws of the US and other countries where we do business. We are committed to conducting business in an honest and ethical manner, wherever we operate.

Acceptable practices in the commercial business environment may be entirely unacceptable when the practice involves foreign or domestic government officials, and may even violate certain applicable laws and regulations. When dealing with government officials[5], public servants, or those who act on a government's behalf, be aware of restrictions.

Payments made indirectly through an attorney, consultant, broker, contractor, or other third party are subject to the same restrictions, and it is your obligation to understand what such a party is doing on your behalf.

To comply with anti-bribery and corruption laws, adhere to Guardian preapproval and reporting requirements. For more information, refer to the Anti-Corruption Policy, Gifts and Entertainment Policy and the Political Involvement Policy.

Insider trading

Material, nonpublic information is information that a reasonable person would be likely to consider important when making an investment decision.

Insider trading is unethical and illegal. Colleagues who come into possession of material, nonpublic information through or because of their employment with Guardian regarding another company or leaders of that company are not permitted to trade in securities of that company.

It is also illegal to "tip" or pass on inside information to any other person who might make an investment decision based on that information or who might pass the information on to someone else. You are prohibited from engaging in these activities. Any colleague who violates this provision could be subject to not only internal disciplinary action but also civil or even criminal penalties.

- Do not give or offer bribes, kickbacks, payments of money, facilitation payments[6], or other things of value, including business amenities, to anyone, including government officials, to wrongfully obtain or retain Guardian business.
- Do not give or offer anything of value, including employment opportunities, to government officials or their family members, or to any person, third party, or charitable organization suggested by such officials, to obtain or retain business or to influence official action.
- Do not give or offer anything of value, including employment opportunities, to government officials, public servants, or their family members without prior written approval in accordance with the Political Involvement Policy.

Examples of insider information

- Knowledge of financial, competitive, or regulatory matters that may impact the value of a company's stock
- Information about proposed mergers or acquisitions
- New product information
- Significant management changes

Competitors and antitrust laws

Guardian believes in fair and open competition and adheres to the requirements of antitrust laws. Certain contact with a competitor presents problems under antitrust laws. It is important to remember that antitrust laws may be violated even in the absence of a formal agreement. For example, under certain circumstances, an agreement to fix prices[7] may be inferred from conduct, such as the exchange of price information, and from communications among competitors, even without an express understanding.

To avoid antitrust law potential violations, do not take part in discussions or agreements with competitors to share information such as: marketing strategies; underwriting or claims practices; strategic plans; costs and profits; and policyholder dividends.

If you participate in industry groups, benchmarking activities, or informal roundtables with peers at other organizations, it is important the group adhere to the antitrust laws and not share information that would be deemed a violation. Before speaking, you should confirm if the meeting is held under the Chatham House Rule, which means that participants are free to use the information received, but the identity and affiliation of the participant may not be revealed.

These events can also include members of the media. Refer to the **Communications section** of this Code and The Media and Speaking Engagement Policy for guidance on media interactions.

If you work in the Investments Department, Park Avenue Securities LLC (PAS), Park Avenue Institutional Advisers LLC (PAIA), or Broadshore Capital Partners LLC, you are subject to specific rules, policies, procedures, and codes of ethics that are applicable to those departments or entities.

Antitrust violation examples

- Written or verbal agreements with competitors related to prices
- Competitors agreeing to divide markets by territory or customers
- Competitors agreeing not to do business with a customer or supplier
- Certain communications between competitors concerning problems with a customer or supplier

Political activity

Guardian respects and supports the right of colleagues to participate in political activities. Guardian's expression of views on local and national issues that affect our operations, contributions to political parties or candidates, and payment of certain costs for political action committees are governed by the Political Involvement Policy.

All political or lobbying positions must be disclosed on Guardian's Conflict of Interest Questionnaire.

Consult the Political Involvement Policy before you:

- engage in political activities
- make a political contribution
- seek political office
- become a lobbyist
- retain or hire a current or former public official or lobbyist

Conflicts of interest

A conflict of interest occurs when an individual's private interests interfere, or even appear to interfere, with the interests of Guardian. A conflict of interest may make it difficult to perform your work objectively on Guardian's behalf.

You should avoid activities, interests, or relationships that might interfere with your ability to act in the best interests of Guardian. Guardian relies on your good judgment and commitment to our values to avoid conflicts of interest, and encourages you to seek advice when you need it. To help you spot potential conflict situations, some examples are provided.

Since it is not always easy to determine whether a conflict of interest exists, report potential conflicts immediately to your manager, who must in turn report the situation to the Corporate Compliance Department. Certain situations will be reviewed by the Chief Executive Officer, with advice of the Chief Legal Officer, and reported to the Human Resources, Governance, and Sustainability Committee of the Board of Directors.

Read the Conflicts of Interest Policy and complete the Conflict of Interest Questionnaire distributed by the Compliance Department both annually and when new activities arise.

Conflict: outside employment or service as an officer or director

You may have a conflict of interest if you have an outside job or interest that interferes with your ability to do your job or that potentially conflicts with Guardian's business objectives. Outside employment with organizations that have no business dealings with Guardian and serving on boards of nonprofit and community organizations are generally not conflicts of interest, if the time commitment does not interfere with your work duties. Do not accept a position as a director or officer of a for-profit business without prior approval of your manager and the Corporate Compliance Department. For Guardian's policy on outside employment, refer to your respective Colleague Handbook. All positions, regardless of their potential to present a conflict, must be disclosed through the Conflict of Interest attestation process.

Conflict: relatives and friends

Business relationships with third parties, including vendors, independent contractors, and consultants, should be based on objective standards such as quality, performance, and value. Family and personal relationships with third parties, whether those third parties are doing business with Guardian or are under consideration to do business with Guardian, can create the appearance that the relationship influenced decisions regarding that third party.

Disclose relationships with third parties to your manager and Corporate Compliance. For Guardian's policy on employee relationships, refer to your respective Colleague Handbook.

Conflict: gifts, meals, and entertainment

Business gifts and entertainment are customary courtesies designed to build goodwill among business partners. However, a problem may arise when such courtesies compromise, or even appear to compromise, our ability to make objective and fair business decisions. Do not give or accept a gift, meal, or entertainment that might be perceived as unfairly influencing a business relationship. This does not change during traditional gift-giving seasons.

Be mindful that government officials or companies that receive federal or state funds have strict rules regarding gifts and entertainment. Refer to the Gift and Entertainment Policy for limitations and reporting requirements.

Conflict: travel and entertainment

If your job duties require that you travel on Guardian business, or you are responsible for reviewing and approving expenses, refer to the requirements detailed in the Business Travel & Expense Reimbursement Policy.

Conflict: corporate opportunities

You may encounter certain opportunities that arise through your use of corporate property, access to information, or position at Guardian. You should never use those opportunities for personal gain or engage in activities that compete with Guardian.

Conflict: tax and legal advice

While you may be sensitive to tax and legal considerations while doing business for Guardian, unless your job function specifically permits you to provide tax or legal advice to customers, you are prohibited from offering or providing such advice. This applies even if you are an accountant or an attorney by training, background, or job description. Instead, if such advice is solicited, customers should be advised to seek the assistance of an attorney, accountant, or tax professional of their own choosing.

Q: My job requires that I select Guardian vendors. One of the vendors being considered is a company owned by my spouse. What should I do?

A: This presents a conflict, which you must report to your manager. Course of action options may be for you to be removed from the selection process or for your spouse's business to be eliminated from consideration.

Q: A new vendor sent me a bottle of wine valued at US$40. Since it's not very expensive, is it okay to keep it?

A: You are required to report this gift as instructed in your local Gift & Entertainment Policy. Accepting a gift above a nominal value, like an inexpensive notepad, t-shirt, or pen, could create the impression that such a gift influenced your decision. Procurement colleagues must be especially careful to avoid the appearance of impropriety. Remember, oftentimes with conflicts of interest, perception is reality.

Corporate impact

Guided by our purpose, we make decisions to benefit our colleagues, consumers, and communities — from meeting our colleagues' unique needs and empowering them to reach their potential, to serving our consumers with compassion and empathy, supporting the communities where we live and work, and reducing our impact on the planet — we are seeking to always do what is right in how we operate.

Your commitment and engagement in championing our purpose is central to our success.

Communications

Our customers deserve accurate, clear, and consistent communications about Guardian. To that end, only colleagues who are trained and authorized should represent Guardian to the public through communications and advertising.

Guardian's Corporate Communications team is responsible for managing interactions with the public and the media. This includes ensuring that written information and interviews with our executives are timely, accurate, complete, and reflect Guardian's point of view. It is especially critical that contact with the media on behalf of Guardian be handled with the benefit of professional public relations judgment and counsel. Speaking engagement or other professional appearances that are personal in nature (i.e., not on behalf of Guardian) should be approved by Corporate Communications well in advance and should not disclose confidential or proprietary Guardian information.

If a third party wishes to use Guardian's name or logo, refer them to Corporate Communications for permission.

For our policies on communications with the public, refer to the Media & Speaking Engagement Policy, the Social Media Policy, and the Advertising & Marketing Policy.

If you receive an inquiry from outside of Guardian and are not authorized to respond:

1. Be friendly and polite.
2. Do not share information or your opinions about Guardian.
3. Refer the inquiry to Corporate Communications.

Resources

Policies, procedures, and guidance

The Code of Conduct does not address all workplace conduct. Guardian maintains additional policies and resources that provide further guidance or address topics not covered by the Code.

This list is not exhaustive. Visit your local Guardian intranet for the most current policies for your location.

Advertising & Marketing Policy
Anti-Bribery and Corruption Policy
Approval and Signature Authority Policy
Business Travel and Expense Reimbursement Policy
Complaints and Regulatory Inquiries Policy
Conflict of Interest Policy
Corporate Procurement Policy
Colleague Handbook (includes the Electronic Communications, the Internet and Other Electronic Services Policy)
Foreign Country Engagement Policy
Gifts & Entertainment Policy
Guardian Security Services Policy and Standards
HIPAA Privacy Policies
Information Classification and Protection Policy & Standards
Media & Speaking Engagement Policy
Model Risk Management Policy
Personal Mobile Device Policy
Political Involvement Policy
Privacy Policies
Records and Information Lifecycle Management Policy
Social Media Policy
Vendor Contracting Policy and Vendor Contracting Policy - India

Ethics & Compliance office contacts

Philip Pescatore
Chief Ethics & Compliance Officer
Philip_Pescatore@glic.com

General inquiries
Corporate_Compliance@glic.com

Subsidiary contacts
India
Deepa Baburaaj
General Counsel & Head of Legal Shared Services
Deepa_Baburaaj@glic.com

1 "Guardian" or "Company" means The Guardian Life Insurance Company of America and all its subsidiaries that do not have a separate code of conduct.

2 This Code does not apply to field representatives or individuals who do not have employment relationships with Guardian. Similarly, this Code does not apply to field clerical employees at general agencies, who are either employees of the general agencies (rather than Guardian) or are governed by a separate Code of Conduct.

3 Employees with "Privileged Access," as defined by the Security Services Policy & Standards must refer to that policy for specific requirements.

4 Bank Secrecy Act (BSA). Under Indian law, money laundering occurs when an individual "directly or indirectly attempts to indulge, knowingly assist, or knowingly is a party to or involved in any process or activity connected with the proceeds of crime and projecting it as untainted property." Section 3 in The Prevention of Money-Laundering Act, 2002.

5 A Government Official is any person employed by or representing a government, officials of a political party, officials of public international organizations, candidates for office and employees of state-owned enterprises.

6 Also known as "grease payments," these are small payments to government officials to expedite or secure performance of a non discretionary, routine governmental action, such as obtaining permits or other official documents to qualify to do business, processing governmental papers, such as visas or providing postal or utility services.

7 Price fixing is a criminal offense, and may subject Guardian to substantial fines and penalties, and the offending employee to imprisonment and fines.

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guardianlife.com

New York, NY

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