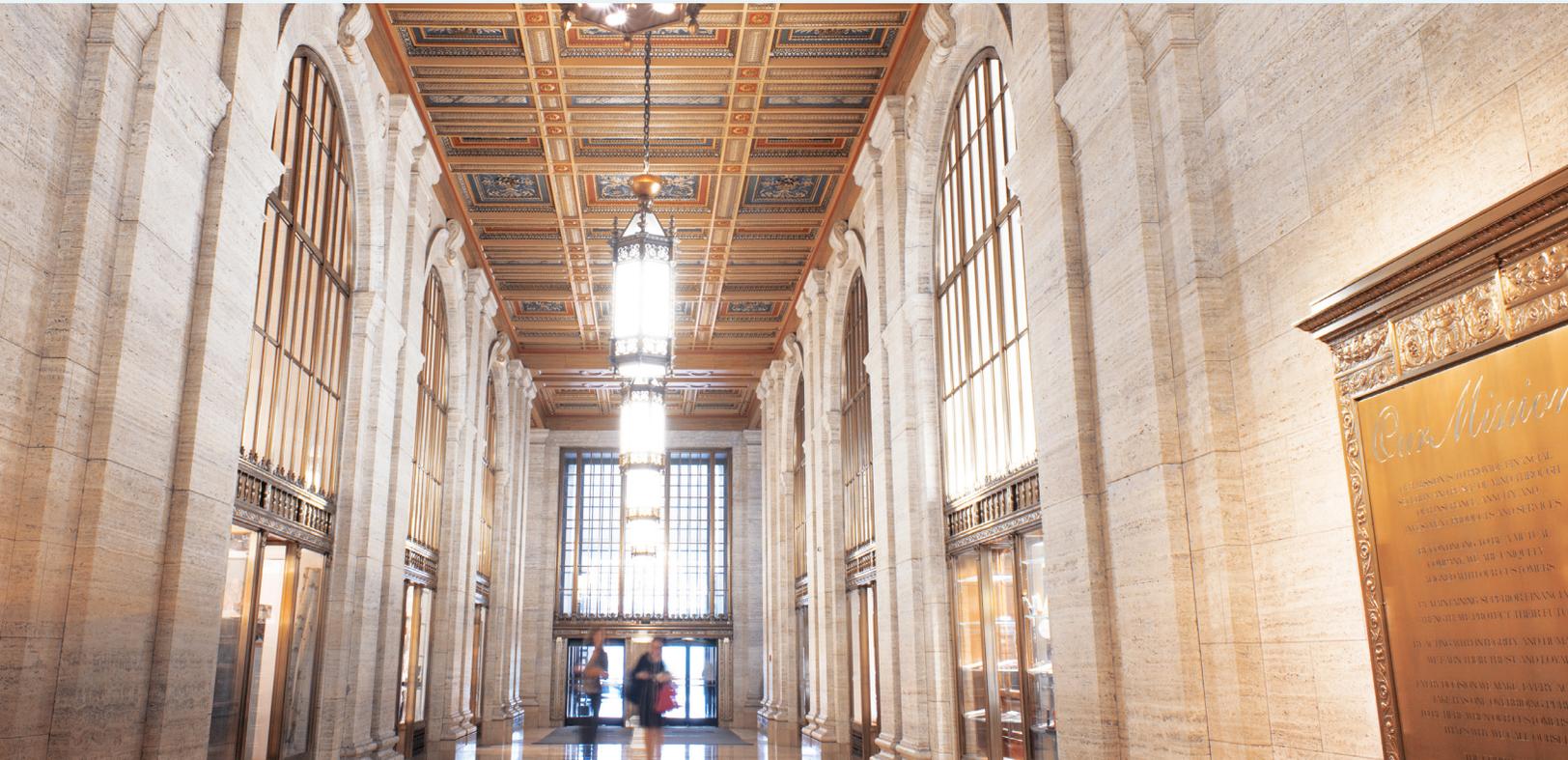


Working with Integrity.

STANDARDS OF BUSINESS CONDUCT
OCTOBER 2020



A message to employees from Chairman and CEO Ted Mathas.



When people seek a secure financial future for those they care about most, they naturally want to do business with a company that puts their best interests at the forefront—a company with a reputation for doing things the right way, every time, all the time. That is why our core value of integrity is central to all facets of New York Life’s business. Everything we do is dependent on people believing that we will never take chances with their future and that we will always live up to the promises we make.

It comes down to one word: trust. Trust is not something we can ever take for granted. It must be earned and re-earned each day. Our good name is put to the test in every interaction with customers, prospects, suppliers, community leaders, public officials, and even each other. For this reason, it is critical for all of us to consider these moments as opportunities to further strengthen New York Life’s reputation.

The company’s Standards of Business Conduct explain the policies guiding the behavior we expect from everyone throughout the organization. I encourage you to become familiar with this material, as it will help you understand not only the reasons behind our ethical standards, but also how you can put them into practice in your daily activities. If you have any questions about these guidelines, you should discuss them with your manager or get in touch with the appropriate contact listed in the following pages. And, of course, if you ever suspect any unethical activity at New York Life, you should immediately report it. You can be certain that you will be protected from retaliation for any report made in good faith.

We can point to many reasons why New York Life is one of the most respected life insurers in the industry. Our long history of acting with integrity in all that we do is most certainly at the top of the list. I’m counting on you to join your coworkers and me in upholding this vitally important tradition.

TED

Ted Mathas
Chairman and CEO

About this code of conduct.

Who we are.

New York Life has a rich and uncompromising history of acting with integrity and humanity. We are deeply ingrained with these core values, grounded in confidence and humility, and stewards for the long term. These standards have served as the cornerstone of New York Life's culture for over 170 years. As a mutual company, we operate for the benefit of our policy owners and our core purpose is to be there when our policy owners need us.

It's our duty.

We each play an important part in maintaining the company's ethical reputation by understanding and complying with the policies in this code, including asking for guidance when necessary and reporting potential issues or violations. All employees have a duty to immediately report concerns that are—or appear to be—unethical, unlawful, or violate [company policy](#). By raising your hand about suspected unethical activity, you are doing your part in protecting our brand and maintaining a positive workplace for yourself and your colleagues.

Where to go.

There are many outlets available for employees to report any suspected unethical or unlawful situations, such as:

- Your immediate supervisor or department head;
- Your [Human Resources Business Partner](#) or Human Resources Employee Relations group;
- New York Life's Ethics Hotline—either [online](#) or by calling (888) 331-0619;
- Contact **Vice President & Chief Ethics Officer Gina Cristallo** at (212) 576-4469 or **Corporate Vice President Gertrude Olla** at (212) 576-6048 in Corporate Compliance's Business Conduct and Ethics Unit; or
- Consult directly with one of our [key company contacts](#).

All allegations will be thoroughly reviewed in accordance with our [investigation procedures](#). Any employee found to have engaged in inappropriate conduct is subject to disciplinary action, up to and including termination of employment. All complaints will be kept confidential to the extent feasible.

Whistleblower and anti-retaliation protection.

We recognize that reporting unethical or unlawful concerns is not always easy. Employees who submit a concern in good faith are protected by the company's zero tolerance policy regarding retaliation. They may also be protected by applicable whistleblower laws. Any employee who is found to have engaged in retaliatory behavior is subject to disciplinary action, up to and including termination of employment. If you feel that you are the subject of retaliation, you should immediately report this to any of the contacts listed above.

Working from home.

"Work-at-home" means performing the tasks that you would normally perform in the office, but while at home. You should work your normal schedule and leverage the various resources from Technology to make the most of your workday.

When working from home, employees must adhere to all the conditions in the company's [Work-at-home Policy](#), Standards of Conduct and the [Employee Handbook](#). All company policies around conduct, confidentiality, sick leave, etc., continue to apply regardless of location.

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Creating a positive workplace.

New York Life is committed to providing a safe and productive work environment free of discrimination and harassment. The company is also committed to achieving a diverse workforce and to the implementation of policies to help maintain an environment where employees are encouraged to achieve their fullest potential.

Managers and officers lead by example. If you are a manager or officer, your actions can become those of New York Life. You have a special responsibility to encourage ethical behavior, make fair decisions, and maintain a workplace which honors human dignity and respects all individuals.

Of course, all employees are expected to grant others the same respect, cooperation, and dignity they wish for themselves. All of us must promptly report misconduct when we become aware of it.

Misconduct comes in many different forms. Some examples of misconduct include actual or perceived conflicts of interest, discrimination, harassment of all kinds, inappropriate behavior or comments, substance abuse, and policy violations. All forms of misconduct must be reported through the appropriate channels as outlined on page 3. For more information on what constitutes misconduct, please refer to page 35.

New York Life has a “zero tolerance” policy with regard to discrimination or harassment, including sexual or any other type of harassment.

HARASSMENT

Harassment can be based on:

- Age
- Citizenship
- Color
- Ethnicity
- Gender
- Gender Identity or Expression
- Status of Being Transgender
- Genetic Information
- Marital Status
- National Origin
- Physical or Mental Disability
- Political Affiliation

- Race
- Religion
- Sexual Orientation
- Veteran Status
- Any Other Protected Status

SEXUAL HARASSMENT

Sexual harassment can happen to:

- Men and women
- People of the same or different genders
- Managers/subordinates
- Employees
- Agents
- Applicants
- Customers
- Contingent workers/Consultants/Independent Contractors
- Vendors
- Others outside of New York Life

Examples of inappropriate behaviors in the workplace:

- Creating an intimidating, hostile, or offensive working environment through:
 - Displaying sexually oriented material, pictures, Internet sites, or screen savers
 - Gossip about coworkers
 - Innuendos
 - Propositions
 - Remarks about an individual’s body
 - Repeated flirtation
 - Words, jokes, instant messages, text messages, or emails of a sexual nature
 - Touching
 - Other sexually suggestive statements and/or conduct
- Making unwelcome sexual advances, as well as verbal, written, or physical contact of a sexual nature.

OTHER TYPES OF HARASSMENT

New York Life will not tolerate any forms of harassment, including, but not limited to, those related to the groups described earlier. Some other examples of behavior that is prohibited include workplace violence and verbal or physical abuse, such as:

- Damaging property
- Graffiti
- Joking or making other inappropriate comments about the protected status of a person or group
- Other inappropriate comments
- Threats
- Social media, Internet, or other electronic harassment

There are resources on The Square (New York Life's intranet) that provide detailed guidance on policies about harassment, workplace violence, and other behaviors that have a negative effect on the workplace. Please see the [Employee Handbook](#).

What if...

My boss tells me sexually explicit jokes and when I don't laugh, he calls me a prude. His behavior is making me uncomfortable. What should I do?

Answer: This type of behavior is not acceptable and you should report it to the Human Resources Department or through the Ethics Hotline. All employees are required to treat people with respect and dignity. The company does not permit retaliation against an employee who files a complaint in good faith.

EQUAL OPPORTUNITY EMPLOYMENT

New York Life is committed to equal employment opportunity (EEO). We are also committed to the diversity of our workforce and providing an environment where discrimination, harassment, and retaliation are not tolerated.

We hire, train, develop, compensate, promote, and provide benefits based on qualification and merit without regard to:

- Age
- Citizenship
- Color
- Ethnicity
- Gender
- Gender Identity or Expression
- Status of Being Transgender
- Genetic Information
- Marital Status
- National Origin
- Physical or Mental Disability
- Political Affiliation
- Race
- Religion
- Sexual Orientation
- Veteran or Military Status
- Any Other Protected Status

We work to ensure that your work environment is free of all types of discrimination, harassment, and retaliation.

We empower your supervisors and managers to enforce New York Life's policy of equal opportunity employment and affirmative action.

AFFIRMATIVE ACTION

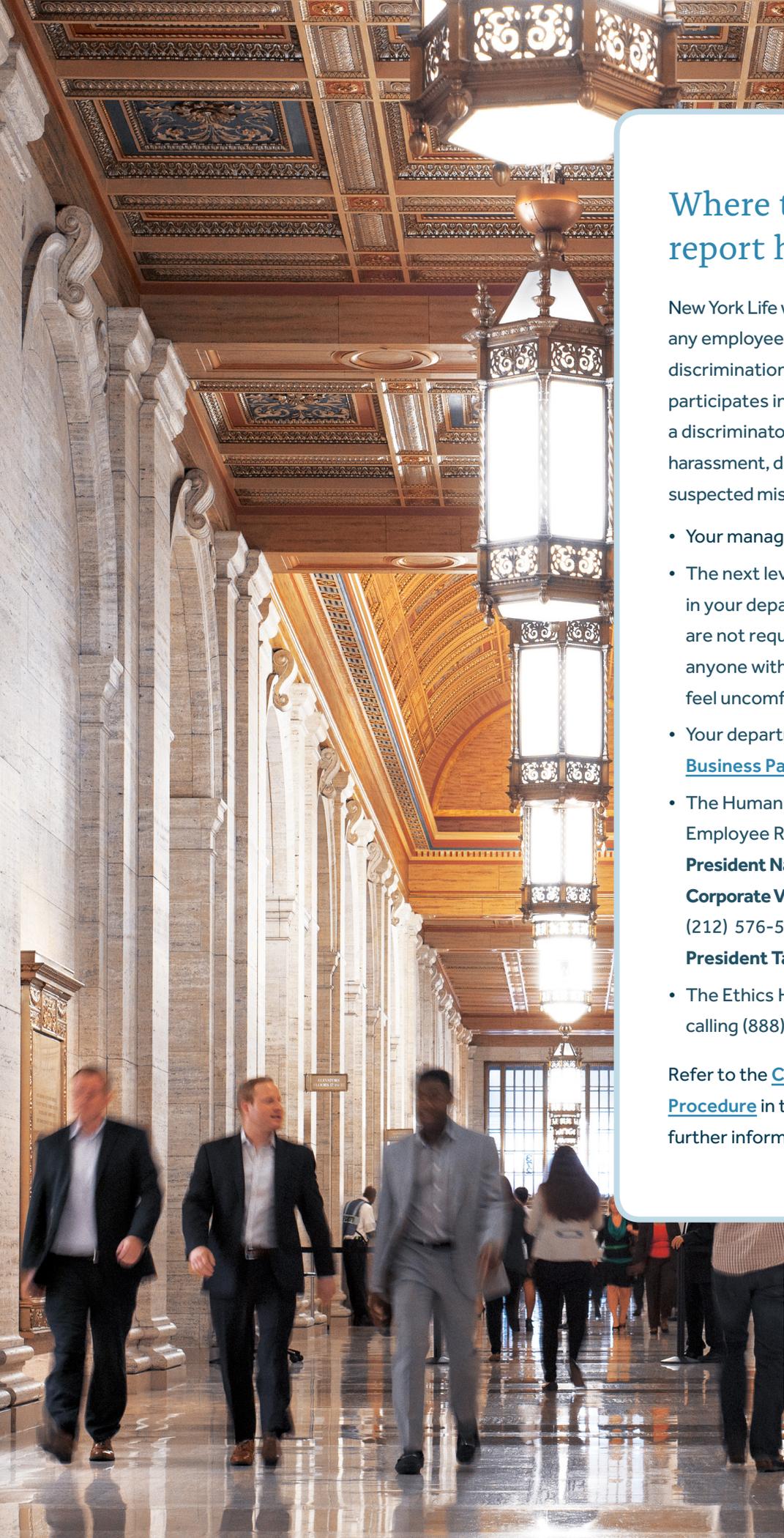
New York Life has written Affirmative Action Plans (AAPs) for:

- Minorities and women
- Individuals with disabilities
- Disabled veterans
- Other protected veterans

These AAPs confirm our policy of providing equal opportunity employment for all people. They will not be used to discriminate against any employee or applicant.

Examples of situations to avoid:

- Asking discriminatory questions
- Using inappropriate language
- Using one of the aforementioned groups as a basis to recruit or not to recruit
- Showing favoritism



Where to go to report harassment.

New York Life will not permit retaliation against any employee who complains of possible discrimination, harassment, or retaliation, participates in an investigation, or opposes a discriminatory practice. You may report harassment, discrimination, retaliation, or other suspected misconduct to any of the following:

- Your manager or supervisor
- The next level of management or authority in your department. Note, however, that you are not required to report your concerns to anyone within your chain of command if you feel uncomfortable doing so.
- Your department's [Human Resources Business Partner](#)
- The Human Resources Department Employee Relations Group, **Corporate Vice President Nancy D'Angelo** at (212) 576-8372, **Corporate Vice President Jeffrey Goldstein** at (212) 576-5368, or **Corporate Vice President Tammy Mata** at (212) 576-7033.
- The Ethics Hotline—either [online](#) or by calling (888) 331-0619

Refer to the [Complaint and Investigation Procedure](#) in the Employee Handbook for further information.

Health policies.

New York Life is strongly committed to providing a safe, healthy, and productive work environment for all employees. The [Employee Assistance Program \(EAP\)](#) can provide you with confidential access to consulting services, professional assessment, and guidance on a broad range of personal and interpersonal concerns.

DRUG-FREE WORKPLACE

We recognize that drug abuse affects our society at all economic levels and ages. We make an ongoing effort to counsel employees about the dangers of drugs and the availability of help through our EAP.

DRUG AND ALCOHOL ABUSE POLICY

Our policy on controlled substances prohibits you from engaging in their:

- Distribution
- Dispensing
- Manufacture
- Possession
- Sale
- Transfer
- Use for nonprescription purposes

Employees must remain free from the influence of drugs, alcohol, or any other substance that could potentially impair their ability to work safely and effectively while representing the company. This is true whether you are on company premises, traveling, or at social events or corporate functions where you are representing the company. While this prohibition does not apply when attending company events where alcohol is served, your consumption should be moderate in these situations.

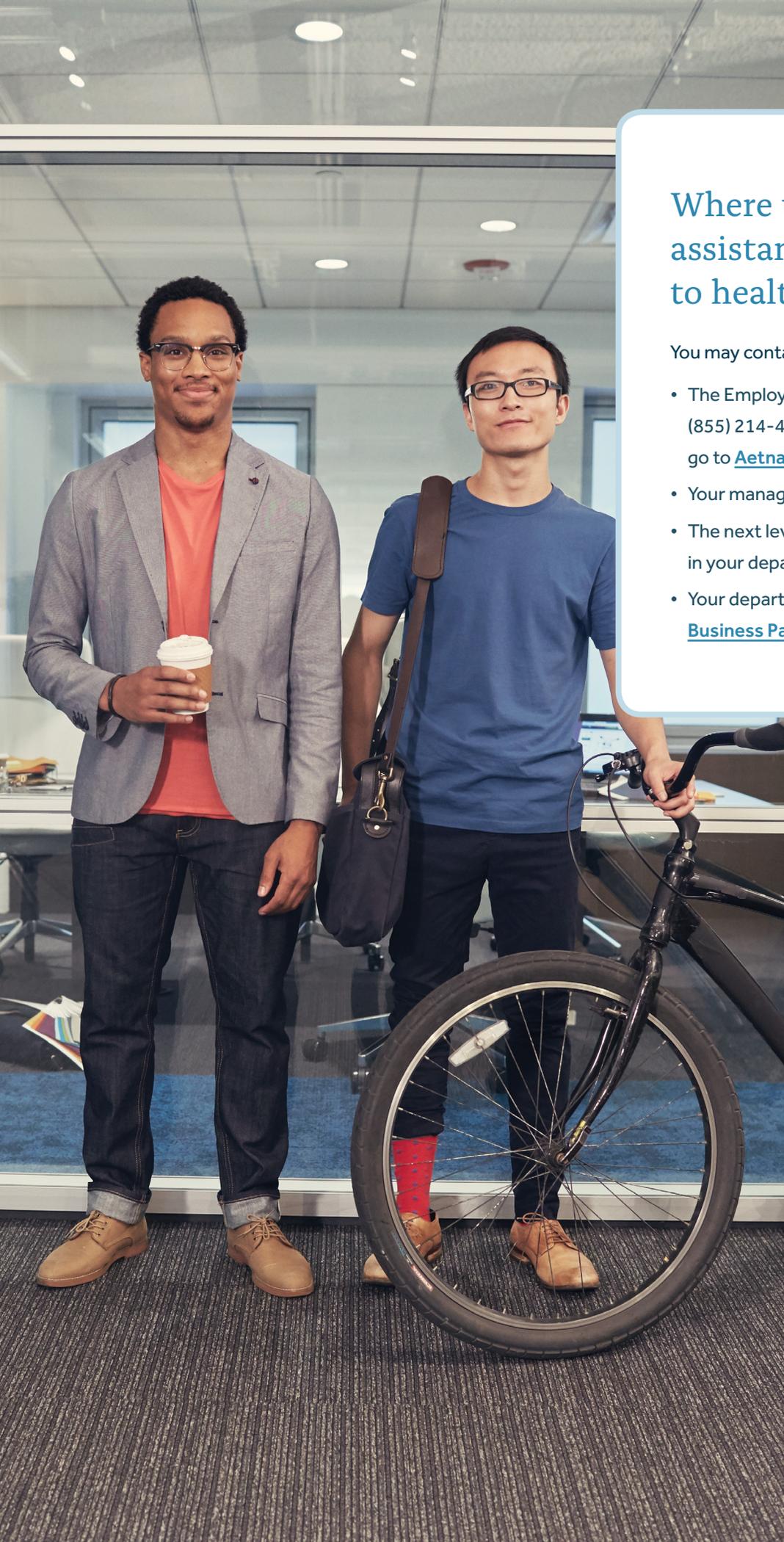
Violation of this policy will result in disciplinary action, which may include the immediate termination of your employment. Where warranted, you may face arrest and criminal prosecution.

If you are charged with a crime relating to controlled substances, you must inform New York Life within five days of being charged. Failure to do so may result in disciplinary action, up to and including termination.

What if...

My subordinate's job performance is deteriorating, and he confided in me that he has been fighting an alcohol addiction. What should I do?

Answer: As a supervisor, you should encourage a subordinate whose job performance is deteriorating to contact the Employee Assistance Program or refer them to your Human Resources Business Partner. You must also inform your manager about your subordinate's performance.



Where to go for assistance related to health policies.

You may contact:

- The Employee Assistance Program at (855) 214-4781. For additional information, go to [Aetna Resources for Living](#)
- Your manager or supervisor
- The next level of management or authority in your department
- Your department's [Human Resources Business Partner](#)

Avoiding conflicts of interest.

A conflict of interest exists when your personal interests, activities, or relationships could or appear to affect or influence decisions you make on behalf of the company that should be made objectively and in line with your duties as an employee. These interests, activities, or relationships may affect your judgment, prevent you from effectively performing your job, or harm your and the company's reputation. You should avoid any situation that creates such a conflict.

OUTSIDE BUSINESS ACTIVITIES (OBAs)

Most people have very busy lives outside of work, including family, recreational, and business activities.

While the company doesn't want to prevent people from working outside the company, you may not engage in activities that could cause an actual or perceived conflict with your job.

Please keep in mind that some New York Life employees and those of certain New York Life subsidiaries may be required to adhere to codes of ethics or policies that may differ in certain aspects from this code. If you are one of these employees, you should follow the requirements in those codes and policies.

OUTSIDE ACTIVITIES THAT COULD CAUSE A CONFLICT INCLUDE:

- Owning an interest in a supplier, customer, or competitor of New York Life
- Consulting with or being employed by a customer, supplier, or competitor
- Taking part in a business activity that competes with the company's business
- Actively selling products or services on behalf of a relative
- Participating in an activity that is inconsistent with company values

Sometimes there could be conflict when a member of your family, a close relative, or a significant other is involved in outside activities. Speak to your supervisor if you think there may be a conflict.

Even if your activity is not a conflict, be careful to:

- Use your own supplies and resources, not the company's
- Do any work related to the activity on your own time, not during work hours
- Make sure that you have discussed the activity with your manager to ensure that you have their approval

Certain internal situations would cause a conflict:

- If you supervise or review the work of a relative* or significant other.
- If you can influence the evaluation, pay, or benefits of a close relative or significant other

If you think you may have a conflict, talk it over with your manager. If she or he thinks it is a conflict, let the Corporate Compliance Department's Business Conduct and Ethics Unit know the details. They will determine if the matter needs to be brought to the Conflicts of Interest Committee for review and approval. You may also be required to report the situation on your Business Conduct Questionnaire.

*Relatives are defined as those who are related by blood, marriage, or law. These include, but are not necessarily limited to, spouse, child, stepchild, parent, step-parent, foster parent, guardian, grandparent, grandchild, sister, brother, niece, nephew, aunt, uncle, cousin, and in-law. For the purposes of this policy, relatives shall also include romantic or sexual partners and anyone with whom the employee resides.

APPROVAL PROCESS FOR OBAs

All employees must secure approval prior to engaging in any OBA. First, employees must notify and obtain approval from their manager. After receiving management approval, all employees must contact **Corporate Vice President Thony Pierre**, **Corporate Vice President Gertrude Olla** or **Corporate Vice President Jennifer DeCicco** in Corporate Compliance for company approval. After the activity is approved, employees must update their Business Conduct Questionnaire.

OBAs FOR REGISTERED REPRESENTATIVES

There are additional restrictions and approval requirements if you are a registered representative of NYLIFE Securities LLC or NYLIFE Distributors LLC. If you are registered with NYLIFE Securities, submit an [online](#) OBA request form to the OBA Unit of Corporate Compliance. If you have any questions, contact **Corporate Vice President Dave Long** at (914) 846-5830.

If you are registered with NYLIFE Distributors, submit an [OBA request form](#) to **Corporate Vice President Linda Howard** of Corporate Compliance, or contact her at (201) 685-6220 if you have questions.

These steps are in addition to the steps outlined above, which pertains to all employees.

What if...

**My brother works for the company.
Can I be his supervisor?**

Answer: No. Family members should not supervise others in their family. It may be difficult to be objective when you supervise a close relative. You should not have the ability to influence the evaluation, pay, or benefits of a relative. There may also be a perception of preferential treatment.

OFFICERS AND OUTSIDE INTERESTS

If you are an officer of New York Life, you generally should not act (for any business organized for profit) as an:

- Agent
- Consultant
- Employee
- Officer
- Representative

SERVING ON A BOARD OF DIRECTORS OR MANAGERS OR ON AN ADVISORY BOARD

For profit

Employees must obtain written preapproval from the Conflicts of Interest Committee before serving on a for-profit board of directors or managers, an advisory board, or in a similar fiduciary position. This includes boards of companies not affiliated with New York Life and those of any subsidiary, affiliate, or joint venture where New York Life (or a subsidiary) has the right to name board members.

Not-for-profit

Employees must obtain approval from their supervisor prior to serving on a not-for-profit board of directors or an advisory board, as well as advise Corporate Compliance.

FINANCIAL INTERESTS

Those who approve or issue orders, contracts, or commitments for the furnishing of supplies or services by or to New York Life, or make loans or arrange for services by or to New York Life, must follow certain steps.

- Before obtaining a financial interest in a supplier or customer of New York Life, you must report the facts, in writing, to the Conflicts of Interest Committee and obtain its approval by contacting **Vice President Gina Cristallo** at gina_cristallo@newyorklife.com
- If an immediate family member has a financial interest in any supplier or customer of New York Life, you must report the facts, in writing, to the Conflicts of Interest Committee by contacting **Vice President Gina Cristallo** at gina_cristallo@newyorklife.com

OWNERSHIP IN FINANCIAL SERVICES OR INSURANCE COMPANIES

You must promptly inform the Conflicts of Interest Committee if you or an immediate family member acquires or maintains a significant ownership interest* in any of the following:

- A life insurance or health insurance agency, insurance brokerage firm, or any insurance consulting firm
- A mortgage loan correspondent of New York Life or other mortgage banking concern
- An investment banking firm, brokerage, or other firm engaged in the business of buying and selling securities
- An organization providing managed care services, such as health maintenance organizations (HMOs), preferred provider organizations (PPOs), and utilization management companies

EMPLOYMENT OF RELATIVE**

A relative of an employee may be considered for employment or a consulting position in accordance with the company's hiring practices and procedures. Relatives, however, may not work in the same department or field office when one has a direct or indirect supervisory relationship over the other. In situations where employees in a direct or indirect supervisory relationship marry or cohabitate, one of the employees will be reassigned when a suitable position is available.

Notwithstanding the foregoing, if the CEO makes a determination that there is a unique and compelling business need that cannot otherwise be effectively met, then an employee may be hired or transferred into a department or field office in which a relative works, but only where an indirect and not a direct supervisory relationship will exist.

In such situations, the Executive Officer may be required to recuse himself or herself from any significant business decision that may directly impact that relative to avoid any appearance of bias in the decision-making process.

Relatives of the president, CEO, chairman, and directors of New York Life are not eligible for employment by or with the company. Such individuals may, however, be considered for engagement as consultants or agents in accordance with the company's policies and procedures.

RELATIVES OF EMPLOYEES ACTING AS NEW YORK LIFE AGENTS

A relative of an employee may become an agent of New York Life in accordance with the company's usual practices. However, an agent of the company may not solicit business from an employee who is directly or indirectly supervised by a relative of that agent. Similarly, an employee who is a relative of an agent may not solicit business on behalf of that agent from any employee.

CONFLICTS OF INTEREST COMMITTEE

The Conflicts of Interest Committee considers and reviews most matters involving possible conflicts of interest and reports to the Audit Committee of the board of directors if any material issues need to be raised. This committee consists of senior management members from:

- Corporate Compliance
- Human Resources
- Office of the General Counsel
- Office of the Secretary

To obtain approval from the Conflicts of Interest Committee:

- Submit a written statement about the activity to your department head or direct supervisor
- State why you feel it is compatible with your current position
- Send a copy of your statement to **Vice President Gina Cristallo** at gina_cristallo@newyorklife.com

The committee will review the information and make its recommendations. You will be notified when a decision is made.

BUSINESS CONDUCT QUESTIONNAIRE

One way the company measures and tracks potential conflicts of interest is through your responses to its annual Business Conduct Questionnaire. Every employee is required to complete the questionnaire annually, and all employees have an ongoing obligation to ensure that their questionnaire responses are current at all times.

The questionnaire asks for information about, among other things:

- Outside employment
- Outside financial or business interests
- Relationships with contractors or suppliers
- Payments on behalf of the company to employees or officials of foreign governments
- Personal political contributions

*A significant ownership interest means: (1) An ownership interest of one percent or more or an ownership interest equal to 10 percent or more of the employee's net worth. (2) Having control of the company (i.e., serving as a director, partner, or officer, and exercising executive responsibility). (3) Having the right to vote 25 percent or more of the company's voting securities. (4) Being entitled to 25 percent or more of the company's profits.

**Relatives are defined as those who are related by blood, marriage, or law. These include, but are not necessarily limited to, spouse, child, stepchild, parent, step-parent, foster parent, guardian, grandparent, grandchild, sister, brother, niece, nephew, aunt, uncle, cousin, and in-law. For the purposes of this policy, relatives shall also include romantic or sexual partners and anyone with whom the employee resides.

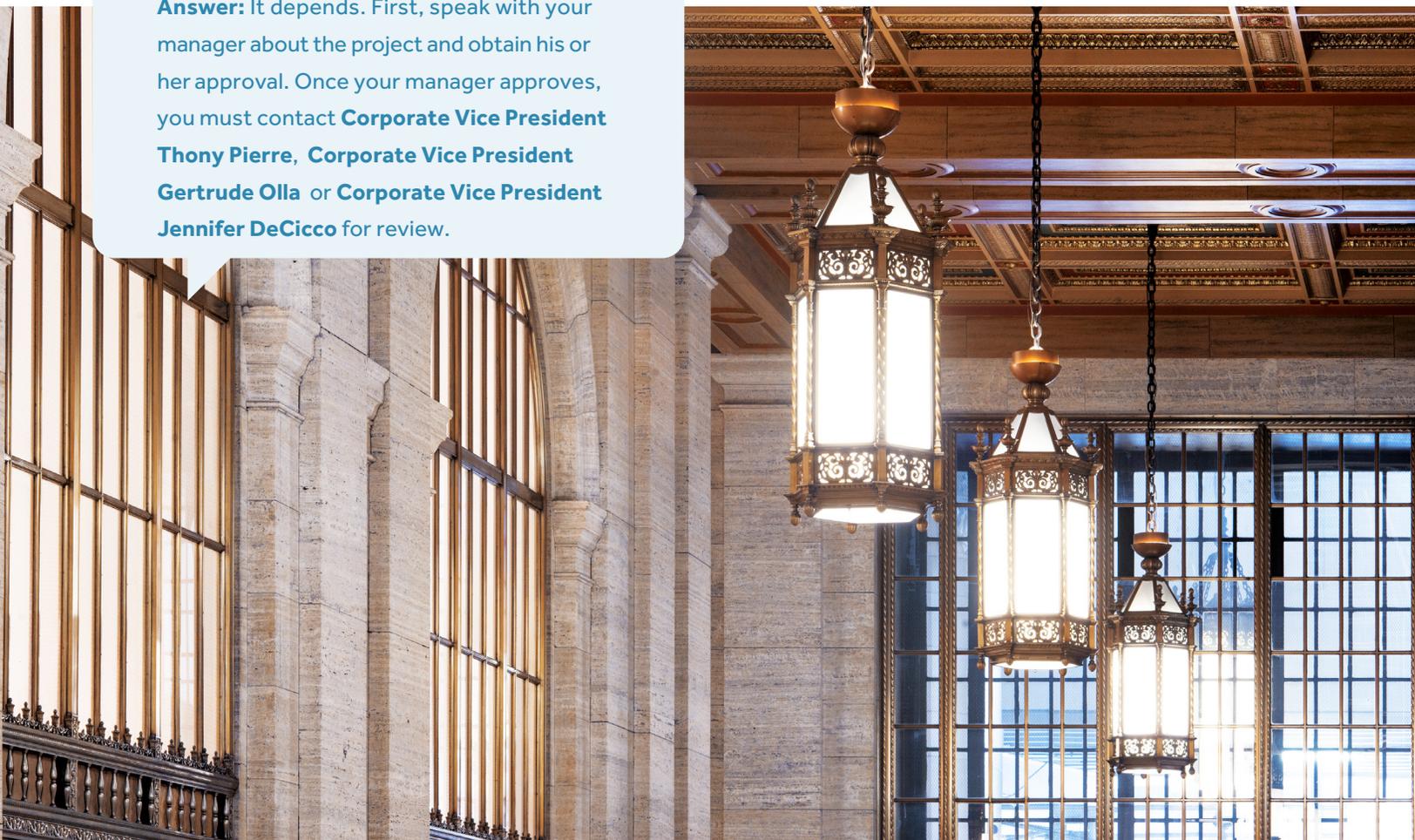
What if...

I started working for New York Life in August, but have recently been asked by my old employer to work for them as a part-time consultant to help complete a project on which I had previously worked. The project will be completed in October. Can I take this consulting job and do I have to obtain approval from the Conflicts of Interest Committee?

Answer: It depends. First, speak with your manager about the project and obtain his or her approval. Once your manager approves, you must contact **Corporate Vice President Thony Pierre**, **Corporate Vice President Gertrude Olla** or **Corporate Vice President Jennifer DeCicco** for review.

Where to go for help and approval of OBAs.

If you are considering temporary or part-time outside employment, notify and obtain approval from your manager, who will also ensure that the job is compatible with your position here. After you receive your manager's approval, you must contact **Corporate Vice President Thony Pierre** (212) 576-6386, **Corporate Vice President Gertrude Olla** at (212) 576-6048 or **Corporate Vice President Jennifer DeCicco** at 212-576-4559 in Corporate Compliance for company approval.



Gifts, meals, and entertainment.

Business gifts and entertainment are a normal part of business life. During your employment, you might buy a meal for a customer or receive a bottle of wine from a vendor. These are acceptable business practices that foster goodwill and create lasting relationships. But when you give or receive gifts, meals, or entertainment, your actions must not imply that you want to receive, or are giving, favorable treatment. Even if you don't intend to influence someone or to be influenced by them, the perception could be damaging to you and the company.

WHAT DO YOU MEAN BY GIFTS AND ENTERTAINMENT?

Gifts – Anything of value given to or received from a third party that does not come within the definition of entertainment, as defined below. For example, if a vendor gives an employee tickets to an event rather than attending the event with the employee, the tickets would be considered a gift, not entertainment.

Entertainment – Occurs when an employee accompanies a third party, including a client, prospective client, employee of a client or prospective client, or a vendor, for any meal, refreshments, leisure activity, charitable event, theatrical or sporting event, concert, or any other entertainment event in connection with company business. Such events are considered to be in connection with company business where either party is seeking reimbursement for the cost of the event. Entertainment also includes any transportation and/or lodging provided to attend such activity if the third party accompanies the employee. If not, these items should be logged as gifts.

REPORTING GIFTS, MEALS, AND ENTERTAINMENT (GM&E)

What is reportable GM&E?

Generally, all GM&E, whether given or received, valued at \$50 or more, are reportable, and all reportable GM&E given or received requires the approval of your supervisor.

Any gifts given or received that are valued at \$100 or more must be preapproved by your supervising Executive Officer (EO). Any meals or entertainment given or received that is valued at \$250 or more must be preapproved by your supervising EO. We recognize that it may not always be practical to obtain preapproval for GM&E that exceeds these amounts. For example, you may have to extend an unexpected invitation to dinner after business hours. In those cases, you should report the meal to your supervising EO the next business day. However, scheduled events such as golf outings and theater shows are usually planned with enough time to obtain preapproval.

When entering the item in the [GM&E reporting system](#), be sure to include the reason why you didn't get preapproval. Third-party invitations for entertainment hosted at locations outside of the local business location (i.e., conference center, hotel) in which the outside party is paying some or all the cost of the trip (i.e., hotels, meals, entertainment, tickets to sporting events, etc.) require the preapproval of your supervising EO. If necessary, your supervising EO may also seek the approval of your Executive Management Committee member.

Please keep in mind that some New York Life employees and those of certain New York Life subsidiaries may be required to adhere to alternative policies that may differ in certain aspects from this policy. If you are one of these employees, you should follow the requirements in the codes and policies that are applicable to you.

What if...

Included in the cost of the industry conference you are attending are breakfast, snack breaks, and dinner. You realize the dinner is sponsored by a current New York Life vendor. Would this be considered a reportable GM&E under the company policy?

Answer: No. If the sponsored meals or snack breaks are included as part of the scheduled events for the conference and your attendance at the conference was approved, it would not be a reportable GM&E under the policy and would not be required to be entered into the [GM&E reporting system](#).

Where do I report my GM&E?

The company's [GM&E reporting system](#) can be found on The Square at [Gifts, Meals, and Entertainment](#). You are responsible for accurately and promptly reporting GM&E, given or received. If you have questions about whether something is acceptable GM&E, speak with your manager or contact **Corporate Vice President Linda Howard** in the Corporate Compliance Department at (201) 685-6220.

What is non-reportable GM&E?

You do not have to report GM&E under the following situations:

- Company entertainment provided for New York Life agents and their guests—unless your area is required to report this information for regulatory purposes
- Business-related GM&E provided to you by fellow employees, a department, or the company
- Commemorative items such as an inscribed paperweight, plaque, or crystal bowl received to commemorate a special event, a product, or company promotion
- Gifts between you and other employees purchased with personal funds
- Entertainment, including meals received at industry meetings, if the company already paid an admission for attendance to the meeting

You should also check with your manager to learn about any other standards specific to your department's operations.

ACCEPTABLE AND UNACCEPTABLE GM&E ACTIVITY

When you are offered or giving GM&E, think about whether or not:

- What you are giving or receiving is consistent with acceptable business practices
- The GM&E could be perceived as a bribe or inducement
- The GM&E makes you or the person receiving it feel obligated
- The GM&E makes it difficult for you or someone else to make a fair decision
- It would embarrass the company if others learned about the GM&E

Some examples of acceptable GM&E:

- A small token or item with a logo given as a thank you at the end of a successful project
- A meal given or received during the course of a project
- Registration fees for a conference at which you are presenting
- Visa, American Express, and store gift cards of \$50 or less per person
- A small gift of thanks from an individual agent to an employee, examples include, but are not limited to, cookies, popcorn, fruit baskets, or flowers

Some examples of unacceptable GM&E:

- Cash or its equivalent, such as American Express gift checks or store gift cards over \$50, cashier's checks, and traveler's checks that can be exchanged for cash
- Transportation expenses paid by anyone other than the company (excluding nominal costs such as airport car service or taxis)
- GM&E from a vendor during contract negotiations
- GM&E solicited or encouraged by an employee
- GM&E so extravagant or frequent, it may appear improper
- GM&E that is not in line with the company's culture and values
- GM&E from an individual agent to an employee that exceeds a token gift such as cookies, popcorn, fruit baskets, or flowers

PLEASE NOTE: GM&E must be reported in the [GM&E reporting system](#) if their value is \$50 or more. If an employee receives a gift of \$100 or more from an agent, they must contact their manager. The manager will determine whether the gift is acceptable. Employees may not accept gifts of cash or cash equivalents from agents.

SPECIAL REPORTING REQUIREMENTS

Gifts and Entertainment Involving Restricted Recipients

Union Recipient – A labor union or a labor union officer, employee, agent, shop steward, or other union representative, as well as union appointed plan trustees. This includes consultants engaged by a labor union. It does not include a consultant retained by a union pension plan.

Plan Fiduciaries – A person or entity responsible for managing a qualified retirement plan in accordance with the Employee Retirement Income Security Act (ERISA).

All GM&E provided to union recipients and plan fiduciaries must be reported **regardless of amount**. All gifts, payments, or items of value provided to union recipients and plan fiduciaries must be reported in the [GM&E reporting system](#). This includes situations in which nominally valued items bearing a company logo are provided to such recipients, or an employee provides a personal gift to a union recipient or plan fiduciary, regardless of whether the employee seeks reimbursement from the company for the cost of the gift.

Gifts Involving Registered Representatives

Gifts given by NYLIFE Distributors or NYLIFE Securities registered representatives, or the firm itself, to any employee of another firm must be aggregated, and their total amount in any given calendar year may not exceed \$100. For example, it would be a violation of FINRA rules if two different NYLIFE Distributors registered representatives each gave a gift valued at \$75 to the same individual. **As a registered representative, it is your obligation to be aware of this limit and the gifts you give and receive that accumulate under this rule. You may not accept more than a total of \$100 in gifts from any one firm or its employees per calendar year.** Gifts provided in connection with business entertainment count toward the \$100 per person FINRA limit unless they are logoed or commemorative in nature and are worth \$75 or less.

What if...

A company colleague surprises you on your birthday with a bottle of wine, worth approximately \$50. Can you accept the gift and should you report it in the company's [GM&E reporting system](#)?

Answer: You certainly can accept the gift and there's no need to report the item, as it is a gift between coworkers paid for with personal funds.

Gifts and Entertainment Involving Government Officials

Many laws restrict or prohibit giving GM&E to government officials. If you wish to provide GM&E to a public or government official, even when using personal funds, you must first request and receive approval from the Office of Governmental Affairs (OGA). Whether you will be able to do so depends on:

- The applicable law
- The nature and value of the GM&E
- The prior relationship with the public official, if any
- Other circumstances surrounding the GM&E

Under no circumstances can you provide GM&E to a government official in exchange for, or as a result of, an official action. If you are unclear as to whether the person is covered by this rule, contact OGA.

There is an exception to complying with the aforementioned OGA preapproval procedure, if you are an OGA employee who is not a registered representative and have a personal relationship with congressional staff or certain employees in the executive branch. In this event, if you are providing or receiving a gift or entertainment in connection with your personal relationship with congressional staff or certain employees in the executive branch, please contact **Vice President Michael Tobin** in the Office of Governmental Affairs at (212) 576-4625.

INDUSTRY CONFERENCES OR EVENTS

During your career, many of you will attend industry conferences. If your department has already paid an admission charge or attendance fee, any GM&E received by all attendees, including meals, does not have to be reported.

GM&E THAT MAY BE REPORTABLE AT AN INDUSTRY CONFERENCE

- A raffle prize
- A separate meal provided by a vendor
- A separate gift given by a vendor

On occasion, the sponsors of a conference will pay for the hotel and attendance fee for the presenters. If you are presenting and are offered lodging, it may be acceptable but must be reported in the [GM&E reporting system](#) and you must obtain preapproval from your supervising EO. Transportation may not be accepted as part of your attendance at an industry conference.

If an outside party (e.g., a for-profit business or an industry association), is hosting a conference or event and offers to pay for some or all of the cost of the trip for the attendee of the conference (excluding transportation), the attendee must obtain preapproval from their EO and report it in the [GM&E reporting system](#). This includes payments for:

- Hotel accommodations
- Meals (outside of the conference venue)
- Entertainment (tickets to sporting events, etc.)

Transportation expenses should always be paid by the company, even to industry association meetings (excluding nominal costs such as airport car service or taxis).

TRAVEL AND OTHER REIMBURSABLE EXPENSES

The company's [Travel Policy](#) explains the guidelines of business travel for employees, including reimbursement for all reasonable and necessary expenses covered under this policy. Adhering to the policy ensures that employee travel expenses are uniform and predictable.

SPOUSAL EXPENSES

In general, the company does not provide reimbursement for the travel, meals, lodging, entertainment, or other expenses of spouses who accompany employees on business trips or at business functions, except in the limited instances where the presence and service of an employee's spouse are requested for company business purposes at a particular function. All such spousal expenses are subject to the approval and reporting process outlined in the company's [Spousal Expense Reimbursement Policy](#), both to confirm that there is a legitimate business purpose associated with the expense and to control the overall costs of the company.

RECORDING AND REPORTING TRAVEL EXPENSES

All expenses must be reported accurately and in a timely manner. The procedures for recording and reporting travel expenses are detailed in the [Expense Travel Policy](#).

CHARITABLE DONATIONS

The company believes in the importance of giving to charities. Keep your donations separate from your business dealings. You should not feel pressured, or pressure someone else, to make a donation in order to begin or continue a business relationship.

PERSONAL DONATIONS

Personal charitable contributions may cause a conflict or the appearance of a conflict if they involve a customer or vendor. If you are asked by a customer or vendor to personally support a charitable organization using your own funds, such as by buying tickets to a charity event or donating funds, you should confirm with your supervising EO that he or she is comfortable with your donation and that it will not create the appearance that you made the donation to the charity to obtain or keep business. If you are considering asking a customer or vendor to donate to a charity, please contact Corporate Responsibility for further guidance.

GRANTS FROM THE NEW YORK LIFE FOUNDATION

The New York Life Foundation, established as the philanthropic arm of the company, provides leadership and support to New York Life agents, employees and retirees who want to make a difference in the lives of others. The foundation makes grants to national and local nonprofit organizations where members of the New York Life family donate their time and talents. Nonprofit organizations apply for grants through an online grant application process that can be accessed at [New York Life Foundation](#). All requests for funding must be submitted online. If foundation staff is interested in further exploring the proposed project, the nonprofit is contacted for more details and a project proposal, which is also submitted online. After reviewing the proposal, foundation staff will decide whether to recommend it for funding.

The foundation president may approve grants of up to \$50,000, and the foundation chairman may approve grants of up to \$1 million, provided that such approved grants are thereafter reported to the foundation's board of directors. All foundation grants over \$1 million must have the prior approval of the foundation's board of directors.

Employees should refer any potential grantees to the foundation website and the online application process outlined above. For additional details regarding the organizations and activities that are eligible for foundation contributions, please go to the [New York Life Foundation](#).

CORPORATE OR DEPARTMENTAL DONATIONS OUTSIDE OF THE FOUNDATION

Charitable contributions may also be made by the company or departments to nonprofit organizations with tax-exempt status under Section 501(c)(3) of the Internal Revenue Code.

Departmental contributions may fund a broader range of projects than the foundation is able to support, such as goodwill advertising (e.g., ads in dinner journals), fundraising events, and other fundraising benefit activities. However, such contributions must be preapproved by Corporate Responsibility. Please refer to the New York Life Foundation's [Application Guidelines](#) for more information.

ANNUAL GIVING CAMPAIGN

The company's annual Giving Campaign encourages employees to help charitable organizations across the nation. You may be asked to assist in the company's campaign or to participate in departmental fundraising efforts. You may not ask local businesses or vendors to contribute cash, goods, or services to support or enhance your, or the company's, fundraising activities.

Where to go for approval on GM&E involving public or government officials.

To obtain preclearance, call Michael Tobin, Vice President, in the Office of Governmental Affairs, at (212) 576-4625. You should provide:

- Specific names and titles of the officials
- Complete details of the proposed entertainment
- Anticipated expenses

The GM&E to public or government officials must also be entered into the [GM&E reporting system](#) found on The Square at [Gifts, Meals, and Entertainment](#).

Where to go for help on GM&E.

Please contact **Corporate Vice President Linda Howard** in the Corporate Compliance Department at (201) 685-6220 if you need assistance. For questions regarding gifts from agents, contact **Vice President Sandra Gill** in Agency Standards at (914) 846-5572.

Where to go for help on charitable donations.

For information on grants, corporate, or departmental donations, contact **Vice President Heather Nesle** in Corporate Responsibility at (212) 576-3923.

Procurement and engagement.

Corporate Finance's Procurement Division must be engaged in all transactions for goods and services before any discussions with a third party regarding new business or renewal of existing business takes place. If you need services, equipment, or supplies, first review the company's procurement policy and, if necessary, contact the Procurement Division.

WHY ENGAGE PROCUREMENT?

Procurement helps protect you, your business unit, and the company. By adhering to a rigorous procurement methodology, and operating under a strict code of ethics, Procurement helps to ensure that an impartial, objective review of suppliers is performed. They work with the business units to detail the scope of work, identify critical business drivers, and manage a competitive request for proposal process to identify the proper suppliers for New York Life's business needs. It is the business unit's responsibility to select from the list of competing suppliers.

Procurement will assist you in complying with all company policies and regulations related to third-party risk and working with the Office of the General Counsel in establishing proper legal protections.

To help the company meet its goal of having a supplier base as diverse as our customers, Procurement will also identify and vet diversity suppliers.

Working with Procurement will not only help you follow company policy and provide independent oversight of the procurement process, but will also provide:

- Access to competitive pricing
- Risk mitigation
- Proper legal protections
- Financial due diligence
- Appropriate financial and auditing controls
- Opportunities to engage diversity suppliers
- Demonstration of the principles of the code of conduct

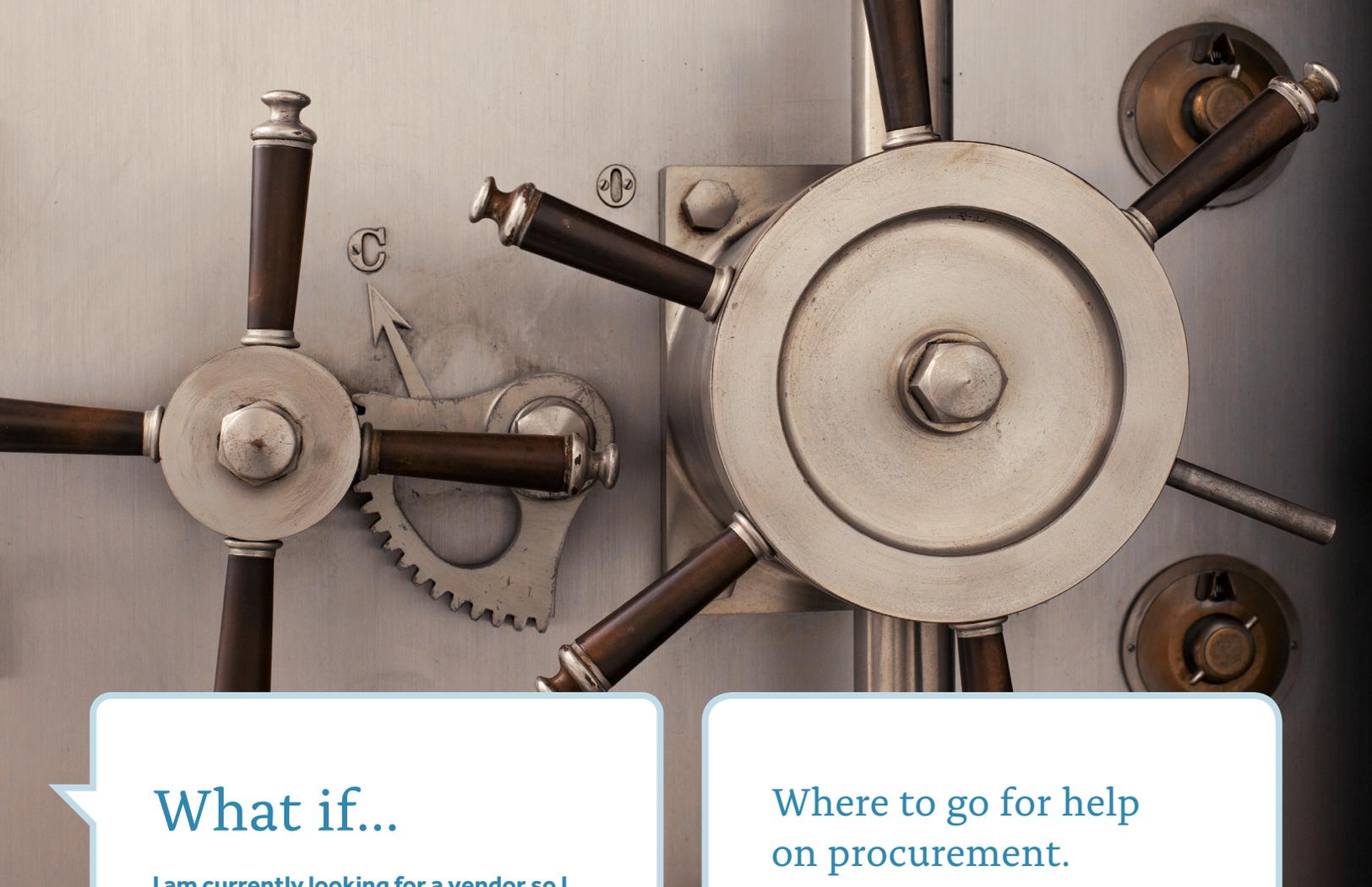
LAW FIRMS AND LEGAL FEES

The Office of the General Counsel is the only department within the company that has the authority to hire law firms and to approve legal fees. When considering the need for outside legal expertise, employees must contact Robert Karmen, Senior Vice President & Deputy General Counsel, in the Office of the General Counsel at (212) 576-6073.

ENGAGEMENT OF ACCOUNTING FIRMS

PricewaterhouseCoopers (PwC) is currently the company's independent auditor. No engagement of PwC or payment to PwC or a PwC affiliate (including Diamond Management & Technology) can be made except through the review and approval process outlined in the [Engagement of Accounting Firms Policy](#). In addition, the accounting firms of Ernst & Young, Deloitte & Touche, and KPMG (the "Firms") cannot be engaged or paid any amounts except as provided in this policy.

Please refer to the policy before taking any action related to retaining or paying PwC, another firm, or their affiliates, for any work.



What if...

I am currently looking for a vendor so I can purchase new personal printers in my unit. There are so many vendors out there, the process is daunting. Is there an easier way?

Answer: Yes. Your first step should always be to contact Procurement. They will help you understand what you can and cannot do regarding equipment contracts or purchases. You can also learn about what Procurement can do for you. They may have already researched the issue and may have a list of acceptable vendors.

Where to go for help on procurement.

See the [Procurement Policy](#) for additional information or contact the relationship manager who supports your area:

- Corporate areas—**Vice President Debra Bronzo** at (212) 576-8378
- Technology Department—**Corporate Vice President Lanse Natsch** at (212) 576-8999
- Insurance & Agency—**Corporate Vice President Michael Mooney** at (212) 576-5926
- NYL Direct—**Corporate Vice President Candice Crain** at (813) 288-2431
- Investments—**Corporate Vice President Richelle Pecora** at (212) 576-6929
- Risk Management—**Corporate Vice President Brendan Healy** at (212) 576-7096
- Long-Term Care and Eagle Strategies—**Senior Associate Patricia Poreda** at (212) 576-5253

Insider trading and material nonpublic information.

Federal securities laws strictly govern the financial transactions of publicly held companies. While New York Life is not a publicly traded company, we do business with, and may obtain confidential information about, public companies. The company's rules regarding insider trading and material nonpublic information describe how to treat this information and ensure that we maintain the trust placed in us.

INSIDER TRADING

Insider trading refers generally to buying or selling a security, in breach of a fiduciary duty or other relationship of trust and confidence, while in possession of material nonpublic information about the security. Insider trading violations may also include "tipping" such information, securities trading by the person "tipped," and securities trading by those who misappropriate such information.

Examples of insider trading cases that have been brought by the Securities and Exchange Commission (SEC) are:

- Corporate officers, directors, and employees who traded the corporation's securities after learning of significant, confidential corporate developments;
- Friends, business associates, family members, and other "tippees" of such officers, directors, and employees, who traded the securities after receiving such information;
- Employees of law, banking, brokerage, and printing firms who were given such information to provide services to the corporation whose securities they traded;
- Government employees who learned of such information because of their employment by the government; and
- Other persons who misappropriated, and took advantage of, confidential information from their employers.

Because insider trading undermines investor confidence in the fairness and integrity of the securities markets, the SEC has treated the detection and prosecution of insider trading violations as one of its enforcement priorities.

We all must take care to avoid the appearance of impropriety by understanding what material nonpublic information is and what steps must be taken to ensure that it is not used improperly. This is particularly important if your job requires you to have access to material nonpublic information about a company's current or future business transactions.

As an employee, it is important that you:

- Maintain the confidentiality of information you receive
- Do not use such information in any way that would violate laws or could create an appearance of impropriety

PERSONAL TRADING POLICY

Employees are subject to the company's policy on the protection of material nonpublic and other confidential information and prevention of insider trading, unless such employees are subject to one of our affiliate's insider trading or other information policies. The policy states that if you have material nonpublic information about a public company, you cannot:

- Buy or sell securities of that public company
- Communicate the information to someone else who trades based on it; this includes interactions on social networking sites
- Share the information with anyone who does not have a need to know it; this includes interactions on social networking sites

If you do any of the above, you may be engaging in insider trading.

MATERIAL NONPUBLIC INFORMATION

What is Material Information?

It is information about a public company that a reasonable investor would consider important in deciding whether to buy or sell the company's stock. If disclosure of the information would significantly affect the stock price, the information is material.

Examples of material information include:

- Business prospects
- Changes in senior management
- Financial results
- New or pending acquisitions or mergers
- New product announcements
- Projections of future earnings or losses

What is Nonpublic Information?

Nonpublic information is information that has not been disclosed or announced to the general public. The fact that information about a company may be found somewhere does not necessarily mean the information is public.

Examples of nonpublic information could include:

- Blogs
- Chat rooms
- Facebook (noncorporate entries)
- Internal email

What is Public Information?

Public information is information that has been disclosed to the general public or made widely available to investors.

Examples of public information sources include:

- Documents filed with the SEC (proxy statements, quarterly reports)
- National newspapers (The New York Times, The Wall Street Journal)
- News websites (CNBC.com, CNN.com, Foxnews.com)
- News wire services (Dow Jones)
- Radio
- Television

If you are aware that the company has a business relationship with a company whose stock you want to buy or sell, you should carefully consider how regulators and others might view the transaction in hindsight.

If you violate company policy, you also may be subject to disciplinary actions, including a warning, a reprimand, probation, suspension, a monetary penalty, demotion, or termination. In the event you do violate federal securities rules, penalties are severe and can include prison time or fines.

COVERED PERSONS

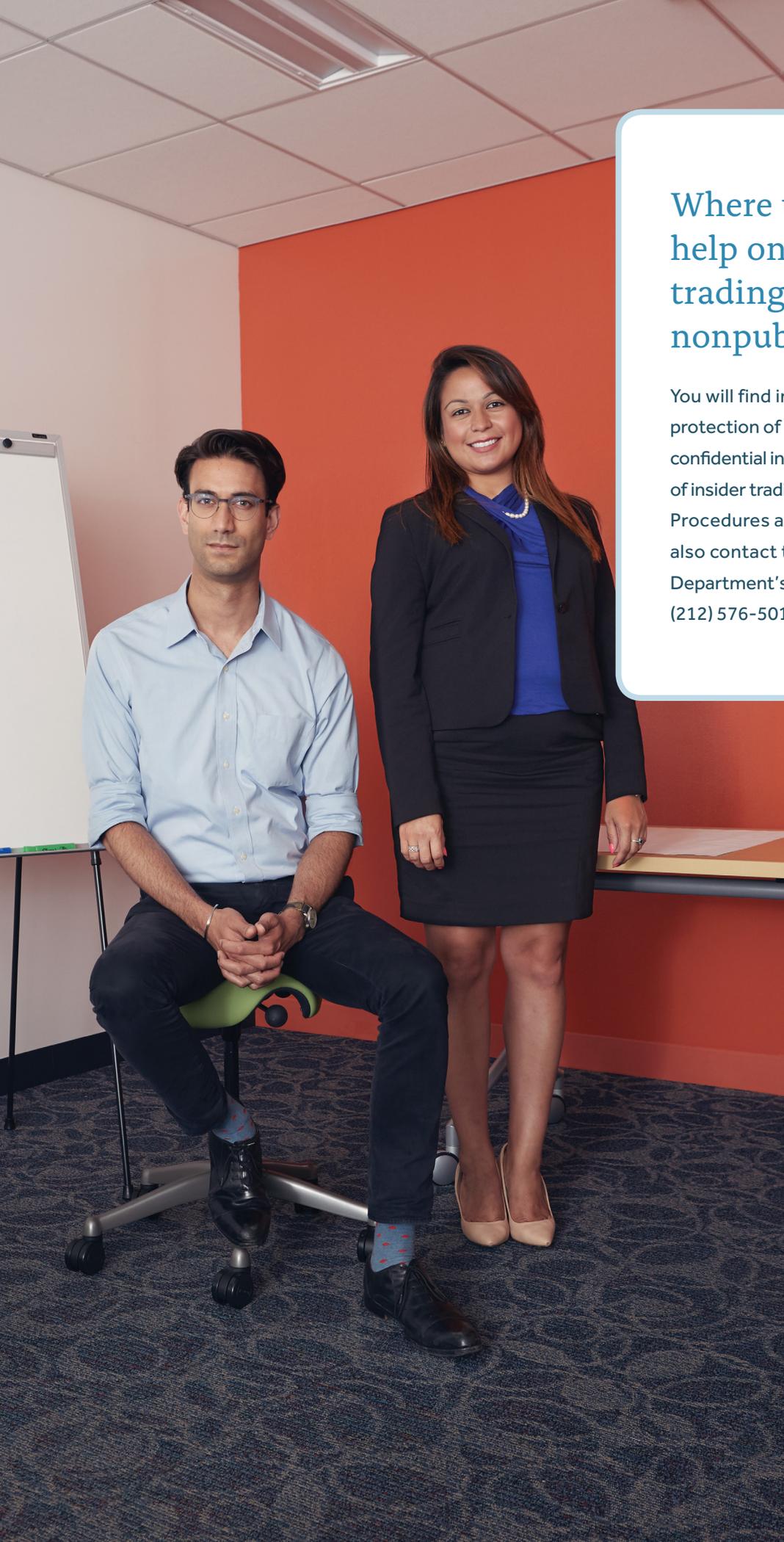
Your level in the company or the nature of your responsibilities may require you to follow the company's [Insider Trading Firewall Procedures](#). If you are designated a "covered" employee, you will be contacted by the Corporate Compliance Department and will be required to:

- Disclose your personal brokerage, discretionary, or managed accounts and those of your immediate family;
- Pre-clear securities transactions, which includes, but is not limited to, any securities in an Initial Public Offering or a Private Placement; and
- Annually certify that the information you've disclosed remains the same.

What if...

I often work with a longtime supplier of the company. During a meeting, I was told by my contact that they are purchasing another company within a few weeks, so it might affect deliverables. I am sure the stock will go through the roof. If I purchase our supplier's stock now, I can make some money, which I really need. I really like the company and was thinking about buying stock anyway. Can I buy it?

Answer: No. You are basing your decision on information you learned during your work here. As you've already stated, you think the news will affect the company's stock price. If the information is not public and you purchase stock, you have violated insider trading rules.



Where to go for help on insider trading and material nonpublic information.

You will find information regarding the protection of material nonpublic and other confidential information and the prevention of insider trading and Insider Trading Firewall Procedures at [Insider Trading](#). You may also contact the Corporate Compliance Department's Personal Trading Hotline at (212) 576-5011 if you have any questions.

Representing the company to the public.

The company wants a consistent message to be provided to the public. To that end, it is important to coordinate communications with the media through the Corporate Communications Department. In addition, communications with public officials should be approved by the Office of Governmental Affairs.

COMMUNICATIONS WITH THE MEDIA AND PUBLIC SPEAKING OPPORTUNITIES

The Corporate Communications Department plays an important role in preparing employees for interviews with news media as described in the [Public Communications Policy](#). You should contact Corporate Communications for approval for the following:

- Interviews
- Requests for comment by the news media on company business
- Content of speeches, lectures, and articles (including any requests for "endorsements")
- Industry presentations (including participation on panels at conferences)
- Press releases and advertising content

New York Life encourages you to be actively involved in civic affairs in your community. When speaking on public issues, however, you should do so only as an individual citizen of the community and must be careful not to create the impression that you are acting for, or representing the views of, New York Life.

USE OF THE COMPANY NAME OR LOGO

You may not permit any supplier or other party to use the New York Life name, logo or other branding in its advertising, promotional materials, customer references, or the like without written approval from your department head and from Corporate Communications. This includes listing New York Life as a customer or client.

What if...

I receive a telephone call from a news reporter asking me to provide comments on a recent business article that featured New York Life. What should I do?

Answer: Do not provide any information to the reporter. Instead, immediately contact **Corporate Vice President Kevin Maher** in Corporate Communications at (212) 576-6955 for guidance.

COMMUNICATIONS WITH GOVERNMENT OFFICIALS

The Office of Governmental Affairs represents all New York Life businesses with government entities and public officials. It is the only authorized representative of New York Life in the public policy arena. The Office of Governmental Affairs has a detailed corporate policy on employee political involvement. You are responsible for ensuring your personal compliance with this policy. View the Office of Governmental Affairs' [Corporate Policy on Employee Political Involvement](#).

If you are asked to testify before or comment to a legislative or regulatory body, a federal or state agency, or a foreign government or international trade body, the Office of Governmental Affairs must review and approve content.

LOBBYING

Lobbying is a legal way to influence decisions made by:

- Federal, state, and local public officials
- Government bodies

Lobbying activities are highly regulated. The company and certain employees who lobby may be required to register as lobbyists. New York Life may also need to file reports of expenditures, contributions, and certifications. In some cases, employees are also required to file reports of their own activities, expenditures, and contributions. View the [Corporate Policy on Employee Political Involvement](#).

CORPORATE POLITICAL CONTRIBUTIONS

New York Life will not make corporate political contributions, nor will the company reimburse persons or entities for political contributions they make.

Corporate political contributions may include, but are not limited to:

- Participating in political events at the federal, state, or local level, at which attendance is often predicated upon making a political contribution
- Contributing in order to oppose or support ballot initiatives

You may not require any other employee to personally contribute to, support, or oppose any political group or candidate.

You must obtain approval from the Office of Governmental Affairs for:

- Use of New York Life assets, funds, equipment, supplies, employee time, facilities, telephones, email, or other property in support of a candidate, political campaign, political party, or ballot initiative

What if...

One of our vendors asked to include New York Life's name on the client list he maintains on his website. Is this allowed?

Answer: We generally don't allow the company's name to be listed. However, you should reach out to your department head and Corporate Communications, both of whom would be required to approve such use.

PERSONAL POLITICAL CONTRIBUTIONS

The SEC and the Financial Industry Regulatory Authority (FINRA) enacted pay-to-play rules. These rules are intended to limit the influence that personal political contributions to certain government officials (including candidates) may have in awarding investment or advisory contracts by government entities. As a result, all employees are required to obtain approval from the Corporate Compliance Department prior to making a contribution to, or engaging in fundraising or solicitation activities on behalf of (1) any political candidate seeking or holding state or local office, (2) any political action committee (excluding the New York Life PAC), or (3) any nonnational political party or committee.

Contributions made by employees' spouses, dependent children, or other family members who reside in the employee's household also require preapproval by Corporate Compliance.

Before making a contribution, please review our [Personal Political Contributions Policy](#) on The Square.

Preapproval decisions will be based solely on applicable laws, regulations, and internal policies. All communications with the Corporate Compliance Department regarding political contributions will be kept confidential, except to:

- Comply with required reporting to a jurisdiction or regulator
- Respond to regulatory inquiries
- Adhere to lawful processes
- Create and maintain any required books and records

Your manager and, if necessary, other members of senior management will only be informed of such a communication if a violation of the company policy occurs.

What if...

My town supervisor is visiting other companies throughout the area and I believe my coworkers would be interested in his views and outlook for the economy. Can I invite him to speak at our next department staff meeting?

Answer: You must obtain preapproval from the Office of Governmental Affairs. They determine if the visit complies with applicable law and New York Life's policies and strategy.

What if...

I would like to make a contribution to New York Life's PAC (Political Action Committee). Do I need preapproval from the Corporate Compliance Department?

Answer: No. Contributions to New York Life's PACs are permitted and do not need to be preapproved.

Where to go for approval of communications with the public.

You will find information regarding communications in the company's [Public Communications Policy](#). If you have any questions, contact **Senior Vice President Kevin Heine** in Corporate Communications at (212) 576-5671. If the communication involves public officials, also contact **Vice President Jon Paone** in the Office of Governmental Affairs at (212) 576-7842.

Where to go for approval of lobbying.

If you plan to engage in lobbying on behalf of New York Life, you must contact **Vice President Michael Tobin** in the Office of Governmental Affairs at (212) 576-4625.

Where to go for questions about corporate political contributions.

To obtain approval, contact **Vice President Jon Paone** in the Office of Governmental Affairs at (212) 576-7842. Also contact **Vice President and Associate General Counsel Mike McDonnell** in the Office of General Counsel at (212) 576-4534.

Where to go for assistance or approval of personal political contributions.

To obtain approval, send an email to the Corporate Compliance Department at Political_Contributions@newyorlife.com. No contributions should be made without preapproval from Corporate Compliance. If you have any questions, contact **Corporate Vice President Gertrude Olla** in Corporate Compliance at (212) 576 - 6048, **Corporate Vice President Thony Pierre** at (212) 576-6386 or **Corporate Vice President Jennifer DeCicco** at (212) 576-4559.

Social media.

Social media is an integral part of conducting business and the way we communicate with each other on a regular basis. As employees, you are encouraged to share your pride in being part of New York Life. In doing so, you need to be conscious of how you represent yourself and the company. The company's [Social Media Policy](#) applies to all New York Life employees. Your responsibility to uphold New York Life's high ethical standards of conduct extends to all online communities you participate in at work and outside of work. For that reason, this policy applies to both company-sponsored social media and personal use that could potentially relate back to New York Life.

WHAT IS SOCIAL MEDIA?

Social media refers to online applications that are designed to permit the sharing of content in real time. [Examples of social media](#) include blogs, aggregator and review sites, chat rooms, and communication apps such as LinkedIn, Facebook, Instagram, and Twitter (among others). These tools can be a great way for companies like ours to connect with current and prospective customers and other stakeholders.

WHAT ARE THE RULES?

If you want to say something positive about the company online or on social media, you can identify yourself as an employee of New York Life. When you are posting an opinion or statement about New York Life, you should make it clear that you are sharing your personal opinion and do not represent the views of the company. Very few designated employees are permitted to make official statements on behalf of the company. To obtain approval to speak officially on behalf of the company or use social media for business purposes, contact **Corporate Vice President Kevin Maher** in Corporate Communications at (212) 576- 6955.

You are responsible for the content that you publish on social media. Remember that everything you publish on the internet—even if it is intended to be private or is subsequently deleted—can become widely publicized and visible to others. Employees should not forward, post, share, or discuss any internal or proprietary information or documents in any fashion.

Other best practices include:

- Not posting expletives, obscenities or other inappropriate remarks that could be construed as discriminatory, racially or sexually charged or personally abusive or that are in violation of the company's [harassment policy](#) or that implicitly or explicitly threaten violence.
- Not posting defamatory remarks. Be truthful and do not make false statements.
- Extending respect to others, including our competitors, too. Do not use social media to criticize New York Life's competition.
- Being aware that if someone views your posts and personal messages and finds them offensive or inappropriate, they may take a screenshot and send the material to New York Life and ask the company to respond or take action, even if the content is unrelated to your employment.

- Do not endorse the services of any of our investment advisory firms or individual investment advisors or agents, as such actions may constitute a prohibited testimonial under SEC Rules.
- If you see posted complaints or defamatory comments about the company, please send a copy to socialmedia@newyorklife.com.

What if...

You attend an event that was not sponsored by New York Life and want to share pictures on social media with your friends. Is this permissible?

Answer: Yes. But remember, unless otherwise authorized, employees are prohibited from commenting on behalf of the company in social media posts and must not tag the company in social media posts.

Safeguarding important information.

Everyone needs to help protect the security of the company's data and the privacy of our customers, agents, and employees. The Information Security Policy was put in place to help all of us understand the principles and functions needed to safeguard our information resources. Whether working in the office or working from home, you are responsible for understanding these policies and the reasons for their existence.

PROTECTING COMPANY INFORMATION

While you are an employee of New York Life, and even after you leave, you must keep company information confidential. You must also make certain that third parties are aware of and agree to abide by this requirement before disclosing company information. Protecting our computer resources will help prevent the following potential problems:

- Unauthorized access to proprietary, privileged, personal, or sensitive data
- Equipment damage resulting from hazards such as misuse or vandalism
- Inaccurate, damaged, or destroyed data caused by unauthorized access or attempted access to our systems
- Use of computer resources for purposes other than legitimate company business
- Use of computer software of outside companies in violation of software license agreements and copyright laws
- Violations of privacy and information security laws and regulations that could result in actions being taken against you and New York Life

ELECTRONIC COMMUNICATIONS

We use electronic communication (e-communication) every day. It is faster than paper and provides more documentation than a phone call. But this efficient form of communication has created some privacy and protection issues.

E-communications include, but are not limited to:

- Electronic mail (email)
- Instant messaging, Skype
- Electronic collaboration tools (e.g., Webex, Skype, SharePoint)
- Text messaging
- Communications through internal and external websites (e.g., webmail, blogs, social networking sites, Jive)

Email systems are considered one of the company's computer resources, and should be protected in the same way as any other resource. Email should be used primarily for legitimate company business.

You can protect sensitive material when you send it via email by:

- Routing it only to those people with a legitimate need to know; and
- Protecting it according to its classification level as defined in New York Life's [Information Classification Standard](#)

For example, private business information sent over the Internet must be encrypted.

Since electronic messages can be used as evidence during legal proceedings, you need to use the same discretion in writing and sending e-communications as with any written documentation.

What if...

You are working on an assignment that has a tight deadline. You are using an Excel spreadsheet that contains New York Life customer personally identifiable information (PII), including Social Security numbers. To meet the deadline, you want to encrypt an email with the Excel document and send it to your personal email account to work on when you get home that evening. Will this be sufficient to protect the information?

Answer: You should not send PII or nonpublic company information to your personal email account. There are several secure ways in which employees can access the company information that they may need to do their jobs while outside the office without sending information to personal home computers. This includes accessing the network remotely via a secure VPN or VDA connection. You should speak to your manager about accessing your New York Life email account from home.

PAPER RECORDS

Though electronic records are being used with increasing frequency, paper records still exist. Employees must safeguard paper records with the same diligence they apply to safeguarding electronic information. Employees should review the paperwork visible in their workspace and protect it accordingly. Documents that contain sensitive information should not be left out on a desk or at a printer. Some examples may include:

- Copies of email messages
- Customer, employee, or agent files
- Invoices that may contain a payee's personally identifiable information
- Financial projections or strategic analyses
- Handwritten notes or summaries from closed meetings or brainstorming sessions

Employees can protect sensitive material by:

- Maintaining a clear workspace
- Locking paperwork in desk drawers
- Converting notes from meetings and phone calls into electronic files
- Bringing papers to be discarded directly to the office shredder
- Picking up materials immediately after sending to a printer

PRIVACY

The company has a long-standing commitment to ensure the privacy of personal information of its customers. The company's [Global Privacy Policy](#) helps ensure that all personal and confidential information is safeguarded appropriately.

Laws such as the Gramm-Leach-Bliley Act and state privacy laws place additional responsibilities for protecting privacy on financial service companies, their agents, and employees. To meet customers' needs with insurance and financial products and services, the company depends on certain information. In gathering and maintaining that information, New York Life protects data by:

- Collecting only the information needed to deliver superior products and services
- Preventing unauthorized access to customer information, including through the Internet
- Refusing to disclose any health information on a customer to any third party for marketing purposes
- Giving customers a choice about having their information shared with other companies for marketing purposes
- Requiring companies that help service customers' policies or accounts to protect their privacy in accordance with strict privacy standards
- Providing updates to customers on the company's privacy policies at least once a year, and giving customers an opportunity to choose to share their privacy preferences

A Customer's Right to Privacy

The company's files on applicants, policy owners, and insureds are confidential and may only be accessed by employees who need the information to perform their job responsibilities.

Customer consent is required for certain disclosures of personal information to third parties. Consent is not required for disclosures that are permitted or mandated by law, such as to:

- Service providers, including agents and vendors, who help us process transactions or service customer accounts
- Government regulatory officials and law enforcement
- Parties in response to a subpoena or other litigation request

However, even if customer consent is not required, permissible disclosures must still follow company guidelines. For more detailed information regarding the company's use and disclosure of customer personal information, please see the [Customer Privacy Policy](#).

A Customer's Right to Information

An applicant, policy owner, or insured can access certain information we maintain about them in our files. If an individual feels the information is inaccurate or incomplete, he or she may submit corrected information. Files will be amended where warranted.

An Agent's Right to Privacy

Each General Office and Zone Office maintains files about its agents for supervisory purposes. All agent information must be appropriately secured and access limited to those who have a need to know.

An Employee's Right to Privacy

New York Life has adopted policies and procedures to safeguard employee information. The company uses only ethical and lawful means to gather information about applicants or employees and, whenever reasonable, gathers it directly from the individual concerned.

You should be aware that all information stored, transmitted, received, or contained on New York Life's electronic communications systems is the property of New York Life. Therefore, users should have no expectation of privacy with respect to any electronic communications transmission.

An Employee's Right to Information

You have a right to review the information contained in either your departmental or basic personnel file. If you want to inspect your own departmental file, see your manager. If you want to see your basic file, contact the Human Resources Department.

What if...

You are online on your personal social networking web page. Someone whom you don't know sees that you work for New York Life and tells you that they also work for the company. They ask you about New York Life's latest product development efforts. The person seems friendly enough and appears to know a lot about New York Life. How should you respond?

Answer: You should not share any proprietary New York Life information with any individual, whether you know them or not, on any online forum such as a social networking site or blog. The Internet has no restrictions, and any information you post online could become public in seconds. This could be embarrassing for you both personally and professionally, could subject you to disciplinary action, and could have a negative impact on the company.

YOUR EMPLOYEE FILES

Your manager or division head maintains your employee departmental file. This file includes:

- Emergency and personal contact information
- Performance documentation or memoranda

The Human Resources Department maintains a basic file, which contains:

- Your application for employment
- Copies of documents, such as diplomas
- Personnel survey forms indicating education and military background
- Memoranda concerning job changes or transfers

The information in your department and basic files is kept confidential, with access limited to management or Human Resources Department personnel on a need-to-know basis.

EMPLOYMENT REFERENCES

All requests for information about employees from outside parties should be referred to the New York Life InfoLine at (888) 513-INFO. Instruct the caller to select the prompt for Payroll>Employment Verification.

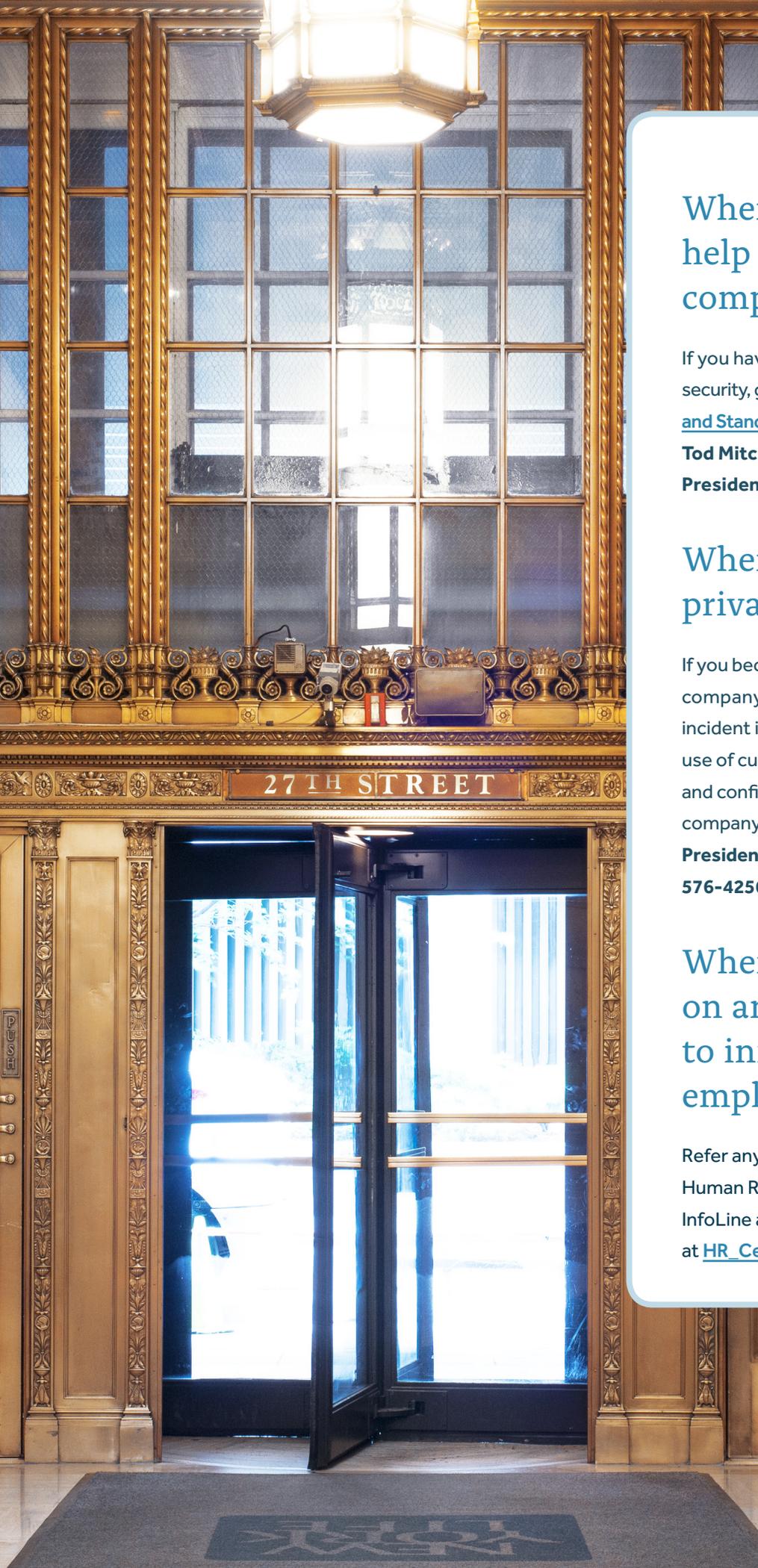
It is company policy to verify or furnish only the fact of past or present employment, dates of employment, title or position, and job site. Salary data will be provided only if authorized by the individual involved. Information about an employee's job performance will not be provided.

We need to protect both the company and its employees from those who try to obtain information deceptively. It is a violation of this code to provide employee confidential information to recruiters or any other unauthorized third parties.

What if...

You receive a call from an outside company's Human Resources Department asking for information about a former employee. What should you do?

Answer: You should refer any questions about former employees to Human Resources by directing the caller to the New York Life InfoLine at (888) 513-INFO.



Where to go for help on protecting company information.

If you have questions about information security, go to the [Information Security Policies and Standards](#) page or contact **Vice President Tod Mitchinson** at (212) 576-7942 or **Vice President Nick Scott** at (212) 576-7791.

Where to go to report privacy violations.

If you become aware of a violation of the company's privacy policy or a security incident involving unauthorized access to or use of customer, agent, or employee personal and confidential information, or confidential company information, promptly contact **Vice President Kevin Rhodehouse** at (212) 576-4256.

Where to go for help on an employee's right to information or employment references.

Refer any questions about references to Human Resources through the New York Life InfoLine at (888) 513-INFO or to HR Central at HR_Central@newyorklife.com.

Complying with laws.

New York Life's reputation depends upon the decisions we make and the actions we take each day. Our employees must:

- Act with integrity
- Comply with all applicable laws, rules, and regulations
- Strive to avoid the appearance of impropriety
- Comply with the Standards of Business Conduct, and
- Cooperate with any investigations or audits of New York Life's policies and procedures

EMPLOYEES' DUTY TO REPORT MISCONDUCT

Employees have a duty to, and must immediately, report to the company any concerns about, or violations of, the code of conduct, any legal or regulatory or internal policy violations, securities law violations, unethical conduct, and financial, accounting, or auditing matters ("accounting matters") that appear to involve unlawful or unethical conduct. We also encourage employees to report any good faith concerns. These reports may be made without the fear of dismissal or retaliation.

Employees must also inform New York Life within five days if they have been:

- Charged with any felony or misdemeanor
- Convicted of or pled guilty or no contest to any felony or misdemeanor

In addition to the required information above, employees will be required to include felony and misdemeanor charges in their responses to the company's annual Business Conduct Questionnaire. Failure to disclose this information may result in disciplinary action, up to and including termination.

TYPES OF MISCONDUCT

Misconduct is any improper or unprofessional behavior that does not conform to New York Life's standards or applicable laws. Some examples of misconduct include:

- Refusing to follow the directions of a manager or director, other than those that are unethical or illegal
- Written or verbal statements that may call into question your credibility, integrity, judgment, or commitment to New York Life's policies or mission. These statements include those made through:
 - Social media platforms such as Facebook, Twitter, and YouTube
 - Blogs
 - Chat rooms
- Conduct that shows a lack of respect for other employees, including, but not limited to:
 - Discussion groups
 - Speeches and lectures
 - Interviews with the media
- Indecent or immoral behavior
- Undisclosed and unauthorized recording of in-person conversations or telephone calls
- Creating discord with fellow employees or clients of New York Life
- Theft, fraudulent use, or destruction of property

- Threatened or actual injury of another person
- Misrepresenting or withholding facts from New York Life during the hiring process, during an investigation, or at any other time
- Falsifying or destroying documents or records
- Disclosing proprietary or New York Life information without prior approval by senior management
- Misusing computer resources or other New York Life property
- Violating New York Life's equal employment opportunity, harassment/sexual harassment, non-retaliation or other policies
- Securities law violations and other regulatory violations
- Failing to protect information held by New York Life that is confidential, private, and/or protected. Examples are data covered by the Health Insurance Portability and Accountability Act (HIPAA) and the Gramm-Leach-Bliley Act (GLB)

What if...

You review the account statements for your area's procurement card use. You notice that another employee who has the authority to use the procurement card appears to be using it to pay personal expenses. What should you do?

Answer: You have a duty to report this misconduct to the company. This card may only be used for legitimate business purposes. By using it to pay personal expenses, the employee is stealing from the company. You should report your findings to your manager. You may also report the matter through the Ethics Hotline or contact the Corporate Compliance Department's Business Conduct and Ethics Unit.

CONSEQUENCES OF MISCONDUCT

When misconduct occurs, an employee may be subject to disciplinary action, including a warning, a reprimand, probation, suspension, a monetary penalty, demotion, or termination. Generally, the decision to terminate rests with the employee's department head in coordination with the Human Resources Department.

ACCOUNTING OR FINANCIAL MATTERS

Accurate and timely financial and accounting records are critical to the effective management of New York Life. It also fulfills our obligations to our policy owners, regulators, and the public. New York Life complies with all applicable financial reporting and accounting laws. We do not permit the integrity of our records to be compromised in any way.

ACCURATE BOOKS AND RECORDS

New York Life prohibits employees from taking actions that may cause our books and records to be inaccurate in any way. Examples include:

- Creating records that do not accurately reflect a transaction
- Submitting expense account reports that do not accurately reflect the expense

It is a violation of company policy to withhold, misrepresent, manipulate, or alter any information that may deceive any readers, such as management, regulators, and auditors.

NAIC MODEL AUDIT RULE (MAR)

We comply with the requirements of the MAR regarding internal control over financial reporting. These requirements are similar to those imposed by the Sarbanes-Oxley Act on public companies. These standards identify management's responsibilities for its financial statements and require management to certify as to the integrity of those statements and the effectiveness of internal controls.

We established the Financial Reporting and Operational Controls Review (FROCR) Committee to oversee New York Life's control environment. The FROCR is supported by the Financial Controls Unit (FCU), a division within the Corporate Controller's organization, and other subcommittees and working groups. Certain managers are also subject to the Financial Officers' Code of Conduct, which includes a requirement to certify that our internal financial controls have been evaluated, documented, and validated.

IMPROPERLY INFLUENCING GOVERNMENT OFFICIALS

The Foreign Corrupt Practices Act (FCPA) prohibits direct or indirect payments to foreign officials to influence a decision or obtain a business benefit. The FCPA prohibits many forms of payments, including those made in cash, stocks, property, or services. New York Life conducts an insurance business in the United States and Mexico. We prohibit giving money, goods, or services to any government official for official action or as a result of official action. We ensure compliance with this policy by requiring employees to:

- Obtain preapproval from the Office of Governmental Affairs for gifts, meals, and entertainment given to public officials. See the Corporate Policy on Employee Political Involvement
- Obtain preapproval from the Corporate Compliance Department for personal political contributions, including those made to candidates in foreign jurisdictions
- Receive approval from their manager for meals and entertainment given to any third party during business travel

New York Life monitors compliance with its FCPA policy by screening certain disbursements and auditing travel expenses.

Because the Investments Group conducts business in non-U.S. jurisdictions, they have their own FCPA policy, posted on the Investments Group Square site.

BOYCOTTS

New York Life conducts its business in accordance with U.S. anti-boycott laws. Generally, these laws prohibit participation in boycotts that are not approved by the U.S. government. Examples of boycotts include agreements to refrain from:

- Doing business with or in certain countries
- Doing business with people from certain countries
- Doing business with any U.S. persons engaged in trade with certain countries
- Doing business with companies that are owned or managed by persons who are a particular nationality, race, or religion
- Selecting or retaining corporate directors who are persons of a particular nationality, race, or religion
- Employing persons of a particular nationality, race, or religion

ANTITRUST COMPLIANCE

New York Life is committed to complying with antitrust laws. These laws promote free and open competition and prohibit practices that restrict competition.

The antitrust laws prohibit competitors from acting jointly to restrict competition. Some examples include agreements with competitors to:

- Fix prices
- Divide insurance markets (geographically or by line of business)
- Boycott third parties

When competitors agree to take joint action, they may be engaging in conduct that involves significant antitrust risks. The exchange of business information with a competitor can be the first step toward a possible antitrust violation. To limit the possibility of anti-trust law violations, New York Life has created [Antitrust Compliance Guidelines](#) to help you avoid potential antitrust dangers. These guidelines also address trade and professional association activity that can give rise to antitrust risks.

A person who violates the antitrust laws may be subject to civil and criminal penalties, including fines and jail sentences. Employees who violate New York Life's guidelines are also subject to disciplinary action, including termination of employment.

What if...

I was just told by a vendor that the promotional items we ordered and which are being shipped from overseas are being held by the local customs officer because we haven't paid an extra fee. It's not much money and we need those items quickly. Can we pay it?

Answer: No. It's illegal to give money to a representative of a foreign government in order to receive goods more quickly.

What if...

I was recently at an industry conference and after dinner I was speaking with four colleagues from “rival” life insurance companies. One woman said, “Let’s chat about interest rates. What’s your threshold? Maybe we can all agree to keep them low for the next year.” I told her I couldn’t discuss that and left the group. Did I do the right thing?

Answer: Yes. A discussion among competitors about taking joint action in the market presents an antitrust risk. Sharing competitive information could be seen as a way to restrict competition. You were right not to take part in the discussion.

TRADE AND PROFESSIONAL ASSOCIATION ACTIVITY

Trade and professional association activity involves interaction among competitors and can present significant antitrust risks. Our antitrust guidelines address conduct at trade and professional association meetings and will assist you in complying with the laws. It is important to remember that all New York Life agents (except for certain inexperienced agents known as Training Allowance Subsidy or TAS agents) are independent third parties, not employees. Agreements between employees and agents can also raise antitrust risks.

INTELLECTUAL PROPERTY PROTECTION

New York Life employees have access to and work with intellectual property (IP) that is valuable to New York Life and third parties with whom the company does business. IP includes, but is not limited to:

- Trademarks
- Copyrights
- Patents
- Trade secrets
- Business, customer, and employee information

New York Life’s intellectual property is an extremely valuable asset and should be protected.

New York Life protects IP in several ways, including:

- Maintaining a comprehensive information security program that contains administrative, technical, and physical safeguards
- Filing for copyrights, trademarks, patents, and other protections
- Ensuring that a nondisclosure/confidentiality agreement (NDA) is in place before we disclose confidential New York Life information to a third party
- Monitoring the Internet for violations of New York Life’s IP rights

Employees are required to keep all New York Life and third-party IP strictly confidential, except as may be necessary to perform their job.

TRADEMARK COMPLIANCE

To protect its valuable trademarks, New York Life does not allow third parties to use its trademarks without written permission. New York Life is respectful of third-party trademarks and only uses these trademarks in compliance with third-party guidelines or as allowed by law.

COPYRIGHT COMPLIANCE

United States and international copyright laws prohibit the copying, distribution, use, and display of a copyrighted work without the prior permission of the copyright owner, except in very limited circumstances. Some examples are:

- Written, audio, and visual works
- Computer software
- Derivative works
- Compilations of copyrighted material

New York Life abides by all applicable copyright laws and observes the terms and conditions of applicable license agreements.

SOFTWARE COPYING

Generally, computer software used by employees is copyrighted by the licensor. New York Life does not have the right to make copies of that software except for backup purposes unless permitted by the applicable license agreement. This applies to all major software applications and smaller “shrink wrap” programs used throughout the company. New York Life licenses enough programs to provide for the needs of our employees. For example, if a New York Life unit has six employees all using their equipment simultaneously, they should have six software programs. They should not acquire just one program and make copies for the others.

Copyright laws and New York Life policy prohibit individuals from copying company-developed or -licensed software applications for personal use.

CONSULTANTS

All New York Life consultants must abide by the same code as our employees. The employee who retains a consultant is responsible for making sure that each consultant is aware of and abides by this code.

Each consultant must also execute a nondisclosure/confidentiality agreement (NDA) before he or she is given New York Life confidential information or given access to any New York Life computer system or computerized data. An appropriate agreement should be signed before a consultant performs any work for the company. The Office of the General Counsel will give you guidance and help you develop the appropriate NDA.

INDEMNIFICATION

All current and former employees of New York Life are eligible to be indemnified (protected against liability) for legal claims, actions, suits, and proceedings brought by third parties against an individual in connection with their work as an employee of New York Life, subject to certain conditions imposed by New York Life and those required by law. The conditions imposed by the company, which are described more fully in the Indemnification Policy, include the requirement that the employee provide prompt notice of a claim or threatened claim and cooperate with the company.

Individuals serving as directors or officers of companies other than New York Life are eligible to be indemnified by New York Life if they, as set forth in the Service on Boards of Directors policy:

- Meet the conditions set forth in the policy
- Serve in that role at the request of the company as described in the policy
- Exhaust all reasonable efforts to obtain indemnification from the other company or its insurance carrier(s)

Where to go for help on reporting misconduct.

Employees have several ways to report actual or suspected misconduct and ethical concerns:

- **Reports to Supervisors or Managers—**
Employees can report their concerns directly to their immediate supervisors or managers, or New York Life management
- **Ethics Hotline—**Employees can use our Ethics Hotline to file an anonymous report via telephone or online. This service is provided by EthicsPoint, an independent, third-party service provider, and is available 24 hours a day, seven days a week. Call (888) 331 - 0619 or access it online on The Square at: [Ethics Hotline](#)
- Employees can also notify **Senior Vice President & Chief Compliance Officer Sara Badler** at (212) 576-6910, **Senior Vice President & General Auditor Patricia Barbari** at (212) 576-5084, **Executive Vice President and Chief Legal Officer Sheila Davidson** at (212) 576-5353, **Senior Vice President and General Counsel Natalie Lamarque** at (212) 576-7514 or **Vice President and Chief Ethics Officer Gina Cristallo** at (212) 576-4669.

Where to go for help on consultants and NDAs.

Contact **Vice President & Associate General Counsel Phylliss DelGreco** in the Office of General Counsel at (212) 576-5719.

Where to go for help on payments and gifts to government officials.

For questions on or approval for gifts to government officials, contact **Vice President Jon Paone** in the Office of Governmental Affairs at (212) 576-7842.

For questions on or approval for personal political contributions, send an email to Political_Contributions@newyorklife.com or contact **Corporate Vice President Gertrude Olla** in the Corporate Compliance Department at (212) 576 - 6048.

Where to go for help on boycott issues.

Employees must promptly report any requests to participate in or provide information about a prohibited boycott.

If you receive any such requests, please contact **Associate General Counsel Jeremy Klatell** in the office of the General Counsel at (212) 576-7163, or **Vice President Kevin Rhodehouse in the Corporate Compliance Department at (212) 576-4256**.

Where to go for help on the indemnification policy.

For additional information, contact **Senior Vice President & Deputy General Counsel Robert Karmen** in the Office of the General Counsel at (212) 576-6073.

Where to go for help on anti-trust, trade and professional associations.

Antitrust guidelines for exchanges of information with competitors, trade and professional associations, and potential antitrust issues with agents can be found at Antitrust Compliance.

If you have questions or concerns about whether your conduct may raise anti-trust risks, please contact **Associate General Counsel Jeremy Klatell** in the Office of the General Counsel at (212) 576-7163.

Where to go for help on IP protection, copyright, and trademark issues.

For guidance on how to properly use and protect copyrighted material, trademarks, patents, or trade secrets, and to ensure that New York Life's confidential information is properly protected before disclosing it to a third party, or if you suspect that New York Life's or a third party's IP rights are being violated, contact **Vice President & Associate General Counsel Phylliss DeIGreco** in the Office of the General Counsel at (212) 576-5719.

Key company contacts.

There are many places within the company where you may go to seek help. In addition to the individuals named throughout the manual, you may also contact any of the departments, units, or individuals listed below to discuss your questions or concerns.

CORPORATE AUDIT DEPARTMENT

The Corporate Audit Department provides reports to the Audit Committee of the board of directors on the results of its audits, examinations, and investigations of the financial operations of the company and its subsidiaries. The department supports management by performing independent appraisals of the adequacy and effectiveness of the systems of internal control which safeguard assets and ensure the accuracy of financial reporting.

Patricia Barbari (212) 576-5084

CORPORATE AUDIT DEPARTMENT—SPECIAL INVESTIGATION UNIT

The Special Investigation Unit (SIU) of the Corporate Audit Department is an independent investigative unit responsible for ensuring that all allegations and suspicions of fraud are investigated promptly and discreetly. The SIU will conduct any type of authorized and legal inquiry and handle state-regulated fraud reporting requirements. Employees must report suspicions of fraud to the Special Investigation Unit.

Richard (Rick) Matarante (212) 576-5383

CORPORATE COMMUNICATIONS DEPARTMENT

The Corporate Communications Department's primary functions are to enhance and preserve New York Life's brand with the company's many constituencies through advertising, media relations, internal communications (such as employee and retiree newsletters), video productions, and the Annual Report and the Report to Policyholders.

Kevin Heine (212) 576-5671

CORPORATE COMPLIANCE DEPARTMENT

The Corporate Compliance Department develops and maintains compliance standards and procedures to ensure that the products and services offered by New York Life and its subsidiaries meet federal and state laws and regulations. The department accomplishes this through the review and approval of sales material, the resolution of customer complaints, on-site reviews of field offices, the analysis of sales data to detect potential sales practice problems, and the review and analysis of new products. It is also responsible for the corporate oversight of subsidiary compliance programs. Corporate Compliance is also responsible for ensuring compliance with anti-money laundering regulations and insider trading policies, as well as federal and state privacy laws.

Sara Badler (212) 576-6910

CORPORATE COMPLIANCE DEPARTMENT— BUSINESS CONDUCT AND ETHICS UNIT

The Business Conduct and Ethics Unit is responsible for maintaining a high level of ethical awareness throughout the organization. It ensures that our policies and standards are ethical, and that all of our employees and agents are aware of those standards. It directly develops and delivers training and communication programs for employees, and helps assure adherence to the company's Standards of Business Conduct and management accountability for business conduct.

Gina Cristallo (212) 576-4469

Thony Pierre (212) 576-6386

Gertrude Olla (212) 576-6048

Jennifer DeCicco (212) 576-4559

CORPORATE COMPLIANCE DEPARTMENT— COMPLAINT REVIEW UNIT

The Complaint Review Unit (CRU) resolves complaints promptly and in compliance with laws and regulations. Complaints are a vital source of information for us about the quality of our products and services and the way they are delivered. The CRU's goal is to first seek to resolve complaints fairly and quickly and to then identify and resolve any general or systemic problems which could lead to further complaints.

Kevin Welton (914) 846-3898

OFFICE OF GOVERNMENTAL AFFAIRS

The Office of Governmental Affairs (OGA) monitors and influences state, federal, and international legislative and regulatory activity on behalf of New York Life. The office assists senior management in developing New York Life's position and strategy on public policy issues and in communicating with key policymakers and regulators. OGA manages two Political Action Committees that support the campaigns of select federal and state candidates. OGA participates in a variety of industry associations and coalitions that seek to influence legislative and regulatory activity, including the American Council of Life Insurers, the U.S. Chamber of Commerce, and the Business Round Table.

Julie Herwig (202) 654-2947

Douglas Wheeler (212) 576-6881

Jon Paone (212) 576-7842

OFFICE OF THE GENERAL COUNSEL

The Office of the General Counsel (OGC) provides legal advice to the company and its business units and profit centers, and oversees subsidiary legal operations. OGC is staffed by practitioners with expertise in insurance, litigation, securities, antitrust, bankruptcy, employment, intellectual property, human resources, and corporate governance. OGC's primary goals are to support the company's business objectives in a complex legal and regulatory environment, and limit legal risk in an efficient and cost-effective manner consistent with overall corporate strategy.

Natalie Lamarque 212-576-7832

OFFICE OF THE SECRETARY

The Office of the Secretary provides legal advice on corporate governance matters for both New York Life and certain key subsidiaries. It also assists the chairman in all matters pertaining to the board of directors and its standing committees, and the operations and activities of the Executive Management Committee.

Amy Miller (212) 576-6179

Policy center.

POLICY CENTER—NYL ENTERPRISE

[Acceptable Use of Technology Standard](#)

[Agency Portal](#)

[American Express Corporate Card Policy](#)

[Anti-Money Laundering](#)

[Antitrust Compliance Guidelines](#)

[Attendance](#)

[Complaint and Investigation Procedure](#)

[Corporate Policy on Political Involvement](#)

[Corporate Records Management Policy](#)

[Customer Privacy Policy](#)

[Dress Policy](#)

[Employee Assistance Program](#) [Employee](#)

[Handbook](#)

[Employee Trade Preclearance](#)

[Engagement of Accounting Firms Policy](#)

[Expense Reporting](#)

[Expense Travel Policy](#)

[Foreign Account Tax Compliance \(FATCA\)](#)

[Gifts, Meals, and Entertainment Policy](#)

[Gifts, Meals, and Entertainment Reporting System](#)

[Global Privacy Policy](#)

[Indemnification Policy Information](#)

[Classification Standard](#)

[Information Security Policies and Standards](#)

[Insider Trading](#)

[Insider Trading Firewall Procedures](#)

[Key Company Contacts](#)

[Leave Programs and Other Time-Off Policies](#)

[Maintaining a Drug-Free Workplace](#)

[New York Life Ethics Hotline](#)

[New York Life Foundation](#)

[New York Life Political Action Committee](#)

[Personal Political Contributions Policy](#)

[Personal Relationships Policy](#)

[Procurement Policy](#)

[Procurement Card Policy](#)

[Public Communications Policy](#)

[Safe and Secure Work Environment](#)

[Sexual Harassment and Other Types of Harassment](#)

[Social Media Policy](#)

[Spousal Expense Reimbursement Policy](#)

[Travel Policy](#)

[Vulnerable Adult Financial Abuse \(VAFA\)](#)

[Work-at-home Policy](#)

[Workplace Violence](#)

POLICY CENTER—INVESTMENTS GROUP

(additional resources for employees in the Investments Group)

[Anti-Money Laundering Procedures](#)

[Code of Ethics](#)

[Conflicts of Interest](#)

[Distribution of Private Funds Policy](#)

[Foreign Corrupt Practices Act \(FCPA\) Policy](#)

[Information Barrier Policy](#)

[Information Risk and Security Program](#)

[Inside Information Policy](#) [Institutional](#)

[Marketing Procedures](#) [Gifts and](#)

[Entertainment Policy](#) [Personal Political](#)

[Contributions](#)

[Placement Agent Selection Policy](#) [and Procedures](#)

[Privacy Policy](#)

[Record Retention Policy](#)

[Security Breach Policy](#)

[Social Media and Communications Policy](#)

[Solicitation Policy and Procedures](#)

New York Life Insurance Company

51 Madison Avenue
New York, NY 10010

www.newyorklife.com

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Forwarding to login...