

SERVICE CORPORATION INTERNATIONAL

Our Code of Conduct



This Is Who We Are

EVERY DAY, WE HAVE THE PRIVILEGE TO TOUCH THE LIVES OF OUR CLIENT FAMILIES AND THE COMMUNITIES WE SERVE IN A MEANINGFUL WAY.

It's an honor to be in a profession where we impact people's lives in a significant manner. We must always ensure that our actions are honest and ethical – it's not only what our client families expect and deserve, but it's also who we are. We uphold our core values of Respect, Integrity, Service Excellence and Enduring Relationships in all that we do whether it is directing a service, assisting a family with securing their final arrangements or providing timely support in a home office role.



Our Code of Conduct applies to each of us. It provides the foundation of who we are as an organization and helps define us and what our client families, vendors and colleagues can expect every time they interact with us. It takes into account our spirit of inclusion and enables us to leverage our diverse backgrounds and perspectives so that we make better, ethical business decisions. We must all embody this spirit and our core values by complying with the Code, as well as all related policies, laws and regulations.

Remember that if you have a concern, there are a number of resources available to you to discuss questions or report possible violations. These include your direct supervisor, leadership team and human resource representatives, all of which are outlined in our [Pathway to Open Communication](#).

Thank you for always acting with integrity. Your dedication ensures that our Company operates lawfully and ethically, and continues to serve our client families and communities well into the future.

Sincerely,

A handwritten signature in dark ink that reads "Scott Ahrendt". The signature is written in a cursive, professional style.

AVP, Ethics & Business Conduct

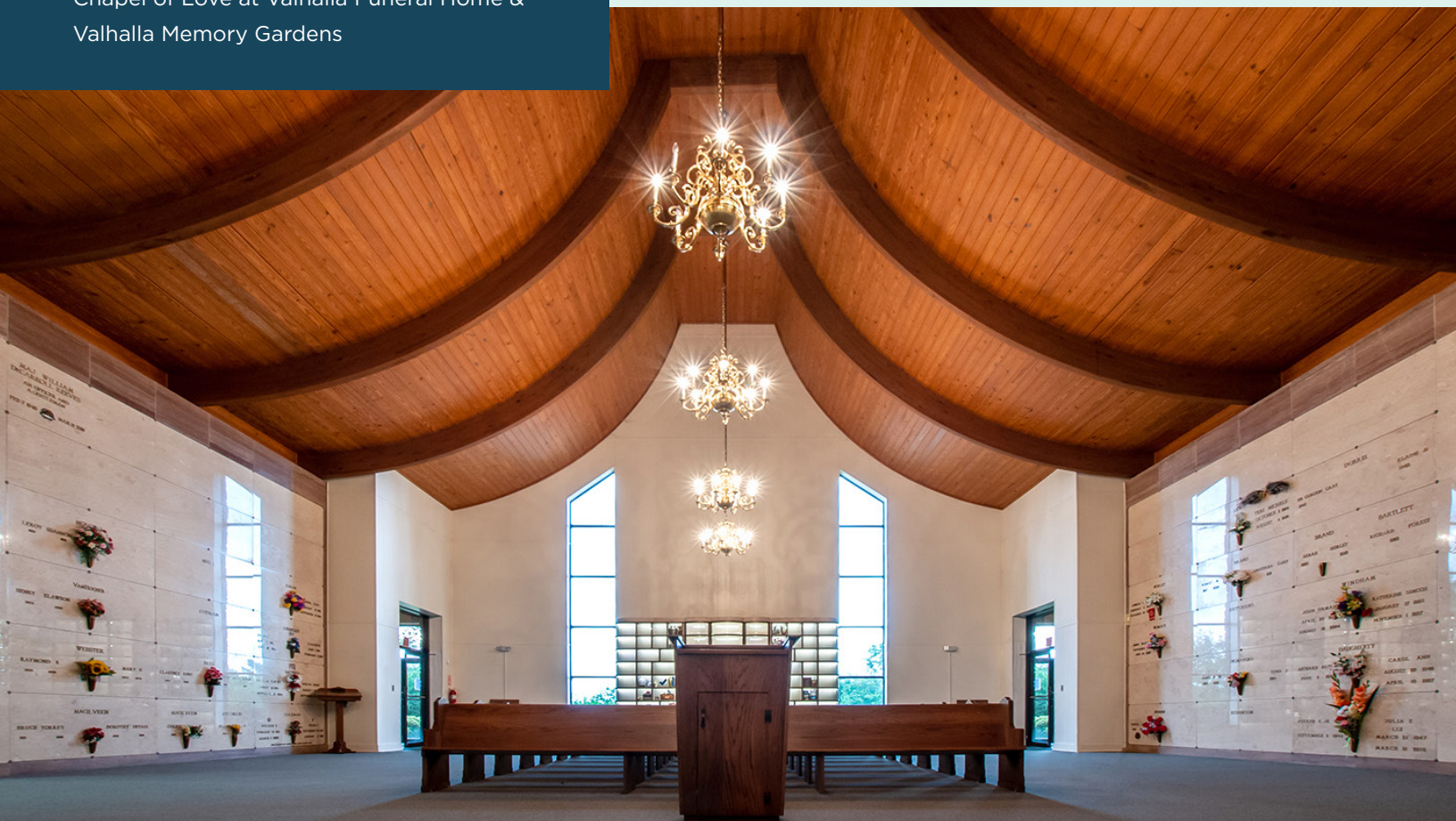


TABLE OF CONTENTS

Our Responsibilities	5
Compliance with Our Code of Conduct.....	5
Ethics Link.....	5
Seeking Guidance and Reporting Concerns.....	5
This Is Who We Are: Integrity	6
General Rules of Conduct.....	6
Discrimination and Harassment.....	6
Safe Work Place	6
Drugs and Alcohol.....	6
Company and Customer Property, Information and Records.....	6
Fraudulent Financial Activity	6
Antitrust/Anti-Competition Policy.....	7
Conflicts of Interest and Business Gifts	7
Accurate Reporting of Time, Training and Other Information.....	7

Accounting & Disclosure Practices	8
Reports and Filings with Government Agencies	8
Government Investigations and Information Requests	8
Copyright Policy	8
Compliance with International Trade Laws and Regulations	8
Compliance with Anti-Bribery Laws: Business Relationships	9
Securities Trading and Investment Policy	9
Records Retention and Litigation Holds	10
Intellectual Property	10
This Is Who We Are: Respect	11
Respect for the Deceased	11
Guidelines for Camera, Audio, Video and Recording Devices	11
Romantic or Intimate Relationships	11
Personal and Family Relationships	11
Social Media Policy	11

Chapel of Love at Valhalla Funeral Home & Valhalla Memory Gardens



We are committed to upholding the highest ethical standards in all we do. It is part of our culture, embedded into our business practices and reinforced through our communications and training. Each of us must remain vigilant for situations that may violate this Code of Conduct, our policies and procedures, or any laws or regulations that govern our businesses.

OUR RESPONSIBILITIES

We are guided by [our purpose, values and vision](#) every day to treat each other, our client families and their loved ones with dignity and respect. Many of us see our work as a calling. Every time a family chooses us, we have the enormous privilege to help make a difficult time a little easier, give them the support they need and celebrate their loved one in the manner in which they choose.

COMPLIANCE WITH OUR CODE OF CONDUCT

This Code is an integral part of our Company. Conduct Company business in compliance with applicable laws, as well as Company policies. Doing so is an integral part of who we are and supports our commitment to Service Excellence. We all share this responsibility and must also report any actual or suspected non-compliance, fraudulent activity, misappropriation of Company assets or any other irregularity in the workplace.

The Company may initiate an investigation if any of us fails to comply with the Code, Company policies or federal, state or provincial laws or regulations, as such a failure undermines our commitment to Integrity and Service Excellence. Associates at all levels are expected to cooperate with an investigation and should never withhold material information. Failure to comply with Company policy or federal, state or provincial laws or regulations, may result in disciplinary action, up to and including termination.

Always strive to do what is right for our client families, our colleagues and our Company. There may be a time when we are faced with a difficult decision. When that occurs, it is always important to ask four important questions:

- Is it legal?
- Is it consistent with this Code and Company policy?
- Is it consistent with our core values?
- Would I be proud if my decision was made public?

When we can answer yes to these four important questions, we can have comfort knowing that the right decision is being made.

ETHICS LINK

It is difficult and cumbersome to create a policy that addresses every possible situation. Even when there is a written policy, it is not always clear how that policy applies to a specific situation, nor are we able to address every scenario that could possibly arise, so we created EthicsLink. EthicsLink is available to assist when you have questions or need guidance regarding what course of conduct is appropriate and consistent with Company policy and our commitment to ethical business practices. Email your inquiries to EthicsLink@sci-us.com.

SEEKING GUIDANCE AND REPORTING CONCERNS

By sharing our concerns, we uphold our values of Respect, Integrity, Service Excellence and Enduring Relationships. It fosters an ethical culture and allows issues to be addressed before they become larger concerns. If you wish to raise a question or concern, please follow the steps outlined in the [Pathway to Open Communication](#):

- Speak with your supervisor or manager.
- If you are not comfortable approaching your supervisor, speak with the next level of management.
- Discuss the issue with an appropriate representative from human resources.
- Contact the Company's CareLine at 1-800-455-1140.

We want you to share your concerns without fear of retaliation. Any associate who, in good faith, raises a question, complaint or concern shall not be discharged, demoted, suspended, threatened, harassed or discriminated against in any way for reporting such information. If you believe that you have been retaliated against, report that concern to the Company through the [Associate Problem-Solving Process](#) outlined in the associate handbook or by calling or by calling the CareLine.

This Is Who We Are:

Integrity

GENERAL RULES OF CONDUCT

We respect the dignity of our colleagues, customers, guests and vendors, and conduct ourselves courteously, professionally, and with the highest level of integrity at all times. This includes maintaining a businesslike appearance with appropriate attire and personal hygiene. The [Dignity Memorial Promise Booklet](#) provides basic guidelines; however, the market, location or department in which you work may have additional, more specific requirements.

DISCRIMINATION & HARASSMENT

Any type of discrimination, harassment or other unwelcome conduct whether physical or verbal, that is on the basis of race, color, national origin, religion, ethnicity, age, sex, sexual preference, veteran's status, disability or any other legally protected status, is not tolerated. Examples include (i) epithets, slurs, derogatory jokes, unwanted sexual advances, negative stereotyping or intimidating acts; or (ii) written or graphic material circulated or posted within the workplace that shows hostility or degradation.

Sexual harassment directed at another on the basis of sex/gender also is not tolerated. Examples include (i) quid pro quo, which requires an associate to submit to sexual conduct in exchange for continued employment, promotions or other job benefits, and (ii) hostile workplace harassment, in which the conduct interferes with an associate's work performance or creates an intimidating, hostile or offensive work environment.

SAFE WORKPLACE

The Company prohibits the possession of unauthorized weapons (firearms, knives, explosives, etc.) on Company premises, in Company vehicles, and parking facilities, unless otherwise precluded by laws of a jurisdiction.

Violence in the workplace is strictly prohibited. This includes acts and threats of violence on Company premises, as well as offsite at Company related events. If you experience, witness or

are aware of a situation, report it immediately. If there is a threat of immediate danger, contact the local authorities. Please refer to the Company's [Violence-Free Workplace Policy](#) for more information.

DRUGS & ALCOHOL

To ensure safety, we must be free from the influence of alcohol, drugs and improperly used prescription medicine whether we are on or off Company premises. Consume alcohol at business dinners or other Company functions only in moderation.

Avoid use that threatens the safety of others or impairs your ability to act on Company business or operating a Company vehicle. Please refer to the [Drug & Alcohol Policy](#) for more information.

COMPANY & CUSTOMER PROPERTY, INFORMATION & RECORDS

Never (i) damage, destroy, steal, embezzle or misuse Company property; (ii) falsify Company records; (iii) commit any type of forgery or fail to follow established signature procedures; or (iv) be dishonest, or provide false information to or withhold important information from the Company, its associates or its customers.

FRAUDULENT FINANCIAL ACTIVITY

Report suspected financial fraudulent activity to the Manager of Client Satisfaction at 713-525-5479. As appropriate, such concerns will be relayed to the Internal Audit, Security, and/or Legal Departments for further investigation, and, if appropriate, to the Audit Committee of the Company's board of directors.

Associates, independent contractors, third-party associates, consultants and vendors who engage in fraudulent activities shall be terminated from employment or engagement with the Company. The Company will cooperate with law enforcement agencies in the detection, investigation and reporting of criminal acts.

ANTITRUST/ANTI-COMPETITION POLICY

Antitrust/anti-competition laws are designed to promote competition and preserve the free enterprise system. Violations of federal, state or provincial antitrust laws may result in civil and criminal penalties against you and the Company. Please refer to the [Antitrust Policy](#) for additional information. Direct any questions regarding this policy to the General Counsel or the head of Ethics & Business Conduct.

CONFLICTS OF INTEREST & BUSINESS GIFTS

Part of who we are involves avoiding even the appearance of impropriety, which is why it is important that we must act in the Company's best interests at all times. Never engage in any activities or receive gifts which may potentially conflict or appear to be in conflict with the Company's best interests. This may not always be clear. In those instances, ask yourself:

- Is it consistent with the Company's values?
- Would I be embarrassed if my actions made the front page of my local newspaper?
- How would my actions be viewed by my co-workers?

You may find yourself in a situation in which your personal interest is inconsistent with that of the Company or where a gift being offered to you is inconsistent with our [Conflicts of Interest and Business Gifts policies](#).

ACCURATE REPORTING OF TIME, TRAINING AND OTHER INFORMATION

SCI requires honest, accurate recording and reporting of information. Submitting or approving inaccurate time records, expense reports, employment records, dependent information or eligibility data is not permitted. No associate or supervisor is authorized to instruct associates to submit inaccurate records, or to work hours that are not paid, i.e., working "off the clock." If this occurs, report it to Human Resources or your supervisor's manager.

Other behaviors that may result in disciplinary action being taken are:

- Using Company-paid time for an unauthorized purpose
- Violating safety rules and regulations or failing to report on-the-job accidents
- Failing to complete all training courses assigned to you in a timely manner, including in-person and Dignity University courses
- Submitting false expense reports
- Behaving in an insubordinate manner or refusing to comply with reasonable instructions
- Excessive absenteeism or tardiness

Q&A

QUESTION: One of my competitors reached out to me and suggested that our businesses should set our prices at the same amounts. This doesn't feel right. Should I do this?

ANSWER: Your instincts are good. What your competitor has suggested is illegal. Our businesses are subject to laws that prohibit the restraint of competition, including price fixing, which inhibits consumer's ability to select the provider of their choice. You should follow up with your competitor making it clear that the suggested arrangement is inappropriate.



Mausoleum at Memorial Gardens Funeral Home and Memorial Gardens Cemetery

ACCOUNTING & DISCLOSURE PRACTICES

SCI maintains books, records and accounts that accurately and fairly reflect our financial condition, and we comply with applicable accounting principles, laws, rules and regulations (“Accounting Rules”). If you have accounting and auditing responsibilities, you are responsible for understanding and complying with the Accounting Rules, ethical standards and internal procedures. Each of us has a responsibility to provide accurate and reliable information in accordance with our internal accounting policies and disclosure processes. The Company’s Disclosure Committee is responsible for overseeing these processes and all associates are expected to comply.

REPORTS AND FILINGS WITH GOVERNMENT AGENCIES

All public communications made on behalf of the Company must be full, fair, accurate, timely, complete and understandable, including all documents filed with the Securities and Exchange Commission and/or other government agencies.

GOVERNMENT INVESTIGATIONS AND INFORMATION REQUESTS

The Company cooperates with federal, state, provincial, and local investigators who seek information about Company operations including requests to interview an associate, or seek data, document copies or file access. At the same time, the Company is entitled to all legal safeguards for the benefit of persons under investigation.

If contacted by a government representative, explain Company policy requires your supervisor and the Legal Department to handle the interaction. Obtain contact information and advise the representative that someone will respond promptly and immediately report the request.

COPYRIGHT POLICY

We respect all copyrights. Copyrights limit the right to make and circulate copies of various types of materials, including articles, stories, photographs and other publications. You may circulate the paper original of a publication using a routing slip or forwarding an electronic link to a publication via email. However, do not distribute published materials by email, fax, or other electronic means as it is a form of copying. Please contact the Legal Department with any questions.

COMPLIANCE WITH INTERNATIONAL TRADE LAWS AND REGULATIONS

The Company complies with all United States trade control and sanctions laws, as well as applicable laws of other countries.

Q&A

QUESTION: A vendor has offered an all-expenses paid trip to Colorado for me and my family. Is this permissible?

ANSWER: It depends on the nature of the trip. While you may accept gifts of nominal value, it is never permissible to accept any gifts, vacations or pleasure trips unless there is an express business purpose:

- it is consistent with accepted business practices;
- it does not violate any laws;
- it cannot be construed as a kickback, bribe or payoff; and
- it will not embarrass the Company.

You should also inform your manager of the trip and its purpose.

COMPLIANCE WITH ANTI-BRIBERY LAWS: BUSINESS RELATIONSHIPS

Wherever we do business, we must comply with all applicable anti-bribery laws. Bribery is illegal and harms the communities where we operate. We all fully comply with the U.S. Foreign Corrupt Practice Act (“FCPA”) and must never provide bribes or “kickback” payments, no matter the amount. This includes never making a payment to improperly secure regulatory approvals, favorable tax or customs treatment, licenses, permits or any other benefit. Report and stop, if possible, anyone who attempts to offer a bribe on behalf of the Company.

SECURITIES TRADING AND INVESTMENT POLICY (U.S. ONLY)

As a publicly traded corporation, associates must adhere to the legal limitations in place to trade SCI stock. Violation of these laws may lead to fines, monetary penalties and criminal prosecution.

By law, you may not (i) buy, sell or recommend buying or selling SCI stock based on information known to you because of your employment, but not known to the general public; (ii) buy, sell or recommend buying or selling another company’s stock based on information known to you because of your employment, but not known to the general public; or (iii) disclose non-public information for your own account or to anyone who uses the information to buy or sell, even if you do not profit yourself.

Examples of non-public information include, but are not limited to, advance earnings reports, proposed major acquisitions or investments, widespread management reorganizations, increases or decreases in dividend payments, pending litigation or governmental proceedings, and major new customers or products.

Direct questions about this policy to the Legal Department.

POLITICAL CONTRIBUTIONS (U.S. ONLY)

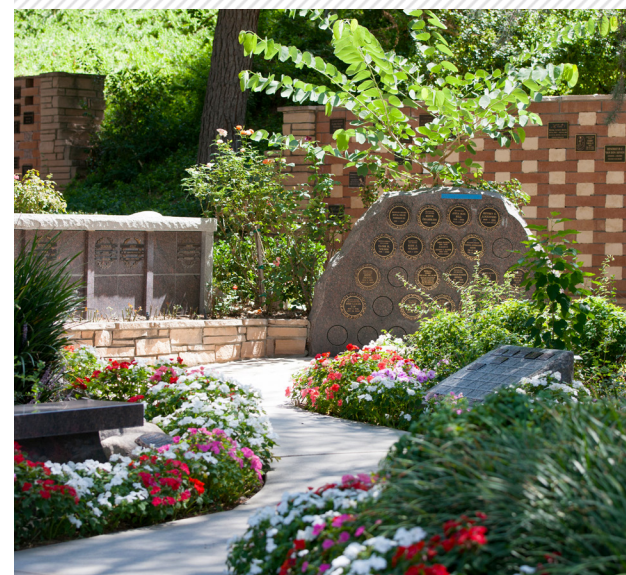
SCI encourages you to participate in the political process and political activities; however, do so on your own time and at your own expense. Be clear that your personal activities and contributions are your own and not the Company’s.

The Company makes political contributions from corporate funds (where permissible) or the SCI Political Action Committee (SCI/PAC). The reporting of those contributions is heavily regulated. SCI/PAC is a fund comprised of voluntary contributions from qualified associates throughout the United States. Do not make political contributions or gifts on behalf of the Company unless first reporting it to the Governmental and Industry Relations Department. If you wish to donate to the SCI/PAC or recommend a contribution, contact the Governmental and Industry Relations Department.

Q&A

QUESTION: We are doing some spring cleaning at my location and there are documents everywhere. Is there a process that we need to follow or can we just throw them away?

ANSWER: Depending on the specific type of record, the company’s retention schedules will determine how long it must be kept before it can be destroyed. You can review the company’s Records Management Policy on The InSCIder to learn more about the process. You should also contact the Records Department manager who can answer your questions and assist you with the process.



Cremation Garden at Montecito Memorial Park and Mortuary

RECORDS RETENTION & LITIGATION HOLDS

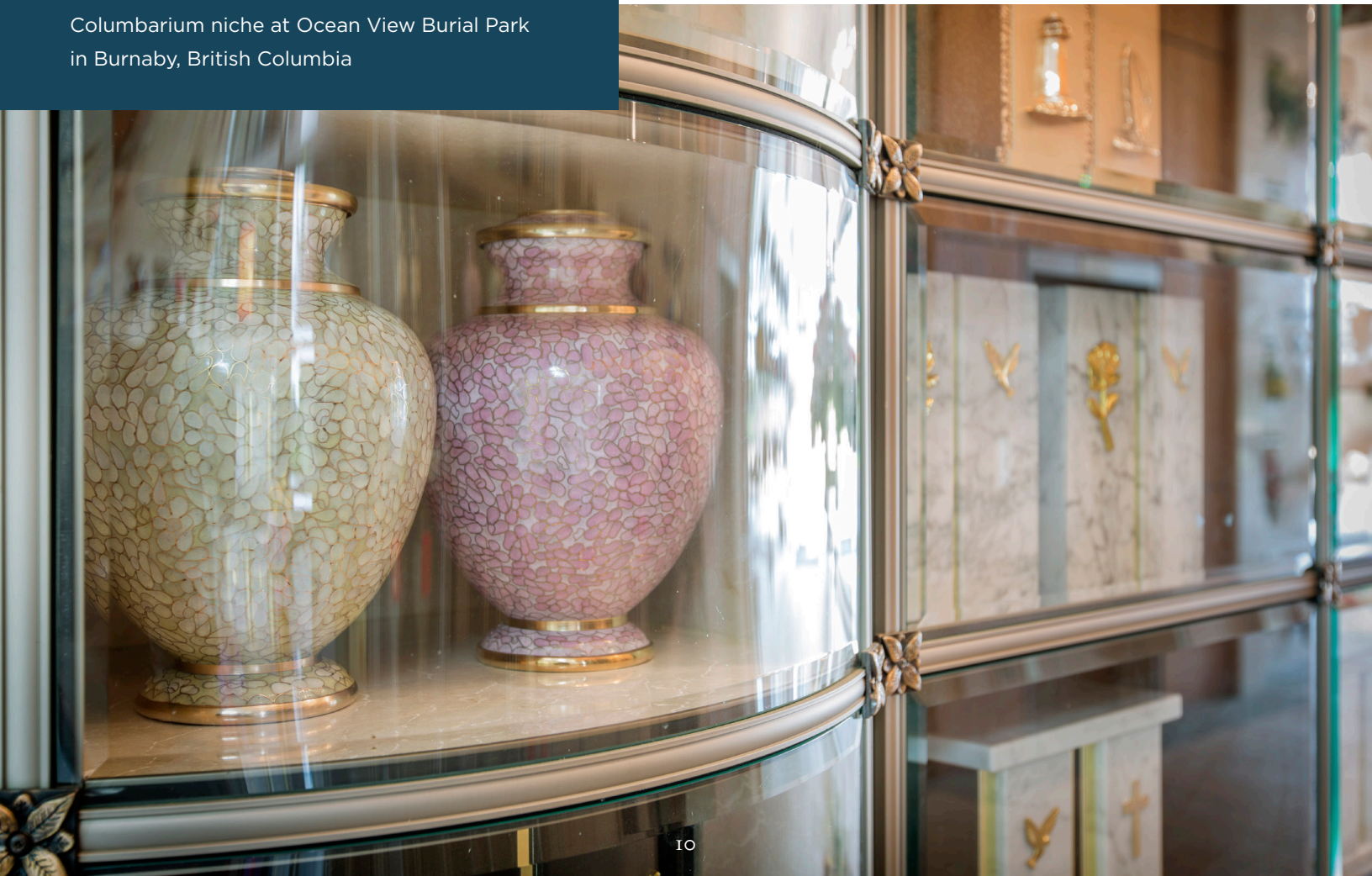
We are all responsible for maintaining accurate records and complying with SCT's [Records Retention Policy](#). In addition, if you learn that an individual or organization has filed or initiated a demand, threat, claim lawsuit or investigation against the Company, do not destroy any documents whether in electronic or hard copy, or delete any email messages or attachments, whether sent or received by you, that in any way might relate to demand, threat, claim, lawsuit or investigation. Direct questions about this policy to the Legal Department.

INTELLECTUAL PROPERTY

Intellectual property is a type of confidential information that includes Company trade secrets and/or business strategies. All intellectual property developed by associates during their employment with the Company is owned fully and completely by the Company and cannot be disclosed during or after employment.



Columbarium niche at Ocean View Burial Park in Burnaby, British Columbia



This Is Who We Are:

Respect

Respect for the Deceased

We care for the deceased with respect and dignity while protecting the client family's privacy with compassion and integrity. Always handle human remains respectfully, ethically and professionally, adhering to all laws and Company policies.

GUIDELINES FOR CAMERA, AUDIO, VIDEO AND RECORDING DEVICES

Unless specifically authorized by the Legal Department or a client family, do not directly or indirectly make any audio or visual recording while on Company premises or while conducting Company business.

Do not use any camera or recording device in a way that violates other Company policies and practices, including the Harassment-Free Workplace Policy, respect for the deceased, or the policies governing the safeguarding and disclosure of confidential and proprietary information.

Except where specifically authorized by the Legal Department or a client family, do not take, make, or distribute in any manner or by any means photographs, visual records or audio records of a decedent, a funeral service, or a decedent's place of interment. Cameras and recording devices include any equipment that can store, transmit, and/or play back a photograph or a visual or audio recording, whether personally owned by the associate or the Company.

This policy applies to all associates, vendors, and visitors to the Company's premises. Ensure that visitors are aware of the Company's policy regarding these devices. Immediately report any unauthorized use of a camera or recording device to your immediate supervisor.

ROMANTIC OR INTIMATE RELATIONSHIPS

The Company does not desire to regulate personal relationships between associates outside of the workplace. Disclose romantic or intimate relationships between associates, particularly those between a supervisor and a subordinate as they may lead to allegations of favoritism, conflicts of interest or sexual harassment. Such relationships may also be contrary to the ethical standards expected of all associates.

In such instances, an involved individual may be reassigned to minimize potential workplace issues and risks. If reassignment is impractical or could negatively impact business operations, the Company will discuss options with the associates involved.

When the Company is aware that such relationships are negatively impacting the work environment, management will meet with the associates to advise them of their professional responsibilities. Behavior that: (i) disrupts the workplace, (ii) is contrary to the Company's interests, (iii) is retaliatory in nature or (iv) creates legal liability for the Company may result in disciplinary action, up to and including termination.

PERSONAL AND FAMILY RELATIONSHIPS

If you wish to hire a family member, disclose this information and obtain advance approval from the market leader or senior managing director responsible for your business, or corporate officer, if a corporate department. In most cases, no family member may report directly to another family member.

In the event that you encounter an issue where this Code or a Company policy does not expressly provide an answer, or a situation in which you believe a law, rule or regulation is unclear or conflicting, please contact your manager or a member of the Legal or Human Resources departments. You may also direct your questions to EthicsLink@SCI-US.com.

SOCIAL MEDIA POLICY

SCI encourages its team members to be champions on behalf of the Company. As the online landscape continues to mature, the opportunities for SCI team members to communicate with each other and the world are evolving. Social media creates new opportunities for our Company. However, with those opportunities comes responsibility. This Social Media Policy was created to protect SCI's reputation, facilitate compliance with applicable laws and regulations, and empower associates to be advocates for the Company. Please refer to the [Social Media Policy](#) to learn more about the Company's Social Media Policy and your obligations.

**As used herein, SCI or the Company refers to Service Corporation International and its related companies.*

