



## Financial Code of Ethics

**ALL INQUIRIES RELATED TO THIS POLICY SHOULD BE DIRECTED TO:**

**OWNER:**

Alison S. Rand

**CONTACT(S):**

Stacey K. Geer, 470-564-6644

**ISSUE DATE:**

April 2010

**REVISED:**

May 2015

## Table of Contents

1 OVERVIEW	3
2 POLICY	4
3 GUIDELINES AND PROCEDURES	5
APPENDIX A: CONTACTS	6

# **1 OVERVIEW**

---

## **1.1 Objective**

Primerica expects all of its employees to act in accordance with the highest standards of personal and professional integrity in all aspects of their activities, to comply with all applicable laws, rules and regulations, to deter wrongdoing and abide by the Primerica Code of Conduct and other policies and procedures adopted by Primerica that govern the conduct of its employees. This Financial Code of Ethics is intended to supplement the Primerica Code of Conduct.

## **1.2 Scope**

This Policy applies to Primerica. Its focus is on the financial professionals who prepare financial statements for Primerica and its subsidiaries and affiliates.

Any functional or business-level directives or guidelines on this subject must be consistent with the requirements of this policy.

## **1.3 Target Audience**

The Primerica Financial Code of Ethics applies to all Executive Team members and all Finance Professionals and Administrative Staff in a finance role, including Controllers, Financial Planning & Analysis, Financial Reporting and Accounting Actuaries, Treasury, Tax, and Investor Relations.

## **1.4 Owner**

This Policy is owned by the Primerica Chief Financial Officer (“CFO”). This Policy, and any changes to this Policy, must be approved by the Primerica CFO.

## **1.5 Effective Date / Transition Period**

This Directive is effective April 2010.

## **1.6 Retired Policies / Related Policies**

This Policy supersedes and replaces the Code of Ethics for Financial Professionals dated April 1, 2010.

## 2 POLICY

---

You agree to:

- (a) Engage in and promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- (b) Avoid conflicts of interest and to disclose to the Primerica Chief Compliance and Risk Officer any material transaction or relationship that reasonably could be expected to give rise to such a conflict;
- (c) Take all reasonable measures to protect the confidentiality of non-public information about Primerica or its subsidiaries and their customers obtained or created in connection with your activities and to prevent the unauthorized disclosure of such information unless required by applicable law or regulation or legal or regulatory purposes;
- (d) Produce full, fair, accurate, timely and understandable disclosure in reports and documents that Primerica or its subsidiaries files with, or submits to, the Securities and Exchange Commission and other regulators and in other public communications made by Primerica or its subsidiaries;
- (e) Comply with applicable governmental laws, rules and regulations, as well as the rules and regulations of self-regulatory organizations of which Primerica or its subsidiaries is a member; and
- (f) Promptly report any possible violation of the Financial Code of Ethics to the Primerica Chief Compliance and Risk Officer or any of the parties or channels listed in the Primerica Code of Conduct.

You are prohibited from directly or indirectly taking any action to fraudulently influence, coerce, manipulate or mislead Primerica or its subsidiaries' independent public auditors for the purposes of rendering the financial statements of Primerica or its subsidiaries misleading.

You understand that you will be held accountable for your adherence to this Financial Code of Ethics. Your failure to observe the terms of this Financial Code of Ethics may result in disciplinary action, up to and including termination of employment. Violations of this Financial Code of Ethics may also constitute violations of law and may result in civil and criminal penalties for you, your supervisors and/or Primerica.

If you should have any questions regarding the best course of action in a particular situation, you should promptly contact the Primerica Chief Compliance and Risk Officer. You may choose to remain anonymous in reporting any possible violation of this Financial Code of Ethics.

## **2.1 Exception Process**

Exceptions to this policy, unless noted otherwise within the Policy, must be approved by the Operating Team Member, Legal Officer and Chief Compliance and Risk Officer, with notification of material exceptions.

### **3 GUIDELINES AND PROCEDURES**

---

#### **3.1 Acknowledgment**

##### **Your Personal Commitment to the Primerica Financial Code of Ethics**

I acknowledge that I have received and read the Primerica Financial Code of Ethics, dated May 2015, and understand my obligations as an employee to comply with the Financial Code of Ethics.

I understand that my agreement to comply with the Financial Code of Ethics does not constitute a contract of employment.

Please sign here:

\_\_\_\_\_ Date: \_\_\_\_\_

Please print your name:

\_\_\_\_\_

## APPENDIX A: CONTACTS

---

- Contacts**
- ALISON RAND 470-564-6286
  - STACEY GEER 470-564-6644