

WHAT ELSE DO I NEED TO KNOW?

In general, anytime a recipient is not required to pay the retail or usual and customary cost for something, it is considered a "gift." Certain circumstances raise concerns because they heighten the likelihood of creating a conflict of interest.

- Has a specific business purpose
- Unsolicited, infrequent and consistent
- Complies with Pacific Life's and the recipient's policies

o reasonable travel & lodging expenses

Bribery includes a wide spectrum of activities. It is not always about the amount of money or the value of the payment or gift. In fact, money does not necessarily even have to change hands in order to violate anti-bribery laws. Bribery is about the intent of the individuals involved. Providing anything of value in exchange for a business advantage can be a bribe.

- Gaining or retaining business
- Obtaining an unfair business advantage
- Influencing the outcome of a business transaction
- Securing non-routine government licenses or
- Influencing any act or decision of a government official in his or her official capacity, or inducing the official to do any act in violation of his or her

These are small amounts paid to a governmental official to induce the official to expedite the fulfillment of a routine duty, such as processing governmental paperwork and licenses. Such payments are illegal under certain international anti-bribery rules and prohibited by this policy.

If you encounter a situation that requires such a payment, contact Enterprise Compliance or the Law Department for guidance.

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- Cash or cash equivalents (e.g. checks, gift certificates or gift cards, securities)
- Solicited for your personal benefit
- Could be considered lavish or inappropriate
- Would be in violation of local laws, industry regulations and standards, or Pacific Life's or the recipient's policies

Gift giving to government officials is governed by many anti-bribery and anti-corruption laws and regulations. Violations of these laws can carry severe consequences for the individual involved as well as Pacific Life.

- Unless specifically authorized by Pacific Life through Government Relations, you must not use Pacific Life assets, directly or indirectly, to provide gifts or entertainment (regardless of dollar amount), or arrange travel for, any government official, their staffs, or their immediate family members.

Ad n i i d n

significant jail time and dollar amounts. Notable publicized sentencing has included up to 20 years in jail and over \$200M in individual and corporate fines. Pacific Life is subject to both U.S. and many foreign government laws including the United States Foreign Corrupt Practices Act and the U.K. Bribery Act however, other commercial bribery laws also come into play.

EXTRAVAGANT:

Gifts or payments of very large dollar amounts

CURIOUS TIMING:

The person or entity giving the gift is in the process of seeking or renewing a contract with Pacific Life.

FREQUENT:

The receipt of frequent gifts from the same person or entity

TARGETED:

The employed (dollar amount) - person

IT STARTS WITH ME: WHAT SHOULD I DO?

It is your responsibility to make good decisions about the appropriateness of accepting or offering gifts. The purpose of business gifts is to build and maintain relationships, not reward or induce business decisions. During the vendor selection process, there is a higher potential for gifts being used, or appearing to be used, to improperly influence our business decisions. Although acceptance of gifts is not prohibited during these times, gifts must still be consistent with ethical business practices as described in this policy.