

## Code of Business Conduct: *It's My Responsibility*

<b>Compliance with Laws, Regulations, Policies, and Procedures</b>	<p>Laws and regulations are ever present in the financial services industry, affecting virtually every area of Pacific Life.</p> <p><b>It's My Responsibility</b> to comply with all Company policies and procedures, and laws and regulations applicable to my job responsibilities.</p>
<b>Ethical Conduct</b>	<p><b>It's My Responsibility</b> to conduct my business activities in accordance with the Company's high ethical standards of honesty, trustworthiness, and integrity.</p> <p><b>It's My Responsibility</b> not to commit any type of fraud, such as embezzlement, theft, and making false or misleading statements.</p>
<b>Conflict of Interests</b>	<p><b>It's My Responsibility</b> to ensure that my personal interests do not conflict or appear to conflict with my business responsibilities. In any business transaction, I will place the Company's interest ahead of any personal interest or personal gain (to me or someone I have a close personal relationship with) and disclose all facts in any situation where a conflict of interest may arise.</p>
<b>Confidentiality/Privacy</b>	<p>While conducting business, I may possess confidential information about the Company, employees and clients. <b>It's My Responsibility</b> to protect and maintain the confidentiality of this information and the privacy of our employees and clients, and not disclose this information to unauthorized parties.</p>
<b>Protection and Proper Use of Company Assets</b>	<p><b>It's My Responsibility</b> to safeguard Company assets, including appropriate use of Company property and equipment.</p>
<b>Professional Conduct</b>	<p><b>It's My Responsibility</b> to provide and maintain a work environment that respects the rights of all employees, that is free of harassment, hostile or offensive behavior, and that is safe and healthy.</p> <p><b>It's My Responsibility</b> to avoid conduct that may reflect adversely on the integrity or reputation of Pacific Life.</p>
<b>Company Records</b>	<p><b>It's My Responsibility</b> to prepare Company records completely, accurately and truthfully, and to retain Company records according to Company policies and procedures and applicable laws and regulations.</p> <p>The Company's financial reports and accounting records are relied upon by management, the Board of Directors, policy owners, clients, creditors, government agencies, and others. <b>It's My Responsibility</b> to uphold the Company's policy to ensure that the financial records accurately and fairly reflect transactions and events and conform to required accounting principles.</p>
<b>Insider Trading</b>	<p><b>It's My Responsibility</b> to not personally trade in any securities based on knowledge that comes from my job, if that information is not available to the public.</p>
<b>Compliance with the Code</b>	<p><b>It's My Responsibility</b> to make sure my words and actions live up to the Code.</p> <p><b>It's My Responsibility</b> to ask questions when in doubt about the implications of any given situation or proposed course of action.</p> <p><b>It's My Responsibility</b> to report any concerns about business practices that may violate the Code of Business Conduct.</p> <p><b>It's My Responsibility</b> to not retaliate against any employee who reports a concern or participates in an investigation about business practices that may violate the Code of Business Conduct.</p>