

NEW YORK LIFE SUPPLIER CODE OF CONDUCT

Integrity is one of NYL's core values. It is critical to NYL's success and its recognition as a leader in its industry. NYL expresses this value by conducting its business in accordance with the highest ethical standards, aligned to US and international principles and laws. NYL expects everyone in the NYL community, including its employees and the suppliers with whom NYL conducts business, to adhere to these standards.

To this end, NYL sets forth these basic principles of business conduct, for itself and its suppliers:

1. Conduct business in compliance with all applicable laws and regulations, consistent with the highest ethical standards;
2. Select suppliers whose business conduct complements that of NYL and who believe in and practice the same ethical standards and values;
3. Treat employees and business counterparts fairly and with respect;
4. Encourage environmental responsibility, including consideration of the environmental impact of corporate acts and omissions;
5. Take steps to promote human rights and to avoid corporate acts or omissions that lead to or perpetuate human rights abuses, including production through involuntary or forced labor (whether indentured, bonded, imprisoned, or obtained through slavery), human trafficking, child labor, or otherwise; and
6. Avoid conduct or transactions that are inappropriate, unethical, or illegal, or that present the appearance of impropriety, e.g., employees soliciting gifts, entertainment, or other gratuities.

Additionally, in connection with New York State's lobbying laws, Supplier must disclose to NYL if a "State Person" (namely, Governor, Lieutenant Governor, Comptroller, Attorney General, members or employees of the state legislature, and other officers or employees) serves in Supplier's business as a proprietor, partner, director, officer, manager, or owner of 10% or more of the stock (1% if the business is publicly traded).

NYL expects that its suppliers will take appropriate measures to assure that their employees and other representatives perform services for NYL in accordance with these principles. Should a supplier believe its or NYL's employees or representatives are not conforming to these principles in connection with NYL's business, anonymous reports can be made as follows:

- Phone or Online – NYL's EthicsPoint hotline:
888-331-0619
<https://secure.ethicspoint.com/domain/media/en/gui/23192/index.html>
- Mail or Courier:
Chief Ethics Officer
New York Life Insurance Company
51 Madison Avenue
New York, NY 10010