



Equal Employment Opportunity and Anti-Harassment Policy

ALL INQUIRIES RELATED TO THIS POLICY SHOULD BE DIRECTED TO:

OWNER:

Chief Human Resources Officer

CONTACT(S):

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1 OVERVIEW

1.1 Objective

The purpose of this Equal Employment Opportunity and Anti-Harassment policy (the “Policy”) is to communicate Primerica’s expectation that all employees contribute to a work environment free from prohibited discrimination, harassment, and retaliation. It also describes our reporting procedures and processes for responding to claims of such prohibited behavior so that issues can be identified and remedied promptly and thoroughly. This Policy aligns with both our Code of Conduct and Employee Handbook. In the event of any conflict between this Policy and the Employee Handbook, this Policy shall govern.

1.2 Scope

Primerica (the “Company”) expects all its employees to act in accordance with the highest standards of integrity and professionalism and comply with all applicable laws, rules, regulations, and Company policies that prohibit discrimination, harassment, and retaliation.

1.3 Target Audience

All Company employees are required to review and comply with this Policy.

1.4 Owner

This Policy is owned by the Human Resources department. Any changes to it must be approved by the Chief Human Resources Officer and the Primerica, Inc. Board of Directors (the “Board”) or a Board committee.

1.5 Effective Date / Transition Period

This Policy is effective August 15, 2018.

1.6 Retired Policies / Related Policies

This is a Company policy.

2 POLICY

Primerica (the “Company”) fosters a work environment in which diversity and inclusion are embraced, employment-related decisions are not discriminatory or retaliatory, and employees treat each other with mutual respect and dignity. The Company has implemented this Equal Employment Opportunity and Anti-Harassment Policy (the “Policy”) as part of its longstanding commitment to comply with all applicable equal opportunity laws.

2.1 Exception Process

Any exception to a provision of this policy, while rare, may only be made by a documented decision of the Chief Human Resources Officer.

2.2 The Role of the Board of Directors

The Board is committed to promoting and supporting a Company culture that fosters trust and respectful treatment of employees. As part of its oversight duties, the Board has delegated to the Corporate Governance Committee of the Board (the “Corporate Governance Committee”) responsibility for overseeing management’s implementation of this policy. In connection with such oversight, the Corporate Governance Committee will annually review a summary of complaints and will annually review and approve this Policy.

3 GUIDELINES AND PROCEDURES

3.1 Non-Retaliation

The Company prohibits any adverse actions against an employee for reporting, in good faith, perceived discrimination and/or harassment, for assisting another employee in making a report, or for cooperating in a discrimination and/or harassment investigation.

Examples of adverse actions relating to good faith reports described above include, but are not limited to, the denial of a promotion, denial of job benefits, reprimands, negative evaluations, threats, harassment, demotion, suspension, discharge, or other treatment that is reasonably likely to deter an employee from engaging in one or more protected activities.

Reporting in good faith means that you share full and accurate information you have about a situation that you believe to be true. Nothing in this Policy, however, prevents the Company from taking action against an employee who raises a concern in bad faith.

If you believe that you have been subject to any retaliatory treatment, you must report it to any of the resources listed in **Section 3.6 Making a Complaint** below.

3.2 Discrimination and Harassment

The Company prohibits discrimination and harassment against any employee or applicant on the basis of race, sex, color, religious creed, religion, national origin, citizenship status, age, disability, pregnancy, ancestry, military service or veteran status, genetic or carrier status, marital status, sexual orientation, or any classification protected by applicable federal, state or local laws. Such discrimination and/or harassment, whether committed by or against employees, clients, vendors, contractors, or visitors while at work or outside of work will not be tolerated.

Harassment can be any single incident or pattern of behavior where the effect (intentional or unintentional) creates a hostile, offensive, or intimidating work environment based upon any of the above protected categories.

Harassing behaviors can include, but are not limited to:

- Religious and racial slurs;
- Age-based remarks;

- Derogatory comments, jokes, or epithets contained in, but not limited to, emails, voicemails, text messages, social media postings or postings on internal bulletin boards;
- Written or pictorial material that makes fun of or insults an individual or group based upon a protected classification;
- Unwelcome comments that are based on one of the above protected classifications; or
- Similar remarks or behavior.

Harassment may include comments or conduct between or among individuals in the same protected category.

3.3 Sexual Harassment

Sexual harassment is a form of harassment that is prohibited by the Company. Such harassment includes, but is not limited to, unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of employment (“quid pro quo”). This type of sexual harassment also occurs when submission to or rejection of such conduct by an individual is used as the basis for employment decisions; or
- Such conduct is either so severe or pervasive that it unreasonably interferes with an individual’s work performance or creates a hostile, intimidating, or offensive work environment (“hostile work environment”).

The following are examples of conduct that is sexual in nature and prohibited by this policy:

- Comments, jokes, or other degrading language or behavior that is sexual in nature or unwelcome comments about body appearance;
- Sexually suggestive objects, books, magazines, pictures, posters, cartoons, electronic communications, including emails, texts, tweets and internet postings, or other such materials;
- Unwelcome sexual advances, requests for sexual favors (including repeated, unwelcome requests for dates or social interactions) or unwanted sexual touching (pinching, patting, brushing up against, cornering, kissing, fondling);

- Offering favorable terms or conditions of employment in exchange for sexual favors; or
- Other non-consensual sexual interactions.

Sexual harassment is prohibited whether it is between members of the same or opposite sex.

The intent of an individual will not dictate whether the conduct will be considered sexual harassment. The impact on the recipient and whether a reasonable person would find the conduct offensive given the circumstances are used to evaluate whether the conduct amounts to sexual harassment.

There may be applicable local laws on sexual harassment and remedies available based on your location. For further information, please refer to your state's supplement to our Employee Handbook.

3.4 Consensual Relationships

The Company recognizes that on occasion dating and intimate relationships may develop between co-workers. However, to ensure compliance with this policy, managers are expected to not date or have any intimate relationship with a member of his or her staff (an employee who reports directly or indirectly to him or her). Such relationships may create compromising conflicts of interest or the appearance of such conflicts or may create the appearance of bias, favoritism, intimidation or coercion.

If an employee enters into a consensual romantic and/or sexual relationship with a member of his or her staff (an employee who reports directly or indirectly to him or her), or if one of the parties is in a supervisory capacity in the same department in which the other works, the parties must notify Human Resources immediately, who will review the situation and take any necessary steps to ensure compliance with this policy. Such reporting is mandatory, and failure to report violates this policy and may subject the individual to disciplinary action, up to and including termination.

Employees with no reporting or supervisory relationship to each other may date or have an intimate relationship, provided that there is no real or perceived conflict of interest, and the relationship does not otherwise adversely affect the workplace.

Unfortunately, there are also times when a consensual relationship ends and interaction between individuals involved becomes uncomfortable. Sometimes, one of the individuals wishes to continue the relationship and inappropriately presses the issue, retaliates, or otherwise makes the work life of the other individual uncomfortable. Such actions may constitute sexual harassment and should immediately be reported. See **Section 3.6 Making a Complaint**.

3.5 Use of Technology or Equipment

Company-owned and Company-provided electronic communications equipment, networks, or systems may never be used to download, view, transmit or communicate any images or text that consist of ethnic or racial slurs, hate speech, sexually explicit material, obscenities or anything else that may be construed as harassing or offensive to others based on a legally protected category.

If you receive an inappropriate communication from another employee, you should report it immediately, just as you would any other violation of policy that you observe. If you receive an inappropriate communication from an external source, you should delete it immediately and advise the sender to not forward you similar communication in the future. Do not forward any inappropriate communication to any employee, other than to Human Resources or your BISO for purposes of reporting. In addition, do not forward any inappropriate communication to any external address, even if it is only to your home computer.

You should not have any expectation of privacy when you use Primerica's electronic equipment, network, or systems. The Company may investigate or monitor any use of its electronic equipment, network, or systems for business reasons. Inappropriate use of our electronic equipment, network, or systems carries very serious consequences up to and including termination of employment.

In addition, you are expected to comply with the **Social Media Policy** section of the Employee Handbook.

3.6 Making a Complaint

We all have a responsibility to contribute to a work environment free from prohibited conduct or behavior. This includes raising a concern when we learn of or witness inappropriate conduct. If you receive a complaint or observe or believe you have been subject to discrimination, sexual harassment, or any other form of harassment which violates this policy, you must immediately report it.

Employees may report concerns to any of the following:

- Your manager or another manager in your management chain. If your complaint concerns your manager, you can talk to another manager in your management chain or any other resource listed here;
- Human Resources;

- The Ethics Hotline which is for use by any employee to report suspected violations of a law, regulation, or Company ethical standard (1-888-742-5500) or PrimericaEthics@humana.com;
- Your Compliance Officer;
- Chief Compliance and Risk Officer; and
- General Counsel.

For matters involving a member of the Operating Team, you may also contact the Company's Lead Director by sending an email to leaddirector@primerica.com

You are not required to report your complaint to anyone who is the subject of it. Reporting a complaint will in no way be used against you or have an adverse impact on your employment status. However, filing complaints in bad faith is an abuse of this Policy and will be treated as a violation. See **Section 3.1 Non-Retaliation** above.

3.7 Investigation of Complaints

An individual may initiate the complaint process by contacting one or more of the resources listed in **Section 3.6 Making a Complaint**. The complaint will be directed to the Head of Human Resources who will review it with the General Counsel, as needed, and initiate an investigation. If recommended by the General Counsel, the investigation may be conducted by an independent third party. Both the reporting party and the party who allegedly violated this Policy will be offered an opportunity to be interviewed or to otherwise respond. While we will always try to keep the complaint confidential, we do have the right to inform people involved in the investigation on a need-to-know basis, and under certain limited circumstances, may have to disclose information to third parties.

The Head of Human Resources or others will, as appropriate, respond to the complainant as promptly as practicable to provide an update on the matter including, if applicable, progress of the investigation.

If an investigation reveals that a violation of this Policy or other inappropriate conduct has occurred, as determined by the Head of Human Resources and/or the General Counsel, then the Company will take corrective action, including discipline up to and including termination of employment, reassignment, changes in reporting relationships, training, or other measures the Company deems appropriate under the circumstances, regardless of the job positions of those involved.

The Company may take corrective action for any conduct that violates this Policy and is discovered in investigating reports made therein, regardless of whether the conduct amounts to a violation of law. If the person who engaged in prohibited conduct is not a Company employee, then the Company will take whatever

corrective action that is reasonable and appropriate under the circumstances.

For complaints involving a member of the Company's Operating Team, the findings of any investigation will be shared with the Lead Director of the Company's Board of Directors, who will inform the Corporate Governance Committee and the Board of Directors.

3.8 Filing an External Complaint

While you are strongly encouraged to raise an internal complaint, nothing in this Policy may prevent you from pursuing formal legal remedies or resolutions through local, state, or federal agencies if you feel you have been subjected to harassment, discrimination, or retaliation.

APPENDIX A: CONTACTS

Contacts

- Karen Fine 470-564-6837
- Ellen Bailey 470-564-6809