

NEW YORK LIFE SUPPLIER CODE OF CONDUCT

(Last modified and published January 2024)

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 social, environmental, and other applicable laws and regulations, in a manner consistent with the highest ethical standards and demonstrating alignment with New York Life's values;
2. Respect human rights and take steps to avoid corporate acts or omissions that lead to or perpetuate human rights abuses, including involuntary or forced labor (whether indentured, bonded, imprisoned, or obtained through slavery), human trafficking, child labor, or otherwise;
3. Treat consumers, employees, and business counterparts fairly and with respect, and avoid conducts or transactions that are inappropriate, unethical, or illegal, or that present the appearance of impropriety, such as employees soliciting gifts, entertainment, or other gratuities;
4. Strive to maintain a culture that recognizes and appreciates diverse representation and creates equal opportunities for inclusion at every level in the organization, including with contractors and suppliers;
5. Understand and take actions, to the best of their ability, to reduce environmental impacts that may arise through corporate acts and omissions; and
6. Take steps to understand, manage, and mitigate, where relevant, the physical and transition risks associated with climate change, in relation to the products and services provided to NYL.

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