



Jackson Financial Inc. Whistleblower Policy

9/13/2021 -



Version	Date	Amended By	Comment
1.0	6 April 2021		Initial Draft – Approved by JFI Board
1.1	10 September 2021	Corporate Governance	To effect minor changes and additional language.

Document Information	
Title	Jackson Financial Inc. Whistleblower Policy
Location	JACK
Owner	JFI General Counsel
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The next scheduled review is due in 2Q2022.

1. Purpose

- A. Jackson Financial Inc. (together with its subsidiaries, the “Company”), is committed to high standards of ethical, honest and legal business conduct. In line with this principle and our commitment to open communication, this Policy provides an avenue for employees and other interested parties to bring to our attention illicit or illegal conduct and reassurance that they will be protected from reprisals for raising such concerns. This Policy is intended to cover protections for bringing to our attention questionable business conduct at the Company (“Reports”) such as:
- i. questionable accounting, internal accounting and disclosure controls and auditing matters, including fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company, fraud or deliberate error in the recording and maintaining of financial records of the Company, deficiencies in, circumvention or attempted circumvention of, or non-compliance with, the Company’s internal accounting and disclosure controls, misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of the Company or deviation from full and accurate reporting of the Company’s financial condition and results of operations (an “Accounting Allegation”);
 - ii. compliance with legal and regulatory requirements (a “Legal Allegation”); and
 - iii. retaliation against employees who make Accounting Allegations or Legal Allegations (a “Retaliatory Act”).

- B. This Policy is intended to comply with the requirements of Section 301 of the Sarbanes–Oxley Act of 2002, Section 922 of Dodd-Frank Act of 2010 and the New York Stock Exchange’s corporate governance standards for listed companies.

2. Procedures for Receiving Reports

- A. Any Report that is made directly to management, whether openly, confidentially or anonymously, shall be promptly reported to the Audit Committee. An Audit Committee member who has an actual or perceived conflict of interest in the subject matter of the Report shall not receive such a Report. If a majority of Audit Committee members have such a conflict, then a Special Committee shall be appointed of non-conflicted Board members to receive such a Report.
- B. Each Report forwarded to the Audit Committee by management and each Report that is made directly to the Audit Committee, whether openly, confidentially or anonymously, shall be reviewed by the Audit Committee, who may, in their discretion, consult with any member of management who is not the subject of the allegation and who may have appropriate expertise to assist the Audit Committee. The Audit Committee shall determine whether the Audit Committee or management should investigate the Report, taking into account the considerations set forth in Section C below. If management investigates the Report, the procedures set forth in the Company’s Investigations Policy shall be followed unless otherwise instructed by the Audit Committee.
 - i. If the Audit Committee determines that management should investigate the Report, the Audit Committee will notify the General Counsel in writing of that conclusion. Management shall thereafter promptly investigate the Report and shall report the results of its investigation, in writing, to the Audit Committee. Management shall be free in its discretion to engage outside auditors, counsel or other experts to assist in the investigation and in the analysis of results.
 - ii. If the Audit Committee determines that it should investigate the Report, the Audit Committee shall promptly determine what professional assistance, if any, it needs in order to conduct the investigation. The Audit Committee shall be free in its discretion to engage outside auditors, counsel or other experts to assist in the investigation and in the analysis of results.
- C. In the discretion of the Audit Committee, responsibilities of the Audit Committee created by these procedures may be delegated to the Chair of the Audit Committee or to a subcommittee of the Audit Committee.

3. Considerations Relative to Whether the Audit Committee or Management Should Investigate a Report

In determining whether management or the Audit Committee should investigate a Report, the Audit Committee shall consider, among any other factors that are appropriate under the circumstances, the following:

- A. Was a shareholder derivative demand relating to the subject matter of this Report received? If so, the Audit Committee or a Board-designated committee should undertake the investigation.
- B. Who is the alleged wrongdoer? If an executive officer, senior financial officer or other senior management officer is alleged to have engaged in wrongdoing, that factor alone may weigh in favor of the Audit Committee conducting the investigation.
- C. How serious is the alleged wrongdoing? The more serious the alleged wrongdoing, the more appropriate that the Audit Committee should undertake the investigation. If the alleged wrongdoing would constitute a crime involving the integrity of the financial statements of the Company, that factor alone may weigh in favor of the Audit Committee conducting the investigation.
- D. How credible is the allegation of wrongdoing? The more credible the allegation, the more appropriate that the Audit Committee should undertake the investigation. In assessing credibility, the Audit Committee should consider all facts surrounding the allegation, including whether similar allegations have been made in the press or by analysts.
- E. As a matter of judgment, will an Audit Committee investigation improve credibility with key constituencies, including without limitation, regulators?

4. Protection of Whistleblowers

It is the policy of the Company to encourage employees and other interested parties, when they, in good faith, reasonably believe that any questionable conduct regarding accounting, internal accounting controls, auditing matters, internal disclosure controls, or legal or regulatory compliance, has occurred, is occurring or is about to occur, to report those concerns immediately. Consistent with the policies of the Company, the Audit Committee shall not retaliate, and shall not tolerate any retaliation by management or any other person or group, directly or indirectly, against anyone who, in good faith, makes an Accounting Allegation or Legal Allegation, reports a Retaliatory Act or provides assistance to the Audit Committee, management or any other person or group, including any governmental, regulatory or law enforcement body, investigating a Report. The Audit Committee shall not, unless compelled by judicial or other legal process, reveal the identity of any person who makes an Accounting Allegation or Legal Allegation or reports a Retaliatory Act and who asks that his or her identity as the person who made such Report remain confidential and shall not make any effort, or tolerate any effort made by any other person or group, to ascertain the identity of any person who makes a Report anonymously.

5. Records

The Company shall retain for a reasonable period of time (or in accordance with any document retention policy or Legal Hold instituted by the Company) all records relating to any Accounting Allegation or Legal Allegation or report of a Retaliatory Act and to the investigation of any such Report.

6. Procedures for Making Complaints

In addition to any other avenue available to an employee, including to the employee's manager or to Human Resources, any employee or stockholder may report to the Audit Committee openly, confidentially or anonymously any Accounting Allegation or Legal Allegation or report of a Retaliatory Act. Accounting Allegations, Legal Allegations and reports of a Retaliatory Act can be made orally or in writing to the Chief Compliance Officer. The Chief Compliance Officer can be contacted at:

Chief Compliance Officer
Jackson Financial Inc.
1 Corporate Way
Lansing, Michigan 48951
Phone : (517) 381-5500
E-mail : JFIChiefComplianceOfficer@jackson.com

Such Reports may also be made directly to management either (a) confidentially by contacting the JFI General Counsel in writing or in person at Jackson Financial Inc., 1 Corporate Way, Lansing, Michigan 48951 or (b) if made by an employee, anonymously, by using the Speak Out Confidential Reporting system at any time. The toll-free line is managed by an outside, independent service provider and allows anyone to make a Report without divulging his or her name. The helpline service provider is required to share the information provided in the Report to designated individuals in Legal as promptly as practicable.

The reporting individual should provide names, dates, places and other details sufficient to facilitate an effective investigation.

Speak Out Confidential Reporting Hotline	844-506-0767
Speak Out Confidential Reporting Website	Jackson.ethicspoint.com
Speak Out Confidential Reporting Mobile Phone Site	Jackson.mobile.ethicspoint.com

7. Cooperation with Investigations

All information disclosed during the course of any investigation will remain confidential, except as necessary to conduct, conclude, and, if appropriate, prosecute the investigation. In the case of any anonymous complaint, a person who reports a suspected violation may not be informed of the results of an investigation. Retaliation against a reporter or witness is not tolerated.

All employees and members of management have a duty to promptly cooperate and provide accurate information in connection with any investigation of reports of questionable conduct, or of discrimination, retaliation or harassment resulting from the reporting or investigation of such matters. In almost all circumstances, interviews will be conducted without independent legal counsel or other management representatives present.

Prompt and appropriate corrective action will be taken when and as warranted. The specific action taken in any particular case depends on the nature and gravity of the conduct or circumstances reported, and the facts proven by investigation. The persons responsible for any misconduct, or those

failing to cooperate or who provide false information during an investigation, will be subject to disciplinary action, up to and including termination.

Nothing in this policy is intended to limit the ability of any employee to communicate with any governmental agency, commission or body or self-regulatory organization, or otherwise participate in any investigation or proceeding that may be conducted by any governmental agency, commission or body or self-regulatory organization, including, without prior notice to the Company, reporting possible violations of federal securities laws or regulations to the Securities and Exchange Commission (the "SEC"), making other disclosures that are protected under the whistleblower provisions of federal law or regulation or covering any individual monetary award from the SEC or other government authority in connection with that report.