

Policy Statement on Political Activity

OVERVIEW

This policy, which was approved by the Governance and Nominating Committee of our Board of Directors, sets forth the principles concerning CNO Financial Group's political contributions, political action committee and participation in trade associations.

CNO's mission, to secure the future of middle-income America by providing insurance and financial services that help protect their health, income and retirement needs, is achieved, in part, by having a voice in the political process. We are committed to the highest standard of ethical conduct in our involvement in the political process, with all financial contributions strictly adhering to all applicable federal and state laws.

Our public policy priorities align with our mission and include the federal role in insurance regulation, retirement security, entitlement reform and tax policy, among others. Any corporate contributions made by CNO shall reflect the interests of CNO as an entity, not those of its individual officers or directors.

CORPORATE CONTRIBUTIONS

Federal law and certain state laws prohibit a corporation, such as CNO, from making political contributions. CNO does not make contributions from corporate funds to:

- Political candidates or their committees.
- Political parties or their committees.
- Ballot measure committees.
- Direct independent expenditures.
- 501(c)(4) organizations.

CNO's corporate contributions include:

- Political organizations organized under Section 527 of the Internal Revenue Code.
- Industry trade association dues, some of which may be used by the associations for non-partisan political purposes.

POLITICAL ACTION COMMITTEE CONTRIBUTIONS

Federal election law allows corporations to establish political action committees (a “PAC”), which may make certain political contributions as permitted by law. Political contributions made by the CNO PAC are used to send a strong, collective, bipartisan message to members of Congress on matters of federal public policy that are in the best interest of our Company, our industry, and our customers. The CNO PAC is funded entirely by voluntary contributions from eligible CNO associates who take pride in supporting the Company’s purpose, mission and values through political advocacy.

The CNO PAC is administered internally by its treasurer and advisory committee consisting of representatives from across CNO’s business functions. PAC disbursement decisions are made by members of the PAC advisory committee who consider several factors when deciding which candidates and members of Congress to support, including but not limited to:

- Candidates’ views on issues related to CNO’s mission and values.
- Viability of candidacy.
- Candidates’ presence on key committees of jurisdiction (if an incumbent).
- Candidates’ voting history on related legislation.

No associate is required to contribute to or participate in the CNO PAC, nor is any associate pressured or penalized for a decision to participate or not participate in the CNO PAC.

The CNO PAC limits its giving to federal congressional candidates and certain industry trade association PAC-to-PAC contributions. The CNO PAC is not authorized to make any contributions to any state or local candidates, political parties or committees.

TRADE ASSOCIATION MEMBERSHIP

CNO’s advocacy efforts are also conducted through its membership in various insurance industry trade associations. Participation in these organizations can help further our understanding of current political and regulatory developments and issues, and they can advocate on behalf of their members for common business interests.

CNO regularly reviews the performance and effectiveness of trade associations to determine the value of the membership and appropriate level of involvement by its employees. CNO’s positions may not always consistently align with the trade associations to which we belong. However, CNO believes its participation in these organizations helps promote public policy objectives that are important to CNO’s shareholders, clients and employees and advances its employees’ professional development.

COMPLIANCE AND OVERSIGHT

CNO’s political activities are overseen by our government relations staff and general counsel, who reports to our chief executive officer.

The Governance and Nominating Committee of the CNO Board of Directors periodically reviews CNO’s policies and practices regarding public policy advocacy and political activities, including political contributions, lobbying and support of organizations that may engage in political activity. The Committee also periodically reviews the Political Activity Report.

CNO’s Code of Conduct outlines our expectations for all associates and Board members on political activities and contributions.

PUBLIC REPORTING AND DISCLOSURE

CNO complies with all lobbying laws and regulations. Any outside parties who lobby on behalf of the Company must comply with federal, state or local requirements for registering, tracking and reporting their lobbying activities. Federal lobbying reports are publicly available and can be accessed [here](#).

The CNO PAC is required to publicly disclose receipts and contributions to the Federal Election Commission, which can be accessed [here](#).

CNO's Political Activity Report, which outlines our corporate contributions and CNO PAC disbursements, is located on our website at CNOinc.com.