

Reporting Violations, Seeking Help, and Raising Concerns



WHY DOES IT MATTER?

Reporting violations of the Code of Conduct is an opportunity to recognize that you are not alone in dealing with issues. Pacific Life has a process to help you address problems in the workplace. Reporting a suspected violation in good faith (meaning telling the truth, as you know it) displays our Core Value of *Integrity*, and allows us to investigate and take appropriate action.

HOW DOES THIS APPLY TO ME?

As an employee, it is your obligation to report actual or suspected violations of the Code. Pacific Life, its subsidiaries, and affiliates rely on your honesty and integrity in coming forward so that potential problems can be addressed in a timely and appropriate manner.

Regardless of the resolution of a reported violation, you should never fear retaliation for reporting a concern in good faith or participating in an investigation. Retaliation is a serious offense that will not be tolerated, and any employee who participates in retaliation will be disciplined, up to and including termination.

WHAT ELSE DO I NEED TO KNOW?

RETALIATION

Retaliation is negative treatment or adverse action taken against an employee because he or she has reported a concern or cooperated in an investigation. Examples of retaliation may be overt (such as demotion or termination) or subtle (giving the employee undesirable assignments, poor performance evaluations, and ostracizing the employee from the rest of the department).

INVESTIGATION PROCESS

If a report is made, Pacific Life does not automatically assume a violation has occurred. All reports are documented and investigated carefully and timely. In some instances, there may be coordination between specialty groups to look into the matter and conduct an investigation. A conclusion will be reached only when all relevant information has been considered, including speaking with any individuals who have been implicated in wrongdoing, and the investigation has been completed. It will be determined that a violation has occurred only if the investigation demonstrates such. To the extent possible, confidentiality will be maintained while conducting an investigation.

THE RESOLUTION

The resolution of the investigation depends on many factors. These factors include whether the report was substantiated, the seriousness of the matter, and the effect on Pacific Life and its employees.

Possible resolutions include employee counseling, verbal or written warning, and termination of the employee who committed the violation. Once there is a resolution, the employee who reported the violation may be notified that the matter is closed. In most instances, the reporting employee will not receive a detailed explanation of the resolution because of confidentiality. Although the reporting employee may not be notified of the exact outcome, and the resolution may not be what he or she was expecting, that doesn't mean there was not a full investigation and an appropriate conclusion to the matter.

IT STARTS WITH ME: WHAT SHOULD I DO?

SPEAK UP!

Sometimes the only way we will find out about a concern is from our employees. You are our front-line defense and have the ability to protect Pacific Life's reputation and financial strength by speaking up.

The Code of Conduct cannot provide all the answers for every situation you may face at Pacific Life. There may be times when you have questions about doing the right thing. There may be other times when you have concerns about an issue that is more serious than just a question but is not necessarily a violation of the Code. Maybe you've noticed a business process that isn't functioning properly, or perhaps you have concerns about other matters in your department or division.

In any case, you are encouraged to ask questions or seek help to guide you through the situation and use the resources available to you to raise a concern. Talk to your manager, another manager, Enterprise Compliance, or HR Employee Relations. You can pick the choice that you feel most comfortable with or that you feel is most appropriate. There is no wrong way to speak up; the only mistake you can make is not to speak up at all.

ANONYMOUS REPORTING IS AVAILABLE

Anonymous reporting is also available through the PL Responsibility Line. The Responsibility Line is administered by a leading third-party provider of reporting services. This third party does not record, nor could it disclose to Pacific Life, telephone numbers or IP addresses of people choosing to report anonymously. The Responsibility Line and website provide an effective way for employees to receive feedback from Pacific Life. It also provides us a means to seek clarification or more details, while preserving the anonymity of the employee.

COOPERATE IN THE INVESTIGATION PROCESS

Whether you reported the violation or not, if you're asked to participate in an investigation, you must cooperate and tell the truth, as you know it.

MANAGERS' RESPONSIBILITIES FOR OPEN COMMUNICATION AND REPORTING

Managers are responsible for developing an atmosphere of openness and trust by encouraging employees to speak up and taking appropriate action in response by promptly reporting:

- to Enterprise Compliance any information they are aware of (including information provided by an employee) which indicates that a compliance review or investigation may be warranted.
- employee complaints related to prohibited harassment, discrimination and/or retaliation to Human Resources for appropriate action.

RELATED POLICIES, PROCEDURES, FORMS, OR OTHER RESOURCES

- [Preventing Harassment Policy](#)
- [Employee Handbook](#)
- [HR Employee Relations Splash Page](#)
- [PL Responsibility Line](#)

WHAT IF I HAVE QUESTIONS OR NEED MORE INFORMATION?

Contact:

- [Your Manager or another Manager](#)
- [HR Employee Relations](#)
- [Enterprise Compliance](#)
- [The Responsibility Line \(for anonymity\)](#)