

CODE OF CONDUCT

TRUSTEESHIP PLANS, INC.

- This Code of Conduct establishes the standards of conduct of all Officers, Employees, and Sales Agents of Trusteeship Plans, Inc. (TPI) with the end view of conducting its activities professionally, lawfully and ethically.
- With integrity and honesty, TPI commits to operate with transparency to its planholders.
- TPI commits to comply and cooperate with the regulations of the Insurance Commission and all relevant government agencies.
- TPI commits to promote a culture of accountability and strengthen corporate governance.
- TPI commits to deliver on its commitments to its planholders, deal with them professionally and fairly in a timely manner.
- TPI commits to observe data privacy requirements and regulations and properly secure the data of the Company and its planholders.
- TPI commits fair treatment of its employees with open communication and encourage professional competence.
- TPI officers, directors and employees are expected to comply with the Code and other policies that the Company may adopt over time. The Code may be modified, revised and/or updated from time to time.
- Violations of the Code may lead to disciplinary action, penalties including termination.