



FINANCIAL CODE OF ETHICS

ALL INQUIRIES SHOULD BE DIRECTED TO:

OWNER:

ALISON RAND, EVP, CHIEF FINANCIAL OFFICER

CONTACT(S):

JEFF FENDLER, CHIEF COMPLIANCE AND RISK OFFICER
470-564-7165

ELLEN MONTGOMERY, SVP, ETHICS OFFICER
470-564-6881

ISSUE DATE

April 2010

REVISED DATE

JUNE 2019

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1 OVERVIEW

1.1 Objective

Primerica (the “Company”) expects all of its employees to act in accordance with the highest standards of personal and professional integrity in all aspects of their activities, comply with all applicable laws, rules and regulations, deter wrongdoing and abide by the Company’s Code of Conduct and other Company policies and procedures. This Financial Code of Ethics (the “Code of Ethics”) is intended to supplement the Company’s Code of Conduct.

1.2 Target Audience

The Code of Ethics applies to all finance professionals and administrative staff in a finance role, including controllers, financial planning and analysis, financial reporting and accounting actuaries, treasury, tax, and investor relations, each and collectively, “Finance Professional”.

1.3 Owner

The Code of Ethics is owned by the Company’s Chief Financial Officer. Any changes to it must be approved by the Company’s Chief Financial Officer and the Corporate Governance Committee of the Board of Directors of Primerica, Inc.

1.4 Effective Date

The Code of Ethics is effective June 2010.

2 POLICY

The Code of Ethics outlines principles and standards that Financial Professionals should be familiar with, in addition to those outlined in the Company's Code of Conduct.

As a Finance Professional, you understand that you will be held accountable for your adherence to the Code of Ethics, and your failure to observe to its terms may result in disciplinary action, up to and including termination of employment. Violations of the Code of Ethics may also constitute violations of law and may result in civil and criminal penalties for you, your supervisors and/or the Company.

You must comply with applicable governmental laws, rules and regulations, as well as the rules and regulations of self-regulatory organizations of which the Company or its subsidiaries is a member.

2.1 Conflicts of Interest

You must engage in and promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and financial relationships. Any material transaction or relationship that reasonably could be expected to give rise to such a conflict should be disclosed to the Company's Chief Compliance and Risk Officer.

2.2 Confidentiality

You must take all reasonable measures to protect the confidentiality of non-public information about the Company, its subsidiaries and customers obtained or created in connection with their activities and prevent the unauthorized disclosure of such information unless required by applicable law or regulation or legal or regulatory purposes.

2.3 Financial Reporting

Primerica is committed to accuracy in the preparation of financial statements and tax-related records, in accordance with applicable accounting principles and laws and regulations. You must produce full, fair, accurate, timely and understandable disclosure in reports and documents that the Company or its subsidiaries files with, or submits to, the Securities and Exchange Commission and other regulators and in other public communications made by Primerica or its subsidiaries.

Any direct or indirect action taken to fraudulently influence, coerce, manipulate or mislead the Company or its subsidiaries' independent public auditors for the

purposes of rendering the financial statements of the Company or its subsidiaries misleading is strictly prohibited.

2.4 Required Reporting of Violations

You must promptly report any suspected violation of the Code of Ethics to the Company's Chief Compliance and Risk Officer or any of the parties or contacts listed in the Company's Code of Conduct.

Any questions regarding the best course of action in a particular situation should be promptly brought to the attention of the Company's Chief Compliance and Risk Officer. You may choose to remain anonymous in reporting a possible violation of the Code of Ethics.

APPENDIX A: ACKNOWLEDGMENT

Your Personal Commitment to the Primerica Financial Code of Ethics

I acknowledge that I have received and read the Primerica Financial Code of Ethics as applicable to Financial Professionals, dated April 2010, and understand my obligations as an employee to comply with the Financial Code of Ethics.

I understand that my agreement to comply with the Financial Code of Ethics does not constitute a contract of employment.

Please sign here:

_____ Date: _____

Please print your name:

GEID Number:

APPENDIX B: CONTACTS

Contacts

- Jeff Fendler 470-564-7165
- Ellen Montgomery 470-564-6881