

Administration

In the event of any uncertainty as to whether an associate is subject to this Code, the Chief Financial Officer shall make a determination of its applicability and inform the appropriate individuals or business units.

Investigation and violations of the Code will be handled in the same manner described in the RGA Code of Conduct. Violators of this Code and those who supervise or manage them shall be subject to disciplinary action. Managers who retaliate against an employee reporting a violation shall also be subject to disciplinary action.

Disciplinary action may include, but is not limited to, reprimands and warnings, probation, suspension, demotion, reassignment, reduction in compensation or immediate termination. Certain actions and omissions prohibited by the Code might also be unlawful and could lead to criminal prosecution, imposition of fines or imprisonment.

Only the Board