Anti-Bribery and Anti-Corruption Policy

Date Revised: 12/17/2025

The Anti-Bribery and Anti-Corruption policy outlines your responsibilities when representing MassMutual. You must not not offer or make any improper payment or provide any benefit to someone to obtain or retain business or gain any improper business advantage.

What You Need to Know

MassMutual conducts business in many jurisdictions that require compliance with anti-bribery and anti-corruption laws designed to prevent improper payments to government officials or private individuals.

Neither you nor third parties representing MassMutual should improperly offer, promise, pay, or authorize the payment of money or anything of value to anyone, directly or indirectly, to obtain or retain business or gain any improper business advantage for MassMutual. Even if you personally pay and do not get reimbursed by the Company, it could still be deemed improper if the intent was to improperly influence the recipient for the benefit of MassMutual.

This includes improper attempts to:

- influence any act or decision by any person;
- induce any person to do or refrain from taking action in violation of a lawful duty;
- secure any improper advantage; or
- induce any person to use their influence to affect any act or decision.

You must accurately record all business transactions in MassMutual's books and records.

Additional Information

Due Diligence and Third Parties

MassMutual may be liable for indirect payments made or offered to any entity or person on its behalf. This includes improper payments or offers to pay money or anything of value to any entity or person, including a government official, by a third party acting on behalf of MassMutual. When working with any third party, including any potential joint venture partner or company that MassMutual is considering buying, you must conduct appropriate due diligence to understand the third party's background and reputation so that you may assess the bribery or corruption risks that may exist. Contact the Compliance & Ethics Department or the Law Division with questions about conducting third party due diligence.

Facilitating Payments

The anti-bribery and anti-corruption laws in many countries prohibit facilitating or expediting payments, which are payments of small amounts to secure or expedite a routine governmental action. MassMutual prohibits these types of payments. Contact the Compliance & Ethics Department or the Law Division with any questions about these types of payments or if you are asked to make any payment that could be interpreted as a bribe.

Payment of Expenses

Payments for expenses incurred by persons other than government officials must comply with the Business Gifts and Entertainment policy, Business Travel and Expense Policy and any contract that may be in place.

In certain situations, MassMutual may pay for a government official's reasonable and bona fide expenses, such as travel, meals and entertainment, incurred in connection with the promotion, demonstration, or explanation of products or services, or the execution or performance of a contract with a government or agency. You must obtain approval from the Compliance & Ethics Department prior to extending an invitation to any government official and prior to paying any such expenses.

Business Gifts & Entertainment

In addition to the general requirements of this policy, business gifts and entertainment provided to both government and non-government officials must comply with the Business Gifts and Entertainment policy. Under certain circumstances, MassMutual may provide business gifts of nominal value to a foreign government official as a gift, a token of regard or esteem, or as an expression of gratitude, provided that local law allows the gift.

In addition, business entertainment may be provided to a foreign government official, so long as certain requirements are met:

- The entertainment expenses must be allowed under local law or applicable business policies.
- The entertainment must directly relate to a government official's participation in a product or service promotion, demonstration or explanation.
- The entertainment must be reasonable.
- The entertainment must comply with the Business Gifts and Entertainment policy.

Prior to providing a gift or business entertainment to a government official, contact the Compliance & Ethics Department to determine if the proposed business gift or business entertainment is permissible.

Political and Charitable Contributions

All political and charitable contributions must comply with applicable laws and must not be made to improperly influence the recipient or in exchange for any business advantage.

Refer to the Political Contributions and Solicitation policy and contact the Compliance & Ethics Department with questions about personal political contributions.

Prior to requesting or authorizing any payment on behalf of MassMutual to a government official, political party, candidate or incumbent for political office, contact Government Relations.

Recordkeeping

Information related to anything of value made or received by MassMutual must be accurately recorded in MassMutual's books and records. All disbursements and other financial transactions must be authorized by management. Undisclosed or unrecorded funds may not be established for any purpose. MassMutual's funds must not be placed in any personal or non-corporate account.

Other Details

Applies To

This policy applies to employees of the following companies (collectively "MassMutual"), including when acting on behalf of other MassMutual subsidiaries or affiliates:

- Massachusetts Mutual Life Insurance Company
- MassMutual Global Business Services India LLP

This policy also applies to temporary or contract workers and interns ("temporary personnel").

MassMutual may be subject to liability for violations of the anti-bribery and anti-corruption laws by its subsidiaries or affiliates. Therefore, MassMutual subsidiaries and affiliates have adopted anti-bribery and anti-corruption policies substantially similar to this policy.

This policy does not apply to MassMutual employees who work for a MassMutual field agency or firm as they are subject to the Compliance and Supervision Manual.

Enforcement and Discipline

If you violate this policy, you may be subject to discipline, including termination of employment. Civil or criminal penalties may also apply.

For temporary personnel who violate this policy, appropriate action may include termination of contract or business relationship, dismissal or prohibition from MassMutual property or events.

Speaking Up

You should report any violation, or other compliance, ethics or risk issues related to the policy, through the reporting channel that is the most appropriate or with which you are most comfortable. The reporting channels available to employees are set forth in the

Speaking Up policy.

Additional Resources

For more information about this policy, contact:

- Your manager
- Compliance & Ethics Department
- Government Relations
- Law