

LINCOLN FINANCIAL GROUP LUXURY EXPENDITURES POLICY

This Luxury Expenditures Policy (the “Policy”) sets forth written standards applicable to all LFG employees, officers, and directors with the purpose of prohibiting excessive and luxury expenditures by LFG.

LFG requires all of its employees to exercise reasonable care and prudence in determining the appropriateness of any LFG expenditure. As a part of our standard business practices, LFG has established policies, practices and procedures that manage expenditures and ensure appropriate management oversight in the ordinary course of our day-to-day business. These policies and procedures provide principles for prudent spending in line with our standard business practices for various expense types, balanced with flexibility to accomplish our corporate goals while remaining competitively positioned for future growth, and reasonably limit excessive or luxury expenditures across the enterprise. All expenditures are subject to these established policies and procedures, which include but are not limited to formal policies regarding approval documentation, budget authorization, reporting requirements and audit standards.

This Policy supplements and should be read in conjunction with the following existing LFG policies:

- LFG’s Code of Conduct
- LFG’s Travel and Entertainment Policy
- LFG’s Corporate Aircraft Usage Policy
- LFG’s Disbursement Policy
- LFG’s Conflict of Interest Policy
- LFG’s Relocation Policy

Other items, activities, or events for which LFG may reasonably anticipate incurring expenses, or reimbursing an employee for incurring expenses, which are not specifically addressed by one of the LFG policies listed above must be for legitimate business purposes and reasonable in nature or amount. Similar to other expenditures incurred on behalf of LFG, expenses for such items, activities or events must be in accordance with established LFG policies and procedures, including those outlined in LFG’s Code of Conduct and policies on travel and entertainment. Any event which is expected to have a total cost to LFG in excess of \$100,000 requires the prior approval of the CEO.

Each of the Chief Executive Officer, the Chief Financial Officer and the General Counsel has the full authority to amend the Policy from time to time, in their discretion, without the consent of any affected employee.