

**Genworth Financial, Inc.**  
**Policy on Corporate Political Contributions and Expenditures**

Genworth Financial, Inc. is committed to being actively involved in the communities we serve. This commitment extends to our approach to public policy. Because public policy issues have the potential to impact our business, employees, partners, customers and communities, Genworth, like other commercial enterprises, uses its resources on occasion to promote public policies of concern to our company and educate elected and public officials about our business.

Genworth has a long history of being committed to conducting business ethically, with integrity, and in accordance with the law. Part of that commitment includes compliance with rules, regulations, and standards governing our interaction with all governments, including our disclosure and accountability regarding political contributions and expenditures.

To that end, Genworth recognizes the importance of meaningful corporate governance practices as it relates to corporate political contributions and expenditures. Accordingly, Genworth's Board of Directors has adopted this policy (this "Policy") to ensure that political contributions and expenditures in the United States are made in a manner consistent with Genworth's core values to protect or enhance stockholder value.

**Applicability:** This Policy sets forth the policies of Genworth with respect to corporate political contributions and other campaign expenditures in the United States by Genworth and its majority-owned subsidiaries.

**Public Policy Support:** Consistent with applicable laws, corporate political contributions may be given to political candidates and organizations whose views and work are consistent with the interests and values of Genworth and the communities in which we operate. We recognize that political candidates and organizations may support positions that align with some, but not all, of Genworth's public policy positions. In these instances, we base our involvement on those areas of mutual agreement that we believe will have the greatest benefit to our stockholders and key stakeholders.

**Genworth Political Action Committee:** The political action committee sponsored by Genworth ("GenworthPAC") is a voluntary, nonprofit, unincorporated political action committee established by Genworth to promote and facilitate the support by Genworth's employees and other eligible contributors of candidates for federal and state office who share Genworth's views on important issues. The GenworthPAC is dedicated to the support of candidates who:

- have taken positions on issues involving private enterprise and on economic questions of national importance that are consistent with Genworth's business interests;
- who otherwise have experience on issues of importance to Genworth;
- who represent geographic areas of strategic significance to Genworth's business interests; or
- who are working to promote bi-partisan and consensus-driven policy to address divisive and challenging issues facing Genworth and the country.

The GenworthPAC is not affiliated with any political party or with any specific candidate for election.

**Federal Elections:** Federal law prohibits Genworth from making contributions to any candidate for federal office or to a federal political party. This prohibition includes all forms of support, regardless of whether in the form of cash, property, goods, services, or otherwise. Accordingly, Genworth will not make any contributions or expenditures to or for any candidate for federal political office or to or for any federal political parties, provided that this prohibition does not preclude contributions by the GenworthPAC.

**State and Local Elections:** Laws relating to state and local elections vary from state to state and may present complex legal issues. In fact, in certain jurisdictions, it may be illegal for Genworth to make political contributions. Accordingly, no officer or other employee of Genworth is authorized to make political contributions on behalf of Genworth or in its name or to use his or her position within Genworth to solicit political contributions for the benefit of any candidate to state or local office without the prior written permission of Genworth's General Counsel or his/her designee.

**Employee Activities:** This Policy does not apply to the private political activities of officers or other employees, each of whom, subject to applicable law, may spend their personal time and resources supporting political candidates and issues as they see fit. Employees engaging in political campaign activities are expected to do so as private citizens, and must at all times make clear that their views and actions are their own, and not those of Genworth. Employees must not use their position with Genworth to coerce or pressure any of Genworth's employees, officers, directors, agents, vendors, customers and other parties with whom Genworth has dealings in any manner to make contributions to or support or oppose any political candidates, elections, or ballot initiatives. Employees engaging in political activities must also adhere to the applicable provisions of Genworth's Code of Ethics.

**Legal Compliance:** Genworth's political contributions shall be made in compliance with all applicable laws and corresponding legal reporting requirements. To ensure compliance, all corporate political contributions shall be reviewed and approved by Genworth's General Counsel or his/her designee, and appropriate legal counsel.

**Board and Management Oversight:** Genworth's political contributions shall be reviewed retroactively by the Nominating and Corporate Governance Committee to ensure alignment with this Policy and Genworth's overall values. In addition, the Nominating and Corporate Governance Committee has authority to review and administer this Policy to ensure that Genworth's practices are in conformity with this Policy.

**Public Transparency:** Genworth supports public transparency relating to corporate political contributions and Genworth shall comply with all applicable laws and legal reporting requirements relating to corporate political contributions. In addition, and to further the goal of transparency in this area, we will post on the Genworth website ([www.genworth.com](http://www.genworth.com)) this Policy and a summary of annual direct corporate contributions, including those to state and local parties and candidates, as well as our participation in trade associations and other non-profit organizations. These disclosures will also include summary data for the Genworth PAC.

**Amendments to the Policy:** Amendments to the Policy must be approved by the Board of Directors.

If you have any questions or require further information regarding this Policy, please contact the office of the General Counsel.