GLOBE LIFE INC.

Regulation FD Policy and Guidelines

What This Policy Covers

This policy covers disclosure to the investment community by employees, directors and agents of Globe Life Inc. (the "Company") and its subsidiaries. The "investment community" includes the Company's stockholders, investors in other Company securities, any securities market professionals (such as brokers, dealers and investment advisers), investment companies, hedge funds and buy-side and sell-side analysts.

The purpose of this policy is to govern the disclosure of material, non-public information in a manner designed to provide broad, non-exclusionary distribution of information so that the public has equal access to the information. The purpose of the policy is also to ensure that the Company complies with applicable laws, including the Securities and Exchange Commission's fair disclosure rules (known as "Regulation FD") that govern the disclosure of material, non-public information to the investment community.

Material Information

Any information concerning the Company and its subsidiaries and affiliates is considered "material" if there is a substantial likelihood that a reasonable person would consider it important in determining whether to buy, sell or hold, or engage in other transactions in the Company's securities. Although not intended to be a comprehensive list, the following are examples of information that could be material depending on the scale and magnitude:

- Earnings results, estimates or projections;
- Operational results, estimates or projections, including sales results;
- Mergers, acquisitions, joint ventures, divestitures, or sales of substantial assets;
- Significant changes in operations;
- Changes in management or other key personnel;
- Changes in control of the Company;
- Dividend payments;
- Public or private sales of additional securities;
- Deterioration or improvement in credit status with rating agencies;
- Liquidity problems;
- Profits by business division or subsidiary;
- Increases or declines in business;
- Stock splits;
- Significant litigation or investigations, whether pending or threatened;
- Company share buyback programs and their implementation or cessation;
- Change in auditors and agreements/disagreements with auditors;
- Cyber incidents; and
- Issues with insurance regulatory departments.

Disclosures to the Investment Community

Disclosures of material, non-public information to the investment community must be coordinated with the Executive Vice President – Administration and Investor Relations and shall be made using one or more of the following methods:

- Issuing a press release which is distributed in a manner designed to ensure wide dissemination;
- Hosting a conference call and/or webcast that is designed to provide broad, non-exclusionary distribution of the information to the public and to which call or webcast the public has been provided adequate notice and reasonable means for accessing it;
- Filing or furnishing on a Form 8-K with the Securities and Exchange Commission (the "SEC"), or including the information in another document filed with the SEC, as determined by the General Counsel;
- Any other means, which after consultation with the General Counsel is deemed to provide broad, non-exclusionary distribution of information to the public in a manner satisfying the requirements of Regulation FD; and/or
- Any combination of the foregoing methods.

Authorized Spokespersons for Disclosures to the Investment Community

Only the following "authorized spokespersons" may communicate or discuss (whether orally or in writing) information regarding the Company with the investment community:

- Co-Chairmen and Chief Executive Officers
- Chief Financial Officer
- Executive Vice President – Administration and Investor Relations
- General Counsel

Other employees may be designated by any of the above-authorized spokespersons for a limited, specific communication only, including but not limited to an investor conference, a group meeting or a one-on-one meeting. Following the occurrence of the limited, specific communication, the employee's designation shall expire.

Additionally, the General Counsel and the Corporate Secretary, as well as employees designated by such persons, are authorized to communicate, orally or in writing, with shareholders and beneficial holders regarding shareholder accounts, corporate governance matters and other shareholder or administrative matters that do not involve the disclosure of material, non-public information.

Employees and Company representatives (other than the above authorized spokespersons) receiving any inquiries from the investment community shall not respond to such inquiries other than to refer the inquirer to the Executive Vice President – Administration and Investor Relations at 972-569-3239 or mmajors@Globe.Life. Failure to adhere to this policy may result in disciplinary action, including termination of employment.

All Company meetings with members of the investment community shall be attended by either the Executive Vice President – Administration and Investor Relations and/or the General Counsel. Exceptions to this policy may be authorized only by one of the authorized spokespersons listed above.

Disclosures to the Media

Although the Company recognizes that Regulation FD does not apply to communications with the media, it is the Company's policy to publicly disclose material information before discussion with individuals representing the media. Disclosures of material, non-public information to the media shall be consistent with disclosures to the investment community and shall be discussed only by one or more of the following:

- Co-Chairmen and Chief Executive Officers
- Chief Financial Officer
- Executive Vice President – Administration and Investor Relations
- General Counsel
- Other Company employees as specifically designated by any of the above

Disclosure of Material Non-Public Information In Advance of Public Announcement

Any disclosure of material non-public information by an authorized spokesperson, which is made in advance of the public announcement of such information, shall only be made pursuant to an appropriate confidentiality arrangement or to a person who owes a duty of trust and confidence to the Company, such as an attorney, investment banker or accountant retained by the Company.

Public Disclosures of Forward-Looking Information

The Company may from time to time provide forward-looking information to enable the investment community to better evaluate the Company and its prospects. These statements will be made only in a broadly disseminated format, in accordance with Regulation FD.

The Company will strive to identify publicly disclosed forward-looking statements about the Company as such, either orally or in writing. These statements will be accompanied by meaningful cautionary statements identifying important factors that could cause actual results to differ materially from those projected in the statement and a reference to a widely available disclosure documents (such as the Company's most recent 10-K and recent 10-Qs) that discuss these important factors.

Except to the extent imposed by law, the Company shall not undertake any obligation to update any forward looking information, and the Company will not respond, except by means of an appropriate public disclosure as provided herein, to any inquiries or rumors seeking reaffirmation of such information at any date subsequent to the date that such information was originally provided.

Financial Guidance; Preliminary Earnings Announcements

When the Company provides guidance, the guidance generally will relate to the Company's anticipated net operating earnings per share for the current fiscal year and/or the following fiscal year. The Company will usually publicly disclose this guidance on an annual basis followed by publicly disclosed quarterly updates or affirmations that generally occur in connection with the public release

of quarterly financial information. In addition, the Co-Chairmen and Chief Executive Officers and Chief Financial Officer of the Company may determine to provide guidance for a longer or shorter time frame and may determine to discontinue or suspend guidance.

It shall be the standard policy of the Company not to give intra-quarter updates on financial corporate performance; however, the Company may publicly disclose updates at other times depending on the circumstances. If the Company elects to update or clarify prior public statements, this will be done in an SEC filing or press release. For instance, should the Company determine during a quarter that net operating earnings will likely be out of the range of the current estimates (particularly if earnings will likely be below the range), the Company may consider issuing a broadly disseminated press release explaining this and the reasons why.

The Company will not comment privately on a prior public statement about guidance other than to refer to the last time guidance was publicly given.

Company Review of Draft Analysts' Reports and Financial Models

Draft analysts' reports and financial models may be reviewed and commented upon only by the authorized spokespersons for disclosures to the investment community. Company comments on these drafts will be limited to the following:

- Corrections of inaccurate historical public information;
- Deviations from information and projections the Company has publicly issued, specifying, without reaffirming, the date and/or occasion of such issuance;
- Non-material information, whether in the public domain or not; and
- Industry-related information.

It should specifically be noted that the Company has not undertaken the obligation to update any forward-looking statement that it makes or has made, and that the Company, as a matter of policy, does not "embrace," "endorse" or state that it "is comfortable with" any analyst's report and/or financial model as a result of the Company review process. Under no circumstances will the Company, through a review of an analyst's model or report, communicate material, nonpublic information.

Rumors and Stock Price Movement

The authorized spokespersons of the Company for disclosures to the investment community shall be the only Company spokespersons to comment on Company stock price movements or market rumors, including possible mergers, acquisitions or any other transaction.

So long as it is clear that the Company is not the source of a market rumor, it shall be the standard policy of the Company to respond consistently to market rumors in the following manner, "It is our policy not to comment on market rumors or speculation." If the New York Stock Exchange requests a more definitive statement, the determination to do so will be made by the General Counsel of the Company.

If a statement or projection is incorrectly attributed to Company sources, either directly or indirectly, a Company spokesperson will publicly deny Company responsibility for the information, and reaffirm that the Company has no comment on the accuracy of the statement or projection.

If a projection is correctly attributed to a Company source, or its nature makes it likely that there was a Company source, an authorized spokesperson will publicly confirm or deny the accuracy of the information provided by the source, as appropriate.

Participation in Chat Rooms

All employees of the Company and its subsidiaries shall refrain from writing, or in any other way initiating or responding to, messages in chat rooms and message boards in a manner which could be interpreted as though such employees are speaking on behalf of the Company or its subsidiaries. Failure to adhere to this policy may result in disciplinary action, including termination of employment. Persons viewing chat room information that they believe to be false or misleading should bring that information to the attention of the General Counsel of the Company, who will determine what action, if any, to take.

Inadvertent Disclosure of Material Non-Public Information

If an employee of the Company or one of its subsidiaries believes that there may have been an accidental or unintentional disclosure of material non-public information, the employee must immediately notify the Chief Financial Officer, the Executive Vice President – Administration and Investor Relations or the General Counsel of this incident. The Company will then determine whether to promptly file a Form 8-K and/or issue a press release to fully disclose this information in accordance with Regulation FD.

Disclosure of this Policy

The Company will post this policy on the Company's web site (https://investors.globelifeinsurance.com) for reference by the investment community and the general public.

Questions

All questions relating to this policy should be addressed to the General Counsel.