

UFCW-GIANT VARIABLE ANNUITY FUND

TRUSTEE CONFLICT OF INTEREST AND WHISTLEBLOWER POLICY

1. Conflict of Interest Policy

The conflict of interest policy with respect to the members of the Board of Trustees of the UFCW-Giant Variable Annuity Fund (“Fund”) is the fiduciary standards, including the prohibited transactions provisions, of the Employee Retirement Income Security Act of 1974, as amended (“ERISA”).

2. Whistleblower Policy

The Trustees of the Fund are subject to the fiduciary standards of ERISA with respect to their own actions and/or inactions and those of their co-fiduciaries, and ERISA constitutes the Fund’s whistleblower policy with respect to the Trustees.

IN WITNESS WHEREOF, the undersigned have hereunto set forth their hands and seals as of the date written below.

UFCW-GIANT VARIABLE ANNUITY FUND

Date

Union Trustee

Date

Employer Trustee