



# ENTERPRISE CODE OF CONDUCT & BUSINESS ETHICS



## A MESSAGE FROM LEADERSHIP

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Dear Colleague:

People often ask us what makes our Enterprise, the American Family Insurance Mutual Holding Company, so special. That's easy. It's you, our people – dedicated, innovative and customer-focused. You not only care about what you do, but also how you do it . . . with integrity.

In simple terms, integrity means avoiding conflicts of interest, following local, state and federal laws, and living by the values our Enterprise and companies have established.

But integrity goes far beyond just knowing and complying with the rules. It's about doing the right thing even when no one is watching – or there's no specific rule about it. It's about not cutting ethical corners or taking shortcuts. And, it requires identifying and acting on problems, not ignoring them.

Take the time to review our Enterprise Code of Conduct and Business Ethics. It applies to all companies that are part of the American Family Insurance Mutual Holding Company. (See the listing on page 2.)

Our Enterprise has grown and diversified significantly in recent years. We've welcomed new companies, including several not directly involved in insurance but that contribute to our success in other valuable and differentiating ways. Together, we all share an uncompromising commitment to integrity and ethical behavior.

This Code provides direction and examples to address the most common ethical issues you may face during your work. But we also know our world is constantly changing – and with those changes may arise new ethical challenges not addressed in the Code. If you face one of those situations or suspect ethical misconduct, speak up. Inform your manager or contact the appropriate resource for your company, listed on page 17.

You can also report suspected ethical misconduct to our Enterprise EthicsLine at 1-877-772-6326. The EthicsLine is operated by a third party. You can also report information to the EthicsLine anonymously if you'd like.

As individuals and as an Enterprise, we can't take exemplary behavior for granted. That starts with reading and understanding this Code. It continues with remaining vigilant by acting ethically and reporting situations when that may not be the case.

Thank you for making our Enterprise special, and for living our commitment to ethics and integrity every day.



**JACK SALZWEDEL**  
Chair and Chief Executive Officer



**BILL WESTRATE**  
Enterprise President and CEO Elect

## AMERICAN FAMILY INSURANCE FAMILY OF COMPANIES



Founding: 1927  
Headquarters: Madison, Wisconsin

American Family Insurance inspires, protects and restores dreams by providing exceptional multi-line products and service. Our exclusive agents sell American Family-brand products and serve as trusted advisers for customers in 19 states. We meet needs of customers who want to purchase insurance through other channels with products offered by our American Family Connect platform.



Founding: 1963  
Headquarters: Nashville, Tennessee

Permanent General Companies, Inc. (PGC), operating under The General® brand, offers a range of products designed to meet the unique needs of the non-standard auto insurance customer. We write business through multiple distribution channels in 47 states with a vision of “making life easier” for our customers.

**Homesite** Founding: 1997  
Headquarters: Boston, Massachusetts

Homesite was one of the first companies to enable customers to purchase home insurance online, during a single visit. And, we continue to innovate and grow to meet needs of consumers, partners and employees. Today, Homesite offers insurance coverage for home, renters, condo, small business, term life, and flood.



Founding: 1923  
Headquarters: Jacksonville, Florida

Main Street America Insurance offers a wide range of commercial and personal insurance, as well as fidelity and surety bond products, to individuals, families and businesses throughout the United States. Through eight carriers, we offer our products exclusively through independent agents who find policyholders the best combination of coverage, price and service.



Founding: 1986  
Headquarters: DePere, Wisconsin

CONNECT, Powered by American Family Insurance is a property-casualty insurance company acquired in 2019. CONNECT sells its products primarily through partners, including wholesale retailer Costco.



Founding: 2001  
Headquarters: Asheville, North Carolina

HomeGauge is a leading provider of inspection software and business services primarily for the home inspection industry. The home inspection is a crucial touchpoint with home buyers on their journey to homeownership and HomeGauge aims to provide the best experience for home buyers as they interact with their reports.



Founding: 2017  
Headquarters: Chicago, Illinois

Moonrise is an on-demand jobs platform that connects hard-working, motivated, and qualified people in search of extra income with reputable employers in need of filling short-term shifts. We're here to help people fulfill the dream of financial stability.



Founding: 2019  
Headquarters: Madison, WI

A wholly owned subsidiary, Opterrix is an enterprise software platform designed to simplify and automate several key workflows throughout the insurance value chain. Opterrix is currently used within the enterprise by ERM, Claims, Sales, and Marketing.



Founding: 2021  
Headquarters: Madison, WI

AFICS Enterprise Claims Services brought together all claims employee and operations from American Family Insurance, Homesite, Main Street America and CONNECT, along with some members of The General's claims organization. This new company will deliver industry-leading, customer-driven claims experiences to customers.



Founding: 2016  
Headquarters: Columbus, Ohio

Bold Penguin is a technology company providing a digital exchange used by insurance agents, brokers and other distributors to match, quote and bind policies from a range of business insurers to meet the insurance needs of small business customers.

# INTRODUCTION

The Enterprise Code of Conduct and Business Ethics guides our daily business activities to ensure we operate within ethical and legal standards. It is also important to remember that, along with the Code, each company has policies and is subject to laws and regulations that ensure we make sound workplace decisions. It is important to stay current with company policies and applicable laws and regulations as they may change periodically.

## DEFINITIONS

- Code:** Refers to the Enterprise Code of Conduct & Business Ethics.
- Colleagues:** Refers to all employees, as well as, all associates, contingent workers, and any other temporary workers. This excludes all agents and agency staff.
- Company:** Refers to the entity with whom you are employed or provide services for unless otherwise indicated.
- Wholly owned subsidiary:** Refers to a Company whose common stock is 100% owned by another company, the parent company.

## RESOURCES

Each company has resources to help you with your Code questions. The appropriate resource for your company can be found on Page 17 of the Code.

## WHO THE CODE APPLIES TO

This Code applies to American Family Insurance Mutual Holding Company and its direct or indirect operating companies and affiliates (the "Enterprise") and the Board of Directors, officers, and employees of such entities. The Code also applies to contingent workers and interns while performing services on behalf of the Enterprise.



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## INTEGRITY: THE CODE'S FOUNDATION

If you've ever built a house or any other permanent structure, you know the importance of starting with a solid foundation. The Enterprise Code of Conduct and Business Ethics is no different. Our Code's foundation is integrity, which consists of honesty and truthfulness. Integrity is important in every decision, every action, every day.

Integrity is expected and required at every level throughout the Enterprise – in all dealings with customers, other colleagues, agents and their staff, contingent suppliers, and partners; in the accuracy of our advertising; in the recording of our business transactions; and in the quality of our products and performance of our service.

Enterprise business is conducted by following laws and regulations and the highest ethical standards.

### THE BASIC BLUEPRINT

The Enterprise commitment to ethics is demonstrated by our vision and values.

Ethical, compliant behavior should not be compromised in the pursuit of business objectives. You should role model good ethical behavior. You are expected to:

- Conduct yourself ethically
- Perform your duties with honesty and integrity
- Treat others with respect

- Not retaliate against others
- Promote diversity and inclusion
- Promptly report any improper discriminatory behavior, sexual harassment, illegal activities, or other violations of this Code, laws, or regulations
- Exercise independent judgment free from any improper outside influence
- Maintain the confidentiality of customer, company, and colleague information
- Fully cooperate in any company investigation
- Comply with all applicable federal, state and local laws and regulations
- Complete all mandatory training
- Follow this Code's standards
- Promote trust and collaboration
- Create a culture which inspires the highest standards of ethics and compliance
- Provide information to ensure all colleagues remain compliant with company policies, laws, and regulations
- Take appropriate action when a violation of this Code, law, or regulation is brought to your attention

Violations of this Code may result in disciplinary action up to and including termination.

## OUR VALUES

### ACCOUNTABLE OWNERSHIP, URGENCY, EXCELLENCE

We are all leaders of a high performing business delivering unparalleled customer solutions

### CARING RESPECTFUL, EMPATHETIC, COLLABORATIVE

We embrace the power of teamwork and our partnerships across the enterprise and our communities

### COURAGEOUS AGILE, RESILIENT, DRIVEN

We are focused and passionate in driving the actions that will move our business forward

### INCLUSIVE ADVOCATE, ACCEPT, BELONG

We encourage and embrace the power of diverse ideas formed through unique experiences and backgrounds

### INNOVATIVE ENTREPRENEURIAL, RISK TAKING, EMPOWERED

We proactively seek to transform our business in new and meaningful ways

### TRUSTWORTHY TRANSPARENT, AUTHENTIC, ETHICAL

We operate with integrity in all that we do

## ISSUES BEYOND THE CODE

The Code cannot possibly cover all circumstances you may encounter in your role. If you are faced with a situation not addressed by the Code, consider the following questions and seek help from others:

- Do I have all the facts?
- Am I confident that I have reviewed all applicable policies and other available resources?
- Should I discuss the situation with leadership?
- Would I feel comfortable reading about my actions in the newspaper?

If you are still unsure what to do, seek guidance from a resource at your company.

## NO RETALIATION

The Enterprise does not tolerate retaliation against anyone who reports in good faith a suspected or actual violation of law, regulation, or the Code.

The Enterprise treats claims of retaliation seriously, and will take reasonable and appropriate steps to address allegations of retaliation. If you suspect that you or someone you know has been retaliated against for raising an issue, you can immediately contact the EthicsLine or a resource at your company. By raising concerns, you help to protect yourself, colleagues, and the Enterprise.

## REPORTING AND INVESTIGATIONS

If you suspect ethical misconduct, violations of our Code, or violations of any law or regulation, you should report the incident to a resource at your company. Reports may also be made confidentially to the EthicsLine, an independent third-party resource. This resource helps guide you to make our workplace safe, secure, and ethical. This third-party resource is available 24 hours a day, seven days a week. The EthicsLine is available:

- Via phone at 1-877-772-6326
- **Via an online submission form**

When you report the incident to the EthicsLine, the following process will take place:

- The highly trained employees of the independent third-party resource, Navex Global, will ask you a series of questions and obtain all pertinent information from you. Your concerns will be taken seriously.

- You can report anonymously, without providing your name. We urge you to provide as much information as possible even if you are not sure if there is an issue. You will be given a unique code number called a “report key” and a follow-up date to check the status of the report.
- The information gathered will be forwarded to the appropriate area for handling at your company.
- A reasonable and thorough investigation will occur. A typical investigation takes 30-45 days to complete. (There may be instances where there is not enough information to complete an investigation.)
- During the investigation, it is important to check back, using your report key, on the status of the investigation as you may be asked for additional details or clarification of information provided.
- Appropriate action will be taken. Due to privacy reasons, details about the investigation including any actions taken are kept strictly confidential and cannot be shared, even with the individual reporting the concern.

You will not be retaliated against for contacting the EthicsLine. When in doubt, speak up! If you have good faith basis to believe that a violation of the law, regulation, policy, procedure, or the Code has occurred, you should not remain silent.

### Q: What is the Ethics Line?

**A:** The EthicsLine is a simple way to report any incidents, and is also a source for seeking guidance on incidents. It's a resource to help keep our workplace a safe, secure and ethical environment. When you report, you may be anonymous. Take action if you have witnessed, have information or believe in good faith the enterprise, a colleague, agent, agency staff, business partner, vendor or other related person has committed one of the following:

- A crime
- A violation of the Code, law, regulation or any other policy
- Unethical or inappropriate business conduct

Report this information to the Ethics Line at 1-877-772-6326 or a resource at your company.



## BUSINESS PRACTICES

### RECORDS MANAGEMENT

You must record business transactions in a timely manner and report them accurately. These transactions include virtually all activities pertaining to our business.

By following records management principles and applicable policies, you retain only business records that are required, and properly dispose of records and non-records that no longer meet any compliance or business requirements and are not subject to pending legal litigation hold requirements.

### USE OF ENTERPRISE RESOURCES

The Enterprise relies on you to use Enterprise resources honestly and efficiently. Resources include physical property, such as facilities, equipment, supplies, documents, and company funds. They also include intangible assets, such as company time, confidential information, intellectual property, and information systems. You should protect them from theft, loss, damage, or misuse.

Illegal and/or unauthorized downloading, uploading, copying or distribution of Enterprise-owned information, copyrighted, or trademarked materials using Enterprise resources is not allowed.

### ELECTRONIC RESOURCES

You should apply common sense and good judgement when using Enterprise electronic resources. The term Enterprise electronic resources

**Q:** I've started my own business and do a lot of my business over the Internet. I've been using my company computer to update the website for my personal business, but only on my lunch break and after work. Is this OK?

**A:** This is not OK. Using Enterprise electronic resources for outside business interests is not acceptable. You should review the Use of Enterprise Resources section to better understand your responsibilities with Enterprise electronic resources.

includes, but is not limited to, information systems, applications, programs, computer equipment (desktop, laptop, tablet, or smart phone), Enterprise-owned voicemail systems, and the Enterprise networks. This policy applies to all access to Enterprise electronic resources.

Electronic communication such as email, instant messaging, texting, and interactive social media applications are used daily to create official company records. These electronic communication tools are useful business tools when they are used legally, wisely, responsibly, and in a professional and respectful manner.

Your use of Enterprise electronic resources may be monitored. Attempting to circumvent any established security controls is prohibited. Accessing, distributing, or storing inappropriate information on Enterprise electronic resources is not allowed.

The term "inappropriate information" refers to any text, images, audio, video, or other material that could be considered discriminatory, harassing, or offensive. Examples include, but are not limited to:

- Pornography or sexually explicit material
- Racist material
- Violent material
- Electronic chain letters
- E-mail hoaxes

Personal use of Enterprise electronic resources is allowed, but limited to incidental use and should not interfere with your productivity or work performance. You may not conduct outside business activities using Enterprise resources. You may not access auction websites (including eBay, unless you have a business reason to do so) or gambling websites using Enterprise electronic resources. Further, do not use Enterprise electronic resources to access or make changes to your personal information, such as billing records, underwriting information, and claim files, via any channel not available to our customers.

If you are aware of any resources being misused, speak up and report it to a resource at your company or to the EthicsLine at 1-877-772-6326.

## CONFIDENTIAL INFORMATION

We define confidential information as any non-public information pertaining to your company and all companies within the Enterprise. Non-public information is defined as information that is not readily accessible by those without a need to know, and if disclosed, may be detrimental to the Enterprise, our customers, colleagues and/or business partners.

You are responsible for protecting the confidential and proprietary nature of Enterprise information and information concerning customers, colleagues, agents and their staff, suppliers, partners, and other individuals and entities in our business dealings. Confidential information may not be accessed or used for personal purposes. It may not be disclosed outside the Enterprise unless the disclosure has been properly authorized or is required by law or regulation. Should you leave the company, your responsibility continues to keep non-public information confidential and you must return any such information that you possess.

Pursuant to the 2016 Defend Trade Secrets Act, you may not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that is made (a) in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney if such disclosure is made solely for the purpose of reporting or investigating a suspected violation of law or for pursuing an

anti-retaliation lawsuit; or (b) in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal and you do not disclose the trade secret except pursuant to a court order.



### Examples of confidential information include but are not limited to:

- Customer information
- Supplier contracts
- Financial records
- Pricing materials
- Product or marketing plans
- Product designs
- Personnel files
- Systems and trade secrets



## PERSONAL INFORMATION

Privacy laws require all of us to protect the security and confidentiality of personal information. Personal information broadly refers to any information that identifies or relates to an identifiable person. If you have access to this type of information or the systems that maintain it, you must comply with all applicable policies and laws regarding the handling of such information.

A type of personal information is customer information and may include name, Social Security number, address, policy and account information, medical information, and status as a customer. Only authorized individuals who need to know a customer's personal information may access and use it.

In some instances, customer information may need to be shared between operating companies of the Enterprise (i.e.: American Family, The General, Homesite, Networked Insights, HomeGauge, Moonrise, Main Street America). It is necessary to consider any privacy policies, the Fair Credit Reporting Act, privacy notices under the Gramm-Leach Bliley Act, and state privacy laws. If you have questions concerning whether or not you can share customer information, please contact a resource at your company.

With regard to personal information, we abide by the following principles:

- Request and retain only information that is required for business or legal purposes.
- Protect the confidentiality of all personal information within appropriate records.
- You have the right to correct inaccuracies or disagree in writing regarding your personal information located in company records.
- Access to personal information will be strictly limited to individuals with a clear business need to know.
- We will not release information to outside sources without an employee's written approval unless required by law or allowed by a permissible purpose.
- All requests for employment verification for current or former colleagues, including requests for personal and character references, must be forwarded to the appropriate resource at your company.

**Q:** I received a call from an individual working in human resources for another company. She is working on a research project for her company and asked for my staff hire dates, titles, and base salaries. What should I do?

**A:** You should not provide the information to the individual. Information about our employees is confidential and should only be given to those who are authorized to have the information. Instead, refer her to the appropriate resource at your company.

**Q:** A good friend experienced an insurance loss with one of our insurance companies. I do not work in claims but he wants me to see if I can find out anything about his claim from the company computer records and let him know if he's getting a fair deal. I know we're supposed to focus on good customer service, but is it all right for me to do this?

**A:** No it is not all right. You should not review nor disclose information from his claim file. While the customer's interests are important, company policy states only authorized individuals who need to know customer information may access and use it. Customer information may not be accessed or used for personal reasons.

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## WORKING ENVIRONMENT

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### DIVERSITY AND INCLUSION

The Enterprise is dedicated to promoting a culture that is welcoming, diverse, and inclusive. We believe that a strong diversity and inclusion strategy will connect us with our customers, make us more attractive to top talent, and produce higher performing teams that reflect the communities we serve.

Our commitment to diversity and inclusion positively affects our company. By valuing our differences we build deeper relationships with each other, our customers, and our communities. Inclusion of diverse talent helps drive innovation and results.

### EQUAL EMPLOYMENT OPPORTUNITY, NON-DISCRIMINATION AND NON-HARASSMENT

Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including sexual misconduct and harassment.

Sexual misconduct is any unwelcome sexually-related behavior, including but not limited to, requests for sexual favors and other inappropriate verbal or physical conduct of a sexual nature, from the viewpoint of reasonable persons.

Harassment is verbal or physical conduct that degrades or shows hostility or aversion toward an individual because of their race, color, religion, sex, sexual orientation, gender identity or expression, pregnancy, national origin, age, disability, genetic information, veteran status, or other protected characteristics as established by applicable federal and state laws. Harassing conduct includes, but is not limited to:

epithets, slurs, or negative stereotyping; threatening, intimidating, or hostile acts; degrading jokes and displays or circulations in the workplace of written or graphic material (including through email) that degrades or shows hostility or aversion toward an individual or group.

### WORKPLACE SAFETY

The Enterprise is committed to providing a healthy, safe, and clean work environment. You play an important role in helping us meet that commitment by following workplace rules and using good judgment to avoid inappropriate risks. In addition, you're expected to look out for the safety of others and to report any injuries, incidents, unsafe practices or conditions, or threatening or dangerous behaviors that pose a risk to the health or safety of yourself or others in the workplace.

As part of maintaining a productive and safe work environment, you must never engage in or tolerate any form of violence. This includes any threats, intimidation or acts of violence, whether physical, verbal, written, or electronic in delivery. If you know of a situation in which workplace violence has happened or has been threatened or insinuated, you should immediately report your concerns to a resource at your company.

**Q:** Earlier in the year, I took a beach vacation and my boss made a comment that I'd fit right in because I have a "great beach body." I told him that even though he may have meant it as a compliment, the comment made me uncomfortable. He continues to make comments about my physique that make me uncomfortable. Should I continue to put up with this?

**A:** No, unwelcome sexually related comments can constitute sexual harassment. You are encouraged to report this information to the EthicsLine 877-772-6326 or a resource at your company.

## OUTSIDE INTERESTS

### CONFLICT OF INTEREST

You must exercise good judgment and make good decisions, avoiding activities and personal interests that create an actual or perceived conflict between your personal or separate business interests and the interests of the company.

If an actual conflict of interest is found to exist, it will be considered a violation of this Code and you may be asked to end the activity causing the conflict and/or the company may take appropriate action regarding your employment. Therefore, use common sense and good judgment in determining whether a conflict exists and taking action. When in doubt, contact an appropriate resource at your company. Additionally, note your involvement.

The term “relative” used in this section includes a spouse, parent or step-parent, child or stepchild, sibling or step-sibling, grandparent or step-grandparent, grandchild or step-grandchild, uncle or aunt, nephew or niece, in-law, domestic partner, or legal guardian.

### PERSONAL RELATIONSHIPS/CONDUCTING BUSINESS

Relationships may create a conflict or the appearance of a conflict of interest. You, your relatives, and/or close personal friends should not receive any improper benefit from your position with the company. Therefore, do not participate in or influence business transactions involving relatives or close personal friends. Additionally, remove yourself from decisions about current or prospective business transactions that may involve your relatives and close personal friends. This guideline is not intended to prevent the company from transacting business with your relative or close personal friend as long as the transaction is handled by a disinterested third party.

You may not receive any kind of payment, other than your normal salary, company-issued bonus, referral bonus or gift card, on any business transaction. (This does not include products provided to you by the company for the purpose of research and development.)

### HIRING

We ensure that our hiring practices are fair. Therefore, you should not participate in selecting or hiring of job candidates who are relatives or close personal friends. Referring a friend or relative for a position of employment is acceptable and is not considered a conflict of interest.

### REPORTING RELATIONSHIP

It is not appropriate to manage a relative or close personal friend. If your reporting relationship changes and involves a relative or close personal friend, you must disclose this relationship to your manager.

### INVESTMENTS

The Enterprise respects the right of its employees to manage personal investments. However, to ensure your investments and those of your relatives do not create a conflict of interest, you should not have a substantial personal interest in companies that do business or compete with your employer company or the Enterprise as a whole. Substantial personal interest is defined as owning at least 5 percent interest in the stock of the company or a wholly owned subsidiary, as previously defined, of such company. Regardless of your level of personal interest in companies competing or doing business with your company, you are still required to comply with all paragraphs under this Conflict of Interest section.

### OUTSIDE EMPLOYMENT AND ACTIVITIES

We value and encourage activities outside of work, but you should be mindful of outside activities that interfere with your work at your company. Therefore, you should ensure that your outside employment, personal businesses or volunteer work outside of the company do not conflict with the company’s best interest.

#### Conflict of Interest Checklist

If you’re concerned that you might have or appear to have a conflict of interest, ask yourself these questions before taking action:

- Will I feel obligated or make someone else feel obligated to do something?
- Am I failing to honor our core values?
- Is this an action that will benefit me but not the Enterprise?
- Is there any chance my judgment might be compromised?
- Is there any way it could give the appearance of a conflict of interest in the eyes of others?

If you answer yes to any of these questions or aren’t sure how to answer any of them, contact the appropriate company resource.

## ENDORSEMENT/TESTIMONIALS

No employee of the Enterprise shall issue any testimonials, endorsements or statements of satisfaction regarding any outside supplier of products or services. This includes private and public communications. Exceptions are limited to: (1) suppliers the Enterprise invests in through American Family Ventures and nonprofit charities we partner with or support; and (2), marketing practices connected to organizations with which American Family has an affinity or partnership relationship that benefits American Family as well as those organizations, where the protocol for such endorsements is set out in the affinity/partnership agreements between those entities.

Outside suppliers are allowed to make statements – including on their websites, at conferences, in news releases and in marketing materials – that the enterprise operating company using their products or services is a customer. Use of the operating company logo is also permitted, subject to the company’s logo-use standards, which should include obtaining written consent. However, those statements shall not include any comment from an operating company regarding its satisfaction with or usefulness of the product or service.

All supplier contracts must be reviewed before execution to ensure those contracts do not require the Enterprise or any operating company to issue a testimonial or endorsement-like statements. Any questions regarding these policies should be directed to American Family Media Relations ([mediarelations@amfam.com](mailto:mediarelations@amfam.com)).

## GIFTS, MEALS AND ENTERTAINMENT

In the course of performing your job, you may be offered gifts from third parties (potential or existing suppliers, service providers, customers, partners, claimants, agents or their staff) who have or hope to have business dealings with the company. You may also be offered meals and entertainment from those third parties. Accepting these items can cause conflicts of interest where your personal interests or feelings may conflict with the company’s best interests. You should also not put third parties in these situations. Refrain from giving these items to third parties to avoid putting them in a potential conflict of interest situation.

## GIFTS

During the course of a calendar year, you may not accept or give gifts having a total value of more than \$100 from or to any one third party. “Gifts” includes anything of value, whether goods or services, including prizes from drawings and raffles. “Gifts” also include meals or tickets to events when the third party does not attend with you. **It is never acceptable to receive or give cash equivalent (such as a prepaid debit card or gift cards) from or to a third party.**

If you receive a gift or gifts in excess of the \$100 limit, notify your manager and politely return the gift(s) with an explanation of our policy. If a gift is perishable and/or it is impractical to return, it may be accepted and donated to a charity. Perishable gifts not donated to charity should be shared with all persons in your department.

Occasionally, a gift that exceeds the \$100 limit may be accepted in certain situations. For example, gifts might be offered by a business partner to commemorate a special event or milestone. If declining a gift could cause undue embarrassment and/or damage a business relationship, it may be reasonable, under the circumstances, to receive the gift on behalf of the Company. The recipient should consider donating the monetary value of the gift to a charitable organization. In any event, it should be reported to Corporate Compliance via **eform** or disclosed on the annual conflict of interest disclosure statement. In other instances, the Company itself may receive a gift, the value of which may be difficult to ascertain. In such cases, it is not required to quantify the value of the gift as the potential for a conflict of interest has been eliminated.

## EXHIBIT A

Examples of Business Gifts <small>(subject to \$100 limit)*</small>	
Generally Acceptable	Generally Not Acceptable
Logo mugs, T-shirts, pens, calendars	Jewelry
Flowers or gift baskets to be shared with other colleagues	\$200 bottle of wine
Chargers, USB cords	iPads, cameras, smart phones, televisions

\* For illustrative purposes only. Refer to guidelines above.



## MEALS AND ENTERTAINMENT

“Meals” include both food and beverages. “Entertainment” includes but is not limited to sporting events, cultural events, concerts, golf outings, conferences, and seminars. You may accept a meal or entertainment from a third party, so long as:

- It is approved by your manager
- The cost is reasonable
- There is a legitimate business purpose, and
- The third party accompanies you

If the third party is not present, the item is a gift and you should refer to the gift section of the Code to determine if accepting the meal or entertainment is appropriate. Travel and lodging expenses associated with meals or entertainment should always be paid by the company.

## CONSIDERATIONS

The following considerations apply to gifts, meals, and entertainment:

- The term “reasonable” can vary depending on the circumstances, but in all cases should not lead to a material possibility of creating a conflict of interest.
- These rules do not apply to registration fees for continuing education courses and conferences having a legitimate business purposes. However, you are required to obtain your manager’s approval before attending.
- These rules do not apply to gifts, meals, or entertainment that a trade association offers for services you provide to the association, so long as the cost is reasonable.
- You are responsible for using good judgment to ensure that receipt of a gift, meal, or entertainment is proper and could not be viewed as an attempt to receive favorable treatment or obligate you or the company in any way. To judge whether it is appropriate to accept a gift, meal, or entertainment, ask yourself whether the item is appropriate and reasonable, and how it would appear to others if you accepted it.
- Do not accept any gift, meal, or entertainment during contract negotiations if you are in a position to influence supplier selection or contract negotiations.
- Do not accept personal favors from third parties.
- All gifts, meals, and entertainment received that are in excess of the

guidelines are required to be reported on the annual conflict of interest disclosure form.

**Q:** A supplier wants to take me to a basketball game. Can I accept the invitation?

**A:** If the supplier gives you the tickets, and does not attend the game with you, the tickets are a gift and are subject to the \$100 limit. If the value of the tickets is over \$100, notify your manager and politely return the tickets to the supplier with an explanation of company’s policy.

If the supplier accompanies you to the event, this is entertainment and is subject to a reasonableness standard. Obtain your manager’s pre-approval, which includes a discussion about whether there is a legitimate business purpose in attending the game with the supplier. Always consider whether your attendance at the event would influence or appear to influence a decision you make about the supplier. Also, consider whether it has a business purpose, how it might appear to others, and whether attendance benefits the company. Do not accept the tickets during contract negotiations with the supplier if you are in a position to influence supplier selection or contract negotiations.



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In evaluating any conflict of interest question, including the receipt of gifts, meals, or entertainment, consider the impact on your ability to exercise good judgment to act in the company's best interest.

### **POLITICAL ACTIVITIES**

You are encouraged to participate in the democratic process as private citizens by voting and staying informed on pending public policy issues. You may personally volunteer in political activities and contribute personal resources to candidates and political parties, but your personal participation in political activities must not interfere with your productivity or work performance. It is not permissible to use company resources to advance your own personal political activities. Further, your personal political activities should not in any way suggest that the company is involved with or supportive of a candidate or issue. However, you may participate in your company's political action and grassroots programs.

Federal law prohibits the company and individuals from providing providing any item of monetary value to members of Congress and their employees. Many states have similar laws. You should not provide any gifts, entertainment, in-kind contributions (such as your time, office supplies, or use of office space), or travel to any government official without first discussing with a resource at your company.

**Q:** My friend is running for political office and I would like to help with the campaign. Is this allowed?

**A:** Yes. Your personal political activity is your business. Just make sure that you do not use company resources, including company time, email, or company's name, to advance the campaign.



## OTHER LAWS AND REGULATIONS

### FEDERAL/STATE LAWS AND REGULATIONS

Our businesses are subject to many laws, rules, and regulations imposed by state, federal, and local authorities. Below we will go into some laws, rules, and regulations in further detail, but it your responsibility to understand the legal and regulatory environment which affects your job. It is our policy to strictly comply with each and every law, rule or regulation governing our businesses. Some of the laws which affect us every day are those relating to the environment, safety and health, wages and hours, immigration, antitrust, regulatory compliance, sexual harassment, equal employment opportunity, corporate and accounting practices, and the various operating and reporting requirements which specifically affect our businesses.

### INSIDER TRADING

It is illegal for you to use “inside information” to purchase or sell securities. Insider trading occurs when you know material non-public information about the Enterprise or any other company with whom we have a business relationship, any other company, and you you trade such companies securities, such as stocks or bonds, while in possession of that information, or tell others about it before it is made public. This applies no matter where you live or where the receiver of the information lives.

Information gained through your employment or business dealings with the company may not be used to trade (buy or sell) in the securities of any company.

Inside information is defined as material, non-public information that an individual learns through their business dealings or relationship with a company. If the information would motivate an investor to buy or sell, such information is considered material.

Material non-public information is information that would affect a reasonable investor’s decision on whether or not to invest in a company’s securities. Examples of material non-public information include, but are not limited to:

- IPO or other public offering plans
- Plans to issue additional securities
- Sharp changes in earnings patterns
- Changes in key management personnel

- Joint ventures
- Anticipated partnerships
- Product launches
- Mergers and acquisitions
- Important regulatory actions

Insider trading can result in an investigation by stock exchanges or by governmental authorities. Such an investigation could result in liabilities or penalties, including criminal charges and fines against both you and one of our companies.





## ANTI-TRUST

Federal and state anti-trust laws prohibit agreements and activities that unfairly restrain trade or reduce competition. Prohibited activities generally include price fixing; boycotting specific suppliers or customers; allocating or dividing products, territories, or markets; and restricting the availability of products.

A number of topics are inappropriate to discuss with competitors. Anti-trust implications are possible when attending meetings (including trade association meetings) or participating in discussions with competitors or representatives of competitors. If you are in a meeting with competitors where any of the following topics arise, you should leave the meeting and report the incident to the appropriate resource at your company:

- Pricing information, rating methodologies, underwriting criteria, limits, deductibles, and other features of products or services
- Allocation or division of products, services, markets, or customers
- Limitations or restrictions on products or services that may be offered
- Limitations or restrictions on the ability of competitors to do business with any person, entity, or group

- Marketing plans or strategies

- Internal or external costs associated with supplier products or services

## BRIBERY AND CORRUPTION

We operate with the highest degree of ethics and integrity. And as our Enterprise expands into new business areas and into new locations, we want expectations to be clear that bribery and corruption have no place in our business operations. Therefore, we should ensure we conduct our business in a fair, ethical and legal manner free from corruption and bribery anywhere we do business. Bribery and/or corruption occurs when someone offers, accepts or pays another person a payment, gift, favor, kickback, or a financial or other advantage that could improperly influence a business decision. Bribes of any kind are illegal, unethical, violate this Code, and are not tolerated.

Use common sense and good judgment as your guide to prevent bribery and corruption. If you are uncertain whether an action constitutes a bribe or is corrupt, contact a resource at your company.





## TERRORISM AND MONEY LAUNDERING

The Office of Foreign Assets Control (OFAC) of the U.S. Department of the Treasury administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals against targeted foreign countries, regimes, terrorists, international drug traffickers, individuals involved in proliferation of weapons of mass destruction, and all other threats to national security, foreign policy, or the U.S. economy.

To comply with OFAC regulations, we are required to check names and businesses with whom we do business (insureds, claimants, suppliers, etc.) against government databases of “specially designated nationals” (SDN). Reasons for being in the OFAC database include links to terrorism, money laundering, drug trafficking, hostile enemy countries, and leaders of blocked countries. The Enterprise is not to do business with people or businesses that appear on the SDN list. We have a system in place that automatically checks customer, supplier, and claimant names against the SDN list on a daily basis. The system will automatically notify a company of any possible match. Departments within each company determine if the individual or entity is an exact match against the SDN list and will notify you on next steps.

You are required to inform the appropriate resource at your company if you suspect money laundering related to company products. Money laundering is the act of converting money gained from an illegal source into money that appears legitimate so that its illegal source cannot be traced.

## DISCLOSURE OF A FELONY CONVICTION

The Violent Crime Control and Law Enforcement Act includes provisions regarding insurance fraud. Under the act, insurers may not permit any person who has been convicted of a criminal felony involving dishonesty or a breach of trust to work in their industry without express written permission. Violations can subject the company and the individual to criminal and/or civil liability.

**Q:** What is an example of money laundering?

**A:** An individual may purchase a large life insurance policy with money they received illegally (sale of drugs, stolen property, etc.). They will pay cash for the first premium payment. Then, within a few days they decide to use their rights under the “free look” provision, and ask for a refund. The cash received from the illegal activity is now “clean,” in the form of a refund check from one of our companies.



To comply with the Act, we have implemented a program in which current and prospective employees and other covered persons are asked to certify in writing whether they have been convicted of a felony. If you are appointed or employed by, or provide services for our insurance companies, you must immediately inform the appropriate resource at your company if you have any past or current felony convictions.

## RESOURCES

The Enterprise Code of Conduct and Business Ethics requires us to act with integrity and in ways that maintain our reputation for honesty and fair dealing. If you are unsure of what to do, seek clarification and guidance before you act. Doing the right thing requires understanding this Code and the ethical implications of your choices. It can sometimes be challenging, but ethical behavior pays off. Take a stand when you see a problem, and when in doubt, ask for help. For each of us, ethics and compliance are calls to action.

An [online training module](#) exists to assist you in understanding the Code. Employees are required to complete the module annually. If you have not already completed this module or would like a refresher, you can do so by accessing the module through your company's learning system.

To report misconduct and for more resources specific to your company within the Enterprise see below:

### AMERICAN FAMILY RESOURCES

- Talk with your division's **Compliance & Ethics Champion**.
- Contact **Ask HR** at askhr@amfam.com or ext. 33123, or contact **Corporate Compliance** at corporatecompliance@amfam.com.
- The Code will be maintained online on the **Compliance Department's intranet site**.
- There are also a number of Enterprise resources on **Compass** that are available to assist you.
- Call the EthicsLine 24 hours a day, seven days a week at 1-877-772-6326.

### THE GENERAL (PGC) RESOURCES

- If you feel you need additional information or training regarding the Code of Conduct, please reach out to your manager or human resources consultant.
- The Code of Conduct and Employee Handbook are maintained and available to all employees on **thegeneral.net**.
- You should contact the Human Resources department with any questions or concerns as they arise.
- Call the EthicsLine 24 hours a day, seven days a week at 1-877-772-6326.

### HOMESITE RESOURCES

- If you feel you need additional information regarding the Code of Conduct, please reach out to your manager or **Human Resources Business Partner**.
- The Code of Conduct, Employee Handbook, and other relevant company policies can be found on the **Human Resources Sharepoint**.
- You should contact **Human Resources** or the **Legal Department** with any questions or concerns as they arise.
- Call the EthicsLine 24 hours a day, seven days a week at 1-877-772-6326.

### MAIN STREET AMERICA RESOURCES

- If you feel you need additional information regarding the Code of Conduct, please reach out to your manager or your human resources consultant. You may also contact **AskHR at AskHR@AmFam.com, Live Chat or 608.242.4100 ext. 33123 for assistance Monday – Friday, 9 am-5:30 pm ET**.
- Applicable company policies and practices can be accessed through MSA's internal website, **MSAToday**.
- If you need more information or would like to discuss a specific instance, questions can be directed to the **Head of Human Resources** or **Head of Law**.
- Call the EthicsLine 24 hours a day, seven days a week at 1-877-772-6326.

### CONNECT RESOURCES

- Contact **Ask HR** at askhr@amfam.com or 1-833-952-7547.
- If you feel you need additional information regarding the Code, please reach out to your manager.
- Access to the Code can be found on Compass under Tools and Resources>Corporate Policies.
- Call the EthicsLine 24 hours a day, seven days a week at 1-877-772-6326

### HOMEGAUGE RESOURCES

- If you feel you need additional information regarding the Code of Conduct, please reach out to your manager.
- If you have questions or concerns about a specific issue, you can discuss it with your manager or contact **Human Resources at AdvantageHR@bakertilly.com** or 1-833-myBTA-HR.
- You may also call the EthicsLine 24 hours a day, seven days a week at 1-877-772-6326.

### MOONRISE RESOURCES

- If you feel you need additional information regarding the Employee Handbook, please reach out to **your manager or our Human Resources Department**.
- The Employee Handbook, and other relevant company policies can be found on Google Drive or by contacting our Human Resources Department.
- You should contact our **Human Resources Department** with any questions or concerns as they arise.
- Call the EthicsLine 24 hours a day, seven days a week at 1-877-772-6326.

### OPTERRIX RESOURCES

- If you feel you need additional information regarding the Code of Conduct, please reach out to your manager.
- If you have questions or concerns about a specific issue, you can discuss it with your manager or contact **Human Resources at AdvantageHR@bakertilly.com** or 1-833-myBTA-HR.
- You may also call the EthicsLine 24 hours a day, seven days a week at 1-877-772-6326.

### AFICS RESOURCES

- Contact **Ask HR** at askhr@amfam.com or 608-242-4100 extension 33123.
- If you feel you need additional information regarding the Code, please reach out to your manager.
- Access to the Code can be found on Compass under Tools and Resources>Corporate Policies.
- Call the EthicsLine 24 hours a day, seven days a week at 1-877-772-6326

### BOLD PENGUIN RESOURCES

- If you feel you need additional information regarding the Employee Handbook, please reach out to **your manager or Human Resources**.
- The Employee Handbook and other relevant company policies can be found on Google Drive or by contacting **Human Resources**.
- Call the EthicsLine 24 hours a day, seven days a week at 1-877-772-6326.



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**ETHICSLINE 1-877-772-6326**