

Erie Insurance Code of Conduct

for Third Party Service Providers



Erie
Insurance®

Above all in sERvICE® – since 1925



From the CEO

At ERIE, being Above all in Service is a promise that's been at the heart of how we do business for nearly a century. It's our core value. It compels us to continually challenge ourselves. It inspires us to do the right thing. It's what we expect of each other, expect of the Agents who represent us and expect of you as a third party doing business with us.

Our co-founder, H.O. Hirt, was an advocate of "common sense mixed with just plain decency." We think that's still a good approach to business. If we've chosen to work with you-or vice versa-you probably think that's a good approach, too. But a complex regulatory environment demands a bit more detail for the benefit of all. That's the guidance you'll find in this handbook.

Tim NeCastro,
President & CEO, Erie Insurance

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1. Introduction

Why does ERIE have a Code of Conduct for vendors, suppliers and contractors?

At Erie Insurance, we believe in doing the right thing. ERIE's Founding Purpose and Mission is "to provide Policyholders with as near perfect protection, as near perfect service as is humanly possible and to do so at the lowest possible cost." We prioritize ethical business conduct, accountability, respectful treatment and teamwork.

Just as our Code of Conduct provides a roadmap for our Employees to act in compliance with laws and regulations and in the spirit of ERIE's purpose and values, this Code provides standards and expectations for how we do business with third party service providers of goods and services (hereafter "third parties"). It sets forth our expectations as to how third parties will interact with ERIE, and how they will conduct themselves in a legal, ethical manner that aligns with ERIE's purpose and values. We acknowledge that no Code of Conduct can address every situation that our partners may encounter. Therefore, this Code is not a substitute for third parties' own responsibilities regarding proper business conduct.

How does the Code apply to vendors, suppliers and contractors of ERIE?

As a third-party doing business with ERIE, we expect you and the people you engage to abide by the principles and practices described in this Code of Conduct, and to take all appropriate actions to support and follow the Standards of Conduct described below, even if your own published code of conduct describes those principles and practices differently. This Code applies to all people and organizations we do business with—whether you provide contract labor or supply ERIE with products or services. We expect our third parties to require the same level of integrity from their personnel and their third parties that may engage in providing services to ERIE. We expect everyone associated with ERIE to share our commitment to ethical behavior. ERIE may monitor information and audit activities to support compliance with the principles and practices described in this Code. If your principles or practices of acceptable conduct conflict with those stated in this Code of Conduct, we expect you to promptly inform us so we can evaluate whether ERIE wants to enter or continue a relationship with you.



What are my responsibilities under this Code?

- Read and understand these requirements
- Follow the Standards of Conduct
- Ask questions if they arise
- Report potential illegal activity or misconduct

How do I ask questions, make a report or raise concerns?

At ERIE, we are committed to doing business ethically, responsibly and in compliance with laws, regulations, our Code of Conduct and company policies. We expect those with whom we do business to report any activities which they believe to be potentially illegal or unethical.

There are several options for reporting concerns.

First, you may contact us through the ERIE Ethics line by either calling toll free at 866-469-5709, or by making a report online at: <https://erieinsurance.alertline.com/gcs/welcome>. If you choose, your call/report may be anonymous. You can also make a report by contacting the following individuals:

Stephanie Howell

Director, Sourcing & Vendor Management
Stephanie.Howell@erieinsurance.com
814-870-4484

Scott Schnars

VP, Strategic Sourcing & Vendor Management
Scott.Schnars@erieinsurance.com
814-870-2725

Whistle Blower Protection

It is contrary to the values of ERIE for anyone to retaliate against any board member, officer, Employee or volunteer who in good faith reports an ethics violation—or a suspected violation of the law—such as a complaint of discrimination, suspected fraud or suspected violation of any regulation governing the operations of ERIE. An Employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

2. Standards of Conduct

Compliance and Ethical Business Practices

Just as we expect our Employees to act ethically and comply with all laws and regulations, we expect the same commitment to legal and ethical behavior from our third parties. We treat our customers and claimants with respect and fairness every step of the way—from marketing to sales and service, to the underwriting and rating of each policy. We settle claims fairly, promptly and in good faith. We expect our third parties to conduct business with the same commitment to integrity and ethical business practices.

Privacy and Security

The business of insurance, by its nature, requires us to collect information about people and organizations that is sensitive, restricted, confidential and often personal and non-public—and it is critical to our reputation and trustworthiness that we protect it. This means that we understand the rules and safeguards in place to protect all non-public, sensitive information, including personally identifiable information concerning an individual or an organization or their transactions with us. We have policies in place that

inform our Employees about the rules for legally disclosing this information to others. We expect our third parties to abide by our Privacy Notice, our contractual requirements and applicable law.

Maintaining the security of this information is critical. We expect all third parties who have access to sensitive, restricted, confidential or non-public personal information in connection with their relationship with ERIE to protect that information from unauthorized access, use or disclosure.

Protecting ERIE's Intellectual Property and Company Assets

ERIE Intellectual Property is the exclusive property of ERIE. Our contract with you will dictate ownership of materials that you create for us. It is our expectation that you adhere to the provisions of our contract.

ERIE's name, brand names, logos, taglines, slogans or other trademarks may not be used by third parties without written permission from ERIE.

Management of Company Records

We are careful to create records that clearly and accurately reflect our intentions, actions and decisions. We maintain records responsibly, in compliance with the law and ERIE's Records Retention Schedule. We expect our third parties to create and manage records (electronic and paper) that are accurate, accessible and stored in a safe, secure location.

Responsible & Ethical Sourcing

ERIE's third party business partners are a vital part of our business. We expect them to provide the best service, deliver the best products and materials and provide us with the best value. ERIE utilizes a transparent procurement process and maintains integrity with our third party partners' information. Third party partners are expected to conduct business in accordance with all applicable antitrust or anti-competition laws and regulations. All of ERIE's third party business partners are expected to refrain from any and all forms of illegal or improper activity, including misrepresentation, extortion, embezzlement or insider trading.

ERIE is committed to operating responsibly and minimizing environmental impacts of

our operations and continuously improving its environmental performance. We expect our suppliers to conduct their operations in a similar manner and to comply with local, state, federal, national and international environmental legislation.

Bribery and Anti-Corruption

We conduct business fairly and do not give anyone anything of value in an attempt to gain an unfair business advantage. We prohibit bribery and kickbacks anywhere we do business. This includes compliance with all laws dealing with bribery of government officials. We expect third parties conducting business on ERIE's behalf to comply with all applicable anti-corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act. Your failure to comply with applicable laws can result in significant fines or even criminal charges for third parties, our Employees and for the company. Third parties should not promise or give something of value in an attempt to secure an unfair business advantage. They should never try to conceal the true nature of a payment or an expense.

Antitrust and Fair Competition

Actions that may violate or give the appearance of violating antitrust laws undermine the integrity of ERIE's business, its reputation and its relationships with our customers. ERIE mandates strict compliance with the antitrust laws of the United States and its individual states. ERIE makes independent decisions concerning what products and services to offer, how to market those products and services and how much to charge for those products and services. Third parties must comply with antitrust and competition regulations within the areas where they do business on behalf of ERIE. ERIE will not tolerate either knowing violations of law or mistakes resulting from inattention to antitrust compliance requirements.

Insider Trading

ERIE complies with all laws and corporate policies that prohibit Employees from trading in ERIE's securities based on information that they learn of through the course of their employment. As a third party, you may have access to material, non-public information or "inside information." Buying or selling securities as a result of acquiring inside information is prohibited. This includes sharing that information with others in any fashion, including recommending buying or selling securities based on inside information.

Export Controls and Sanctioned Persons

ERIE strives to operate in compliance with all applicable economic sanctions or export control laws. Third parties conducting business on behalf of ERIE must take steps to ensure that they are not interacting, contracting or otherwise engaging with a sanctioned person or entity, or otherwise violating any export control legal requirement. This may include screening or other procedures that ensure that the third party is not conducting business with a sanctioned entity.

Safe Work Environment

ERIE complies with all applicable safety and health laws and regulations. We also expect third parties to provide a safe work environment and to mitigate and prevent accidents and exposure to health risks. This includes prohibiting the use or consumption of drugs or alcohol while conducting ERIE business or on ERIE property. ERIE does not engage nor tolerate any form of Child Labor and expect our suppliers to employ personnel who meet the minimum legal age requirement to work in the location in which they operate.

Inclusion & Belonging

At ERIE, we define diversity as all of the ways—visible or invisible—that each individual is unique. Our expectation is for third parties that contract with ERIE to foster a fair and inclusive environment that values diverse individuals, perspectives and backgrounds.

Discrimination and Harassment

We do not condone and will not permit discrimination or harassment of any individual in our workplace based on age, ancestry, citizenship, color, disability, gender identity, genetic information, marital status, military status, national origin, race, religion, sex, sexual orientation, pregnancy, breastfeeding or any other category protected by applicable federal, state or local law. Threats, acts of violence, bullying or intimidation are also prohibited. We expect third parties to create and maintain a respectful workplace free from any form of discrimination or harassment.

Reciprocity

ERIE provides third parties with a reasonable and fair opportunity of obtaining and conducting business with us. We do not expect third parties to buy ERIE products in order to obtain or maintain ERIE's business. ERIE does not give preference to any third party who may also be a customer of ERIE.

Conflicts of Interest

A “conflict of interest” arises when one’s personal interests interfere, or even appear to interfere, with the company’s interests. To protect ERIE and preserve our reputation for fairness and professionalism, our Employees must avoid conflicts of interest and disclose anything that could look like a conflict. We expect third parties to follow the same standard.

Gifts and Entertainment

ERIE Employees are prohibited from soliciting or accepting gifts or other benefits that might influence or appear to influence their independent judgment or affect their decisions or actions concerning ERIE business. Gifts or prizes of cash and cash equivalents, such as gift cards, are not to be offered or accepted regardless of the amount involved. Gifts, gratuities, prizes, discounts or unusual or expensive entertainment are not to be offered or accepted beyond those usual and customary nominal courtesies associated with lawful and acceptable business practices. Receiving courtesies of small value may be permitted, as long as a reasonable person would not question whether the gift would influence an Employee’s judgment when acting in the best interest of the company.

Accepting prizes while conducting ERIE business should be viewed in the same way as gifts. If an ERIE Employee’s acceptance of a prize from you as a third party could cause a reasonable person to question the Employee’s judgment, the Employee may decline or return a gift or prize to you. We expect third parties to use good judgment when conducting business with ERIE Employees and to avoid compromising their ability to make objective business decisions.

Communicating with the Media and the Public

ERIE expects every third party to be a responsible steward of its relationships with ERIE, including how that relationship is publicized or disclosed. ERIE prohibits its third parties from publicizing their relationship with ERIE unless and until approved by ERIE in advance. Also, third parties must not communicate publicly about business activities of ERIE. Any third party wishing to disclose its relationship with ERIE must follow our review/approval process for such requests. The process is applicable for any disclosure of ERIE’s name or information on a website, customer list, press release, reference list or in any other manner that implies an endorsement or discloses the existence of a relationship.

