



INSURANCE AGENCY CODE OF CONDUCT AND ETHICS

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As an insurance producer or agent (“Agent”) of one or more of the insurers of American Modern Insurance Group, Inc. (“Company”), the Agent commits itself to this Code of Conduct and Ethics (“Code of Conduct”). Moreover, by accepting these rules of the Code of Conduct, the Agent represents that it applies the highest standards to its activities as an insurance Agent.

General

An insurance agent or producer has to fulfill an important economic task. As insurance coverage is largely in need of explanation, insurance companies distribute their products via qualified insurance intermediaries, known as producers or agents. They are thereby the indispensable link between the insurer and the customer.

Customer service is a demanding task: The variety of risks occurring, the development of social security systems, the resulting variety of insurance options and insurance forms and the need of explanation of the terms of insurance and risk/ reward potentials require a qualified and competent insurance agent with appropriate expertise to guide a customer’s fully-informed decision that is suited to the particular customer. It is an insurance agent’s task to consult the prospectively insured or insured person about the coverage necessary and sufficient for him/her before insurance coverage is bound and to properly and responsibly advise and support him/her during the contract period.

The successful execution of these tasks requires a relationship built on trust between the insured and the insurance agent. Nevertheless, even for the most valued and trusted advisor, long-term success is only guaranteed if the agent fulfills certain prerequisites and obligations.

To fulfill these obligations, insurance companies should work alongside their insurance agents in order to support a proper and professional sales and consulting process.

The Company is aware of its responsibility with respect to the basic protection needs of consumers and therefore offers suitable insurance products to meet those needs.

The integrity and commitment to the principle of “honorable business” in addition to a good level of qualification are the basis for every good business relationship. That holds true for our relationship with our Agents as well as towards our insureds.

These principles shall apply for the Agents of the Company.

I. General Principles

1. The Agent represents a high level of qualification of the profession.
2. The Agent follows the precepts of honesty, competence, and financial care.
3. The Agent refrains from acts that are not in accordance with fair competition, including but not limited to refraining from acts in violation of unfair competition laws, such as the Sherman Act and the Clayton Act, Anti-Boycott laws and regulations, the Foreign Corrupt Practices Act, and the laws and regulations administered by the Office of Foreign Assets Control.
4. Relationships with the Agent should be characterized by trust and partnership. The Agent should respect the personal dignity, privacy, and personal rights of each individual, act openly, and be tolerant.
5. The baseline for any action is compliance with contractual obligations and the law. Agents will carefully and thoroughly fulfill their contractual duties and responsibilities while complying with all laws and regulations.
6. Agents will bind this Code of Conduct upon persons acting on its behalf, including its employees.

II. Principles of Conduct Towards Policyholders

1. An Agent shall continuously endeavor to obtain, to earn and maintain the trust of its customers, and shall comply with the directives of the insured.
2. An Agent may not represent itself to a prospectively insured or insured person as if it is an independent or neutral consultant who has no economic interest in the purchase of the insurance contract. An Agent who misleads a prospectively insured or insured person in this regard commits an especially gross violation of this Code of Conduct.
3. In the course of preparing and placing the insurance contracts, the Agent is obliged to consult the prospectively insured or insured person regarding adequate insurance, to determine the nature and extent of covered risks and to ensure that identified needs are satisfied with the insurance coverage under consideration.

4. Each Agent will, as far as it is part of its obligations, actively service the insured during the entire term of the insurance contract. That means that the Agent should consult with an insured person about changing the insurance coverage because of changed life situations (of which the Agent has become aware). The service also includes support in the course of a loss event.

5. The conclusion of the insurance contract creates rights and obligations of the insured, the insurance company and the Agent. It is an important task of the Agent to ensure that it has properly advised the relevant stakeholders.

6. Insurance contracts shall be documented in writing without any other oral or written side agreements or other unwritten terms.

7. Properly and professionally-placed insurance relates to the financial security of the insured person. Therefore, each Agent is obliged to continuously deepen its expertise and to adapt to the ever-changing requirements of the insurance market.

8. Possible complaints from prospectively insured persons, current policyholders, or former customers should be promptly reported to the Company and be followed up fairly and promptly by the Agent or by the Agent and the Company in the event that the complaint necessitates a coordinated response.

9. All information of prospective customers and policyholders shall be protected and treated confidentially. Privacy and data protection laws and regulations shall be followed, including but not limited to, the Health Insurance Portability and Accountability Act, the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act of 1999, 15 U.S.C. §§ 6801 et seq., and applicable federal and state privacy laws and regulations.

III. Principles of Conduct Toward the Company

1. The Company and the Agent respect each other's corporate assets – in particular their respective intellectual property, including but not limited to copyright laws, patent laws, the Lanham Act, and trade secret laws.

2. The Agent will strongly contribute to the attainment of all objective and subjective risk assessment information required to prevent losses for the Company, which could be caused by an incorrect risk assessment. The Agent will – even after the conclusion of the insurance contract – provide Company with any and all information available to enable a continuous evaluation of the insurance relationship.

3. Any received insurance premium will be administered properly and will be transferred to the Company according to the contractual requirements.

4. Agreements between the Company and Agent shall be documented in writing without any other oral or written side agreements or other unwritten terms.

5. In case of a loss event, the Agent will forward any and all information necessary or required by the Company to clarify the circumstances. The Agent may not conceal any circumstances, which have come to its attention and could affect the Company's liability (or other obligation to pay). Agent may never take any action or fail to act, if that conduct could result in an unjustified payment.

6. The Company and the Agent subsist on the trust from their customers, employees, shareholders and the public. The Agent respects the legitimate rights of third parties and refrains from actions or behavior

which could possibly result in reputational harm to the Company or its Agents in public. The interests of the parent company and affiliates of the Company will also be taken into consideration.

7. If an Agent has a reasonable suspicion that the Company has been used for economic crime, money laundering, or other unlawful purposes, the Agent will inform the Company as soon as practicable under the circumstances.

IV. Principles of Conduct Towards Colleagues

1. The relationship between the Agents of all Company distribution channels, but also to the colleagues from other insurance companies, is based on solidarity and mutual respect. The disparagement of colleagues or competitors or belittling of another insurance company in competition is incompatible with the principles of honorable business.

2. Compliance with the principles of fair competition is an essential duty of all Agents. Fair competition is promoted by competition based on merits, good commercial practices, and efforts to prevent complaints and grievances.

3. Each Agent commits to the directives and submits to the authority of the government agency, regulatory authority, or supervisory authority in the jurisdiction in which it resides or does business as an insurance agent, as well as their respective officers, auditors, and investigators.

V. Violation of These Principles

1. Violations of the Code of Conduct can harm the Company, its Agents, and/or policyholders and can lead to fines, sanctions, and other exposures.

2. The Agent should approach its contact or representative at the Company with issues related to the Code of Conduct, but should also approach the Company's person or organizational unit responsible for compliance tasks regarding the Company's distribution channels and sales support units ("Compliance").

3. If an Agent becomes aware of a violation of law or a significant breach of this Code of Conduct, especially in cases of fraud, corruption, or comparably conduct, which could trigger criminal or civil penalties, the Agent should inform its representative at the Company or Compliance. The Company's confidential compliance and ethics hotline is available at 866.739.4137.

4. Approaching or cooperating with government agencies, regulatory authorities, or supervisory authorities by the Agents remains unaffected.