

Supplier Code of Conduct

The Enterprise¹ is proud of its tradition as an ethical and socially responsible organization and is committed to conducting business in such a manner. Over the years, this has meant dealing fairly with our associates, our agents, our policyholders, governmental regulators, suppliers and the public. Everything we achieve depends upon the trust of these essential constituencies.

Grange Enterprise requires its Suppliers to adhere to and comply with the following Supplier Code of Conduct. Suppliers refers to any third party that provides good or services to the Enterprise. By acceptance of any purchase order, contract or business whatsoever from the Enterprise, the Supplier accepts and agrees to comply with this Supplier Code of Conduct. If you believe a violation of this policy has occurred, you should immediately notify the Corporate Legal Department.

Basic Expectations

- **Respect Rights:** Every individual is entitled to fair and respectful treatment by his or her supervisors, managers, subordinates, and peers. The Company will not tolerate discrimination of any sort on the basis of race, color, religion, age, sex, national origin, handicap, disability, sexual orientation, gender stereotyping, gender identity or expression, genetic information, ancestry, pregnancy, veteran status, citizenship or any other legally protected status; nor will it permit any Supplier to engage in any discriminatory or harassing conduct.
- **Conduct Business Ethically:** The Company expects all Suppliers to adhere to the highest ethical standards and demonstrate social responsibility in performing their jobs. Our success depends upon satisfying the standards imposed upon business by society and governmental entities.

No Supplier shall do anything to wrongfully or fraudulently influence, coerce, manipulate, or mislead the Enterprise, or any other individual or entity related to the work performed for or on behalf of the Enterprise.

- **Know and Comply with All Laws and Regulatory Requirements:** An absolute requirement that arises out of the Enterprise commitment to ethical and socially responsible behavior is for every Supplier to observe all laws and regulations. We require our Suppliers to abide

¹The term "Enterprise" and "Company" means Grange Mutual Holding Company, Grange Holdings, Inc., Grange Insurance Company, Grange Indemnity Insurance Company, Trustgard Insurance Company, Grange Insurance Company of Michigan, Grange Property & Casualty Insurance Company, Integrity Insurance Company, Integrity Property & Casualty Insurance Company, Integrity Select Insurance Company, GrangeAmerica Corporation, and Northview Insurance Agency, Inc., as well as any other corporation, partnership or other business entity with which any of the foregoing may become associated at any time hereafter.

by all applicable federal, state and local laws.

Equal Employment Opportunity & Non-Discrimination Statements

As an equal employment opportunity employer, the Enterprise will always endeavor to select the best qualified individuals based on job-related qualifications, regardless of race, color, religion, age, sex, national origin, handicap, disability, sexual orientation, gender stereotyping, gender identity or expression, genetic information, ancestry, pregnancy, veteran status, citizenship or any other legally protected status. This policy commits the Company to provide equal employment opportunities in all phases of employment including, but not limited to, recruiting, selection, hiring, training and development, transfers, promotions, compensation, benefits, and all other privileged and conditions of employment. The Company requires Suppliers to hold themselves to these same non-discriminatory standards in their employment practices. The Enterprise will not tolerate any discriminatory conduct by its Suppliers.

Harassment and Discrimination

Supplier shall prohibit harassment based on race, color, religion, age, sex, national origin, handicap, disability, sexual orientation, gender stereotyping, gender identity or expression, genetic information, ancestry, pregnancy, veteran status, citizenship or any other legally protected status. Suppliers must commit to providing a work environment free from unlawful harassment and discrimination.

The creation of an intimidating, hostile, or offensive working environment may include such actions as persistent comments on sexual preferences, gender identity or expression, or the display of obscene or sexually oriented images, comments, jokes, and slurs. Suppliers will further not permit physical coercion, verbal abuse, corporal punishment, inhumane treatment, bullying and threats of physical violence.

Summary of Legal Requirements

Supplier's Compliance with Law Policy applies to all laws and regulations that govern the Supplier's business and employment activities. In addition, there are specific areas of law which, because of their complexity and the frequency with which we have to consider them, are summarized below.

- **Compliance with Antitrust Law.** The main objective of antitrust laws is to preserve competition and an open market. The United States antitrust laws prohibit agreements and activities that may have the end effect of reducing competition without providing counterbalancing benefits to consumers. Activities which are or may be prohibited include, but are not limited to, agreements with competitors to fix or control pricing, agreements with competitors to allocate products, markets or territories, agreements to boycott certain customers or suppliers, agreements to refrain from or limit the manufacture, sale or production of any product and reciprocal purchase agreements or tie-in sales.
- **Equal Employment Opportunity.** Suppliers must deal fairly with all applicants and employees to afford them compensation, benefits and opportunities without regard to race, color, religion, age, sex, national origin, handicap, disability, sexual orientation, gender stereotyping, gender identity

or expression, genetic information, ancestry, pregnancy, veteran status, citizenship or based on any other category prohibited by law.

- Unfair Trade Practice. Supplier must know, understand, and follow the dictates of the unfair trade practices statutes and regulations as they apply to the business of insurance.
- Dealing with Governmental Agencies. The insurance industry is regulated primarily at the state level by each state's department of insurance. However, the insurance operations are also subject to regulation by many federal agencies.

Supplier must compile and maintain numerous records and substantial information to be reported to various governmental agencies when required. Virtually every one of these agencies operates under statutes which make it a crime punishable by fines and/or imprisonment to submit knowingly false or incomplete information, to fail to submit required information or to fail to submit information within a required time period.

- Health and Safety. The federal government, the states, and many localities have adopted a number of laws and regulations covering worker safety. The Enterprise expects all Suppliers to obey all laws, observe all necessary permits, report any unsafe working conditions, and to be truthful in dealing with the regulatory agencies which enforce these laws.
- Labor Law. Supplier must comply with all labor laws including but not limited to minimum wage requirements, child labor laws and forced labor.
- Federal Insurance Fraud Prevention Act. The Federal Insurance Fraud Prevention Act identifies a number of actions which, if taken by a person engaged in the business of insurance, can result in fines and/or imprisonment of the individual as well as fines for the company. The prohibited actions include but are not limited to: the making of false statements or reports to regulatory officials; embezzling the property of an insurance company; and influencing or obstructing regulatory officials while they are conducting examinations of the company. Supplier must be knowledgeable of the Act's prohibitions and comply with its mandates.
- Privacy and Safeguarding of Customer Information. The federal government, as well as many states, has adopted laws for safeguarding customer information. These regulations establish standards for developing and implementing administrative, technical, and physical safeguards to protect the security, confidentiality and integrity of customer information. Supplier must adhere to all such laws and regulations requiring it to keep such information private and should adopt policies and procedures to ensure such information is released only as allowed by law.
- OFAC and Anti-Money Laundering. Supplier must adopt procedures to comply with the Office of Foreign Asset Control's reporting and enforcement requirements and procedures to comply with the Anti-Money Laundering laws as they apply to the business of insurance and business or Supplier.

Confidentiality and Trade Secrets

Supplier must ensure that the operations, activities and business affairs of the Enterprise, its clients, and customers are kept confidential. If during the course of their contract or service, confidential or proprietary information about the Enterprise, its clients, or customers is acquired, such information is to be handled in strict confidence and not to be discussed with outsiders.

Supplier has an obligation to protect Enterprise trade secrets. The Company considers a trade secret to be information, including the whole or any portion or phase of any scientific or technical information, design, process, procedure, formula, pattern, compilation, program, device, method, technique, or improvement, or any business information or plans, financial information, or listing of names, addresses, or telephone numbers, in whatever form or format it may take that derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.

Defend Trade Secrets Act of 2016. Suppliers must make the following notice available to its employees working with the Enterprise.

“Immunity from Liability for Confidential Disclosure of a Trade Secret to the Government or in a Court Filing: (1) Immunity—An individual shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that—(A) is made—(i) in confidence to a federal, state or local government official, either directly or indirectly, or to an attorney; and (ii) solely for the purpose of reporting or investigating a suspected violation of law; or (B) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal. (2) Use of Trade Secret Information in Anti-Retaliation Lawsuit—An individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the attorney of the individual and use the trade secret information in the court proceeding, if the individual—(A) files any document containing the trade secret under seal; and (B) does not disclose the trade secret, except pursuant to court order.”

Conflict of Interest

Suppliers must avoid any situation or relationship that may involve an inappropriate conflict or the appearance of a conflict with the interests of the Enterprise. Supplier must not provide excessive gifts, hospitality or entertainment.

Grange Enterprise reserves the right to update, alter or change the Supplier Code of Conduct from time to time. Supplier accepts such updates, alterations or changes by continuing to do business with the Enterprise.