

# FedNat Holding Company Vendor Code of Conduct

## Contents

<b>INTRODUCTION.....</b>	<b>2</b>
<b>PURPOSE AND SCOPE.....</b>	<b>2</b>
<b>POLICY OWNER.....</b>	<b>2</b>
<b>RESPONSIBILITY.....</b>	<b>2</b>
<b>BUSINESS INTEGRITY.....</b>	<b>3</b>
Business Ethics and Compliance with the Law.....	3
Conflicts of Interest.....	3
Gifts and Gratuities.....	3
Anti-bribery and Anti-Corruption.....	3
Inside Information.....	3
<b>RESPONSIBLE BUSINESS PRACTICES.....</b>	<b>3</b>
Customer Privacy.....	3
Confidential and Proprietary Information.....	4
Business Resumption and Contingency Planning.....	4
Outsourcing and Subcontracting.....	4
<b>RESPONSIBLE TREATMENT OF INDIVIDUALS.....</b>	<b>4</b>
Diversity and Non-Discrimination.....	4
Employment Practices.....	5
Health and Safety.....	5
<b>ENVIRONMENT.....</b>	<b>6</b>
<b>RECORD KEEPING.....</b>	<b>6</b>
<b>CODE COMPLIANCE AND MONITORING.....</b>	<b>6</b>

# **FedNat Holding Company Vendor Code of Conduct**

## **INTRODUCTION**

The reputation of FedNat Holding Company and its wholly owned subsidiaries (collectively, the “Company”) is an invaluable asset that each employee of the Company plays a role in preserving. Existing or potential new customers consider this reputation in deciding to do business with us, employees use it in deciding to continue employment or start a career with the Company, and it is an important ongoing consideration for our investors. Our Company’s Code of Conduct (the “Code”), which is rooted in our values, sets behavioral standards for our people, states what we expect of ourselves and each other, and confirms our commitment to conducting business in accordance with all applicable laws.

## **PURPOSE AND SCOPE**

This Vendor Code of Conduct (the “Code”) sets out standards of business conduct you must follow in providing services and/or products to FedNat Holding Company or any of its subsidiaries, divisions, affiliates or agents. FedNat Holding Company recognizes that there are different legal and cultural environments in which facilities operate throughout the world. This Code sets forth the basic requirements that all facilities must meet in order to do business the Company. This Code applies to your conduct, your interaction with the Company, its employees, clients, vendors, and business partners, and your access to the Company’s facilities and property. You are responsible to notify all subcontractors and individuals providing services by or through you of their obligations under this Code and to ensure that all such parties comply with its terms.

In alignment with our values, we are committed to striking the right balance across shareholder groups, clients, employees and communities. Our values are built on providing excellent service to our clients and each other, a work ethic that promotes teamwork to succeed, taking personal responsibility for high performance, diversity for growth, and innovation and integrity in everything we do. We expect Vendors to operate in accordance with values comparable to ours and in a manner which is consistent with prudent business practices.

This Code may be updated or amended from time to time. As a Vendor, you will be expected to comply with any future revisions to the Code and also to inform us if your business changes in ways that may affect your commitment to and compliance with the Vendor Code.

*This Code is based on internationally accepted labor standards and guidance, including the International Labor Organization (ILO)’s core conventions, the Universal Declaration of Human Rights, and the United Nations (UN) Guiding Principles for Business and Human Rights. This Code also supports FNHC Inc.’s human rights commitments, as outlined in the company’s Human Rights Policy. This Code provides the foundation for FedNat’s ongoing evaluation of a facility’s employment practices and environmental compliance.*

## **POLICY OWNER**

Chief Financial Officer

## **RESPONSIBILITY**

Our Vendor Code is administered by our Company’s named Executive Officers and the Vice President of Internal Audit.

The vendor’s relationship owner will be also responsible for ensuring that all new vendors

# **FedNat Holding Company**

## **Vendor Code of Conduct**

have received a copy of the Code before their engagement with the Company begins.

### **BUSINESS INTEGRITY**

#### Business Ethics and Compliance with the Law

Vendors should act ethically and in good faith, with honesty and integrity. In all their activities, Vendors must ensure they conduct business in full compliance with all applicable laws, rules, and regulations including those relating to labor, worker health and safety, and the environment of the jurisdictions in which they operate.

#### Conflicts of Interest

In their relationship with our employees, Vendors must avoid any conflict of interest with the Company and its employees and not try to gain improper advantage or preferential treatment for other relationships they may have with us (for example, as a client). If a Vendor's employee has any type of personal or professional relationship with an employee or Board Member of the Company that might represent a conflict of interest, the Vendor must disclose that relationship to the Vendor's business contact at the Company.

#### Gifts and Gratuities

The nature of the gifts or entertainment must not, by their quality, quantity or timing, be used by Vendors to gain improper advantage or preferential treatment. No bribes, kickbacks or other similar payments, in any form, shall be made to anyone for the purpose of obtaining or retaining business or any other favorable action. No gifts or entertainment may be given to generate or induce business with the Company.

#### Anti-bribery and Anti-Corruption

Vendors shall not tolerate, permit, or engage in bribery, corruption, fraud, or unethical business practices in dealing with business partners, public officials, or any representative of the Company nor engage in any conduct that would put our organization at risk of violating anti-bribery laws.

#### Inside Information

In their dealings with us, if Vendors become aware of inside information about us or our clients, we expect Vendors to have in place policies and procedures for the proper handling and use of that information (such as information barriers). These policies and procedures must meet applicable legal and regulatory requirements to prevent inappropriate access or disclosure of inside information.

### **RESPONSIBLE BUSINESS PRACTICES**

#### Customer Privacy

The trust of our customers is our Company's most valuable asset. We safeguard that trust by keeping non-public personal information about customers in a secure environment and using that information in accordance with our Record Retention and Privacy Policies. Vendors are responsible for safeguarding the privacy, confidentiality and security of customer data entrusted to the Company. This means that customer records and information must remain secure and confidential and Vendors should protect against unauthorized access to or use of such information that could result in substantial harm or

# **FedNat Holding Company**

## **Vendor Code of Conduct**

inconvenience to any insured.

### **Confidential and Proprietary Information**

We have a duty to protect confidential and proprietary information, such as financial data and internal procedures regarding the way we do business. Vendors should maintain the confidentiality of information available to them through the Company or an insured, except when the Company authorizes disclosure or it is legally mandated. This includes disclosures to the public via Internet forums or other means of electronic communication, including social media, “chat rooms”, “blogs”, personal Web pages, or electronic bulletin boards.

Confidential information should not be used for personal advantage. Confidential information includes all financial and other records and non-public information about the Company and its insured’s that, if disclosed, might be of use to competitors, or harmful to the Company or its insureds. Vendors must comply with Company’s published Privacy Policy, and must use information obtained through their relationship with us only for the purpose defined to them.

Vendors must store information as agreed with the Company and have appropriate information security policies and procedures in place to secure access to our information. Vendors must notify us promptly of actual or suspected privacy breaches, security breaches, or losses of our information.

### **Business Resumption and Contingency Planning**

For some services performed by Vendors, due to the significance for our businesses or the types of activities that may be involved, we expect that the Vendor’s business continuity and disaster recovery plans are developed, maintained and tested in accordance with applicable regulatory, contractual and service level requirements.

### **Outsourcing and Subcontracting**

We recognize that outsourcing is a practice that Vendors may use to promote innovation, fill resource gaps, and/or create operational efficiencies. We also recognize that Vendors may need to use subcontractors in the performance of services. However, we expect Vendors not to subcontract services they perform for us or outsource activities that directly impact the delivery of goods and services to us, without our prior written approval. In situations where approval is given, it is important for us to know the locations of where the work will be performed and the parties involved in the provision of the services.

In addition, Vendors must monitor the outsourcing or subcontracting arrangement to ensure it complies with the Vendors’ contractual obligations and with this Code, and provide evidence of such monitoring upon request.

## **RESPONSIBLE TREATMENT OF INDIVIDUALS**

### **Diversity and Non-Discrimination**

Vendors must value the diversity of their employees, clients and others with whom they interact, including respect for differences such as race, color, sex, sexual orientation, gender identity, religion, national origin, age, marital status and physical disability. Vendors are expected to treat each individual with respect and dignity and to provide a

# FedNat Holding Company

## Vendor Code of Conduct

work environment characterized by professionalism and free from intimidation and harassment. No type of violent or threatening behavior by Vendor's employees is permitted, including threats, threatening language or any other acts of aggression or violence against anyone while conducting the Company's business. Possession, use, sale or purchase of illegal drugs, or the abuse of legal drugs or alcohol on Company premises, anywhere while conducting Company business or in any situation where an individual may be identified as being associated with the Company is strictly prohibited. Vendors must not tolerate harassment, discrimination, violence, retaliation or any other disrespectful and inappropriate behavior.

Vendors must respect the dignity of their own employees and others, adhere to principles of diversity and maintain a respectful workplace. See our **Code of Conduct** under Governance information.

### Employment Practices

Vendors must abide by applicable employment standards, labor, non-discrimination and human rights legislation. Where laws do not prohibit discrimination, or where they allow for differential treatment, we expect Vendors to be committed to non-discrimination principles and not to operate in a way that differentiates unfairly.

Vendors must be able to demonstrate that, in their workplaces:

- Child labor is not used and that the employment of young workers adheres to local regulations.
- Involuntary labor of any kind, including prison labor, debt bondage, slave labor, or forced labor by governments, is prohibited and employees, whether local or migrant, are given the right and the ability to leave employment when they choose.
- Discrimination and harassment are prohibited, including discrimination or harassment based on any characteristic protected by law.
- Employees have the right to lawfully and peacefully associate, organize, or bargain collectively and to join associations such as labor unions.
- Employees are free to raise concerns and speak up without fear of reprisal.
- Wages and overtime premiums are paid in compliance with all applicable laws and workers are paid at least the minimum legal wage or a wage that meets local industry standards, whichever is greater.
- Working hours are in accordance with local regulation and industry practice and voluntary overtime is at manageable levels that ensure humane and productive working conditions.
- Appropriate and reasonable background screenings, including investigations for prior criminal activity, have been done to ensure the integrity and good character of the Vendor's Employees.
- Clear and uniformly applied employment standards are used that meet or exceed legal and regulatory requirements.

### Health and Safety

We are committed to maintaining a safe and healthy workplace for our employees, customers and anyone who visits our premises. To do so, we must follow safe working procedures at all times and actively work to prevent accidents. We expect our Vendors to also provide a safe work environment, abiding by local laws and regulations, respecting the

# **FedNat Holding Company Vendor Code of Conduct**

health and wellbeing of their workforce.

## **ENVIRONMENT**

We acknowledge our responsibility to reduce the environmental impacts of our business operations. We are committed to managing our direct environmental impacts in a responsible manner. Vendors are to assist in reducing our environmental footprint, conduct business in an environmentally responsible way, and offer environmentally responsible products and services. We expect Vendors to support our environmental goals and abide by all legislation and regulations related to the protection of the environment. Vendors must manage their environmental impacts, including energy and greenhouse gas (GHG) emissions, air pollution (air emissions), water consumption, water quality, wastewater, waste diversion and disposal, as well as chemical use and handling.

## **RECORD KEEPING**

Vendors must not destroy our records that may be relevant to any pending or threatened legal or regulatory proceeding of which the Vendor becomes aware. Vendors must maintain adequate internal records to ensure proper compliance with their obligations to us.

## **CODE COMPLIANCE AND MONITORING**

We expect Vendors to comply with this Code. We reserve the right to review your policies, procedures or any other documentation related to the Vendor Code. In addition, we must be able to monitor and audit a Vendor's control environment.

Failure to comply with this Code may result in termination of a Vendor's relationship with us. Breach of this Code may also subject you to civil and/or criminal sanctions.