

An aerial photograph of a red sports car driving on a two-lane asphalt road in a desert environment. The car is positioned in the lower right quadrant of the frame, moving towards the top left. A sharp shadow of the car is cast onto the road surface. The road is flanked by dry, reddish-brown earth and sparse desert vegetation. The overall scene is brightly lit, suggesting a sunny day.

HAGERTY *H*

Code of Conduct



As a company, Hagerty is committed to conducting business with integrity and the highest of ethical standards.

We are also committed to providing each of you with the tools to help you be successful in your role at Hagerty. Examples of such tools include the Hagerty Code of Conduct and our Hagerty Employee Handbook. There are country specific versions of our Hagerty Employee Handbook, each specifically tailored for team members located in countries in which we have office locations.

The Code of Conduct is a guide to the conduct expected of Hagerty team members and is a summary of some of the policies and legal requirements that affect our business. We use the Code of Conduct in conjunction with our Hagerty Employee Handbook, which serves to acquaint team members with the company, benefits and policies on a broader scale. When used together, the Code of Conduct and Hagerty Employee Handbook define expectations for conduct, performance and the relationship between employer and team member.

Each of us is responsible for understanding the content contained within these important documents, today and as revisions are posted, in the future. As we work to save driving and to fuel car culture for future generations, the provisions contained within the Code of Conduct and the Hagerty Employee Handbook will aid you in your pursuit of excellence, innovation and authenticity.

McKeel

Hagerty Core Values

Members First
Care for Each Other
Drive Excellence
Growth Mindset
Enjoy the Drive

Living Our Values



The Code

Hagerty exists to save driving and to fuel car culture for future generations. We will succeed in our mission by acting with integrity and in full compliance with the law. Our Core Values make up the Hagerty formula, which fosters a culture for doing business with the highest ethical standards. This Code of Conduct (the “Code”) is a guide for all Hagerty team members that summarizes some of the policies and legal requirements that affect our business. The Code steers team members toward ethical and legal behavior, and supports team members in this effort by sharing additional resources when more information is needed.



The Code

Making Ethical Decisions

This Code is a starting point.

Team members should first ask themselves, “Do my actions support our Mission and our Core Values? Are my actions consistent with any laws that apply? Would they conflict with our Code?” If you’re not sure, the Code provides clear directions and relevant examples to keep you on track. It also includes plenty of additional resources to help you. You can refer to the federal or state laws cited throughout the Code, find more company policies in the Employee Handbook and the Employee Policy Portal, or reach out to the Legal and Compliance Department at AskLegalCompliance@hagerty.com.

Who Must Follow The Code?

This Code applies broadly to directors, officers, regular, part-time, supplemental, and temporary employees, as well as

to independent contractors while they are performing services for Hagerty. All members, directors, officers and team members worldwide who work for Hagerty or Hagerty subsidiaries and affiliated entities must adhere to the standards and policies summarized in this Code. Team members who supervise vendors, consultants, or other business partners must monitor the work of those individuals or entities to ensure that they act consistently with this Code. Guidance concerning this Code is available from your supervisor or from the Legal and Compliance and Human Resources departments.

Hagerty, Inc. is organized in the United States under the laws of Delaware and headquartered in Michigan; however, Hagerty affiliates and subsidiaries do business in all states and in several different countries and are subject to the laws of those different jurisdictions, and of organizations such as the European Union. Where local laws contain requirements that differ from the provisions of this Code, those requirements prevail for team members located in or working in those jurisdictions. If you have any questions about the laws that apply to you, please contact the Legal and Compliance department.

Hagerty Managers have additional responsibilities under this Code.

Managers must always set an example by showing others what it means to live by the Code. They must also support team members who in good faith raise questions or have concerns about anything contained in this Code and must monitor compliance with this Code by those who report to them. As leaders they must demonstrate ethical behaviors and support a safe and secure environment. Managers are responsible for ensuring their teams complete training and have the resources they need to understand and apply company policies and procedures, including information security practices.

Values Statement

We Share The Road. At Hagerty, we share the road. We are an inclusive automotive community where all are welcomed, valued and belong.

We are united by our shared passion for driving, our commitment to fuel car culture for future generations, and our desire to make a positive impact in the world.

Team Member Obligations

All Hagerty team members are required to read, understand, be familiar with, and agree to abide by this Code. Failure to follow the directives and guidelines provided

in this Code, or to complete any required training related to the Code, may result in disciplinary action, up to and including termination of employment. A violation of some provisions of this Code may also subject Hagerty and the team member violator to criminal and civil penalties, including but not limited to fines and jail sentences.

At Hagerty, team members are expected and encouraged to speak up when they witness or know of any violations of this Code or other Hagerty policies.

Team members witnessing or otherwise becoming aware of any conduct by a Hagerty business, member, director, officer, team member or independent contractor that is believed to be unlawful or unethical, or which violates this Code or any other Hagerty policy, must speak up promptly. Hagerty team members may report such concerns to their supervisor, to the Human Resources or Legal and Compliance departments, or they may report concerns through the Hagerty WE LISTEN reporting system. Team members using the WE LISTEN system may report anonymously. WE LISTEN, managed by an outside third party, assigns a tracking number so that team members who do not wish to give their names can still check back to receive a response or provide additional

information. Hagerty will review all Code, Handbook, or policy violations that are reported and take necessary steps to address the matters, including investigating the reported misconduct and applying any necessary disciplinary measures. In certain cases, Hagerty may also report instances of misconduct to outside authorities or initiate legal or other dispute resolution proceedings in connection with reported misconduct.

At Hagerty, retaliation against anyone who raises a concern in good faith is strictly prohibited.

Any team member who, in good faith, seeks advice, raises a concern or reports a possible violation is following this Code - and doing the right thing! Hagerty strictly prohibits and will not tolerate retaliation of any kind against anyone who reports a concern in good faith or who helps to investigate or resolve a concern. Any team member engaging in retaliatory conduct will be subject to disciplinary action, up to and including termination of employment.

Waivers

Hagerty recognizes that in special cases team members may encounter situations which demand behavior or participation in activities that are not illegal or unethical, but nonetheless violate

a strict reading of this Code. In these cases, Hagerty team members may reach out to discuss whether a waiver of the Code is needed for this unique situation. Requests for waivers should be made in writing and approved before you engage in the proposed activity and include a comprehensive description of the relevant facts and circumstances surrounding the proposed activity. In most cases, requests will be reviewed and decided upon by the General Counsel. However, requests from Hagerty’s executive officers and directors must be decided by Hagerty’s board of directors and, if granted, disclosure may be required under the federal securities laws.

For More Information:

Review the [Hagerty Employee Handbook](#).

Review the [Hagerty Whistleblower Policy](#).

Review the [Hagerty WE LISTEN reporting system](#), accessible from Gearbox.

You may also contact The Legal and Compliance or Human Resources departments with questions or concerns, or for more information about any topic contained in this Code.

AskHR@hagerty.com

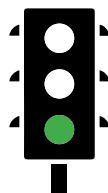
AskLegalCompliance@hagerty.com



Q: I think my supervisor may be doing something that this Code says is illegal and ethically wrong. I'm afraid to report them because I think I might lose my job if they find out that I was the one who reported the concern. I don't believe that Hagerty's WE LISTEN reporting system is really anonymous, so what should I do?

A: Hagerty team members are required to report any suspected violations of this Code, so you should report your concern. If you wish to report anonymously, you may utilize Hagerty's WE LISTEN reporting system. WE LISTEN is operated by a third party and is completely confidential and anonymous – you do not need to give your name, or any other identifying information. However – even if you choose not to report anonymously – remember that retaliation of any kind against a team member who, in good faith, comes forward with a concern or suspected violation is strictly prohibited.

Hagerty Rules of the Road



Read and understand this Code and the Hagerty Employee Handbook.

Report any violations or suspected violations of this Code, Hagerty Employee Handbook, or company policies.

Familiarize yourself with the Hagerty WE LISTEN reporting system and Whistleblower Policy

Report a concern or suspected violation of this Code without hesitation.



Report an incident without a good faith belief that violation or suspected violation has occurred.

Retaliating against another team member who has, in good faith, raised a concern or reported a suspected violation.





We Share the Road

At Hagerty, team members treat colleagues and others with respect and dignity.

Every Hagerty team member is responsible for honoring our commitment to diversity and equal employment opportunity. Treating one another with respect and dignity is a core responsibility, and helps maintain an inclusive workplace in which all team members have the opportunity to demonstrate their full potential.

For More Information:

Review the following [Hagerty Employee Handbook](#) and company policies:

- **Section 3. C. Anti-Harassment**
- **Section 2. Employment**
- [Diversity, Equity, and Inclusion policy](#)

Review the following laws:

- **Title VII of the Civil Rights Act**
- **The Pregnancy Discrimination Act**
- **The Age Discrimination in Employment Act**
- **The Americans with Disabilities Act**
- **The Genetic Information Nondiscrimination Act**
- **The European Union Directive 2000/78/EC**
- **Canada’s Employment Equity Act of 1995**

In addition, many state and local laws prohibit other forms of workplace discrimination.

Diversity and Equal Opportunity

At Hagerty, diversity is visible, valued and sustained throughout the organization. We embrace and encourage our team members’ differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio- economic status, veteran status, and other characteristics that make our team members unique. Hagerty employees create an inclusive environment that nurtures the unique background, skills and creativity that each of our colleagues bring to Hagerty. Hagerty provides equal treatment and equal employment opportunity without regard to any protected status or characteristic. This applies to all aspects of our employment decisions including recruitment, hiring, placement, development, promotion, training, scheduling, benefits, compensation and termination of employment.

Harassment and Discrimination

At Hagerty, team members must not tolerate harassment of any kind, including sexual or discriminatory harassment, or any other type of behavior that is hostile, disrespectful, abusive and/or humiliating. The most prevalent form of workplace discrimination is sexual harassment,

which consists of unwelcome sexual advances or other verbal or physical conduct of a sexual nature. The two types of prohibited sexual harassment are (1) quid pro quo harassment, where a person in a position of authority makes advances toward a subordinate, promising a raise or promotion if the subordinate submits to those advances; and (2) hostile environment harassment, where an atmosphere of sexual comments or jokes (such as sending sexually oriented e-mails at work) creates an offensive or threatening work environment.

All team members are expected to protect and enhance a culture of mutual appreciation and respect. What may seem funny or harmless to some people can be hurtful or degrading to others. Team members must be sensitive to how others could perceive their words and actions and should always speak and treat others in a civil, professional manner.

Although we all have a responsibility to report any incidents of harassment that we witness or experience, managers and supervisors are obligated to report all sexual harassment complaints (both formal and informal) that they receive.

Team members may not be disciplined, demoted or terminated because they (1) reported in good faith an incident of discrimination; or (2) participated in an investigation of a discrimination claim. These actions are considered retaliation and are prohibited by law.

Q&A

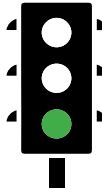
Q: A co-worker frequently makes personal comments about my appearance that make me uncomfortable. I’ve asked them to stop but he won’t. What can I do about it?

A: You can – and should – contact your supervisor, the Human Resources department, the Legal and Compliance department, or use the Hagerty WE LISTEN reporting system.

Q: I feel a little uncomfortable around my manager with their comments about the country where I was born and raised. Since they came to our department I am only assigned to simple tasks and not the big projects I used to get. Maybe I’m being too sensitive, but I feel as though my manager is discriminating against me because I wasn’t born in this country. What should I do?

A: You should raise this issue with the Human Resources department, the Legal and Compliance department, or use the Hagerty WE LISTEN reporting system, so that an inquiry can be made into your manager’s actions.

Hagerty Rules of the Road



Speak up about any harassment you experience or witness. Talk directly with that person about unwanted or inappropriate behavior, discuss the actions with your manager, or report the behavior via WE LISTEN online reporting.



Making unwelcome sexual advances.

Offering assurances of a promotion or raise to encourage submission to your advances.

Making repeated requests for a date with someone who expresses disinterest.

Discussing sexual thoughts or activities at work.

Engaging in unwelcome touching.

Sharing sexually explicit jokes, or images like GIFs or memes.

Referring to an older team member using age-descriptive terms.

Using slang to refer to someone’s race, religion, national origin, political affiliation, or gender.

Mimicking or making fun of the accent of a team member of a particular race or national origin.

Revealing a team member’s medical condition to others, absent some necessity to do so.

Workplace Safety and Health



At Hagerty, a safe and healthy work environment is required. We are committed

to providing a safe and healthy environment for all team members.

Team members must maintain a safe, sanitary and orderly work area. Team members who witness or experience any accidents or signs of potential hazards at Hagerty must report those incidents to Facilities@hagerty.com. If the incident involves a Hagerty team member, this must be reported to askHR@hagerty.com. Hagerty team members should always cooperate with those performing safety audits and supply all requested information.

At Hagerty, drugs and alcohol are prohibited.

Improper use of alcohol or drugs affect job performance and can risk the safety of others. Hagerty team members may not work or report to work while impaired by alcohol, illegal drugs, or controlled substances. Team members are prohibited from possessing, selling, using, distributing or offering to others any illegal drugs or controlled substances while on company business or on company premises. If you observe that another team member is impaired due to the use of alcohol, drugs or other substances, or that another team member is using illegal substances or abusing alcohol on Hagerty premises or while on Hagerty business, notify your supervisor or the Human Resources Department immediately. You may also report it anonymously on the Hagerty WE LISTEN system. Hagerty encourages anyone having substance abuse problems to seek appropriate assistance through our Employee Assistance Program. Use of assistance services is confidential (information about who uses the service is not provided to Hagerty) and will not jeopardize your status with the company, provided that you maintain acceptable levels of performance and conduct.

At Hagerty, firearms and weapons are strictly prohibited.

To help ensure a safe work environment for all team members, no team member may use or possess weapons, including but not limited to firearms, knives (unless required explicitly for your role, i.e., boxcutters) or other dangerous weaponry of any kind, at any time while on Hagerty premises or while conducting business on behalf of Hagerty.

At Hagerty, team members must not condone, tolerate or initiate workplace violence of any kind.

Workplace violence includes verbal abuse, physical abuse, threats of abuse, harassment, intimidation and any other behavior that disrupts the workplace. The behavior may consist of verbal or written statements, gestures, or other means of communicating a threat of harm. Words and actions that are intimidating or threatening are strictly prohibited. If you witness or experience any threatened or actual incidents of violence in the workplace, you must report it immediately.

At Hagerty, team members must not condone, tolerate, or initiate workplace bullying of any kind.

Workplace bullying is unwelcome behavior that

humiliates or intimidates a co-worker or otherwise sabotages his or her performance. Because bullying often affects team member morale, productivity and retention, reduces bottom-line revenue and creates exposure to legal risks, no organization can afford to ignore it. Bullying can take many forms, including hostile behavior, humiliation, abuse of power, deception and sabotage. Hagerty prohibits all forms of bullying and Hagerty team members are expected to treat all others - subordinates, superiors, co-workers, customers, vendors and business associates - with civility, dignity and respect.

Hagerty is committed to responding promptly and appropriately to crises.

Issues, problems, and disruptions which could harm our brand, reputation, revenue, and financial performance could erupt at any time in any organization, including Hagerty. Within an atmosphere of rapid social media spread and 24-hour global news cycles, our leaders must plan ahead to be ready to respond in minutes. Our team cannot afford to “wait and see” before we respond, and any employee could be the first person to identify and report a possible crisis.

The Hagerty Incident Management Team (IMT) is largely responsible for creating each incident plan. All IMT members have input in developing the plan, and the team also consults other stakeholders, such as the operations staff and senior management. The IMT defines important roles in the incident response, including each person’s responsibilities. For more information regarding the IMT, or to escalate an immediate issue, please email the IMT at IncidentManagementTeam@Hagerty.com.

For More Information:

Review the [Employee Handbook](#) and the [Employee Policy Portal](#) for related workplace policies

Review the [Workplace Violence Policy and Procedures](#)

Q&A

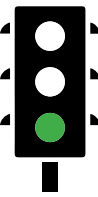
Q: My supervisor seems to be intoxicated while working. I am afraid that if I confront them or tell anyone, it may cause a scene or they may try to get me fired. What should I do?

A: There is enough evidence to believe a problem may exist, so speak right away with another supervisor, the Human Resources department, or use the WE LISTEN reporting tool. Hagerty will not tolerate retaliation against you and will take steps to protect you from any retaliation.

Q: My manager can be highly intimidating. I know she’s pushing us hard to deliver quality work, but at times she can really humiliate people, and it’s affecting the morale of the whole team. Is there anything I can do about it?

A: Your manager is expected to challenge and drive her team to deliver the quality of work we expect at Hagerty. This may mean that she will constructively criticize or comment on underperforming team members’ performance. However, a manager is also expected to treat team members with respect and act with due sensitivity. If you feel that you are not being treated in a fair and professional manner, you should try to speak with your manager. You can also consult with Human Resources, Legal and Compliance or report an issue anonymously through Hagerty’s WE LISTEN reporting system.

Hagerty Rules of the Road



Always treat your co-workers with civility, dignity, and respect.

If you see something, say something. Speak with your manager, contact facilities@hagerty.com, askHR@hagerty.com or use the WE LISTEN reporting tool.



Shouting, yelling, or making spiteful remarks to co-workers.

Expressing anger in an intimidating manner.

Teasing, ridiculing, belittling or otherwise demeaning anyone.

Displaying combativeness toward co-workers.

Making threats of physical or psychological harm, even in a joking manner.

Intruding on a person’s space by pestering, spying or tampering with their personal effects.

Making false allegations of misconduct.

Spreading gossip, rumors or innuendo of a malicious nature.

Taking credit for another team member’s work.

Purposely setting up a co-worker to fail.



Working with Integrity

Hagerty has a well-earned reputation for delivering business results with integrity, earned through unwavering daily commitment to honesty and to acting with the highest ethical standards.

Conflicts of Interest

At Hagerty, team members deliver distinctive client value by identifying and managing conflicts of interest and avoiding them as much as possible in personal and professional relationships.

All of us have activities outside of our jobs at Hagerty. A “conflict of interest” arises when a team member’s personal interests, relationships or activities (or those of an employee’s family member) interfere or conflict with the team member’s loyalty to the company or the team member’s objectivity in making business decisions. Company business decisions must be based on sound business judgment and not motivated by a team member’s personal interest or gain. Actual conflicts must be avoided, but even the appearance of a conflict of interest can be harmful. Each situation must be evaluated in light of the specific facts and circumstances.

Common Ways in Which Conflicts of Interest Can Arise

Outside Activities and Employment. Performing services (such as consulting) for a competitor, customer, or supplier of goods or services raises an actual or possible conflict of interest. Other outside activities that encroach

on Hagerty work time or adversely affect the quality of work performed for Hagerty also raises a conflict of interest.

Jobs and Affiliations of Close Relatives and Friends. The work and financial interests of family members and close personal friends can create conflicts of interest, too. While the work activities of a family member or close personal friend should be considered on a case-by-case basis, as a general matter, family members or close personal friends should not have any direct or indirect supervisory or reporting relationship.

Investments. A conflict of interest can occur if a team member has a material interest in a competitor, supplier customer or other business partner.

Corporate Opportunities. Conflicts of interest may also exist in situations where, for example, a team member: knowingly competes with Hagerty or diverts a business opportunity away from the company; uses company assets for, or uses their position or influence to promote or assist, outside business or personal endeavors, including receiving personal benefits such as loans or guarantees; directs business to a supplier or other business partner that is owned or

managed by a family member or close friend; makes preferential hiring or promotion decisions about a family member or close friend; or services or attempts to influence the handling of an insurance policy issued through Hagerty on behalf of themselves, a family member, or close friend.

If you think you may have a conflict of interest, or that others might believe you are engaged in an activity or relationship that creates a conflict of interest, you must promptly disclose this situation to your supervisor or the Legal and Compliance department via AskLegalCompliance@hagerty.com. This includes any personal or financial relationship with a current or prospective vendor, supplier, or other third party that does business — or may seek to do business — with Hagerty, which should be disclosed before engaging with that party on the company’s behalf. Many conflicts of interest can be resolved in a mutually acceptable way, but full disclosure must be made to protect you and the company.

Directors and Section 16 officers of Hagerty must comply with special requirements to clear conflicts of interest which are outlined further in the Related Party Transactions Policy.

Accepting and Giving Gifts and Entertainment

At Hagerty, team members may give and accept only modest and occasional business courtesies of nominal value. In this Code, “nominal value” is generally considered anything worth \$250 or less. Such courtesies must be modest enough to not interfere with ethical business judgment, not create an appearance of impropriety, and not violate any law (such as anti-bribery, see below). Some state laws prohibit gifts altogether or set value limits lower than \$250 in connection with the purchase or sale of insurance. Please reach out to AskLegalCompliance@hagerty.com if you are not familiar with these rules, or if you are unsure whether gift giving is permitted under applicable insurance laws. The occasional exchange of business gifts, meals and entertainment (business courtesies) is a common practice meant to create goodwill and establish trust in business relationships. Common sense and good judgment must be used in determining what is acceptable to give and receive. Promotional items are generally acceptable, as are modest perishable items such as food, flowers or candy. Having an occasional meal or attending an occasional sporting or cultural event is acceptable if

the intent is to discuss business or promote goodwill, and the meal or entertainment is modest and conducive to a business discussion. If a courtesy would appear questionable if printed in a newspaper article, it should not be given or accepted. If the receipt of business courtesies becomes excessive, or otherwise creates a sense of personal obligation on the part of the recipient, such a sense of obligation can interfere with one’s duty of loyalty and can create a conflict of interest.

In summary, acceptable business gifts are always unsolicited, modest or nominal in value, given openly and directly, and given with no sense of obligation on either side. Additionally, state laws must be considered for anything of value that is tied to the sale or purchase of insurance. Team members who are unsure if accepting or receiving a gift is appropriate should contact the Legal and Compliance department for more information.

Obligation to Disclose Criminal History

Hagerty team members involved in Hagerty insurance business must report convictions of crimes involving dishonesty, breach of trust, or violence. Not reporting such convictions is serious and could result in criminal penalties,

as well as discipline by Hagerty, up to and including termination. Additionally, Hagerty team members who are required to be licensed in connection with Hagerty insurance business must disclose a complete criminal history and any personal bankruptcy to the Hagerty Licensing Team. This obligation is ongoing and enforced to the fullest extent permitted by law. For additional details please refer to the “Licensing Obligations” section in the Hagerty Employee Handbook or reach out to licensingw@hagerty.com.

For More Information:

Review the Hagerty Employee Handbook

Review the Gifts for Members with Insurance Policy



Q: I serve on the Board of Directors of a local antique auto museum. Recently we had to decide on commercial property insurance proposals from several different companies, including Hagerty. Of course I voted for Hagerty's proposal, even though one of our competitors offered better pricing. Did I do the right thing?

A: No, you should have recused yourself from this decision because of the conflict of interest between the museum where you are a director and your employment at Hagerty.

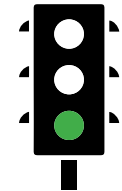
Q: My wife runs a training consulting firm. Can she submit a proposal to become a vendor of Hagerty?

A: She is welcome to submit a proposal, but to be sure to avoid any conflict of interest, you should disclose this relationship to your manager, refer the request to someone else and refrain from participating in this matter. The most important action with any potential conflict of interest is to disclose it so it can be properly managed.

Q: I've been searching for a third-party email management vendor for Hagerty for the past several weeks. I've developed a new friendship with one of the vendors that we are considering and they just offered me the use of their condo on the beach in Hawaii for a week. It costs them almost nothing to let me stay there. What should I do?

A: Use of a condo in Hawaii for a week is an extravagant gift above and beyond normal business courtesies, which would either appear to – or actually will – affect your judgment and interfere with your duty of loyalty to Hagerty. Before you accept this offer, you should disclose it to your supervisor and to the Legal and Compliance department. If Hagerty allows you to accept this offer, you may be required to abstain yourself from the email management vendor selection process.

Hagerty Rules of the Road



Recognize and address potential conflicts of interest.

Avoid doing anything that could create the appearance of failing to act in the best interest of our clients or our business.



Accepting, giving, or soliciting unacceptable gifts, loans, favors or valuables for yourself or another.

Accepting customer/supplier gifts or favors that could influence or appear to influence your decisions.

Maintaining a private business relationship with a supplier that could affect your independence and objectivity.

Working for a competitor.

Owning a competing business, engaging in competing activities or assisting with such activities.

Engaging in situations that could discredit, embarrass or conflict with Hagerty's best interests.

Speaking on behalf of Hagerty or using the Hagerty name, influence or resources without prior consent.

Allowing personal or family considerations to influence business-related decisions.

Accessing Hagerty data or information for personal or unauthorized activity.

Using Hagerty resources and communication channels for personal gain.



Insider Trading and Anti-Bribery

At Hagerty, team members must never trade on or disclose inside information.

Hagerty is a publicly traded company. Hagerty team members may, while working for Hagerty, obtain material non-public “inside information” regarding Hagerty or other companies—especially those with which Hagerty has a close business relationship. This restricted information may not, under any circumstances, be used for personal benefit. Hagerty has an Insider Trading Policy, which all team members are required to be trained on annually. Please refer to the Insider Trading Policy for details regarding what team members can and cannot do. In summary, the Insider Trading policy prohibits team members from trading securities or from sharing restricted information with others and “tipping” others to trade securities of companies while in possession of this material inside information before it becomes publicly available to ordinary investors.

Material non-public or “inside” information is any information that (1) has not been widely and publicly released and (2) a reasonable investor would consider in deciding whether to buy, sell, or trade a security and would thus likely affect the security’s price. This could include, for example, news about our financial performance, new products or services, strategic plans, business initiatives, mergers or acquisitions, litigation, or management changes. The Hagerty policy against insider trading applies not only to Hagerty employees, former employees, directors, officers and business partners, but also to members of their families and households. Thus, Hagerty team members should ensure their family and members of their household understand Hagerty policies.

Penalties for insider trading are severe. Individuals who engage in insider trading face a fine up to three times the amount gained or the loss avoided by insider trading. Those convicted of a willful violation may be imprisoned for up to twenty (20) years and fined up to \$5 million. Insider trading by high-level team members can subject their organizations to fines of up to \$25 million, as well as expose the organization and its officers and directors to civil lawsuits.

Hagerty maintains a quarterly blackout period during which Hagerty team members and their families are prohibited from trading in Hagerty securities. Hagerty may also impose special blackout periods during which similar prohibitions on trading apply. Any special blackout periods will be communicated to team members separately.

Additionally, Hagerty Board members and certain specially designated Hagerty team members, as well as their families and trust administrators, must follow stricter rules on trading.

You should consult our Insider Trading Policy for more details on the rules of the road.

Anti-Bribery Laws, including the U.S. Foreign Corrupt Practices Act (FCPA)

At Hagerty, team members must strive to avoid even the appearance of impropriety. Hagerty is committed to compliance with anti-corruption laws in all countries in which Hagerty operates or travels. These laws prohibit improper payments, such as bribes and kickbacks, as well as offers or promises to make improper payments, whether or not the offer or promise is successful. Under the FCPA and other anti-

corruption laws, it is a crime for any individual, business entity or employee of a business entity to offer or provide, directly or through a 3rd party, anything of value to a “foreign government official” with intent to influence an award or continuation of business or to gain an unfair advantage. The term “government official” is used broadly in many anti-bribery laws. It includes persons employed by state-owned commercial enterprises, such as state-owned or state-controlled insurance companies, banks, oil companies or airlines. The term includes persons acting (or purporting to act) on behalf of government agencies and departments, and non-governmental international organizations. It also includes political parties, party officials and candidates for political office. Consult with Legal and Compliance if you are unsure whether someone should be considered a government official.

At Hagerty, team members must never make improper payments, including bribes or kickbacks, to anyone, whether or not the recipient is considered a government official or is employed by a private (non-governmental) commercial entity, such as a competitor or client. Bribes and kickbacks (including offers

or promises to make improper payments) are illegal and against Hagerty policy, whether the conduct is engaged in by Hagerty team members or by any third party (such as an introducer, consultant, agent, or joint venture partner) acting on our behalf. Improper payments can involve offers, promises or payments of cash, future business, as well as extravagant gifts, travel expenses, entertainment, offers of employment, charitable contributions, and political contributions. All Hagerty political or charitable contributions must be reviewed and approved in writing by Legal and Compliance before being made, as well as accurately recorded in Hagerty’s books and records. Improper payments include both inducements (pre-transaction) and rewards (post-transaction). A payment, offer or promise of anything of value is considered “improper” or “corrupt” if it is intended to secure an improper business advantage.

Sanctions for violating these laws can be significant. For example, a violation of the FCPA’s anti-bribery provisions can lead to fines of up to \$2 million for companies, and fines of up to \$100,000 and/or imprisonment for individuals per violation. There is no limit on the amount of fines that a company could face for violating the UK Bribery Act. Team members may be

subject to additional compliance requirements in their state, province, or local country.

At Hagerty, team members must fairly and accurately record expenses and other transactions in our books and records, and all transactions must be supported by accurate documentation and invoices that clearly reflect the economic realities of the transactions. Supporting documentation must include details about attendees, locales or amounts spent on behalf of any individuals.

As a company, Hagerty must provide full and accurate information in all of our public documents and disclosures, including our financial reports. Hagerty’s books, records, and accounting must be fair, accurate, complete and timely.

Hagerty team members should never be involved in creating or approving false, misleading or fraudulent records, and team members should never mislead or attempt to influence auditors, accountants or anyone involved in preparing, auditing, reviewing or examining Hagerty financial statements, records or government filings.

For More Information:

Review the [Hagerty Employee Handbook](#)

Review the [Foreign Corrupt Practices Anti-Corruption Policy](#)

Review the [Insider Trading Policy](#)

Review the following laws:

- **The Securities Act of 1933**
- **The Securities and Exchange Act of 1934**
- **The Sarbanes-Oxley Act of 2002**
- **The Foreign Corrupt Practices Act (FCPA)**
- **The UK Bribery Act**
- **The OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions**
- **The Canadian Corruption of Foreign Public Officials Act**

Q&A

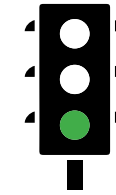
Q: In the course of my employment at Hagerty, I have discovered that Hagerty is planning a partnership with a small publicly traded company. I think this partnership may send the value of this small company's stock skyward. I know that I cannot buy stock because I have this inside information, but I can recommend that my friend invest in the company without telling my friend exactly why he should invest, right?

A: No, you must not do that. You are correct that you may not trade in that small publicly-traded company's stock because you have "material inside information." However, you are also forbidden by Hagerty policy and by law from making any recommendations to others to buy or sell stock, even if you do not share the inside information when making the recommendation. Doing this would be considered "tipping" and could subject you, Hagerty, and your friend to civil and criminal penalties.

Q: We are considering the use of a prominent business man as a consultant to help us open a new market for our insurance products in a particular country. This consultant is asking for a budget of a few thousand Euros to ensure that all the proper individuals and officials think highly of us. He says this is the normal way business is done in this country. Should I agree?

A: No. It is clear the consultant intends to make improper payments that violate this Code and our Employee Handbook policy – and, probably, the law. You cannot allow this to occur, and you cannot turn a blind eye simply because the improper acts would be done by this consultant rather than by you or another Hagerty team member.

Hagerty Rules of the Road



Keep records that accurately and fairly reflect all transactions and dispositions of assets.

Get advice if you aren't sure about something.

WRONG WAY

Offering or accepting bribes, payments, kickbacks, special privileges, or services to or from anyone with whom you do business.

Sharing company information that could be considered "material inside information" outside the company, even with family members, friends or business associates.

Buying, selling, or trading shares or securities of Hagerty during a blackout period.

Buying, selling, or trading shares of or securities of Hagerty or another company if you have or may be thought to have inside information about that company.

"Tipping" others to buy or sell company stock based on material non-public information.

Making any payment - either directly or through another person - with the intent to influence the recipient to misuse their position to secure an improper advantage for you or the company.

Ignoring or failing to report any indication of improper payments, gifts or entertainment.



A blue BMW Z4 convertible is driving on a paved road. The background features a hill with trees in autumn colors (orange, yellow, and green) under a clear blue sky. The car is in motion, as indicated by the blurred background and the license plate 'AC-30998'.

Diversity, Inclusion and Belonging

Hagerty team members have a responsibility to conduct business in a manner that has a sustainable, positive impact on our members, the communities where we operate, and our colleagues worldwide.

Delivering distinctive value to members, communities and colleagues means being honest, collaborating, treating everyone with respect and dignity, delivering on our promises, and always exceeding expectations.

Fair Dealing and Marketing Practices

At Hagerty, team members always deal fairly with members or customers, fellow team members, suppliers, markets and competitors. Hagerty team members do not take advantage of anyone through manipulation, concealment, abuse of privileged information or misrepresentation, or by means of any other unfair practice. Team members’ communications in proposals and contract negotiations must always be truthful – in other words clear, fair and not misleading. Team members must make sure all relationships with business partners are conducted professionally and are based on objective criteria, fairness, and the best interests of Hagerty and its members. Team members must never use, copy or give restricted or proprietary market information to competitors. If you happen to obtain such restricted or proprietary information about a competitor, safeguard it, and contact the Legal and Compliance department immediately.

At Hagerty, team members describe our products and services truthfully and accurately. Team members must not mislead members or consumers through deceptive acts or practices, false advertising claims, or

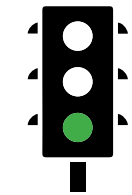
misrepresentations regarding products, services, or pricing for Hagerty or competitors. All marketing communications must be truthful, current, and accurate. Team members must not use any material representation or omission that is likely to mislead or deceive a member or consumer and must be able to substantiate every representation made in marketing communications.

At Hagerty, team members compete fairly and honestly for business, as required by our ethical standards, as well as the unfair competition and antitrust laws of many jurisdictions. Hagerty team members must not discuss sensitive market information, including fees, commissions, prices, territories, or strategies with competitors, whether informally or at professional gatherings or business meetings. Team members should never agree to engage in any anti-competitive practices and should never facilitate such behavior by anyone else. Examples of anti-competitive practices include agreeing to influence prices, allocate customers, suppliers, products, or territories; boycotting or refusing to sell to a customer or purchase from a supplier; working with a competitor to “gang-up” on another competitor, or engaging in price discrimination between customers in such a way

that can affect competition. Doing so may violate antitrust and unfair competition laws.

At Hagerty, team members respect the intellectual property rights of others. Hagerty team members may not reproduce, display, perform, or distribute any materials that are owned by, licensed to, or subject to the copyright of others without first obtaining the owner’s written permission or an appropriate license. For example, printed materials, photographs, graphics, software programs, diagrams, designs, logos, musical arrangements, and any other materials, whether found on the Internet, in other electronic formats, or in traditional media, that were not produced or developed by Hagerty may require permission or license from the owner before they can be reproduced, displayed, performed or distributed. An exception to this rule may apply for “fair use” situations as advised by the Legal and Compliance department.

Hagerty Rules of the Road



- Ensure that all communications and representations are truthful, current, and accurate.
- Use comparative claims, so long as they are fair comparisons of similar products, state a basis for comparison, and don’t discredit another’s reputation.
- Use caution when extending special offers (e.g. “free” products, guarantees, endorsements, etc.).
- Check before beginning a project to be sure you have proper permission to use images or other materials and information that may have been created by a third party.
- Make sure you have appropriate licenses for all software.



- Sharing or partitioning markets or customers with competitors.
- Discussing or exchanging confidential business information with competitors.
- Using deceptive or unfair representations or omissions in advertising or other company communications.
- Hiding disclaimer language in an obscure location to prevent readers from noticing it.
- Making any unsubstantiated claims or representations.
- Advertising sweepstakes that require a payment or purchase to enter.
- Re-using material obtained from the Internet without checking with the Legal and Compliance Department.
- Distributing or altering any licensed material you are using, unless permitted.

For More Information:

Review the following [Hagerty Employee Handbook](#) policies:

- Intellectual Property
- Team member Conduct

Review the following laws:

- The Sherman Act
- The Federal Trade Commission Act
- The Clayton Act
- Canadian Competition Act
- UK Competition Act 1988
- UK Enterprise Act 2002
- EU Competition Law
- US Federal Securities Law

Team members may be subject to compliance requirements in their state, province, or local country

In addition, most US states have antitrust laws that are enforced by state attorneys general or private plaintiffs.

Q&A

Q: I know that some Hagerty members use one of our competitors to insure parts of their collector auto collection. I often joke around with those members about the poor quality of service they must receive, and how our competitors' book of business just keeps going down and down. My manager recently told me I need to tone it down, but I think it's all in good fun – besides I'm helping sell Hagerty's products and services, right?

A: You should listen to your manager and try to tone it down a bit. Although accurately describing product differences and differentiating Hagerty products and services from those of our competitors is permitted and encouraged, purposely disparaging a competitor's products and services could be considered misleading, and could be violating competition and/or consumer protection laws.

Q: I recently joined Hagerty as a new team member. My prior employer is a direct competitor. Is it appropriate for me to share information regarding the business processes of my past employer?

A: Unless this information is a matter of public record, this is probably not appropriate. It is Hagerty's policy to respect the trade secrets or other proprietary information of others. This is particularly pertinent if you have knowledge of trade secrets or proprietary information from a former employer that is a direct competitor. If you still have questions, you should consult with the Legal and Compliance department.



A scenic view of a winding road through a forested mountain landscape under a cloudy sky. The road is paved and has a double yellow line. A car is visible on the road. The surrounding area is covered in dense green trees and shrubs. In the distance, a lake is visible between the mountains.

Public Investor Relations, Brand Ambassadors, Careful Communication and Confidentiality

At Hagerty, team members communicate carefully, honestly and professionally with clients and with the public. Team members must be committed to honest, professional, and legal communications and take care in all communications, internal or external, formal or informal. Unless a team member is expressly authorized to represent Hagerty on a given media or investor inquiry, team members are not authorized to communicate with any member of the media or market participant. All media requests or inquiries should be forwarded immediately to the appropriate PR spokesperson at press@hagerty.com so that Hagerty may respond on a timely basis.

As a public company, Hagerty must take special care not to disclose material non-public information to securities market professionals or Hagerty securities holders. Material non-public information is any information that (1) has not been widely and publicly released and (2) a reasonable investor would consider in deciding whether to buy, sell or trade a security and would thus likely affect the security’s price. This could include, for example, news about our financial performance, new products or services, strategic plans, business initiatives, mergers or acquisitions, litigation, or management changes. Disclosing material non-public information to securities market professionals or Hagerty securities holders could compromise our public communications with investors or influence the market for Hagerty securities.

Accordingly, only team members who are authorized to speak on behalf of Hagerty concerning Hagerty business may do so. For additional details regarding external communication practices, please see the External Communications Policy located in the Policy Portal.

If you think you may communicate particularly sensitive non-public information about Hagerty to a non-Hagerty business contact, or you learn that an unauthorized

disclosure of material non-public information was made, you should immediately contact askemployeestock@hagerty.com or notify our Designated Compliance Officer or a member of the Disclosure Committee, so that Hagerty can take prompt remedial action in accordance with applicable regulations, such as Regulation Fair Disclosure.

At Hagerty, we recognize that social media can be a useful means of marketing. At the same time, because social media sites make information widely available instantaneously, use of social media can pose risks to our restricted and proprietary information, reputation and brands, and can jeopardize the company’s compliance with business rules and laws. Team members may not speak on behalf of Hagerty unless they are authorized by Hagerty to do so – this type of social media communication is considered business correspondence and any information exchanged should be delivered with the same assurance of truthfulness and accuracy. If not speaking on behalf of Hagerty, team members know that they must always make it clear in social media postings that they are speaking on their own behalf. Team members understand that they are personally responsible for what they communicate in social

media, remembering that what they publish might be available to be read by the masses (including the company itself, future employers and social acquaintances) for a long time. The Hagerty Social Media Guidelines and Policy provide team members with additional guidance around the use of social media, both on authorized corporate channels and personal use of social media. This policy can be found on the Policy Portal.

At Hagerty, team members may not accept unsolicited ideas. Hagerty team members are sometimes approached by persons outside our companies with ideas or suggestions they think we should use. These ideas can involve products, promotions, advertising, processes, business methods or other topics.

Unfortunately, if these “unsolicited ideas” are not properly dealt with, our companies risk liability. For this reason, Hagerty team members must not accept, or in any way encourage, offers of unsolicited ideas. If you are approached about an unsolicited idea, immediately notify the Legal and Compliance department.

Privacy & Confidentiality

Hagerty team members are committed to respecting the confidentiality and privacy of members and business partners and safeguarding personally identifiable information. Team members may have knowledge of restricted information about Hagerty business and proprietary property — including information about other Hagerty team members, customers, and business partners — and personally identifiable information related to Hagerty members and consumers, team members, and business partners. Any breach of that information makes Hagerty and the team member subject to severe civil and criminal penalties. It is the duty of all team members to strictly and carefully protect Hagerty business information and private member and consumer, team member, and business partner information at all times. This restricted information may never be used by a team member for a team member’s own personal benefit, or the benefit of another. This obligation continues after separation from Hagerty employment.

Many jurisdictions have additional requirements about acquiring and handling personally identifiable information, including special requirements for information

provided to us through our websites and special rules intended to protect children and health-related information. Team members who do not have a business reason to access consumer and member, team member, or business partner information should not do so. Those who do have legitimate access must learn the specific rules that apply, and ensure that no unauthorized acquisition, release, or misuse of private information occurs. Specific policies may apply in each jurisdiction where Hagerty operates and also, for example, to information received from visitors to our websites. Consumer and member privacy is an important area where rules are still developing and differ from state to state and country to country. Hagerty is committed to monitoring evolving privacy standards and may, from time to time, develop additional policies in light of them.

If you know or suspect that private or confidential information related to Hagerty, a Hagerty team member, member or customer or business partner has been accessed, used, disclosed, modified, or destroyed without authorization, you must immediately report the incident to the Legal and Compliance department.

For More Information:

Review the following:

- [Hagerty Employee Handbook](#)
- [External Communications Policy](#)
- [Social Media Guidelines and Policy](#)
- [General Privacy Policy](#)
- [Data Classification Policy](#)
- [Records Management Policy](#)
- [Cybersecurity Policy](#)

Review the following laws:

- **Gramm-Leach-Bliley Act (“GLBA”)**
- **Health Insurance Portability and Accountability Act (“HIPAA”)**
- **Fair Credit Reporting Act (“FCRA”)**
- **Children’s Online Privacy Protection Act (“COPPA”)**
- **European Union Data Protection Directive**
- **Canadian Personal Information**
- **Protection and Electronic Documents Act (“PIPEDA”)**
- **Additional laws may apply and most US states and Canadian provinces also have privacy laws.**



Q: A news reporter called me today and asked if I could share a little information about Hagerty’s specialty insurance program. I know a lot about Hagerty’s specialty insurance program so it is okay for me to talk to this person, right?

A: No. Although you may know exactly how to answer questions, Hagerty’s policy is that only those team members authorized to speak with the press may respond to inquiries from the press. Any team member who is contacted by the press must refer the inquiry to Hagerty’s Public Relations department at press@hagerty.com.

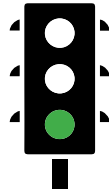
Q: What if someone outside of Hagerty sends me an idea for a new marketing campaign?

A: This is called an “unsolicited idea”. Unsolicited ideas from outsiders can pose risks for Hagerty if not properly dealt with. In order to avoid potential liability, misunderstandings or disputes, you should never accept, or in any way encourage, offers of unsolicited ideas. If someone, despite your refusal to accept unsolicited ideas, still elects to send their ideas to Hagerty, please immediately forward the idea to the Legal and Compliance department. That person will be required to review and sign Hagerty’s Unsolicited Idea Submission Policy.

Q: My co-worker noted the other day that we have a lot of information about our members’ households. For instance, we have records about how many household residents or dependents a member has and their ages. I was thinking that this information could make me a lot of extra money if I used it for my own personal business outside Hagerty to market my age-specific products. Is there any problem with this?

A: Yes, there is a problem. The data we hold about our members and their households may only be used by Hagerty as necessary to provide members our products and services. It may never be used by a team member for a team member’s own personal benefit.

Hagerty Rules of the Road



Refrain from providing any information or commenting on a media, public, investor, or stock market professional inquiry on behalf of Hagerty if you are not authorized by Hagerty to do so, even if you have personal knowledge.

Be polite, courteous and helpful by stating you will be forwarding the information to the appropriate department.

Remember that communications in social media might be available to be read by the masses for a very long time.

Contact the Legal and Compliance department if you are approached with an unsolicited idea or have privacy related questions.

Restrict access to team member, member and consumer, or business partner information and restricted business information to those that need it to do their jobs.

Learn which privacy rules and policies apply to information to which you have access.



Speaking on behalf of Hagerty or using the Hagerty name, influence, or resources without prior consent from Hagerty.

Responding to a media, public, investor or stock market professional inquiry with “no comment”.

Posting anything on a social media site on behalf of Hagerty without consent from Hagerty.

Accepting an unsolicited idea without contacting the Legal and Compliance Department.

Disclosing restricted or confidential business information, personally identifiable information of our team members, members or consumers, or business partners without specific approval from the Hagerty Legal and Compliance department and Hagerty’s Leadership.



Intellectual Curiosity and Creating New Ideas with Loyalty and Respect

At Hagerty, team members are provided the tools and assets they need to exhibit agility, intellectual curiosity and create new ideas.

Team members in turn are expected to protect those tools and assets, including physical assets – such as computers and equipment, intangible assets – such as intellectual property and proprietary information, and financial assets.

Computer Networks and Information Security

At Hagerty, computers and electronic communications are critical to our business.

Every team member using a computer, computer network, mobile device, personal device, other technology or equipment, or any other information resource (collectively referred to herein as “information resources”) has a responsibility to help keep Hagerty information secure. This includes accessing information resources responsibly and respecting restrictions on how information resources should be used. Each team member has a user ID and password to access information resources. A team member’s user ID and password must be protected at all times – even from co-workers. Team members should change passwords every 90 days or whenever prompted by Hagerty’s IT systems. Passwords should always be strong, utilizing a combination of letters, numbers and symbols. Team members should never leave computer terminals or personal mobile devices unattended when logged in, as confidential information may be on the screen or otherwise available. Team members must also avoid opening suspicious e-mail attachments

or hyperlinks and should take special precautions while working in the field or at home to ensure that restricted, protected, and personally identifiable information is secured in laptop computers, personal or other mobile devices, briefcases, or home offices.

At Hagerty, team members have no expectation of privacy when using Hagerty’s information resources. The data and information resources to which Hagerty team members are granted access are Hagerty’s property and team members should not have an expectation of privacy concerning content on Hagerty’s information resources, systems or equipment (e.g., e-mail, telephone records, information stored on hard drives, servers and peripheral devices). Hagerty will monitor the use of such information resources, systems and equipment at any time, in accordance with all applicable laws and regulations, and will refrain from such monitoring in locations where laws prohibit it. Hagerty reserves the right to block access to non-business-related Internet sites.

Hagerty information resources are provided for work-related purposes whether provided by Hagerty in the office or for work

in your home or outside of the office. Hagerty recognizes that team members may occasionally access the Internet for personal reasons. However, any personal use of the Internet by team members during working hours should be occasional, minimal and appropriate. Team members have no expectation of privacy for any Hagerty resources whether the use is personal or work-related. Internet use on Hagerty devices should be occasional, minimal, and appropriate. A team member-created password is not an indicator of personal privacy. Team members may not use the Internet for illegal or offensive activities and may not use the Internet to view any material that is fraudulent, harassing, embarrassing, sexually explicit, profane, obscene, intimidating, defamatory, or otherwise unlawful or inappropriate, including any comments that would offend someone on the basis of race, age, sex, sexual orientation, religion or political beliefs, national origin or disability. Team members inadvertently encountering such material should immediately report the incident to Security@hagerty.com.

Additionally, Hagerty accounts must enroll in multi-factor

authentication (MFA) to help keep them safe and protected from would-be cyber attackers. Registering your user account with MFA can be accomplished with a smart phone and your Hagerty login credentials.

Intellectual Property and Tangible Assets

At Hagerty, we encourage new ideas and creative efforts that support innovation. This sometimes results in the creation of some of our most valuable assets – our intellectual property, principally our trademarks, copyrights, patents, and other proprietary information, including innovations in our products and processes. Intellectual property rights are created every day by team member efforts in our work. Team members must all do what we can to secure and protect these assets for the company. Team members should always fully document product development research and use appropriate Hagerty trademark and copyright notices. Team members should also learn to identify newly created intellectual property in order to protect it fully and should always avoid disclosing proprietary and restricted information unless there is a clear business purpose,

they have business approval to do so, and the recipient of the information has signed a confidentiality agreement.

At Hagerty, team members have a duty to protect Hagerty’s tangible assets as well – things like Hagerty vehicles, desks, chairs, supplies and the buildings we work in. Team members must not misuse, steal, waste, or otherwise mistreat Hagerty assets. Any suspected theft, waste or misuse should be reported to your supervisor or the Human Resources department, or through our WE LISTEN reporting system.

For More Information:

Review the following within the Hagerty Employee Handbook and policies linked below within the Policy Portal:

- E-mail Retention and Destruction
- E-mail Security
- Internet Use
- Password
- Monitoring Calls for Quality Assurance
- Identification Badges
- Reporting of Security Incidents
- BYOD Security Policy
- Social Media Guidelines and Policy
- Records Management Policy
- Cybersecurity Policy

Q&A

Q: I noticed a coworker is attending our virtual team meetings with other non-Hagerty employees close enough to see and hear our business information. This isn't the first time. What should I do?

A: You should talk to coworker or your supervisor about it. Safeguarding restricted information is everyone's responsibility.

Q: I received a phone call from a person claiming to be a representative of one of our IT software vendors. They asked me to send some procedural details for a project she is working on for Hagerty. Is this okay?

A: No. You should first confirm that the person requesting information is who they claim to be and that they are authorized under a signed contract with Hagerty to obtain and keep confidential the information being requested. If you are unable to confirm this, you should not send this person any restricted information.

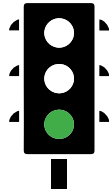
Q: I was attending a conference with several other Hagerty team members. At lunch, most of my co-workers left their laptops and personal devices in the conference room, so I did the same. This was okay, right?

A: No. Laptops, personal devices and the information contained on them are vital Hagerty assets. They must be protected from theft and misuse, and the information they contain must always be protected from unauthorized disclosure. You and your co-workers should not have left those devices in the conference room unattended.

Q: Am I allowed to use my Hagerty-owned device or email to contact my friends and family to make personal plans?

A: Yes, as long as personal use is appropriate and minimal. But remember that you should have no expectation of privacy regarding any use of Hagerty's information resources including Internet, email and computer use.

Hagerty Rules of the Road



Memorize your password, and don't write it down.

Create passwords with at least eight alpha-numeric characters but preferably fourteen or more.

Lock your screen whenever you walk away from your desk.

Contact Security@hagerty.com immediately if you think a virus has infected your computer.

Store paper documents in secure spaces, such as locked file cabinets.

Safeguard mobile devices that contain sensitive personal data, such as laptops, smartphones, tablets, and other mobile technology that can store company data.

Use information resources primarily for legitimate business purposes – any personal uses should be reasonable and kept to a minimum.

See the Inventions GearBox Page to learn about the Invention Incentive Program and find out how to submit an idea.

Remember that Hagerty reserves the right to access, monitor and disclose communications made on its information resources and systems.

Protect company assets — property, resources and funds — as you would your own. Keep them safe from theft, waste and abuse.

Maintain the confidentiality of information entrusted to you by Hagerty unless disclosure is authorized or required by law.

Be sure to use our trademarks properly and consistently so that others don't take advantage of them and remember that intellectual property you create in your work for the company, as well as all records and files you create at your job, belong to Hagerty.

Encrypt restricted, confidential, and internal only data that is transmitted outside of Hagerty. Use only approved networks and Cloud-based storage. Use approved file sharing tools to share restricted and confidential data.

Consult the Legal and Compliance department before licensing Hagerty Intellectual Property ("IP"), and read all agreements carefully to ensure that you are not canceling Hagerty IP.

WRONG WAY

Using a password that is easily associated with you - a password based on the name of one of your children or pets, your birthday or some other common name or number which is not secure.

Letting co-workers or anyone else "borrow" your password.

Leaving your computer terminal unattended when restricted information is on the screen.

Responding to or forwarding spam messages.

Opening e-mail attachments from unknown senders.

Using the Internet in a manner that interferes with your work performance.

Allowing "tailgaters" to enter secure areas without their own key or badge.

Using e-mail or the Internet in a way that might be considered to be discriminatory, offensive, defamatory, harassing, obscene or an invasion of someone's privacy.

Using company electronic communications systems to improperly disseminate restricted, protected, copyrighted or licensed materials.

Using company electronic communications systems to transmit chain letters, advertisements or solicitations (unless authorized by Hagerty).

An aerial photograph of a parking lot. In the foreground, a dark-colored car is parked. A person wearing a white shirt and dark pants is standing next to the driver's side of this car. Behind it, a green car is parked. Further back, another dark car is partially visible. The parking lot has yellow painted lines. To the right of the parking lot is a sandy area with some shadows cast by the cars and the person.

Records Management and Legal Matters

At Hagerty, team members must keep accurate records. In the course of our work at Hagerty, team members may communicate with customers, vendors, co-workers and various other people. Team members may also have investigative or analytical duties where it is essential to document information that is important to Hagerty in some way. All team member communications, investigations or analyses become “records” – whether the communication is an e-mail, a memo, a voicemail message, etc. Hagerty business records are among its most important and valuable assets. Each Hagerty team member is responsible for the accuracy, security and integrity of all Hagerty business records – including, but not limited to, member contact and transaction records, time sheets, expense accounts, financial records, contract negotiations, and other business dealings. Team members must never include any false or misleading information in any business records.

At Hagerty, records management and retention is a vital part of our business operations. Team members are responsible for the proper retention and deletion of all company files and records, including paper-based and electronic-based information. Team members must create, maintain and dispose of business records only in accordance with Hagerty policy. For business and legal reasons, it is imperative that all team members familiarize themselves with the policy and abide by the retention time periods indicated therein. On occasion Hagerty has an obligation to preserve documents that relate to any legal proceeding or investigation. A team member receiving notice of potential litigation, investigation, or audit should report it immediately to the organization's Legal and Compliance department, which may then order that certain records be preserved until further notice. This is called a "legal hold." While a record is subject to such a legal hold, team members must not delete or alter it in any manner - even if the record is scheduled for disposal.

Signatory & Invoice Payment Approval Authority

At Hagerty, team members only make commitments we are authorized to make. Only team members authorized by Hagerty (the "Authorized Persons") may execute documents in the company's name which contain legally binding terms (i.e., enter into contracts or agreements). Further, Authorized Persons may only execute legally binding documents - even as an agreement of terms online - within the nature and scope of their delegated authority as defined by Hagerty policy, and only after the proposed binding terms have been approved by Hagerty's Legal department. Authorized Persons should refer to the "Contract Review Request" process to satisfy this requirement. No sub-delegation of authority by Authorized Persons shall be valid against the company.

Authorized Persons may also approve invoices up to the level of that team member's authority as defined by Hagerty policy. Prior to approving an invoice, Authorized Persons must ensure that the goods or services due to Hagerty have been delivered, they comply with the terms of the underlying agreement and the expense complies with all

applicable company policies and/or procedures. No Authorized Person may approve any invoices which would, directly or indirectly, result in payment or reimbursement of any kind to that same Authorized Person or a related party. Additionally, no Authorized Person shall exercise both Invoice Payment Approval Authority and Check Signing Authority with respect to the same vendor of goods and services.

Lawsuits and Other Legal Matters

At Hagerty, the Legal and Compliance department is responsible for managing legal risks, litigation, and other legal matters. The Legal and Compliance department is solely responsible for hiring outside lawyers for Hagerty and for Hagerty affiliates and subsidiaries. Team members outside the Legal and Compliance department may not engage or hire lawyers for Hagerty. If team members are notified of any lawsuit, arbitration, adversarial proceeding, E&O claim or allegation, or other legal issue involving Hagerty or its affiliates or subsidiaries, they should notify the Legal and Compliance department immediately.

Hagerty team members fully cooperate with legal requests for information. Team members must contact AskLegalCompliance@hagerty.com immediately in the event of any outside request for information —such as a subpoena, a department of insurance complaint or inquiry, or any other non-routine request for information. All information provided by Hagerty team members in response must be truthful and complete.

For More Information:

Review the following policies within the [Hagerty Employee Handbook](#) and policies linked below within the **Policy Portal**:

- [Travel and Entertainment Policy](#)
- **Enterprise Return On Investment**
- **Project Governance and Business Valuation Analysis**
- [Delegation of Authority Policy](#)
- **Limits of Approval**
- **Qualified Expenditures**
- [Contract Review Request](#)



Q&A

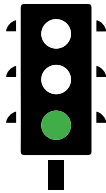
Q: It is the last week in the quarterly reporting period and I want to make sure we meet our numbers for the quarter. I am still waiting on some documentation so I know a sale won't be finalized until next week, but I want to count it now because we are a few clients short of our goal. It won't hurt if I count this sale now, even though I don't have the proper documentation to close the deal – will it?

A: The sale has not officially been completed until we have proper documentation to close the deal. Counting the sale now would be untruthful, inaccurate and could lead to serious disciplinary action. You should not count this sale until it is actually completed, even if it means we will not meet our goal for this quarter.

Q: I just received a call from an FBI agent. He was requesting information about a Hagerty member with respect to an ongoing federal investigation. Because I know he is an FBI agent and I know Hagerty is required to cooperate with any legal request for information from a government official, it is okay for me to share information with him, right?

A: No. Hagerty team members should be committed to responding to legal requests for information truthfully, timely and accurately, but team members must first notify Hagerty's Legal and Compliance department of this request. While it is likely okay for Hagerty to respond, team members must involve the Legal and Compliance department before taking any further action.

Hagerty Rules of the Road



Ensure Hagerty business records are truthful, accurate and not misleading.

Review applicable record retention policies and rules regularly.

Retain and protect business records for the proper retention periods.

Preserve and protect business records as directed by the Hagerty Legal and Compliance department in connection with a "legal hold."

Properly and promptly dispose of business records for which retention is no longer necessary for legal or business reasons.

Ensure that business records are adequately labeled and indexed when placed into storage or electronically archived.

Create records as if they were "going public" and traceable to you.

Review Hagerty policy before signing an agreement or contract on behalf of Hagerty.

Contact AskLegalCompliance@hagerty.com if you become aware of a lawsuit, E&O claim, allegation or any other legal matter.



Falsifying or making deliberately misleading business records.

Altering or destroying company records except in accordance with company policies and procedures.

Jumping to conclusions before creating a record of an event – get the whole story.

Exaggerating or using overly dramatic language; be concise and careful with your wording.

Being subjective in business records – don't let your communications be clouded by personal judgment.

Creating records in haste or when you feel angry or otherwise emotional.

Sending an e-mail before reviewing the contents and double-checking the recipient list.

Approve invoices unless you have proper authority and then, only after you are sure that goods or services due to Hagerty have been delivered and they comply with the terms of the underlying agreement.

Hiring or engaging an attorney on behalf of Hagerty without consulting our Legal and Compliance department.



