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# Code of Conduct

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We're Making Our  
History Every Day



A company of Allianz 



# Fireman's Fund Code of Conduct

Dear Fellow Employees,

Fireman's Fund® has survived great crises and disasters since 1863, while earning a reputation as a company of integrity that strives to do the right thing and be true to its word.

Our survival and success can be attributed to many factors. In the end, it's the customer who dictates the longevity of any business or company. And a major reason customers give us their business and loyalty is because they believe our business practices are grounded in ethical and responsible actions and decisions.

Every one of us, as employees of Fireman's Fund, is a caretaker of this legacy. This means it's essential that we demonstrate integrity – in compliance with the law, our policies, and our values – in each action we take on behalf of the Company.

The Code of Conduct is our guide. It connects our four brand values – courageous, caring, inspired and dependable – to the ethical practices of a truly great company.

We have the courage to speak up when we need to through our management team, HRONCALL, or our Ethics Helpline. Our customers depend on us to do the right thing and do things right. We are creating the kind of environment that you want to work in, where we treat each other in a caring and professional manner. And we can inspire each other to adhere to the utmost ethical standards.

I encourage you to read the Code of Conduct, talk to your manager and for any questions or concerns call the Ethics Helpline at 1.866.831.2243. Thank you.

Sincerely,

Chuck Kavitsky



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# Introduction

Dependable

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We consistently  
apply sound  
business  
principles and  
good judgment.

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## Why We Have a Code of Conduct

Your Fireman's Fund® Code of Conduct is designed as a helpful, easy reference for any questions about our ethical standards. It supports the Code of Conduct of our parent company, Allianz, and is like a corporate "constitution" for how we will work together, with high standards of ethical conduct, to be a leader in the P&C industry.

While the Fireman's Fund Code addresses many significant issues that could arise in your daily work environment, no code of conduct can anticipate all legal or ethical issues. Regardless of whether a specific issue is discussed in the Code, you must follow *all* legal requirements and act ethically in connection with everything you do for Fireman's Fund.

## Your Duties Under the Code of Conduct

All directors and employees of the Company have the responsibility to:

- Read and understand the Code and the Company policies that are referenced in the Code.
- Comply with the Code, in letter and spirit, as well as all other Company policies and all applicable laws.
- Seek guidance if unsure about the right thing to do.
- Promptly report any known or suspected violations of the Code, other Company policies or the law or requests that might constitute such violations, using the reporting procedures described in the Code.
- Demonstrate a commitment to the Code through their words and actions
- Look for additional ways to support the Code and other Company policies.

Managers have the additional duties to:

- Maintain a workplace culture that is conducive to promoting high standards of lawful and ethical behavior and that encourages employees to ask questions and raise concerns.
- Monitor compliance with the Code and other Company policies.
- Ensure that those whom they supervise have completed required compliance training and know where to report violations.
- Prevent retaliation for any such reports.

In some instances, stricter rules than those imposed by the Code apply to certain job functions within Fireman's Fund. If your management adopts a more restrictive policy or guideline, that stricter standard prevails.

Additionally, Fireman's Fund has established policies in a number of areas that provide greater detail than the Code. References to those policies appear in the Code. You are responsible for being familiar with and abiding by both the terms of the Code and the policies.

## Ethical Conduct and Our Values

The Code requires that you act ethically, as well as lawfully, and promote Fireman's Fund's Values in all aspects of your work for the Company. That is, if a possible course of action is troubling to you, you should initially ask if the action is lawful and permitted by Company policy. If the action is either unlawful or prohibited by Company policy, then you should refrain from such action, and report any violations by others.

But even if an action appears to be lawful and not prohibited by Company policy, it still must meet the "transparency test,"

## Dependable

# We always adhere to the spirit and letter of the law.

### Equal Employment Opportunities

**Q** I've been passed over for several opportunities for which I believe I am qualified. It feels like discrimination. What should I do?

**A** Fireman's Fund is proud to be an equal opportunity employer where employment decisions are made based on merit. If you feel that you've been passed over for opportunities, speak with your manager about the qualifications and performance necessary for those roles. If you still believe discrimination has occurred, contact HRONCALL in Employee Services or the Ethics Helpline immediately.

which means that if full disclosure of the situation would result in concern or embarrassment to Fireman's Fund®, then you should refrain from such action, and report any violations by others. Any course of action must align with our Values, which requires that Fireman's Fund employees be:

- Courageous
- Caring
- Inspired
- Dependable

#### Reporting Your Concerns

All directors and employees are obligated to promptly report any known or suspected violations of the Code or requests that might constitute violations. To the extent reasonably possible, reports will be treated confidentially. You also have the option of reporting concerns anonymously.

#### Our Policy on Retaliation

Fireman's Fund policy strictly prohibits any retaliation or harassment for reporting a concern. Any such retaliation is a violation of the Code, and could be a violation of law, which will result in appropriate discipline.

#### Your Reporting Options

The Company has established the following procedures for reporting concerns or seeking guidance under the Code:

1. You may discuss the matter with your manager or any other manager within Fireman's Fund. They will bring your report to the appropriate parties within Fireman's Fund for investigation and follow up.

2. If the matter concerns discrimination, harassment, and/or violations of other Company employment policies, you may contact HRONCALL at 888.899.6844. HRONCALL is a Company resource that provides support, guidance and information to employees and managers on a wide range of employee policies and programs.
3. You may telephone our Ethics Helpline at 866.831.2243, which is operated by an outside company on Fireman's Fund's behalf. Calls to the Helpline are kept confidential to the extent reasonably possible and can be anonymous if you wish. Helpline staff document your concern(s) and create a report, which is sent to the Senior Director, Ethics and Policy Governance for investigation and follow up. The Helpline is available 24 hours a day, seven days a week.
4. You may contact the online Helpline at [www.fficethicshelpline.com](http://www.fficethicshelpline.com), which is hosted by an outside company on Fireman's Fund's behalf. Reports submitted to the Helpline are kept confidential to the extent reasonably possible and can be anonymous if you wish. You create an online report, which is forwarded to the e-mail inbox of the Senior Director, Ethics and Policy Governance for investigation and follow up. The online Helpline is available from any Internet connection 24 hours a day, seven days a week. Reports submitted online might not be reviewed until the next business day.
5. Certain matters specified in this Code should be reported to the General Counsel's Office, Corporate Investigations or the Controller's Office. (Contact information for these offices is provided at the back of the Code.)

## Internet Use

**Q** One of my co-workers spends a lot of time surfing the Internet during work hours. Is that a violation of Company policy?

**A** Employees may occasionally access the Internet for personal use. However, employees must not access personal sites that are inappropriate or cost the company money. Time spent must also not interfere with job performance.

Any reports of known or suspected violations concerning accounting, auditing or accounting controls will be reviewed by the Audit Committee.

### Enforcement of the Code

Fireman's Fund® has established an Ethics and Policy Governance Committee comprised of the Chief Executive Officer and other senior officials of the Company, and appointed a Senior Director of Ethics and Policy Compliance, to ensure that the Company's ethics and compliance standards are fully enforced. Fireman's Fund investigates all reports of violations.

Employees who violate the Code are subject to disciplinary action up to and including termination of employment (as consistent with applicable law). The following are examples of conduct that may result in discipline:

- Actions that violate the Code, a Company policy, or the law.
- Requesting or permitting others to violate the Code, a Company policy or the law.
- Failing to promptly report a known or suspected violation of the Code, a Company policy, or the law.
- Retaliating against or threatening another employee or third party for reporting a Code or policy violation or for cooperating with a Company investigation or audit.
- Failing to cooperate fully with Company investigators or auditors.

- For managers and supervisors, failing to use reasonable care to prevent or detect a violation or otherwise failing to demonstrate the leadership and diligence needed to ensure compliance with the Code and other Company policies.

It is also a violation of our Code – and in some instances of the law – to assist others (at Fireman's Fund or elsewhere) in violating laws, rules, regulations or our ethical standards. (For example, aiding another company in reporting false financial information is a violation of the law and Fireman's Fund policy.) Additionally, we will not use third parties who act on behalf of the Company to engage in business activities that violate our Code, other policies or applicable laws and regulations.



# Our Responsibilities to Our Customers

Inspired

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We have a passion to provide protection and peace of mind for our customers. We relentlessly pursue fresh, high-value solutions to customer needs.

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## **Privacy of Customer Personal Information**

### **Related Policy: Confidential Information**

Fireman's Fund® adheres to all applicable federal and state privacy laws and regulations. Our policy is to safeguard the personal information of applicants, policyholders and claimants. Fireman's Fund will not share, sell or for any reason provide personal information to non-affiliated third parties without the proper notification of the individual or where allowed by law to conduct the business of insurance. All suppliers or organizations that provide services to Fireman's Fund are contractually required to protect the confidentiality of personal information shared with them for business purposes. We will not use or share, either internally or externally, personally identifiable medical information for any purpose other than the underwriting or administration of an individual's policy or claim. We will continuously assess ourselves to ensure that the privacy of an individual's personal data entrusted to us is respected.

## **Prohibition on Discrimination in Underwriting and Rating Insurance**

Engaging in acts of unfair discrimination in rating or underwriting insurance violates state insurance laws and is contrary to Fireman's Fund policy. Company employees involved in rating and underwriting must be

aware of these laws and our policy, and be alert to and report any circumstances suggesting a violation. Among other things, such employees must understand that: issues regarding unfair discrimination in rating or underwriting can arise even where the form or rate has been filed and approved; that the risks of a violation are higher where the form or rate was not required to be filed for regulatory approval; and that underwriting guidelines – which are often not filed – can be especially sensitive.

## **Claims Handling**

It is essential that all claims be handled fairly and in accordance with all applicable laws and regulations. Among other things, Claims personnel must:

- Act promptly and in good faith.
- Conduct thorough investigations.
- Keep the insured or claimant fully informed of the status of the claim.
- Adjust claims in accordance with policy terms and applicable law and regulations.
- Participate in state-mandated training.

**Complaint Management**

**Related Policy: Complaint Management**

We must deal with all complaints of present and former insureds, claimants, insurance agents and brokers, insurance and other regulators, and the general public in a diligent, courteous, prompt and fair manner, and in accordance with applicable law and regulation. We gather and analyze complaint data to find ways to improve our service and products.

**Criminal Convictions**

**Related Policy: Compliance & Reporting Duties, Prohibited Conduct**

It is unlawful for an insurance company to employ persons who have been convicted of felony convictions for crimes of dishonesty or breach of trust including but not limited to, offenses involving perjury, bribery, forgery, counterfeiting, false or misleading oral or written statements, deception, fraud, schemes or artifices to deceive or defraud, material misrepresentations and the failure to disclose material facts. Employees must report any such criminal conviction to HRONCALL immediately upon being convicted.

Dependable

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Our customers  
can count on us  
to be there when  
they need us.  
We honor our  
commitments,  
even when it is  
difficult to do so.

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Caring

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We are emotionally aware and strive to go beyond the business transaction to create a superior customer service experience.

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# Our Responsibilities to Our Shareholders

Courageous

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We take  
personal  
accountability  
for our actions  
and decisions.

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## Financial Records and Internal Controls

**Related Policies: Compliance and Reporting Duties, Internal Control Override**

The shareholders of Allianz Group, our parent company, our directors and management, and applicable regulatory bodies, are entitled to financial statements that fairly present the Fireman's Fund®'s financial condition and results of operations. Misstating financial results carries serious criminal and civil fines and penalties for the Company, as well as personal criminal liability for employees.

The Company's records and books of account must be maintained with integrity and according to established professional accounting and reporting standards. No false or misleading entries shall be made in any books or records of the Company. Information must always be recorded in a timely manner. No payment on behalf of the Company shall be approved or made if any part of that payment will be used for any purpose other than that described by supporting documentation.

The Company is committed to a system of effective internal controls, providing reasonable assurance that transactions are executed and recorded in accordance with proper authorization and company policy, permitting preparation of reliable financial statements and maintaining overall financial control. Employees must never mislead or allow others to mislead the Company's internal or external auditors through false, incomplete or non-responsive information.

## Other Guidelines Regarding Company Records

**Related Policies: Compliance and Reporting Duties, Records Retention, Timekeeping Requirements**

**All records must be accurate.** The need

for accuracy and completeness applies not only to financial matters, but also to records of every kind – including but not limited to, those related to sales and marketing, procurement, personnel matters, time keeping, travel and expenses, and claims. If you are not certain as to the accuracy and completeness of information in a Company record, ask about it. You should never, by your silence, allow yourself to become responsible for an incorrect record.

**Records must be created in a professional manner.** Letters, memos, notes, charts and graphs, e-mails, voice mails and even conversations can become part of the Company's records. You should therefore always record and convey information with clarity and appropriate professionalism, so that your communication would not be misinterpreted if it appeared later, for instance, in a newspaper or court of law.

**Records must be maintained for required periods.** Fireman's Fund has established a records retention policy, and all records must be maintained for time periods and in the manner required by that policy. The improper destruction, removal or alteration of records can harm the Company in many ways, and in some instances can constitute a criminal offense.

## Conflicts of Interest

**Related Policies: Conflicts of Interest, Gifts and Entertainment, Insider Trading**

**What is a conflict of interest?** A conflict of interest can arise under many circumstances and generally occurs when any interest or activity outside of the Company:

- Influences your judgment when acting on behalf of the Company.
- Results in your competing against the Company in any business activity.

## Conflicts of Interest

**Q** A long-term friend and policyholder recently had an insurance loss with us. He wants me to review the claim file and tell him whether he's getting a fair shake. I know we're supposed to be customer oriented, but this seems inappropriate. What should I do?

**A** While our customers are important, your friend's request has placed you in a conflict of interest situation. It also may involve the sharing of Company confidential information, which is a violation of the trust Fireman's Fund has placed in you. Violations of the law, regulations, or Company policy in order to please a customer are not acceptable.

- Diminishes your efficiency and effectiveness in performing your regular duties.
- Causes you to misuse your influence over Company business decisions.
- Causes you to misuse Company resources or influences.

**Appearances of conflicts.** Because of the importance of maintaining the Company's reputation for integrity, our Conflict of Interest policy covers not only actual conflicts of interest but apparent conflicts as well. In other words, even if there is no danger of an actual conflict, circumstances that could reasonably lead third parties to believe that a conflict exists are covered by this policy.

**Our policy regarding conflicts.** Our Code requires prompt and complete disclosure of all actual or apparent conflicts of interest using the procedures outlined in the next section, including but not limited to:

- Being employed by or consulting for any organization (other than a Fireman's Fund affiliate) that does business with the Company, or is seeking to do so.
- If an immediate family member works or consults for an organization that does business with Fireman's Fund, you must disclose that fact.
- Using your position with the Company to directly or indirectly derive a personal benefit for yourself or others, or to appear to do so.
- Using Fireman Fund's name, facilities and relationships for personal benefit or for the benefit of a third party.
- Appropriating to yourself, or to any other person or organization, the benefit of any

actual or potential business opportunity that relates to the Company business.

- Serving as a director or officer (paid or otherwise) of any for-profit organization. However, this does not apply to charitable, civic, religious, political, or social organizations whose activities do not conflict with the interests of the Company or interfere with your productive service as an employee. This also does not apply to companies on whose board the employee serves at the request of the Company or one of its affiliates.
- Your having, or an immediate family member having, an interest in any organization which has or is seeking to establish business relations with the Company. However, this provision does not apply to:
  - Interests in publicly owned mutual funds, or
  - Ownership of a security or other interest in any corporation which is publicly traded on a stock exchange or over the counter if the value of your interest is less than one tenth of one percent of the outstanding shares.

**Disclosure of conflicts.** It is the employee's duty to disclose promptly and completely any circumstances that might constitute an actual or apparent conflict of interest under this Code and our Conflict of Interest policy. If you suspect an actual or apparent conflict of interest, contact HRONCALL so that the matter can be resolved promptly. Any doubts you have must be resolved in favor of disclosure.

Following disclosure, the Company may determine that the circumstances pose no risk to the Company and permit an

## Gifts and Entertainment

**Q** I was given a bottle of wine and cheese as a thank you from an agent. Is it appropriate for me to accept this gift?

**A** You may accept food gifts of “nominal” value that can be shared by your work group, such as tins of popcorn, fruit baskets, candy – and in your case, the cheese. If the wine is of nominal value, you should consider whether accepting it could be perceived as influencing your business judgment or if you would feel obligated in some way to do business with the giver. Your response should guide you in your decision to accept the gift, return it to the sender, or give it to an employee not involved in the business relationship.

*If you are unsure of how you should respond to receipt of a gift (for example, if you are concerned that returning the gift to a customer would cause offense), contact HRONCALL for guidance regarding your specific situation.*

employee to proceed with the interest or activity. However, no such permission is valid unless received in writing.

### Giving and Receiving Gifts and Entertainment

#### Related Policy: Gifts and Entertainment

**Gifts** Other than promotional items of nominal value such as pens, mugs, shirts with our Company logo, etc., you may not – as a general matter – provide gifts to or receive gifts from any person employed by an organization with which Fireman’s Fund® has an actual or prospective business relationship. Under no circumstances may you provide a gift of any kind to an elected official or an employee of a governmental body.

**Entertainment** Entertaining or being entertained by persons employed by an organization with which the Company has an actual or prospective business relationship (insurance agents, brokers, suppliers, and the like) is sometimes necessary and desirable. However, doing so is permissible only if it meets the standards of our Code.

All business entertainment must:

- Be moderate and reasonable, and
- Be consistent with business goals, and
- Comply with applicable law, and
- Comply with the policies of the employer of the person providing or receiving the entertainment, and
- Be intended to build the business relationship (for example, if you offer

tickets to an event, you must attend the event), and

- Not be of a nature that could embarrass Fireman’s Fund if it became public knowledge (such as “adult” entertainment), and
- Not be extended to government employees, particularly those who directly regulate Fireman’s Fund.

### Considerations applicable to both gifts and entertainment

- If you provide a gift or entertainment, you must accurately account for it in your expense claim or department records.
- These guidelines apply at all times and do not change during traditional gift-giving seasons or during the planning of a Company event.
- The limitation on gifts and entertainment includes gifts and entertainment not only provided to or received from an employee of an organization with which Fireman’s Fund has an actual or prospective business relationship, but also those involving a family member or close friend of such individual.
- Stricter gift and entertainment rules may apply to certain functions within Fireman’s Fund. In the event of a seeming inconsistency, the more restrictive standard governs.

If you are uncertain regarding any matter involving gifts and entertainment, you must seek guidance from your manager before acting.

## Inspired

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We have a passion to provide... maximum value for our shareholders.

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### **Using Company Property**

#### **Related Policy: Prohibited Conduct**

Efficient and appropriate use of Fireman's Fund® resources is critical to our success. We must therefore exercise care, good judgment and discretion when utilizing Company property. We should never borrow or remove assets from Company premises without proper authorization nor use them for any inappropriate purpose or in a manner that could harm the Company's reputation. We must also follow applicable procedures for preventing loss, theft or misuse of Company property.

### **Entering into Contractual Commitments**

Fireman's Fund has adopted guidelines that specify the employees who are authorized to commit the Company to specific obligations. You are responsible for verifying that you have the appropriate authority before signing on behalf of Fireman's Fund.

### **Using Internet, E-mail and other Company Communications**

#### **Related Policy: Electronic Communications, Internet Usage**

Access to computer, telephone, voice mail, e-mail and other systems and networks owned or operated by the Company impose responsibilities and legal obligations. Acceptable use always obligates you to act appropriately. Personal use of these resources should be kept to a minimum.

Under no circumstances should these systems be used:

- to send offensive, harassing, defamatory, threatening, dishonest, unlawful or otherwise improper communications;
- to access or receive obscene materials;

- for business purposes other than those of the Company;
- to violate intellectual property rights of the Company or any other party; or
- in a manner that could compromise the confidentiality of Company information.

Communications over Company resources are not private, and may be monitored or searched to ensure compliance with this and other provisions of the Code.

### **Protecting the Company Against Insurance Fraud**

Our shareholders and customers count on Fireman's Fund to take all steps reasonably possible to reduce the risk of fraud. Accordingly, the Company engages in various efforts to prevent, detect and investigate insurance fraud.

All Fireman's Fund employees must be alert to any indications of fraud, and immediately report any suspected fraud to Corporate Investigations at 800. 668.2553. In addition, because we seek to continuously improve our efforts in this important area, you should share any ideas you may have for additional insurance fraud prevention measures the Company can take.

### **Safeguarding Our Confidential Information and Employee Privacy**

#### **Related Policies: Access to Personnel File Information, Confidential Information, Password Protection, Visitor Security**

The unauthorized release of confidential information can cause the Company to lose a critical competitive advantage, hurt relationships with customers and

## **Confidential Information and Employee Privacy**

**Q** I am going on a leave of absence to have surgery. What should I tell my manager, and what is appropriate for my manager to tell my work team?

**A** You are not required to talk to your manager about your medical condition. However, it is important for you to immediately contact the FFIC Absence Management Center (AMC) to request a leave of absence. You may tell your manager that you have contacted the AMC to make a request for a leave. An AMC specialist will notify your manager when a leave of absence is requested, and the expected duration of the leave. The AMC does not provide your manager with any confidential medical information.

*Regarding your work team, for purposes of managing ongoing work activities it is appropriate for your manager to simply inform the team that you will be absent from work for a specific amount of time.*

producers, embarrass or harm fellow employees, and expose the Company to legal liability.

**What information is covered by this policy.** Confidential information may include, but is not limited to:

- Our own information, such as financial records and projections, business plans, information related to our products, prices, costs, sales and marketing data and plans, technical information.
- Personal information about employees (such as performance appraisals or salary history).
- Information related to our producers and customers.
- Other third party information (such as that belonging to applicants, producers, or suppliers) that the Company has received and has contractually committed to maintain as confidential.

**Your duties under this policy.** Each employee must ensure that the confidential information under his or her possession, direction or control is properly safeguarded in accordance with Company policies and instructions, consistent with the Company's contractual commitments and must limit access to confidential information as specified in Company policies and instructions. If the Company has obtained the confidential information pursuant to a contractual commitment to a third party, employees must adhere to those confidentiality obligations. In any event, employees must refrain from using confidential information obtained in the performance of their work for personal benefit or other non-Company purposes.

Employees have a duty not to reveal any confidential information about or related to the Company even after they end their employment. Suspected or actual unauthorized releases of confidential information of any nature must be reported immediately to the General Counsel's Office.

### **Protecting Other Intellectual Property** **Related Policy: Protection of Intellectual Property**

In addition to safeguarding the Company's confidential information, employees are required to protect against the misuse of other intellectual property, including but not limited to Trademarks, Trade Names, Service Marks, Trade Secrets and Copyrighted material. You are required to:

- Use Fireman's Fund®'s intellectual property only in furtherance of the Company purposes.
- Avoid misusing intellectual property belonging to third parties, including but not limited to using Copyrighted material belonging to others without appropriate permission.

Report any misuse of intellectual property by other employees or third parties.

### **Insider Trading**

#### **Related Policy: Insider Trading and Personal Financial Relationships**

American Depository Shares (ADS's) of our parent, Allianz AG, are listed on the New York Stock Exchange, and the common shares of Allianz AG are publicly traded in various markets worldwide. Company policy and federal and state securities law prohibit the buying or selling of Allianz AG securities

## Reporting Duties

**Q** Do I have an obligation to report a suspicion of fraud if I do not have proof?

**A** Yes. FFIC will investigate the matter as discreetly as possible to determine whether the concern has merit. If it is determined that there is no merit, then the investigation will be closed with no further action taken. If it is determined that the concerns have merit, the investigation will continue until a conclusion is reached.

(ADS's, common shares or related derivative instruments) while aware of material non-public information relating to Allianz AG or any member of the Allianz Group. Communicating material non-public information to others who use it to trade in Allianz AG securities ("tipping") is also prohibited.

Information is "material" if there is a substantial likelihood that a reasonable shareholder would consider it important in making an investment decision. Such information may include nonpublic information relating to earnings, significant business transactions, or substantial acquisition or divestiture negotiations. Material non-public information could include information about Allianz AG itself, its affiliates, or Fireman's Fund®.

This policy is also applicable to non-public information obtained in the course of employment relating to any other companies with developing or established business relationships with the Allianz Group, including customers, partners, contractors and vendors. For greater detail, see the Company Insider Trading Policy available on Portal.

## Contact with the Media and Investors

### Related Policy: [Communicating with the Media](#)

All information about the Company or Allianz that is provided to the news media, investment analysts, investors and other third parties must be accurate and not misleading. To ensure that this occurs and that all appropriate business interests are considered, only certain contact people designated by the Chief Executive Officer or the Corporate and Marketing Communications department may disseminate information to the media or other members of the public concerning Fireman's Fund.

### Responding to Regulatory Examinations, Lawsuits and Investigations

#### Related Policies: [Compliance and Reporting Duties, Investigations and Inspections, Prohibited Conduct](#)

The General Counsel's Office must be immediately notified of any regulatory investigation or other legal proceeding in which the Company becomes or might become involved. This policy also covers situations where an employee becomes involved as a third-party (for example, as a witness) if the matter concerns the employee's duties for the Company. The General Counsel's Office must also be immediately notified of any market conduct examination or other regulatory action, investigation or inquiry from federal or state authorities involving the Company. However, if you receive an inquiry related to a financial examination of or a data call directed to the Company, you should contact the Controller's Office for instruction.

## Caring

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We accept honest mistakes and failures as an investment in our future.

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## Charitable and Political Contributions

**Q** I'm getting pressure from my peers to make a charitable contribution to an organization. Is this permitted?

**A** No. It is not permitted to pressure another employee to contribute to a charitable organization. Contributions should be strictly voluntary. Additionally, asking for donations or purchases is a solicitation, which under our Solicitation & Distribution policy is not allowed in the workplace during work time.

**Prohibited conduct.** While it is Company policy and practice to cooperate with all government investigations, no information, whether oral or written, or records or files of any nature, should be furnished to any outside party in connection with a lawsuit or government investigation, inquiry or examination except upon prior approval of the General Counsel's Office. Additionally, employees should never, under any circumstances:

- Destroy or alter any documents in anticipation of a request for those documents from any government agency or a court or in connection with any pending or threatened litigation or court proceeding.
- Lie or make any misleading statements to any government investigator or in connection with any regulatory inquiry or legal proceeding (this includes routine examinations as well as investigations).
- Attempt to cause any other Company employee, or any other person, to provide any false or misleading information or otherwise not to cooperate with any legal proceeding or with any government entity.

## Company investigations and audits.

Employees are required to cooperate fully with all Company investigations and audits. Fireman's Fund® reserves the right to conduct searches of all areas owned or controlled by the Company for any business-related purpose, including searches of desks, file cabinets, e-mail, voice mail, computers and employee property brought onto Company premises.



# Our Responsibilities to Each Other

## Harassment

**Q** If I call and report an incident of sexual harassment, will my identity be kept confidential? Will my job be put in jeopardy?

**A** While we cannot guarantee anonymity, investigations of sexual harassment are made as confidentially as possible. Harassment or retaliation for reporting harassment is against Fireman’s Fund policy and will not be tolerated in our workplace.

## Caring

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We celebrate diversity and respect the dignity of every individual.

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## Equal Employment Opportunity

**Related Policies: Equal Employment Opportunities, Disability Accommodation**

The Company is committed to equal opportunity for all persons, regardless of race, color, religion, sex, pregnancy, disability, medical condition, national origin, ancestry, age, sexual orientation, veteran status, gender, or marital status. The Company adheres to this policy in all of its employment practices, including recruitment, hiring, training, compensation, and promotion and requires that all employment decisions at Fireman’s Fund be based on merit.

The Company’s business goals are achieved through the talent, hard work, and unique qualities that each employee brings to the job. Fireman’s Fund recognizes the need for diversity in the workplace and appreciates the different talents and abilities each employee brings to the job. All employees are expected to demonstrate respect for social, cultural, sexual, and physical differences when working with each other and with customers and vendors.

## Prohibition on Harassment

**Related Policies: Harassment, Prohibited Conduct**

Fireman’s Fund maintains a workplace that is free of harassment and discrimination based on race, color, religion, sex, pregnancy, disability, medical condition, national origin, ancestry, age, sexual orientation, veteran status, gender, or marital status. Harassment includes:

- Verbal harassment, such as suggestive, insulting, or derogatory comments, epithets, innuendoes, sounds, jokes, teasing, threats, or slurs.
- Physical harassment, such as assault, impeding or blocking movement, or any

unwanted physical contact or interference with normal work or movement, including touching, pinching, brushing the body, or sexual contact.

- Visual harassment, such as derogatory posters, cartoons, suggestive objects, pictures, letters, drawings, and actions, such as leering, whistling, or making obscene gestures.

Additionally, sexual harassment includes any unwelcome sexual advances, sexual propositions, requests for sexual favors, and other verbal or physical conduct of a sexual nature that:

- Is made either explicitly or implicitly a term or condition of an individual’s employment.
- Is used as a basis for employment decisions, such as promotions and benefits affecting the employee.
- Substantially interferes with an employee’s work performance or creates an intimidating, hostile, or offensive work environment.

## Workplace Safety

**Related Policies: Health and Safety, Prohibited Conduct**

Fireman’s Fund is concerned for the well being of all its employees – as well as all others who visit our premises, and health and safety is crucial to the Company’s operations. Our goal is to reduce the potential for injury or illness by maintaining safe working conditions, providing proper tools, equipment, and training, and by establishing and maintaining a Company-wide Safety Program. Unsafe conditions should be reported to the manager, or to the Safety Committee in locations where one is established.

## Drug-Free Workplace

**Q** I suspect that a co-worker uses alcohol during work hours. While I have not seen him actually drink alcohol, I frequently smell it on his breath at the office. What should I do?

**A** If you are concerned a coworker is under the influence of alcohol or drugs, you should notify your manager or HRONCALL in Employee Services immediately.

Our Code also forbids any acts of violence, threats or intimidating behavior toward any other employee, customer, supplier or anyone else with whom the Company has a business relationship. Company policy also prohibits carrying firearms or other dangerous weapons or materials on Company premises. Any such conduct must be reported immediately to HRONCALL, and, if necessary, to building security and the local police.

### Drug-Free Workplace

#### Related Policy: Alcohol and Drugs

To meet our responsibilities to customers, shareholders and employees, Fireman's Fund must maintain a healthy and productive work environment.

Misusing controlled substances or selling, manufacturing, distributing, possessing, using or being under the influence of illegal drugs on the job is absolutely prohibited. In addition, no employee may consume alcohol before reporting to work or during breaks or lunch periods if it adversely impacts operations, safety, or performance.

The Company may sponsor events at which management approves the serving of alcoholic beverages. In these cases, all applicable liquor laws must be followed, and intoxication and excessive drinking is prohibited.

## Courageous

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We show our trust for each other by communicating openly, honestly and directly.

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# Our Responsibilities in How We Compete

Courageous

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We take personal accountability for our actions and decisions.

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## Antitrust laws

### Related Policy: Fair Competition and Antitrust

Fair competition is a fundamental principle of our free enterprise system. Fireman's Fund® employees must not engage in activities that unlawfully restrain trade or constitute unfair business practices or that could give the appearance of such a violation.

Among the activities that have been clearly identified as violations of law are those that involve agreements with competitors to:

- Fix prices or terms or conditions of sale for competing products or services.
- Divide or allocate customers, bids (that is, bid rigging), markets or territories for competing products or services.
- Refuse to sell to particular buyers or to buy from particular suppliers.
- Exchange nonpublic sales or price information.

Relationships with agents or brokers, whether embodied within written agreements and understandings or otherwise, must reflect a commitment to proper trade practices and compliance with applicable laws.

## Competitive Information

Obtaining information about competitors and other companies is common in the normal course of business. However, no employee may use improper means to obtain competitive information, such as through misrepresentation, bribery or trespass (including unauthorized access to a computer network).

## Marketing and Related Activities

Marketing, sales, advertising and promotional activities must be honest in every respect. Making false or misleading claims about premiums, terms of coverage or other aspects of our products is forbidden. We also must be accurate when speaking about the products of our competitors. The General Counsel's Office attorneys designated to support Marketing must approve any comparative advertising in advance.

## Prohibition on Corruption

### Related Policies: Fair Competition and Antitrust, Gifts and Entertainment, Charitable and Political Contributions

The Company prohibits bribes, kickbacks or other improper payments, whether made directly or indirectly, to any individual or organization, including government officials, political parties, customers, insurance producers, distributors, agents or private persons. Similarly, acceptance of bribes, kickbacks or any other form of improper payment is prohibited. (Payment, of course, does not only include money but also anything of value.)

## Health and Safety

**Q** Recently I have been experiencing unusual discomfort in my back/neck/shoulder/wrist or hands while working on my computer and suspect my work area may not be set up properly. How can I determine if this is indeed the problem?

**A** Our online Ergonomic Training is an excellent, cost-effective self-assessment tool which explains proper ergonomic positioning and what you can do to adjust your workstation. If your work area adjustments do not resolve the problem, you may request a workplace ergonomic evaluation through Portal at <http://portal02.ffic.com/portal/ergonomics.nsf>

## Prohibition on Money Laundering and Supporting Terrorist Activities

### Related Policies: Prevention of Money Laundering and Supporting Terrorist Activities

Fireman's Fund policy and the law prohibit conduct designed to conceal or disguise the nature, location, source, ownership or control of money (currency or equivalents, such as checks, electronic transfers, etc.) to:

- avoid currency transaction reporting requirements under federal law;
- use Fireman's Fund products or services to conduct money laundering activities; or
- disguise the fact that the money was acquired by illegal means, such as embezzlement or misuse of insured's premiums.

Employees are required to report any potential suspicions of money laundering by any person to the General Counsel's Office.

In addition, Fireman's Fund Anti-Money Laundering policy addresses all required federal anti-terrorism activities to identify potential Specially Designated Nationals as defined by the U.S. Office of Foreign Assets Control. All employees should have an understanding of their obligations under this policy.



# Our Responsibilities to Our Communities

## Inspired

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We are inspired by our social mission to create safer, stronger communities.

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### **Political Involvement and Dealing with the Government**

#### **Related Policies: Charitable and Political Contributions**

While the Company encourages individual participation in political activity, no employee shall make contributions from Company funds or property to any political parties or candidates. Employees wishing to contribute to Fireman's Fund's political activities may do so only through the Allianz Life/Fireman's Fund Political Action Committee. Further, no employee shall, on behalf of the Company, attempt to influence another employee's decision to make, or refrain from making, a personal political contribution to a candidate or a party. This policy is not intended, however, to prevent the authorized communication of the Company's views to legislators, governmental agencies or to the general public with respect to existing or proposed legislation or governmental policies or practices affecting business operations.

We obey all laws regarding lobbying. Lobbying is defined as direct contact for purposes of influence with elected or appointed state and federal officials. This includes but is not limited to legislators, insurance regulators or appointed officials and their staffs. To assure compliance with our policy, Government Affairs must approve, in advance, any lobbying activities on behalf of the Company.

### **Environmental**

We obey all applicable laws and regulations regarding environmental protection. We must also seek to minimize the negative impact of our operations on the natural environment by using energy and resources in an efficient manner and, where possible, reducing the creation of waste materials.

### **Corporate Social Responsibility and Charitable Contributions**

#### **Related Policies: Charitable and Political Contributions, Civic Duty, Military Leave**

The Company strives to be a responsible corporate social citizen. Our Heritage program awards millions of dollars in grants each year to fire departments for essential equipment, training and fire safety education. We are one of the leading charitable companies in the Bay Area, funding a variety of arts and culture, human needs and educational activities. We balance the bottom line of our business commitments with our responsibility to the communities in which our employees and customers reside. Of course, any charitable contributions or sponsorships involving Company resources must be made consistent with Company policy and in accordance with applicable laws.



## To report an illegal or unethical activity, or seek guidance on a concern:

The Code does not constitute a contract of employment. Employment at the Company is “at will,” meaning that an employee or the Company can terminate the employment relationship at any time, for any reason, without cause or notice.

**Related Policy: At-will Employment Status**

### Your Management

You can report issues of illegal or unethical activity to your manager, or to any other manager within FFIC. The manager to whom you report your concerns will take the information to the appropriate parties within FFIC for investigation and follow up.

### HRONCALL

**888.899.6844**

HRONCALL is an FFIC business unit that provides support, guidance and information to employees and managers on a wide range of Human Resources policies, programs, tools and topics. HR Consultants within this unit also investigate complaints of discrimination and harassment, and violations of other FFIC employee policies.

### Ethics Helpline

**866.831.2243**

The telephone Helpline is operated by an outside agency on our behalf. Calls to the Helpline are confidential and can be anonymous if you wish. Helpline staff document your concern(s) and create a report which is sent to the Sr. Director, Ethics & Policy Governance for investigation and follow up. The Helpline is available 24 hours a day, seven days a week.

### Online Ethics Helpline

[www.fficethicshelpline.com](http://www.fficethicshelpline.com)

The online Helpline is hosted by an outside agency on our behalf. Reports submitted to the Helpline are confidential and can be anonymous if you wish. You create an online report which is forwarded to the e-mail inbox of the Sr. Director, Ethics & Policy Governance for investigation and follow up. The online Helpline is available from any Internet connection 24 hours a day, seven days a week. Reports submitted online may not be reviewed until the next business day. If your concern is urgent or you wish to speak to a live person, please call the Ethics Helpline at 866.831.2243.

### Corporate Investigations

**800.668.2553**

Corporate Investigations is an FFIC business unit that primarily investigates improprieties, illegal conduct and fraud by employees, agents, and service providers (vendors) as well as conflict of interest issues and closed claim investigations.

[www.firemansfund.com](http://www.firemansfund.com)

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