

Business Ethics Policy

Policy Number: LE-0019

Purpose Pennsylvania National Mutual Casualty Insurance Company, its subsidiaries and affiliate (“Penn National Insurance” or “Company”) is built upon a foundation of strong corporate values and business practices. Business decisions must be made with integrity and without influence. This policy outlines requirements associated with business conduct, gifts, and conflicts of interest including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.

Scope All employees of Penn National Insurance.

Effective Date January 1, 2005 – Revised April 21, 2021
April 21, 2021 – Revised December 15, 2023
December 15, 2023 – Revised April 10, 2024

Last Review April 10, 2024

Related Policies CM-0002 Community & Charitable Support Programs
FD-0001 Business Travel & Entertainment
HR-0002 Standards of Conduct
HR-0053 Workplace Anti-Violence Policy
Code of Business Conduct

Policy

1. Gifts and Entertainment

Employees shall not accept or give gifts, favors or entertainment if it obligates, or appears to obligate, the recipient, or if it might be perceived as an attempt to influence fair judgment.

When giving gifts or offering to entertain a business partner, ensure that your offer does not violate the recipient’s own policies. If you work with public officials, be aware that even simple offers such as purchasing a meal or refreshments may be unacceptable or even against the law. Contact the Legal Department before providing or accepting any gift or entertainment to a public official.

This policy is not intended to preclude the acceptance or giving of common courtesies associated with acceptable and customary business practices. When in doubt of whether a gift is appropriate to give or receive, you are expected to consult with your supervisor in advance. Supervisors who are unsure should consult with the Legal Department.

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2. Unusual Payments

Bribes, kickbacks, extraordinary or other unusual payments are strictly prohibited.

3. Outside Financial or Business Interests and other Conflicts of Interest

You should not engage in employment or a profit-making interest outside of your responsibilities with Penn National Insurance that:

- Competes with Penn National Insurance or provides services and assistance to a competitor such as selling insurance, claims investigations, claims handling, or automobile or property repairs if such employment conflicts or competes with company business;
- Interferes with your assigned duties with Penn National Insurance such as requiring the Company's time, facilities or property to perform these duties. This also includes, but is not limited to, making or receiving phone calls, handling correspondence or receiving visits from customers while performing your job with Penn National Insurance; and/or
- Diminishes your ability to give full time and attention to your job responsibilities with Penn National Insurance.

4. Relational Policies and Accounts

No employee shall take part in the underwriting, processing or entry of policies, the adjustment of claims, or the billing or collection of premiums involving themselves, relatives and close personal acquaintances. You must refer these transactions to your supervisor or manager for handling. Additionally, employees who have an insurance policy with the Company, or who know that an immediate family member, member of the employee's household or an employee's close acquaintance have an insurance policy with the Company must disclose the circumstances consistent with Section 6 below.

5. Claims Salvage Disposal

The Company strictly prohibits the disposal of any loss recovery salvage, either directly or indirectly, by sale or gift to employees, relatives and close personal acquaintances. This restriction includes automobiles, personal property or salvage emanating from liability

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claims. Company policy is that all loss recovery salvage will be disposed through approved salvage vendors.

6. Conflicts of Interest Disclosure

All employees must disclose situations that involve possible conflicts of interest. An annual disclosure is included within the Code of Conduct Training within Oracle. Employees are responsible for completing the annual training and are required to provide an updated response to the annual disclosure every year.

In addition, if an employee or manager becomes aware of any new actual or potential conflict of interest, the conflict should be reported to the Legal Department for review and documentation either before or at the time the conflict arises. Hiring managers should also report potential conflicts of interest for candidates to whom they are considering making an offer prior to the extension of an offer.

7. Expense Reimbursement

The Company recognizes its responsibility to reimburse you for legitimate business expenses. You are expected to fully, clearly and timely document such expenses in accordance with the Business Travel and Entertainment Policy, FD-0001.

8. Political and Civic Activities

Employee participation in political and civic activities must not impair the employee's ability to fulfill job responsibilities with the Company. Employees shall not make, authorize or permit any contribution, expenditure or use of the Company's funds or property for political purposes.

9. Charitable Activities

Penn National encourages and supports its employees in the participation of charitable activities. All charitable contributions and activities must comply with Company policies including CM-0002 Community & Charitable Support Programs.

10. Accounting and Auditing Matters

Adherence to and consistent application of proper and generally accepted accounting principles, policies, rules and controls is expected at all times. Complete and accurate data must be provided and maintained so that accounts reflect the true substance of transactions and financial reports present fairly the financial position

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of the Company and the results of its operations.

Any employee of the Company may submit a good faith complaint regarding accounting or auditing matters to the management of the Company without fear of dismissal or retaliation of any kind. Penn National Insurance is committed to achieving compliance with all applicable securities laws and regulations, accounting standards, accounting controls and practices.

In order to facilitate the reporting of employee complaints, the Company has established the following procedures:

Employees with concerns regarding accounting matters may report concerns to their supervisor, the Legal Department or Chief Audit Executive. Employees may forward complaints on a confidential or anonymous basis through regular mail to the Legal Department or Chief Audit Executive or through the hotline or web reporting service monitored by Lighthouse Services, Inc.

- The hotline number is 1-888-718-1893.
- The web address is <http://www.lighthouse-services.com>
 - Username: PNI
 - Password: concern

Confidentiality will be maintained to the extent possible but is not guaranteed. Prompt and appropriate corrective action will be taken as warranted. Penn National Insurance will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee in the terms and conditions of employment based upon any lawful actions of such employee with respect to good faith reporting of complaints regarding accounting matters or otherwise. Acts of retaliation should be reported immediately and will be disciplined appropriately.

11. Noncompliance and Enforcement

Violations of this policy may subject the employee to corrective action up to and including termination of employment. Suspected violations of this policy must be reported to a member of the Legal Department and/or Internal Audit.

Questions

Questions regarding this policy should be addressed to **the Legal Department**.

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