

CONIFER HOLDINGS, INC.
CODE OF ETHICS APPLICABLE TO SENIOR FINANCE EXECUTIVES

It is critical to the success of Conifer Holdings, Inc. and all of its subsidiaries, (herein after collectively referred to as the “Company”), and in the best interests of the Company’s stockholders that employees of the Company conduct themselves honestly and ethically. In particular, each member of the Company’s senior executive finance team, including the Chief Executive Officer, President, Chief Financial Officer and Controller of Conifer Holdings, Inc., as well as any other officer(s) serving in a similar capacity at each of the operating subsidiaries (the “Executive Team”), are required to observe the highest standards of ethical business conduct, including strict adherence to this Code of Ethics Applicable to Senior Finance Executives (the “Code”) and the Company’s Code of Business Conduct and Ethics applicable to all employees. Accordingly, each member of the Executive Team must comply with the letter and spirit of the following:

- I. Each member of the Executive Team will act at all times honestly and ethically, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships. For purposes of the Code, the phrase “actual or apparent conflict of interest” shall be broadly construed and include, for example, direct conflicts, indirect conflicts, potential conflicts, apparent conflicts and any other personal, business or professional relationship or dealings that have a reasonable possibility of creating even the appearance of impropriety.
- II. Each member of the Executive Team must ensure that all reasonable and necessary steps within his or her areas of responsibility are taken to provide full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with or submits to the Securities and Exchange Commission or state regulators, and in all other regulatory filings. In addition, each member of the Executive Team must provide full, fair, accurate and understandable information whenever communicating with the Company’s stockholders or the general public.
- III. All members of the Executive Team must conduct Company business in compliance with all applicable federal, state, foreign and local laws and regulations.
- IV. The Company’s board of directors (the “Board) shall be responsible for the administration of the Code and shall have the sole authority to grant waivers of its provisions.
- V. The Board has delegated the responsibility to receive and investigate all actual or potential violations of the Code to the Audit Committee of the Board (the “Audit Committee”). It is each Executive Team member’s responsibility to promptly notify the Chair of the Audit Committee (the “Chair”) of any actual or potential violation of the Code by any member of the Executive Team. All members of the

Executive Team are responsible for ensuring that their own conduct complies with the Code. It is the duty of the Chair to conduct or seek a thorough investigation of the alleged violation by an appropriate independent party.

- VI. Anyone who violates the provisions of the Code by engaging in unethical conduct, failing to report conduct that potentially violates the Code or refusing to participate in any investigation of such conduct, will be subject to disciplinary actions, up to and including termination of service with the Company.

ACKNOWLEDGMENT

The undersigned member of the Executive Team (the “Member”) hereby acknowledges that the Member has received a copy of the Company’s Code of Ethics Applicable to Senior Finance Executives. The Member acknowledges that he or she has read and understands the Code in its entirety and agrees to abide by it. The Member further acknowledges that it is his or her responsibility to seek clarification from the Board of Directors if any application of the Code to a particular circumstance is not clear. The Member acknowledges that the Member’s continued service with the Company requires the Member to fully adhere to the Code and that failure to do so can result in disciplinary action up to and including termination of the Member’s employment by the Company.

Signature/Date

Name & Title