

# **CONIFER HOLDINGS, INC. WHISTLEBLOWER POLICY**

## **General Statement of Purpose**

Conifer Holdings, Inc. and all of its subsidiaries, (herein after collectively referred to as the “Company”), is committed to fostering a workplace conducive to open communication regarding the Company’s business practices and protecting individuals from unlawful retaliation and discrimination for proper disclosure or reporting of illegal or unethical conduct. In an effort to further this commitment, this policy: (1) establishes guidance for the receipt, retention and treatment of verbal or written reports received by the Company regarding accounting, internal controls, auditing matters, disclosure, fraud and unethical business practices, whether submitted by Company employees or third parties (“Reports”); (2) establishes guidance for providing Company employees a means to make Reports in a confidential and anonymous manner; and (3) makes clear the Company’s intention to discipline, up to and including termination of employment, any person determined to have engaged in retaliatory behavior.

## **Receipt and Investigation**

This policy and information regarding problem resolution resources shall be provided to Company’s employees and made generally available through the Company website. The Company has designated the Audit Committee of the Company’s board of directors (“Audit Committee”) to be responsible for investigating Reports filed under this policy and to coordinate any necessary Company action. The Head of Internal Audit has been deemed independent of Company operational management by the Company’s board of directors and will assist the Audit Committee with policy compliance efforts. The Chair of the Audit Committee has also directed the involvement of the SEC Corporate Counsel to receive and assist with the investigations of Reports. Any Report received by a Company officer, director or employee should be immediately forwarded to the Head of Internal Audit and SEC Corporate Counsel or the Chair of the Audit Committee.

## **Treatment and Retention**

All Reports will be taken seriously and addressed promptly, discreetly and professionally. Reports may be submitted anonymously or the person submitting the Report may request to remain anonymous. The desire to remain anonymous will be respected. Discussions and documentation regarding Reports will be kept in strict confidence to the extent appropriate or permitted by policy or law. Should the person submitting the Report identify himself or herself, the recipient of the Report will communicate to that individual, the steps to be taken to address the Report and the results of any Company initiated action. This confidential Report process may be used either to submit a new Report, or to address an employee’s previous Report, which such employee does not feel was adequately resolved.

All Report related documentation shall be maintained in secured files and retained in accordance with the Company’s Document Retention and Disposal Policy and applicable laws.

## **Retaliation**

Retaliation against any individual that files a Report or voices a concern under this policy is strictly prohibited. Employees determined to have engaged in retaliatory behavior or who fail to maintain an individual's anonymity, if requested, may be subject to discipline, which could include termination of employment. Any employee who feels that he or she has been subjected to any behavior that violates this policy should immediately report such behavior to the Head of Internal Audit and SEC Corporate Counsel or the Chair of the Audit Committee.

Employees who knowingly file misleading or false reports, or without a reasonable belief as to truth or accuracy, will not be protected by this policy and may be subject to discipline, including termination of employment.

## **Audit Committee Review of Reports**

A summary of Reports received under this policy will be communicated to the Audit Committee on a quarterly basis (or a more frequent basis should conditions warrant more timely action).

## **Procedure for Making a Complaint**

Company stockholders, employees and other parties who desire to correspond with the Audit Committee regarding accounting, internal controls, auditing matters, disclosure, fraud and unethical business practices, may do so through the following means:

- Access the Company's confidential ethics web forum at:  
[www.lighthouse-services.com/cnfrh](http://www.lighthouse-services.com/cnfrh)
- Call and leave an anonymous message on the Company's toll free employee concerns and ethics hotline at:
  - English speaking USA and Canada: 844-440-0058
  - Spanish speaking USA and Canada: 800-216-1288
  - Spanish speaking Mexico: 01-800-681-5340
  - French speaking Canada: 855-725-0002
- Fax a complaint to (215) 689-3885 (must include company name with report)
- Email a complaint to [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include company name with report)
- Contact the Head of Internal Audit, SEC Corporate Counsel or Chair of the Audit Committee directly with any questions or concerns.