

Code of Conduct

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1. Kelliher Insurance Group Values and Brand name

Kelliher Insurance Group, and its subsidiary companies Kerry London Ltd and Trade Direct Insurance are a well-established company with a firm belief in its company values of commitment, collaboration, consistency and creativity. The Kelliher Insurance Group Code of Conduct has been designed to reflect this by incorporating the Financial Conduct Authority's 'Principles for Business' and the Chartered Institute of Insurer's (CII) Code of Ethics.

2. Professional Skill and Competency

Each member of the Kelliher Insurance Group team relies on the others to maintain high levels of expertise through continuous professional development, and to adhere to professional standards in representing and promoting the Company name appropriately. As Kelliher Insurance Group continues to grow, it is important for all employees to maintain the integrity of the Company's values and ethos. The Company expects the highest standards of conduct and integrity from all its employees and workers. If the wisdom or propriety of a particular course of action or proposed course of action is in doubt, or if there is any possibility of a conflict of interest arising, the matter should be escalated to the appropriate Manager who will, in case of doubt, refer the matter to a Director for a decision.

3. Controls

Employees must take reasonable care to organise and control dealings with internal and external parties in a responsible and effective manner, in accordance with the company's approved risk management systems. Employees should be aware of the relevant Director responsible for each area of systems and controls within Kelliher Insurance Group.

4. Ethical Conduct

Kelliher Insurance Group's foremost priorities are to promote and protect the best interests of our customers and to provide professional expertise in each of our specialist areas of business. Kelliher Insurance Group's employees are required to conduct themselves in a non-discriminatory fashion and to embrace the spirit of diversity and equal opportunities which is at the core of Kelliher Insurance Group's success. Employees should treat others with respect and should not tolerate harassment of any kind, including sexual harassment and bullying. Employees have an express duty to familiarise themselves with the relevant legislative and regulatory framework designed to outlaw bribery, corruption and financial crime. Employees must act in an ethical and professional manner at all times, proactively avoiding conflict between personal and business interests. Everyone at Kelliher Insurance Group is required to fulfil their duties with utmost integrity and in accordance with the principles and policies of the firm, the regulator and the CII.

5. Fair Dealing

Each employee is expected to deal fairly with customers, suppliers, competitors and employees, in accordance with applicable rules, regulations and Company policies. Employees are expected to avoid taking unfair advantage of the foregoing persons or entities through manipulation, concealment, abuse of privileged or confidential information, misrepresentation of material facts or any other unfair practices or inappropriate behaviour.

6. Clear and Open Communication

Through maintaining clear lines of communication in an open and honest environment, and promoting teamwork as well as offering individual support and development, Kelliher Insurance Group will greatly reduce the

risk of strain on or breakdown in relationship between the Company and its employees.

7. Health and Safety

Kelliher Insurance Group recognizes that a healthy and safe working environment is critical to the overall success of the business. At all times, employees are responsible and accountable for maintaining a healthy and safe environment for the business. Whilst on company business, employees will not engage in any activity that is (or gives the appearance of being) unhealthy, unsafe, illegal, immoral or harmful to the business, its employees, clients, customers or environment.

Kelliher Insurance Group complies with both the letter and the spirit of all applicable occupational and health and safety laws and report incidents, injuries and illness at work. We follow all required safety procedures.

8. Protection & Proper Use of Company Assets

Employees are expected to protect the Company's assets and ensure their efficient use. This includes but is not limited to, real property, inventory, equipment, and supplies; also including computer data and confidential information. Company assets are to be used for legitimate business purposes. The unauthorized use of any of Kelliher Insurance Group's assets is prohibited.

9. Company Property

Employees are responsible for safeguarding and using correctly any company property, which may be issued, obtained or created during the course of their employment at Kelliher Insurance Group. On termination of employment with the Company, employees are required to return forthwith, or as otherwise agreed in writing by a Director, any such property in their

possession or control, including all papers, photocopies, tapes and disks. The use of Company property without the appropriate sanction is forbidden.

10. Corporate Social Responsibility

Kelliher Insurance Group's values shape not only the way we do business with our customers but the way we operate as an employer. We recognise that we have an obligation to treat our customers fairly but also to extend this principle towards our own people and the communities in which we all live and work. We strive to improve our environmental credentials, reducing waste and wherever possible eradicating unnecessary consumption of natural resources (electricity, water etc). Our workforce is representative of the rich and diverse society in which we provide our services and we actively promote equal opportunities to all. Where possible, Kelliher Insurance Group promotes the principle of social responsibility within the wider community through social projects including supporting charitable events, offering work-experience and internships within local communities.

11. Related Documents

The below is a list of external and internal related documents which the Company has compiled to expand upon and support our Company's Code of Conduct. All of our employees are required to have read these policies within the first three months of joining the Company.

External:

- FCA 11 'Principles for Business'.
- CII 5 principles contained with 'The Code of Ethics'
- Senior Manager and Certification Regime

Internal:

- Diversity, Equity and Inclusion Policy
- Acceptable Use Policy
- Information Security Policy
- Conflicts of Interest Policy
- Gifts and Hospitality Policy
- Social Media Policy
- Anti-Money Laundering and Sanctions Policy
- Anti-Bribery and Corruption Policy
- Fraud Prevention Policy
- Whistleblowing Policy
- Data Protection Manual
- Corporate Social Responsibility Policy
- Kerry London and Trade Direct Insurance Health & Safety Policies