

# THIRD-PARTY CODE OF BUSINESS CONDUCT

Across the UFG Insurance Companies, we are committed to operating with integrity in every action we take. We always assume good intent and value honest, respectful communications that inspire us to be great today and even better tomorrow. We build a foundation of trust with every promise fulfilled, empowering people to succeed, businesses to prosper and communities to thrive. We demonstrate our core values - Service, Partnerships, Innovation, Respect, Integrity, and Trust - through our decisions and actions each day.

United Fire Group, Inc. and its subsidiaries and affiliates take enormous pride in their longstanding reputation for integrity and trust with their employees, customers and shareholders. The strength of UFG's reputation is based not only on its own conduct, but also on the actions of those with whom it does business. For that reason, UFG aspires to work with third parties who share its values and reflect the same high ethical standards.

In a rapidly changing world and business environment, UFG and its third-party service providers must demonstrate actions and business practices that will earn the trust bestowed upon UFG by its stakeholders, and to protect the UFG brand and reputation.

This Third-Party Code of Business Conduct has been developed as a guide to share UFG's expectations regarding the ethical conduct of its third-party service providers and should be referred to frequently. UFG expects its third-party service providers to take reasonable steps to ensure that this document is communicated throughout their respective organizations and made available to their employees and subcontractors who work on UFG business. UFG expects you to share its commitment to comply with the following standards to the extent they are applicable to our business relationship.

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## CODE OF CONDUCT

The mission of United Fire Group, Inc., including its subsidiaries and affiliates, (collectively "UFG") is to work together as one to achieve superior operational and financial performance, always striving to deliver on our promises. UFG's Third Party Code of Business Conduct ("Code") outlines UFG's expectations for business and professional conduct of the third parties with which it engages, constitutes the foundation of our steadfast commitment to our mission, and ensures fair business practices.

In pursuit of these goals, all UFG third-party service providers are expected to become familiar with the Code and to comply with its terms in the execution of their work with or on behalf of UFG. For purposes of this Code, the terms "Third Party" and "Vendor" may be used interchangeably and generally includes individuals and entities engaged by UFG for the purpose of providing goods and/or services to UFG or to others on behalf of UFG.

### **Business Integrity**

UFG does business with partners and third parties who must conduct themselves with high standards of ethics and integrity. UFG has established practices for assessing and managing risk when engaging with third parties. UFG requires third-party arrangements to be negotiated and in the best interests of UFG. Through third-party risk management standards, UFG defines a framework and requirements for a comprehensive program to effectively and consistently manage risks throughout the third-party life cycle. Vendors must endeavor to maintain their own confidential process to enable employees and contractors to report incidents of unethical behavior.

### **Reciprocity**

UFG believes in providing any supplier with fair and equal access to conduct business with us. UFG does not require or expect any supplier to purchase UFG products or services to compete for its business and asks that you practice the same.

### **Conflicts of Interest**

UFG employees agree not to be influenced by what best serves their personal interests over those of UFG customers and shareholders. Therefore, vendors may not offer any UFG employee anything that may create the risk or perception of undue influence or call UFG's objectivity into question.

### **Personal Conflicts of Interest**

UFG's decision making and actions will not be influenced by close personal or family relationships. Close personal relationships with UFG employees should be disclosed and will not be a basis of consideration in the competition for business.

### **Gifts and Gratuities**

Our employees will not be influenced or obligated by the offer of business courtesies. It is important that our service providers understand that UFG will never sacrifice its integrity. Current or potential vendors should not accept or offer any gift, entertainment, benefit, favor or service. Further, vendors should not solicit or accept charitable contributions from UFG or UFG employees.

### **Illegal and Improper Payments**

UFG strictly prohibits any promise, offer, or the provision of anything of value to any government official or any other person for the purpose of improperly obtaining or retaining business, improperly influencing action or obtaining any form of improper benefit. "Anything of value" is a broad concept that includes, without limitation, financial or other advantages, such as cash payments, loans, inappropriate gifts, travel, lodging, services, amenities, employment opportunities and internships, charitable donations and tickets to sporting and other events.

Payments made indirectly through a vendor or other third party are subject to the same restrictions. Requesting and receiving bribes, kickbacks and other improper payments is also strictly prohibited.

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## Discrimination

UFG supports diversity and equal opportunity in employment. UFG expects its vendors to uphold the same commitment by complying with all applicable laws, rules and regulations prohibiting discrimination. Vendors shall not discriminate on the basis of sexual orientation, gender identity, race, religion, nationality, or other protected categories as provided by applicable law.

## Harassment and Abuse

UFG is committed to a workplace free from harassment and abuse for all people, regardless of whether they are UFG employees. Sexual, racial, ethnic, religious and any other type of harassment has no place in UFG's work environment. Racial, ethnic and religious harassment includes such conduct as slurs, jokes, intimidation or any other verbal or physical attack upon a person because of race, religion or national origin. Sexual harassment includes unwelcome sexual advances or other verbal or physical conduct of a sexual nature.

## Health and Safety

UFG is committed to a safe and healthy work environment. UFG expects our vendors to comply with all applicable safety and health laws and regulations in the countries in which they operate. To ensure that a safe environment is maintained, vendors are prohibited from:

- Possessing, consuming or acting under the influence of intoxicants or any controlled substance not prescribed by a licensed physician while conducting UFG business or while on UFG premises.
- Bringing firearms or other weapons onto UFG premises, except as permitted under applicable laws and regulations.
- Assigning UFG insurance-related work to any personnel whom a supplier knows, or should have reasonably known, to have been convicted of a felony involving dishonesty or breach of trust.
- Bringing any personnel onto UFG premises whom a supplier knows, or should have reasonably known, may pose a significant risk to the health or safety of others.

## Fair Competition and Anti-Trust

UFG seeks to outperform competitors fairly and honestly, achieving competitive advantages through superior performance. Vendors are expected to foster fair competition without restraining or inhibiting competitors or abusing a dominant market position.

## Insider Trading

Buying or selling securities based on inside information is illegal. Vendors and their employees are prohibited from disclosing or using any information that is not available to the general public and that an investor might consider relevant to making a decision to invest in UFG's stock. Vendors and their employees must avoid insider trading by not buying or selling UFG's or another company's securities when in possession of such confidential information.

## Protecting Confidential and Restricted Information

Vendors are expected to take careful and vigorous measures to prevent any unauthorized use of UFG data. Vendors must respect the privacy of all individuals, and comply with applicable laws concerning proprietary, confidential and restricted data owned or possessed by UFG to which the vendor has access.

## Accessing and Using Information and Communication Systems Responsibly

Vendors are expected to respect and protect UFG communications equipment and systems, treating them with care and professionalism. Passwords and systems' access IDs should not be shared beyond the staff member to whom it was specifically assigned and should be terminated immediately following the end of the assignment.

## Notifications of Breaches and Relevant Updates

Transparent and open communications form the foundation of productive relationships. Vendors are expected to provide UFG contacts with information regarding data or security breaches, and/or any material updates that could present a risk to UFG reputation or stakeholders.

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## Respecting the IP of others

Allowing intellectual property to be stolen, misused or mishandled would clearly contradict UFG's core values. UFG holds itself and its vendors accountable for ensuring the proper use of all intellectual property. Additionally, vendors are expected to safeguard personal identifiable and protected health information (PII and PHI) with which it or its agents come into contract and protect PII/PHI from unauthorized or accidental access, use, disclosure or misuse. UFG respects the privacy of all individuals. UFG is committed to complying with applicable laws concerning confidential and personal information.

## Protecting Personal Data

Vendors are expected to safeguard the personally identifiable and protected health information (PII and PHI) to which it has access in connection with the services it provides to UFG, and to protect such information from unauthorized or accidental access, use, disclosure or misuse. UFG respects the privacy of all individuals and is committed to complying with applicable laws concerning confidential and personal information.

## Human and Labor Rights

UFG respects and promotes the fundamental human and labor rights of its workforce as outlined in UFG's Human and Labor Rights Policy ([https://s205.q4cdn.com/556706552/files/doc\\_downloads/GovernanceDocuments/Human-and-Labor-Rights-Policy-Nov-2024-edits-Clean-Version.pdf](https://s205.q4cdn.com/556706552/files/doc_downloads/GovernanceDocuments/Human-and-Labor-Rights-Policy-Nov-2024-edits-Clean-Version.pdf)). UFG vendors are expected to familiarize themselves and adhere to UFG's Code of Human and Labor Rights, as well as respect internationally recognized human rights.

UFG does not permit, condone or otherwise accept any form of slavery and/or human trafficking either by employees, vendors, agents or other entities with whom UFG does business. UFG will not conduct business with vendors failing to meet UFG standards regarding slavery and trafficking.

## Background Investigations

It is important to UFG to comply with Federal laws prohibiting insurance companies like UFG from employing or doing business with individuals who have been convicted of certain crimes. Accordingly, UFG expects its vendors to appropriately screen personnel assigned to perform services for UFG. Vendors' obligations with respect to background investigations and reporting any potential violations will be set forth in their contract with UFG.

## Diversity and Inclusion

UFG values and leverages diversity in a manner that enriches perspectives and creates a strong and inclusive organization. UFG believes in providing opportunities for many types of businesses, including those owned by minorities, women, people with disabilities, veterans and those who are lesbian, gay, bisexual or transgender. Vendors are expected to hire, develop and retain a diverse workforce. In vendor selection, UFG will also strive to promote economic inclusion.

## Compensation

UFG is committed to paying its employees a fair and competitive wage. Vendors must comply with all applicable laws, rules and regulations concerning compensation. A supplier employee should be paid a fair living wage that is at least Local, State, or Federal minimum wage; whichever is highest.

## Brand Name Usage

UFG branding reflects its position as a trusted and respected company. Use of the UFG name, slogan, logos and other trademarks and service marks is prohibited without prior written consent. This extends to the use of the UFG name on all forms of social media.

## Professionalism

UFG supports an environment of professionalism. Vendors are expected to conduct business in a professional manner and adhere to dress code expectations when visiting a UFG facility. In addition, supplier employees should not be soliciting or prospecting UFG employees without first engaging the UFG Vendor Management Office. This extends to onsite visits, email engagement and phone calls.

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## Environmental Stewardship

UFG is committed to operating responsibly and minimizing its environmental footprint through climate action including the reduction of greenhouse gas emissions, increasing energy efficiency, reducing water consumption and the use of natural resources, and increasing waste diversion from landfills. UFG expects its vendors to conduct their operations in a similar manner and to comply with all environmental laws and regulations in every region in which they operate. Vendors should consider the environmental impact of the products and/or services they provide. Specifically:

- Vendors are encouraged to provide environmentally preferable products and services, and to improve their business processes to meet industry best practices and standards with respect to environmental stewardship, minimizing the environmental impact of their operations.
- UFG is committed to mitigating climate risk by making our supply chain more sustainable through emissions reduction and we encourage vendors to set climate-related targets. We expect vendors to advance our commitment by disclosing their environmental data via annual disclosure, if requested by UFG.
- Vendors are encouraged to collaborate with UFG on current and future UFG climate action initiatives, as well as to collaborate with their own value chain to reduce negative impact on the environment.
- Vendors are encouraged to measure and publicly disclose their progress relative to their climate activities.

UFG reserves the right to request the disclosure of metrics pertaining to vendors' environmental efforts, and to take corrective action to mitigate vendors' non-conformance regarding environmental issues.

## Responding to Media

UFG expects all vendors to adhere to the terms of contracts with UFG responding to the media. Vendors shall forward all media requests for information to the UFG Corporate Communications Department. Vendors should never speak for UFG, unless given specific authorization to do so.

## Reporting Violations

As part of UFG's commitment to ethical and lawful conduct, UFG expects entities with whom we do business to report information relating to actual and suspected wrongdoing or unethical behavior involving the company or any of its employees, or complaints concerning accounting, internal accounting controls, or auditing matters.

The Ethics Hotline is available to our employees, officers, directors, shareholders, as well as agents, policyholders, contractors, vendors and others who have a business relationship with UFG.

The Ethics Hotline is maintained by an independent third party. The Ethics Hotline is available 24 hours a day, 7 days a week, and provides a web-based reporting capability, as well as a toll-free telephone-based service. Translation services are available to permit internal and external reporters to submit complaints in their preferred language.

- To access the Ethics Hotline via the web, visit <https://united-fire-group-inc.integrityline.us/>.
- To access the Ethics Hotline via the telephone, dial 1-800-461-9330.

If you believe that your concerns cannot be addressed by the Ethics Hotline, you may also contact the Audit Committee:

- Audit Committee-Confidential  
C/O United Fire Group, Inc.  
118 Second Avenue SE  
PO Box 73909  
Cedar Rapids, Iowa 52407-3909

Reports to the Ethics Hotline may be made anonymously. If you request confidentiality when reporting a violation, every effort will be made to protect your identity; however, it may be impossible to keep your identity confidential because of the demands of conducting a thorough investigation or because of legal requirements.

Regardless of how a concern or complaint is reported, UFG prohibits retaliation against anyone who, in good faith, reports a possible violation or who participates in an investigation, even if sufficient evidence is not found to substantiate the concern. UFG will take appropriate action against any individual determined to be engaging in retaliatory conduct.

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Nothing contained in this Code, or any other UFG policy or agreement, is intended to prohibit or restrict you from (1) filing a complaint with, making disclosures to, communicating with or participating in an investigation or proceeding conducted by any governmental agency (including the United States Equal Employment Opportunity Commission and the Securities and Exchange Commission); (2) pursuing legal rights related to your employment with the Company; or (3) engaging in activities protected by applicable laws or regulations. Notwithstanding the above, but subject to applicable law, UFG does not authorize the waiver of, or disclosure of information covered by, the attorney-client privilege or attorney work product doctrine or any other privilege or protection belonging to UFG.

Additionally, concerns about human trafficking may be raised to the U.S. government's Global Human Trafficking Hotline (1-844-888-FREE) or [help@befree.org](mailto:help@befree.org).

*Failure to comply with any of the standards above will be evaluated and could result in the termination of our engagement with a third party. UFG employees that assist in the non-compliance activity may also be subject to the termination of their employment.*