



HAGERTY
Supplier
Code of Conduct

Hagerty Supplier Code of Conduct

Hagerty, Inc. (together with its affiliates and subsidiaries, “Hagerty”) is committed to conducting business with integrity and the highest of ethical standards. Hagerty exists to save driving and keep car culture for future generations. We will succeed in our mission by conducting all business with integrity, in alignment with our Core Values (Act as One Team Hagerty, Improve Every Day, Take Care of Each Other, Work with Purpose and Energy, and Enjoy the Ride), and in full compliance with the law. Hagerty expects our suppliers, including but not limited to solution and consulting partners, vendors, and other service providers (collectively, our “Suppliers”) to commit to ethical business practices as well.

This Supplier Code of Conduct (“Supplier Code”) serves as a guide for all Hagerty Suppliers and should be referred to frequently. All Hagerty Suppliers are responsible for understanding the content contained within this document. All Suppliers are also responsible for sharing this guide with employees and subcontractors to ensure they understand and are committed to fulfilling our expectations when serving and partnering with Hagerty.

Hagerty views our Suppliers as extensions of our business, so it is imperative that our Suppliers conduct business ethically, professionally, and with integrity. Aligning our behaviors and practices will help us continue to grow and protect our reputation and brand.

For more information about Hagerty’s business practices, please visit <https://corporate.hagerty.com>.

We look forward to working with you.

Let’s drive together.

Table of Contents

Who Must Follow the Supplier Code?	4
Values Statement.....	4
Supplier Obligations.....	4
Compliance with Laws	4
Diversity, Inclusion, and Equal Opportunity Employment	4
Harassment.....	5
Workplace Safety and Health	5
Human Rights	5
Compensation.....	5
Child Labor.....	5
Environmental Impact	6
Reciprocity	6
Conflicts of Interest	6
Gifts and Entertainment.....	6
Insider Trading	6
Anti-Bribery and Anti-Corruption.....	7
Fair Dealing Practices.....	7
Intellectual Property	7
Protection of Assets	7
Privacy and Confidentiality	7
Computer Networks and Information Security	8
Reporting of Security Incidents.....	8
Brand and Communications	8
Reporting and Escalating Concerns.....	8

Who Must Follow the Supplier Code?

All Suppliers doing business with Hagerty must adhere to this Supplier Code. Suppliers are responsible for ensuring all their employees and subcontracted parties performing work for Hagerty comply with this Supplier Code. Hagerty reserves the right to audit compliance with this Supplier Code. Hagerty also reserves the right to require certification of compliance with this Supplier Code.

Values Statement

We Share the Road.

At Hagerty, we share the road. We are an inclusive automotive community where all are welcomed, valued, and belong.

We are united by our shared passion for driving, our commitment to preserve car culture for future generations, and our desire to make a positive impact in the world.

Supplier Obligations

All Hagerty Suppliers are required to read, understand, be familiar with, and agree to abide by this Supplier Code. Failure to follow the directives, guidelines, and requirements provided in this Supplier Code may result in termination of our relationship.

Compliance with Laws

Hagerty is headquartered in the United States but conducts business internationally. All business conducted with or for Hagerty must comply with all applicable federal, state and local statutes, laws, rules, regulations and ordinances, both foreign and domestic.

Diversity, Inclusion, and Equal Opportunity Employment

At Hagerty, we embrace and encourage our team members' differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socioeconomic status, veteran status, and other characteristics that make our team members unique. We expect our Suppliers to uphold the same commitment to an inclusive work environment.

Hagerty is an equal opportunity employer and complies with all applicable federal, state and local fair employment practice laws. Hagerty strictly prohibits and does not tolerate discrimination against employees, applicants, or any other covered persons because of race, color, religion, creed, national origin or ancestry, ethnicity, sex (including pregnancy and sexual orientation), gender (including gender nonconformity and status as a transgender individual), age, physical or mental disability, citizenship, past, current, or prospective service in the uniformed services, genetic information, or any other characteristic protected under applicable federal, state, or local law. All Hagerty employees, other workers, and representatives are prohibited from engaging in unlawful discrimination. This applies to all terms and conditions of employment, including, but not limited to, hiring, training, promotion, discipline, compensation, benefits, and termination of employment. Hagerty expects Suppliers to comply with these antidiscrimination and employment laws, rules, regulations, and practices as well.

Harassment

Hagerty does not tolerate harassment of any kind, including sexual or discriminatory harassment, or any other type of behavior that is hostile, disrespectful, abusive and/or humiliating. We expect our Suppliers not to tolerate these behaviors in their workforce either. Any such behaviors must be reported as soon as they are identified.

Workplace Safety and Health

At Hagerty, a safe and healthy work environment is required. We prohibit the following activities of our team members and Suppliers:

- the improper use of alcohol and drugs
- the use or possession of firearms, knives (unless required explicitly for a role, i.e., boxcutters), or other dangerous weaponry of any kind
- workplace violence, including verbal abuse, physical abuse, threats of abuse, harassment, intimidation, and any other behavior that disrupts the workplace
- workplace bullying, which includes any unwelcome behavior that humiliates or intimidates a coworker or otherwise sabotages his, her or their performance

We expect our Suppliers to provide the same safe and healthy work environment for their team members.

Suppliers involved in insurance-related business must report to Hagerty convictions of crimes involving dishonesty, breach of trust, or violence.

Human Rights

At Hagerty, we respect the human rights of our workforce and promote legal and fair employment practices. We expect our Suppliers to do the same. This includes ensuring workers' freedom of association, providing a safe, healthy, and sanitary work environment, and prohibiting unlawful detention and forced labor practices. Hagerty has zero tolerance for any form of slavery or human trafficking, and Hagerty Suppliers, employees, and business partners must prevent involvement in any form of slavery or human trafficking.

Compensation

At Hagerty, we provide fair and competitive pay to our employees. Suppliers should also provide fair and competitive wages, and Suppliers must comply with all applicable laws, rules and regulations concerning compensation.

Child Labor

Hagerty does not use child labor in its business. Suppliers must ensure that work is only performed by individuals who meet the minimum legal age requirements for employment in the location where the work is performed.

Environmental Impact

At Hagerty, we are using our platform to be a driving force for a more sustainable world in our operations and across the automotive enthusiast world. We expect our Suppliers to conduct their operations in a similar manner and to comply with local, state, federal, national, and international environmental legislation.

Reciprocity

Hagerty believes in providing all Suppliers with a full and fair opportunity to compete for our business. Suppliers are not expected to purchase Hagerty products or services to compete for our business, and we expect our Suppliers to practice the same principle.

Conflicts of Interest

When it comes to Hagerty's business, Suppliers must not be influenced by what best serves their personal interests, relationships, or activities (or those of a family member or close personal relation), over those of Hagerty, our members, employees, directors, officers, and shareholders.

Further, Suppliers may not offer any Hagerty employee anything that may create conflicts of interest or create the appearance that a Hagerty employee's objective judgment has been compromised. Suppliers must disclose to their Hagerty project manager any close personal or family relationships with Hagerty employees as soon as they are known. These relationships will not be the basis of consideration in the competition for business.

Gifts and Entertainment

Hagerty Suppliers must not be influenced or obligated by the offer of business courtesies and should not use the exchange of business courtesies to obtain an unfair business advantage. Any gift, entertainment, or other business courtesy offered or received must not violate applicable laws or standards set by the recipient's organization, be reasonable and infrequent, and be nominal in value. Hagerty Suppliers should never give or accept cash gifts or cash equivalents.

Insider Trading

As a public company, Hagerty takes special care not to disclose material non-public information. Material non-public information is any information that (1) has not been widely and publicly released and (2) a reasonable investor would consider in deciding whether to buy, sell or trade a security and would thus likely affect the security's price. Suppliers are obligated to take that same care and are prohibited from purchasing, selling or trading Hagerty securities while in possession of material non-public information. The same requirements extend to Suppliers' family members and members of their households. Suppliers are obligated to report unauthorized disclosure of any material non-public information immediately to askemployeestock@hagerty.com.

Anti-Bribery and Anti-Corruption

Hagerty has a zero-tolerance approach to bribery and corruption. We expect our Suppliers to act professionally, fairly and with integrity in all business dealings on behalf of Hagerty. Suppliers are prohibited from engaging in any activity that would constitute or be perceived to constitute bribery and/or corruption, including tolerating or facilitating bribery and/or corruption. Further, Hagerty Suppliers must not offer, give, promise, authorize, or accept any payment, gift, loan, fee, reward or other thing of value to any government official or employee, customer, Hagerty associate or any other person to obtain any business advantage or improperly influence any action or decision. This prohibition on improper payments, includes a prohibition on unofficial “facilitation” payments made to government officials to secure or expedite the performance of a routine or necessary action.

Fair Dealing Practices

At Hagerty, we are committed to dealing fairly with members or customers, fellow team members, suppliers, markets, and competitors and following antitrust and unfair competition laws. Suppliers are expected to do the same and are prohibited from unlawfully restraining or inhibiting competitors or abusing a dominant market position.

Intellectual Property

At Hagerty, we respect the intellectual property rights of others. We expect our Suppliers to follow the same guidelines as our team members: no employee, Supplier, contractor, or subcontractor, may disclose, reproduce, display, perform, or distribute any materials that are owned by, licensed to, or subject to the copyright of others without first obtaining the owner’s written permission or an appropriate license.

Protection of Assets

While working with Hagerty, Suppliers may have access to tools and assets necessary to complete services. Suppliers are expected to protect those tools and assets, including physical assets – such as computers and equipment, intangible assets – such as intellectual property and proprietary information, and financial assets.

Privacy and Confidentiality

While working with Hagerty, Suppliers may obtain or have access to confidential or restricted information about Hagerty business or proprietary or personal information — including information about Hagerty team members, customers, or business partners. Suppliers must strictly and carefully protect such information at all times from unauthorized access, use, destruction, modification and disclosure. Suppliers must also comply with all applicable data privacy laws and regulations. For more information about our privacy policies or other information security matters, please contact our privacy team at privacy@hagerty.com.

Computer Networks and Information Security

At Hagerty, computers and electronic communications are critical to our business. All Hagerty Suppliers must keep Hagerty's communications secure from unauthorized access. If access is given, Suppliers must also keep Hagerty devices, networks, other technology and equipment, and any other information resource (collectively, "information resources") secure. Access to information resources will be provided on an as-needed basis for work-related purposes and must follow the security and compliance policies disseminated during Supplier onboarding.

Reporting of Security Incidents

All Suppliers must immediately report any incident that may be a risk to Hagerty data (including data related to Hagerty's business, team members, customers, or business partners), intellectual property, physical property, and technological infrastructure to security@hagerty.com. A reportable incident is any real or suspected adverse event affecting the security of data, computer systems, networks, physical property, intellectual property, or any act violating an explicit or implied security policy.

Brand and Communications

At Hagerty, Suppliers must communicate carefully, honestly, and professionally. Suppliers must be committed to honest, professional, and legal communications and take care in all communications, internal or external, formal or informal. Unless a Supplier is expressly authorized to represent Hagerty on a given media or investor inquiry, Suppliers are not authorized to communicate with any member of the media or market participant. All media requests or inquiries should be forwarded immediately to the appropriate PR spokesperson at press@hagerty.com so that Hagerty may respond on a timely basis.

Reporting and Escalating Concerns

All Suppliers will promptly notify Hagerty, if permitted by law, regarding the receipt of any subpoenas, regulatory requests, media inquiries, or other third-party requests concerning Hagerty or in connection with their activities or services for Hagerty.

Suppliers must also promptly report any concerns or suspected violations of laws, rules, or regulations related to Hagerty's business, this Supplier Code, or any Hagerty policy, including fraud, dishonesty, unfair or unethical conduct related to financial services—whether it is by a Supplier employee or subcontractor, a Hagerty associate, or another third-party—by submitting a report online at www.hagerty.ethicspoint.com. Reports may also be made by dialing 1-866-841-3288 in the U.S. and Canada, or by dialing the ITFS plus 0800-032-8483 in the United Kingdom. Retaliation against anyone who makes a report in good faith is strictly prohibited. Suppliers should also provide their own employees and third parties with means for reporting concerns or suspected misconduct without fear of retaliation.