

Anti-Corruption and Bribery Policy

Introduction

Palomar Holdings, Inc., and its affiliates (“Palomar”) values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:

- Setting out a clear Anti Bribery & Corruption policy;
- Training employees so that they can recognise and avoid the use of bribery by themselves and others;
- Encouraging its employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution;
- Taking firm and vigorous action against any individual(s) involved in bribery.

Palomar absolutely forbids corruption and the paying or receipt of bribes for any purpose.

The Policy

Bribery - Bribery is the offering, promising, giving, solicitation or the receipt or agreement to receive any financial or other advantage, or any other inducement from any person or company, (wherever they are situated and whether they are a public official or body, or a private person or company), by an individual employee, agent or other person or body acting on another’s behalf.

Corruption – Corruption is the abuse of entrusted power for a private gain.

Palomar prohibits:

Bribery of or by any person or company, in any jurisdiction, wherever they are situated and whether they are a public official or body or private person or company or by any individual employee, agent or other person or body acting on the company’s behalf in order to:

- gain any commercial, contractual or regulatory advantage for the company in a way which is unethical or;
- gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual or;
- induce the improper performance of any function that is of a public nature, connected with a business, performed by a body or performed by a person in the course of their employment.

When acting for Palomar, political contributions are not allowed, and charitable contributions are allowed only within agreed corporate schemes and guidelines.

Further clarification

Palomar recognizes that market practice varies across the territories in which it does business and what is normal and acceptable in one place may not be in another.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded:

- normal and appropriate hospitality;
- the giving of a ceremonial gift on a festival or at another special time;
- the use of any recognised fast-track process which is available to all on payment of a fee.

The prevention, detection and reporting of bribery or corruption is the responsibility of all persons within or associated with Palomar. Reports can be made confidentially to the Chief Legal Officer or any HR personnel.