

PALOMAR HUMAN RIGHTS STATEMENT

Palomar's respect for human rights is a fundamental part of who we are and how we operate. We are committed to human and labor rights principles outlined in international standards such as the [United Nations' Universal Declaration of Human Rights](#). Palomar is a [signatory](#) to the United National Global Compact and has committed to follow each of its ten principles, two of which bear directly on human rights:

1. Businesses should support and respect the protection of internationally proclaimed human rights.
2. Businesses should make sure they are not complicit in human rights abuses.

We expect compliance throughout our organization to our Code of Ethics and Conduct (the "Code") and group policies and procedures. We are an equal opportunity employer and have policies and training in place to identify and prevent discrimination, bullying, harassment and other forms of workplace behavior we deem unacceptable. Failure to adhere to the Code intended to respect the human rights of our team members may result in disciplinary action, up to and including termination of employment.

Palomar takes the following actions to ensure we are honoring our commitment to the principles of human and child labor rights:

- Commitments are set by key Palomar stakeholders—Board of Directors, ESG Committee, Management and People and Talent team.
- Annually updating Palomar's Code of Conduct and other applicable policies and procedures to ensure we consider human and labor rights. All team members are required to read and certify annually that they understand and are compliant with the Code and related policies.
- Providing team members required training on important human and labor rights issues, including nondiscrimination, anti-money laundering, anti-bribery, corruption and recognition of conflicts of interest.
- Implementing processes, where necessary, to comply with principles of human and labor rights
- Seeking to understand the nature and context of the evolving human rights journey and how we can make a difference.
- Committing to not tolerate the use of child labor, forced labor, or human trafficking in any form—including slave labor, prison labor, indentured servitude or bonded labor—in our operations or value chain.
- Committing to create a more equitable and protective workplace for all Palomar team members including women and ethnic minorities—throughout our company.
- Promoting and providing the human right to safe drinking water for all team members, without discrimination, and provide access to sufficient, safe, acceptable and physically accessible water to all team members in our offices.
- Providing multiple avenues (including anonymous ones) by which team members, customers or business partners can raise issues of concern or report potential violations of the Code other company policies without fear of retaliation.
- Providing a safe and healthy workplace and complying with applicable safety and health laws and regulations, as well as internal requirements.
- Providing and maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats.
- Engaging with suppliers and partners who adhere to the Palomar Human Rights Statement.

Reporting Concerns

Palomar encourages all team members to report violations of the Human Rights Policy through one of several channels available to them without fear of reprisal. Team members can contact:

- Their direct manager or next-level manager
- Palomar's People and Talent team
- Palomar's Whistleblower Hotline that is operated by a third-party