

#### **Agent Code of Conduct**

As an insurance producer or agent ("Agent") appointed with Sovereign Nations Insurance (SNI), the Agent commits itself to this Code of Conduct and Ethics ("Code of Conduct"). Moreover, by accepting these rules of the Code of Conduct, the Agent represents that it applies the highest standards to its activities as an insurance Agent.

#### General

An insurance agent or producer appointed with the Company shall act in the best interest of the client. Producers shall not permit other interests, activities, or responsibilities to interfere with Producer's faithful fulfillment to the Code. This is a demanding task that requires a qualified and competent insurance Agent with appropriate expertise to guide a customer's fully informed decision that is suited to the particulate customer. It is the Agent's task to consult the prospectively insured about the coverage necessary and sufficient for him/her before insurance is bound and to advise and support him/her during the contract period properly and responsibly. The successful execution of these tasks requires a relationship built on trust between the insured and the insurance agent. The integrity and commitment to the principle of "honorable business" in addition to good level of qualification are the basis for every good business relationship. This holds true for our relationship with our Agents as well as towards our insureds.

These principles shall apply for all appointed Agents of the Company.

# **General Principles**

The Agent represents a high level of qualification of the profession.

The Agent follows the precepts of honesty, competence, and financial care.

Agent shall maintain, in fulfilling their duties, the highest standards of ethics, and

honesty, and shall behave in a dignified, proper, and transparent manner.

The Agent conducts itself in a manner that always reflects favorably on the Products and the goodwill and reputation of the Company and its affiliates and consistent with good business practice.

The Agent shall conduct and/or ensuring all Producer Agents conduct a thorough needs analysis to determine the suitability of available Products for the Prospect or Customer.

Relationships with the Agent should be characterized by trust and partnership. The Agent should respect the personal dignity, privacy, and personal rights of each individual, act openly, and be tolerant.

The baseline for any action is compliance with contractual obligations and the law. Agents will carefully and thoroughly fulfill their contractual duties and responsibilities while complying with all laws and regulations.

# **Principles of Conduct Toward Policyholders**

Compliance with the directives and legitimate interests of the insured should take precedence over the Agent's own personal interests. An Agent shall continuously endeavor to obtain, to earn and maintain the trust of its customers.

An Agent may not represent itself to a prospectively insured or insured person as if it is an independent or neutral consultant who has no economic interest in the purchase of the insurance contract. An Agent who misleads a prospectively insured or insured person in this regard commits an especially gross violation of this Code of Conduct.

The Agent is obliged to consult the prospectively insured or insured person regarding adequate insurance, to determine the nature and extent of covered risks and to ensure that identified needs are satisfied with the insurance coverage under consideration.

Steadfastly offering guidance to all Prospects in the completion of all necessary Application Materials as directed by the Company or its affiliates and in accordance with this Code of Conduct.

Insurance contracts shall be documented in writing without any other oral or written side agreements or other unwritten terms.

Properly and professionally-placed insurance relates to the financial security of the

insured person. Therefore, each Agent is obliged to continuously deepen its expertise and to adapt to the ever-changing requirements of the insurance market.

Possible complaints from prospectively insured persons, current policyholders, or former customers should be promptly reported to the Company and be followed up fairly and promptly by the Agent or by the Agent and the Company in the event that the complaint necessitates a coordinated response.

All information of prospective customers and policyholders shall be protected and treated confidentially. Privacy and data protection laws and regulations shall be followed, including but not limited to, the Health Insurance Portability and Accountability Act, the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act of 1999, 15 U.S.C. §§ 6801 et seq., and applicable federal and state privacy laws and regulations.

# **Principles of Conduct Toward the Company**

The Company and the Agent subsist on the trust from their customers, employees, shareholders, and the public. The Agent respects the legitimate rights of third parties and refrains from actions or behavior which could possibly result in reputational harm to the Company or its Agents in public. The interests of the parent company and affiliates of the Company will also be taken into consideration.

The Company and the Agent respect each other's corporate assets – in particular their respective intellectual property, including but not limited to consumer privacy protection laws and regulations, copyright laws, and trade secret laws.

Agreements between the Company and Agent shall be documented in writing without any other oral or written side agreements or other unwritten terms.

The Agent shall observe all directions and instructions given to it by the Company and its affiliates in relation to the marketing and promotion of the Products, including the Company's marketing, enrollment, certification, and communication policies as designated by the Company from time to time.

The Agent understands prompt response to all requests by the Company are paramount to maintaining a high level of service, quality control and business acumen.

If an Agent has a reasonable suspicion that the Company has been used for economic crime, money laundering, or other unlawful purposes, the Agent will inform the Company as soon as practicable under the circumstances.

#### **Principles of Conduct Toward the Colleagues**

The relationship between the Agents of all Company distribution channels, but also to the colleagues from other insurance agencies or companies, is based on solidarity and mutual respect. The disparagement of colleagues or competitors or belittling of another insurance company in competition is incompatible with the principles of honorable business.

Compliance with the principles of fair competition is an essential duty of all Agents. Fair competition is promoted by competition based on merits, good commercial practices, and efforts to prevent complaints and grievances.

Each Agent commits to the directives and submits to the authority of the government agency, regulatory authority, or supervisory authority in the jurisdiction in which it resides or does business as an insurance agent, as well as their respective officers, auditors, and investigators.

### **Violation of These Principles of Conduct**

Violations of the Code of Conduct can harm the Company, its Agents, and/or policyholders.

The Agent is aware and fully in agreement with the Company Compliance policy of the Company.

The Agent should approach its contact or representative at the Company with issues related to the Code of Conduct, but should also approach the Company's person or organizational unit responsible for compliance tasks regarding the Company's distribution channels and sales support units ("Compliance").

If an Agent becomes aware of a violation of law or a significant breach of this Code of Conduct, especially in cases of fraud, corruption, or comparably conduct, which could trigger criminal or civil penalties, the Agent should inform its representative at the Company or Compliance. The Company's confidential compliance and ethics email is: compliance@sniprotect.com.