

WARNER»
Pacific

**“Quality means doing it right
when no one’s looking.”**

~ Henry Ford

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We believe success begins with a sense of trust and integrity. For over 43 years, Warner Pacific has transformed a rapidly evolving industry into a dependable and forward-moving General Agency. With a strong commitment to expanding access to health insurance and equipping brokers with reliable tools and resources, Warner Pacific is on track to become the largest General Agency in the United States.

Throughout this journey, we've upheld our values, standards, integrity, ethics and policies to preserve the Warner Way — it defines who we are, guides how we hire, and shapes how we work together to achieve our goals and support our communities.



Our Code of Ethics serves as the foundation for our Code of Conduct, clearly defining our identity and the principles we uphold. They are our foundation and our commitment to doing business not only legally but also ethically.

Examples of unethical behavior not tolerated at Warner Pacific:

Conflicts of Interest

- Favoring friends or family when hiring, promoting or awarding contracts
- Accepting gifts, bribes or kickbacks from vendors, clients or competitors
- Using insider information for personal financial gain
- Working for a competitor or starting a competing side business without disclosure
- Dishonesty and misrepresentation
- Lying or intentionally misleading management, coworkers, or clients
- Falsifying records such as timecards, expense reports, or invoices
- Misstating qualifications, experience, or performance data
- Withholding critical information that impacts decisions or safety
- Fraud and theft
- Stealing company property, equipment, funds, or data
- Submitting false reimbursement or overbilling clients
- Creating fake vendor accounts or invoices for personal gain
- Using company resources for personal profit without authorization
- Harassment and discrimination
- Making offensive jokes or comments about someone's race, gender, religion, or other protected characteristics
- Engaging in, or enabling, sexual harassment or inappropriate relationships in the workplace
- Retaliating against someone for reporting misconduct or safety concerns
- Excluding or mistreating employees due to bias or prejudice
- Safety violations
- Ignoring or bypassing safety procedures
- Failing to report workplace hazards or accidents
- Intentionally endangering the health or safety of others
- Using drugs or alcohol while on duty or operating company equipment

Confidentiality Breaches

- Sharing sensitive company, client, or employee information without authorization
- Using confidential information for personal benefit or to harm the company
- Leaving secure systems or records accessible to unauthorized individuals

Abuse of Power or Position

- Intimidating or coercing employees or vendors for personal benefit
- Misusing company resources, like credit cards or vehicles, for personal reasons
- Taking advantage of subordinates or exploiting their work for personal recognition
- Non-compliance with laws and regulations

- Ignoring industry regulations, licensing requirements, or legal standards
- Engaging in illegal activities such as tax evasion, bribery, or fraud
- Failing to report known violations to management or regulatory bodies

Unethical Communication

- Spreading rumors, gossip, or false information about colleagues or the company
- Misrepresenting the company's products or services to customers or regulators
- Using social media to harm the company's reputation or disclose proprietary information

Poor Stewardship of Company Assets

- Wasting resources such as supplies, energy or company funds
- Abusing expense accounts or travel budgets
- Excessive personal use of company time or property

Our core principles are rooted in practicing integrity, fairness, and impartiality. We offer opportunities for partnership and employment without bias or prejudice, treating everyone equally and fairly. Furthermore, professionalism is a key component to our Code of Ethics, which is centered around competence, accountability, and a sense of responsibility.

To have a sense of responsibility in what we do is to take pride in our work and to be intentional with every business decision, big or small. With this in mind, we do not tolerate any conflicts of interest, like incentivized sales, upselling, insider trading, gifts and favors, and other circumstances that can impair our decision-making, and our ability to conduct business fairly and ethically.

Warner Pacific is proactive in staying informed about the rapidly changing laws and regulations surrounding our industry. With a strong compliance and ethics team dedicated to adhering to these laws, regulations and guidelines, we aim to provide knowledge

and guidance to everyone that works with us on how to do the same. In doing so, we consistently maintain a client-centric approach that prioritizes the professional and educational needs of our partners, leveraging innovative tools and technologies to advance our mission of improving the health insurance industry.

At Warner Pacific, we routinely review and update our policies, implement programs that provide guidance on how to follow our Code of Ethics responsibly, and challenge our own business practices to allow room for growth and improvement.



CODE OF CONDUCT

While Warner Pacific has no intention of meddling in your personal affairs and off-duty conduct, we expect that all employees, company leaders, or vendor and business partners, conduct themselves in a manner that upholds the values of Warner Pacific even when off duty. Employees and leadership are expected to conduct their personal affairs in a manner that does not adversely affect the company's integrity, reputation, or credibility. Off-duty conduct that adversely affects Warner Pacific's legitimate business interests or an employee's ability to perform their work will not be tolerated and may result in discipline up to and including termination.

At Warner Pacific, we pride ourselves on being inclusive of all racial backgrounds, ethnicities, religious and cultural practices, and sexual orientations. We do not discriminate against disabilities, veterans, or those needing accommodations to work with us. We pride ourselves on being a diverse organization that sees the value in our differences that can bring forth collaborative opportunities and growth.

Our core values and the spirit of family set us apart and continue to define our company in everything we do. Being non-discriminatory isn't just about how we conduct ourselves, but the way that we make decisions that affect everyone in or around our organization. We emphasize and encourage speaking up if a person feels like they have been discriminated against or treated unfairly by someone in our organization.

We intentionally implement procedures to help every person feel protected from retaliation while delegating necessary resources to investigate if a person feels they have experienced such retaliation from a representative of Warner Pacific.

Our company recognizes retaliation as behaviors that threaten or intimidate, harassment or bullying, and unwarranted increased scrutiny. We do not permit or tolerate the threat of termination, demotion, or strong-arming attempts through negative

performance reviews, reassignment of position, having one's work schedule affected as a result of reporting discrimination, or exclusion from meetings and projects.

Warner Pacific not only maintains a zero-tolerance stance on discrimination, but also proactively provides annual compliance training to all employees to help prevent it and ensure accountability. We do not support pre-conceived biases or prejudice that can impact how we engage with clients, vendors, and broker partners.

Warner Pacific is continually developing robust training and educational resources to build a company rooted in our values, mission, and Code of Conduct. We are committed to regularly reviewing and refining our training, practices, and principles — not only to grow our business but to grow in how we present ourselves within the industry. Our dedication to progress means challenging the status quo, thinking beyond conventional boundaries, and redefining success through diversity, accessibility, equality, and accountability wherever improvement is possible.

“Diversity: the art of thinking independently together.”

~Malcolm Forbes

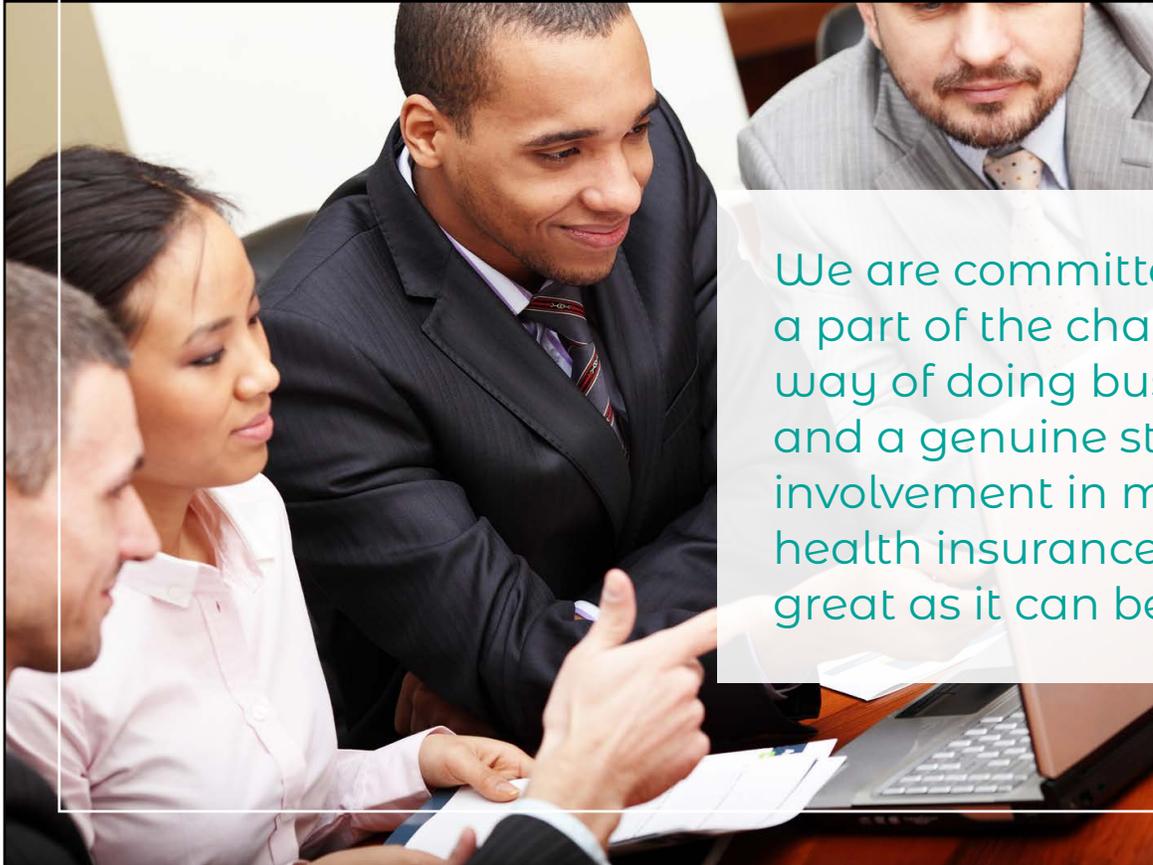


We strive to build sustainable, equitable, healthy, and diverse communities through a combination of innovative business practices and exemplary environmental, social and governance (ESG) performance. This commitment informs every aspect of our business, including how we design and build new projects, operate our company, collaborate with stakeholders and report progress.

Our ESG Policy presents our approach to sustainability.
At the heart of the Policy is a corporate culture that has sustainability
at the core of all our business operations and values.
[Click here to read more about our ESG Policy.](#)

Our innovative approach includes finding ways to maximize our productivity without an impact on our sustainability. We have implemented tools and resources to conduct business in a meaningful way without any substantial increases to our carbon footprint. We encourage everyone within our organization to think of the bigger picture all around us.

We cultivate a work culture that provides a platform for creativity and hands-on action. We believe that every person plays an important role in our path to greater successes and innovation. Our values and our mission are centered around the people we work with, the purpose of what we do, and the efficacy of accomplishing that with consideration to our environment, consistent review of our policies and procedures, and confidence in those that we work with - serving the same purpose.



We are committed to being a part of the change, a better way of doing business, and a genuine step toward involvement in making the health insurance industry as great as it can be.

We encourage all Warner Pacific employees and partners to speak up when there is something that needs to be brought to the attention of the Compliance Department, Senior Leadership, and/or Board of Directors.

In alignment with our Non-Retaliation Policy, we have implemented whistleblowing channels that can be used for anonymous reporting. Ethical concerns or potential breaches should be reported as soon as possible to any manager, the Compliance Department at wpcompliance@warnerpacific.com, or our EthicsPoint's (Navex Global) Hotline at 844-927-2278, or [EthicsPoint – Warner Pacific Insurance Services](#).

We believe that everyone deserves to have their voice heard, and every person is protected from retaliation when speaking up. If you're not sure what warrants reporting, we encourage you to take precautionary steps and contact the Compliance Department. Concerns that you may have could include fraud, harassment, discrimination, conflicts of interest, violations of state or federal laws, company policy, or other unethical behaviors.

Speaking up allows us to identify and address potential problems early on, hence preventing larger issues from developing that can impact compliance with laws and regulations. When you speak up, we have the opportunity to improve our processes and controls.

DISCIPLINARY MEASURES

If a breach of Warner Pacific's Code of Conduct and Ethics is suspected, we reserve the right to initiate an investigation to determine the validity and scope of the alleged violation. Based on the severity of the findings, appropriate disciplinary action may be taken.

If it is determined that an individual has willfully or negligently mishandled confidential or sensitive information, including Protected Health Information (PHI), Personally Identifiable Information (PII), proprietary company data, or other company assets, appropriate disciplinary actions will be taken. We expect all members of our organization to respect and safeguard the resources and information entrusted to them.

Warner Pacific maintains a zero-tolerance policy for using company resources, confidential information, or affiliations for personal gain or inappropriate activities.

At Warner Pacific, we are committed to guiding every team member toward sound decision-making through consistent training, regular performance reviews, and inclusive engagement that fosters mutual respect.

As a forward-thinking, solutions-driven organization, we do not tolerate negativity, boundary violations, or disregard for our core principles. Grounds for disciplinary action include fraudulent activity, intentional damage to company property, breaches of data privacy, discriminatory behavior, and misrepresentation of the company. Disciplinary measures may range from remedial training to, when necessary, termination of employment.

Warner Pacific's disciplinary process involves multiple members of leadership to ensure transparency and fairness. Clear and consistent communication is maintained throughout the process, and all investigations are conducted impartially and thoroughly.

We wouldn't be able to make the strides we do without being bold and courageous. We challenge the industry standard by being open to new ideas, talents, and abilities that allow us to continue improving.

Collaboration is at the heart of everything we do. Don't hesitate to bring new ideas to our leadership teams; there is always room for improvement. When collaborating with others, we encourage everyone to do their best to give the benefit of the doubt when there are misunderstandings.

At Warner Pacific, our culture is rooted in family values, which guides our decision-making. We consider how each individual would want their loved ones to be treated, and we use that perspective to shape how we treat others. These are the questions we continually ask ourselves to ensure we deliver quality service with kindness at the core.

We take pride in what we do and how we do it. We protect the valuable resources that we have available to us, the people we work with, and the entities that entrust us with their business. Doing business with Warner Pacific means being ready to take on the challenge of being bold and courageous, and trusting the process of watching success unfold.

“Courage starts with showing up
and letting ourselves be seen.”

~Brene Brown



VENDOR CODE OF CONDUCT

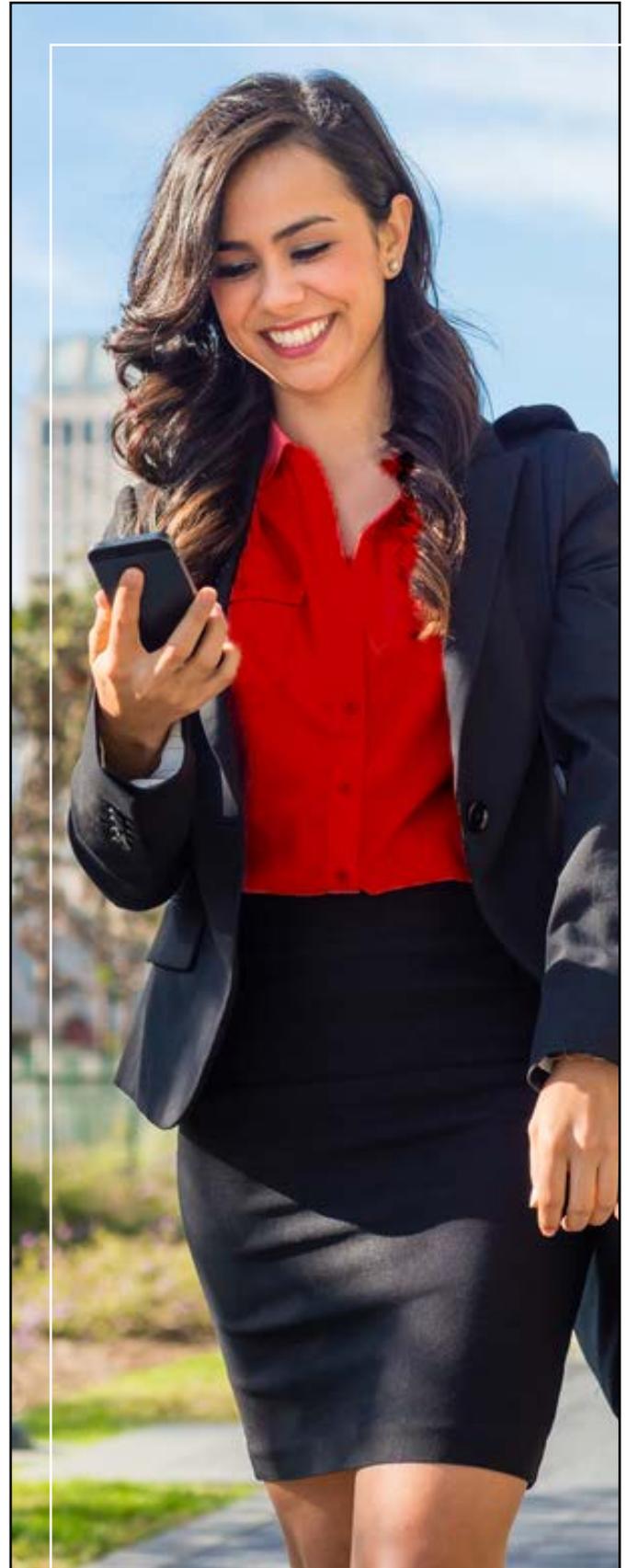
Vendors and third-party partners are expected to adhere to Warner Pacific's Code of Conduct to ensure ethical, legal, and responsible business practices throughout the supply chain. This includes compliance with standards related to integrity, labor practices, and data protection. By aligning with Warner Pacific's values and expectations, vendors help maintain trust, reduce risk, and support a culture of accountability and transparency.

GLOBAL ANTI-BRIBERY AND CORRUPTION

Warner Pacific is committed to conducting business with integrity and in compliance with all applicable anti-bribery and anti-corruption laws. Employees, contractors, and representatives must never offer, give, solicit, or accept any form of bribe or improper payment, whether directly or indirectly, to gain a business advantage. This includes cash, cash-equivalent gifts, unreasonable hospitality and favors, or anything of value intended to influence a decision. All interactions with government officials, clients, and third parties must be transparent and lawful. Violations of this policy may result in disciplinary action up to and including termination, and may include legal consequences. We encourage all personnel to report any suspected bribery or unethical conduct through designated reporting channels. Retaliation against whistleblowers is strictly prohibited.

WARNER PACIFIC BOARD OF DIRECTORS

Warner Pacific's Board of Directors plays a vital role in upholding our Code of Conduct by setting an ethical tone at the top and ensuring we operate with integrity. They oversee implementation and hold senior management accountable for compliance. The Board helps ensure that the Code remains effective, relevant, and aligned with Warner Pacific's values and legal obligations.



COMPLIANCE STEERING COMMITTEE



Warner Pacific's Compliance Steering Committee plays a key role in guiding and overseeing our organization's Compliance and Ethics program. Its responsibilities include setting strategic directions for compliance initiatives, reviewing and approving policies and procedures, monitoring regulatory developments, and ensuring that Warner Pacific maintains a strong culture of integrity and accountability. The Committee also evaluates risk areas, tracks the effectiveness of compliance training and reporting mechanisms, and supports cross-functional collaboration to address compliance challenges.

CLOSING STATEMENT

This Code of Conduct and Code of Ethics serves as a guide for how we work together and represent Warner Pacific. Every member of our team is expected to uphold these principles with integrity, respect, and accountability. Our reputation and success are built on the choices we make every day. By committing to these standards, we create a workplace where honesty, respect, and responsibility guide our actions. Let this Code be more than just rules on paper; let it reflect who we are and who we strive to be. Upholding these values is everyone's responsibility, and together we can build a legacy of integrity.

