

Code of Business Ethics and Conduct

UK Edition



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MESSAGE FROM CEO DOUG HAMMOND

Integrity is fundamental to our business. Our passion is building strong personal relationships based on trust, transparency and active communication so we can create a vibrant and positive work environment for our employees and deliver creative and outstanding solutions to our clients. We care deeply about our employees' and clients' well-being and strive to lead by example. This Code of Business Conduct and Ethics represents our shared commitment to conduct ourselves in a manner that reflects these key values.



All of us – our employees, agents, independent contractors and directors – have a responsibility to understand and follow the Code of Business Conduct and Ethics. The Code defines how we should conduct ourselves as representatives of NFP. It addresses our responsibilities to the company, to each other and to our customers. It also provides guidance on how you should report something that isn't right. We rely on your personal integrity to protect our company's reputation. Never underestimate the importance of the choices you make and the effect they can have on NFP's success.

A handwritten signature in black ink that reads "Doug Hammond". The signature is fluid and cursive, with a large initial "D" and "H".

CODE OF BUSINESS CONDUCT AND ETHICS

The purpose of this code is to underscore and further strengthen NFP's commitment to a business culture of honesty and accountability and to inform you of the appropriate means to ask questions or raise concerns.

WHAT IS EXPECTED OF US?

Each of us is responsible for knowing, understanding and complying with the code. You're expected to use good judgment and avoid even the appearance of improper conduct.

If you have questions, ask them; if you have ethical concerns, raise them. Our conduct should reflect the company's values, demonstrate ethical leadership, and promote a work environment that upholds the company's reputation for integrity, ethical conduct and trust. If you're ever in doubt about a course of conduct, ask for guidance. While the code tries to capture many of the situations we may encounter, it cannot address every circumstance. You can direct questions about this code to any of the following:

- Your manager
- The Human Resources director
- The head of Compliance and Training

The contact information for these departments can be found at the end of this code.

WHO MUST FOLLOW THE CODE?

All employees, officers, directors and managing directors must conduct themselves in accordance with this code, in addition to consultants and independent contractors who have been provided a copy of this code (collectively referred to herein as "you"). This code doesn't replace thoughtful behavior but serves as a source of guiding principles. This code cannot and is not intended to cover every applicable law or provide answers to all questions that might arise; for that, the company must ultimately rely on you to use good judgement, including knowing when to seek guidance from others on the appropriate course of conduct. Note that this code doesn't create any rights for any employee, client, competitor, stockholder or any other person or entity.

This code doesn't replace or supersede existing rules, policies or guidelines of NFP, such as the Employee Handbook or the Conduct Rules under the Senior Manager Certification Regime (SM&CR) but seeks to complement these provisions. Those who violate the standards in this code may be subject to disciplinary action, up to and including termination. Additionally, any office or department of the company may impose more restrictive policies as required in the course of business. You're responsible for complying with these supplemental policies to the extent they apply to your office or department and to the extent they are more restrictive than the company's standard policy.

Q: Where can I find NFP's corporate policies?

A: All corporate polices are located on NAVEX One, our internal policy platform. Log on to your **My Apps** page and select the NAVEX One tile to access the system.

SENIOR MANAGERS AND CERTIFICATION REGIME (SM&CR) – CONDUCT RULES

In addition to the rules as set out in this code, many of our entities are also bound by the Financial Conduct Authority (FCA)'s Conduct Rules. Information about these rules can be found in the COCON section of the FCA Handbook, or by asking compliance. Every member of staff of a regulated entity is required to abide by these rules of conduct, in a way that appropriate to their function, regardless of level, activity or department:

- You must act with integrity
- You must act with due skill, care and diligence
- You must be open and cooperative with the FCA, PRA and other regulators
- You must pay due regard to the interests of customers and treat them fairly
- You must observe proper standards of market conduct

It's important that you understand how these rules apply to you in your function. Please ask compliance if you're unsure.

Failure to abide by the conduct rules will result in a conduct breach being raised which is likely to also result in disciplinary action. This is reported to the regulator and will appear on any reference we produce for you in future. Misconduct can also cost NFP huge fines and reputational damage, so it's vital that you follow up with an appropriate senior manager if you are ever not sure on the right course of action.

The conduct rules apply inside and outside of the office, including at work functions, seminars, and business outings. Please note that actions such as harassment, bullying and discrimination fall under the category of non-financial misconduct and will be raised as conduct breaches in the same way.

In general, treating people the way you would wish to be treated is the best way to go. If something doesn't feel right, stop and escalate to your line manager, before taking any further action.

Q: I've previously advised a client on a product issue and now I've been informed that the advice is incorrect, but the product has now been sold. Can I leave it and pick the issue up at renewal?

A: No, that advice needs to be clarified with the client as soon as practicable after finding out, especially where it is likely to have been material to the client's decision to proceed. Concealing this error would be a violation of this Code of Conduct and the FCA Conduct Rules.

ADDITIONAL INFORMATION FOR SENIOR MANAGERS

The fines imposed under the SM&CR are usually directed to those considered responsible for that function. Each senior manager has a Statement of Responsibilities which outlines to them what duties they are responsible for per regulated entity.

We have a Responsibility Map detailing how the responsibilities are distributed amongst the UK group. Please ask compliance for further information, if needed.

In addition to the conduct rules above, senior managers are also required to abide by the following:

- You must take reasonable steps to ensure that the business of the firm for which you are responsible is controlled effectively.
- You must take reasonable steps to ensure that the business of the firm for which you are responsible complies with the relevant requirements and standards of the regulatory system.
- You must take reasonable steps to ensure that any delegation of your responsibilities is to an appropriate person and that you oversee the discharge of the delegated responsibility effectively.
- You must disclose appropriately any information of which the FCA or PRA would reasonably expect notice.

MANAGERS' OBLIGATIONS

As a manager, you have a greater level of responsibility. You should model appropriate conduct and ensure that the people you supervise understand their responsibilities under the code. Create an environment where employees feel comfortable raising concerns without fear of retaliation. If approached with a concern related to the code, give the employee your complete attention and seek additional clarification. Don't investigate the matter yourself. Instead, contact the head of Compliance and Training Department or the Human Resources Director to raise issues or concerns that arise under the code. Managers who fail to report misconduct may be held responsible and disciplined accordingly. Please also note the additional conduct rules for senior managers under the SM&CR.

RAISING CONCERNS

We all have an obligation to uphold the ethical standards of NFP. If you observe conduct that concerns you, you're expected to report the issue promptly. Doing so will allow NFP to investigate the matter and correct it, possibly before it becomes a violation of the law or a risk to the company's reputation. You have several options for raising issues and concerns. You may contact any of the following:

- Your manager
- The head of Compliance and Training
- The Finance director
- An officer at NFP's corporate office
- The Human Resources director

Contact information is located at the end of this code. You also have the option to make reports of suspected violations of the code by using our Whistleblowing Policy which can be found with our other policies and in your employee handbook.

If you report a concern to anyone in the list above and don't believe the issue has been addressed, feel free to raise it with another corporate officer. While all violations should be reported, the following must be reported immediately:

- Bribery
- Any ethics violation by an officer
- Fraud or theft greater than \$5,000
- Incorrect records and accounts
 - Interfering with audits
 - Falsifying, misrepresenting, or destroying financial data or reports
 - Improperly concealing financial data, including creating off-the-record bank accounts
- Unauthorized access to company information systems (hacking)
- Significant accounting deficiencies
 - Deficiencies in the design or operation of internal control over financial reporting
 - Fraud involving managers or employees involved in financial reporting
- Improper disclosure of protected health information
- Threats to human life or slave or forced labor
- Bid rigging, price fixing and other anti-competitive practices
- Money laundering
- Violations of state insurance laws

Q: I've seen something that I think may be a violation of company policy, but it doesn't affect my area of the company so I may be incorrect. What should I do if I'm unsure and it doesn't affect me directly?

A: We rely on our employees to report misconduct and unethical issues. As Warren Buffet famously said, "It takes 20 years to build a reputation and five minutes to ruin it." When misconduct is left unreported, it can cause immeasurable damage to our reputation and possibly lead to regulatory and legal consequences. Report concerns, even if You aren't certain that it's a violation. Our reputation depends on it!

ANONYMITY AND CONFIDENTIALITY

When you make a report using the company's Whistleblowing Policy, you may choose to remain anonymous, although you are encouraged to identify yourself to facilitate communication and follow-up. If you make your identity known, we'll take every reasonable precaution to keep your identity confidential, consistent with conducting a thorough and fair investigation, and subject to the company's obligation to notify third parties, such as regulators or other authorities. To help maintain confidentiality, avoid discussing these issues, or any investigation, with other employees.

Q: Can I report an issue and still remain anonymous?

A: We encourage employees who make reports to provide contact information so that we can investigate the matter thoroughly and more efficiently. However, you may choose to remain anonymous if you prefer.

INVESTIGATIONS

NFP will promptly investigate any reported matter. It's important that you don't conduct your own preliminary investigation with respect to alleged violations. Investigations of alleged violations may involve complex legal or ethical issues, and acting on your own may compromise the integrity of an investigation and adversely affect both you and the company. You're expected to cooperate fully in any investigation of any potential violation. The company takes these matters seriously and expects the same from you. It's a violation of the code to make a false accusation, lie to an investigator or refuse to cooperate with an investigation. Honest reporting means that you believe that the information you're providing is accurate, even if it's later determined that the facts were different than you believed.



NO RETALIATION

NFP values the help of employees who bring potential problems to our attention. Retaliation against employees who raise an issue is strictly prohibited and a violation of this code. Voicing concerns related to this code may not be used as a basis for any adverse employment action, including demotion, loss of benefits, harassment, discrimination or termination.

If you believe someone has retaliated against you, report the matter to the Human Resources department or use the company's NFP EthicsPoint Hotline.

CONSEQUENCES OF VIOLATIONS

Subject to applicable law, employees, officers, directors and managing directors who violate applicable laws and regulations, this code, the Conduct Rules and/or other company policies may be subject to disciplinary actions, up to and including termination of employment and, if warranted, civil legal action or referral to criminal prosecution. In addition, such disciplinary action may be taken against anyone who directs or approves infractions or has knowledge of them and doesn't promptly report them in accordance with company policy.

UPHOLDING INTEGRITY: COMPANY ASSETS, INFORMATION AND REPUTATION

Business and Financial Records

Ensuring the accuracy of the company's business and financial records is everyone's responsibility, not just the role of Accounting and Finance personnel. Each of us is responsible for creating, retaining and disposing of company records in accordance with NFP's Enterprise Security Program (and NFP's further IT policies and procedures), the UK Data Protection Act (2018) and applicable legal requirements.

NFP is committed to compliance with applicable laws, rules and regulations, accounting standards and internal accounting controls. All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered into our books in accordance with applicable accounting principles. You should promptly report complaints or concerns regarding accounting, internal accounting controls and auditing matters.

Q1. We have a large policy in the pipeline, management is confident it will sail through underwriting, and they've instructed me to accrue the commission revenue. Can I recognize revenue on the policy?

A1. No, you cannot. You should reach out to corporate Finance and understand NFP's revenue recognition criteria. Misinterpretation of the guidelines could potentially distort NFP's financial reports and result in a substantial amount of effort, including yours to correct the misstatement. So, it's imperative to seek additional guidance on this subject in advance.

Q2. My supervisor instructed me to postpone entering payables for two weeks until the beginning of the new accounting period. Can I push these invoices into the next period to help improve the profitability of the office?

A2. No, you cannot. Intentionally delaying the processing of invoices in order to skew the individual performance of the office is a violation of the NFP Code of Conduct. If you believe someone has retaliated against you, report the

matter to the Human Resources department or use the company's NFP EthicsPoint Hotline.

Q3. When the managing director is away from the office, we use his signature stamp to authorize checks. He's given us permission, so it's not a big deal, right?

A3. It is a big deal! You should never use another person's signature stamp to authorize a check. If the managing director's travel schedule interferes with his ability to sign checks timely, then the office should coordinate with NFP Treasury to add another authorized signer on the account.

Q4. A manager asked me to prepare a wire to a new vendor without any supporting documentation. Should I challenge the validity of the request?

A4. You should, and thank you for helping to safeguard NFP's resources. Please contact corporate Finance or Internal Audit when you have any questions.

Company Assets

You're expected to protect the company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on NFP's profitability. All company assets should be used for legitimate business purposes. Company equipment shouldn't be used for non-company business, but limited personal use may be permitted, provided that such use doesn't violate the Employee Handbook in any way.

Q: Is my company email address a company asset?

A: Yes. Your company email address is an NFP asset and should only be used for business purposes. Please don't use it as a username for any personal accounts.

Confidentiality of Company Information

Employees are obligated to protect the company's nonpublic information at all times, including outside of the workplace and working hours, and even after employment ends. You must maintain the confidentiality of information obtained through your association with NFP and/or its clients, except when disclosure is authorized by the company or legally mandated. You must not use that information for personal advantage. Confidential information includes all financial and other nonpublic information and other records that, if disclosed, might be of use to competitors, or harmful to the company or its clients. Similarly, personal and sensitive data of any kind should be treated with the same level of security and discretion.

If you possess or have access to confidential information, you must: 1) not use the information for your own benefit or for the benefit of other persons; 2) carefully guard against disclosure of that information to people outside NFP (e.g., avoid discussing with family members and business acquaintances, or in public places such as taxis and elevators) and 3) not disclose confidential information to another company employee unless the employee needs to know the information for a legitimate business purpose undertaken on behalf of the company. Even then, take appropriate steps, such as execution of a confidentiality agreement, to prevent misuse of the information.

Your obligation to treat information as confidential does not end when you leave NFP. Upon termination of your employment or other association with the company, you must return everything that belongs to the company, including all documents and other materials containing company and client confidential information. You must not disclose confidential information to a new employer or to others after you or they cease to be employed or otherwise associated with the company.

You may not disclose your previous employer's confidential information to the company. Of course, you may use general skills and knowledge acquired during your previous employment.

Q: I'm on vacation next week and want to send some confidential company documents to my personal email account so that I have easy access to the information for a conference call. Is that an issue?

A: You are not permitted to email confidential documents to your personal email. If you need access to the information while you are out of the office, you should use either VPN or Egnyte to access the information. Please note that staff are generally not encouraged to work during their vacation time and should handover any urgent business to a suitably informed colleague.

Comply with Laws, Rules and Regulations

NFP strives to be a good corporate citizen and comply with all applicable laws, rules, regulations and ordinances. You're expected to comply with all laws, rules, regulations and ordinances affecting the company. If you're unsure about any legal or compliance requirements, you should seek advice from your manager or the head of Compliance and Training.

Q: If my supervisor asks me to do something that I think is wrong, what should I do?

A: You should never do anything that you think is in violation of a company policy, including the Conduct Rules, this Code of Business Conduct and Ethics, or the law. Discuss your concerns with your supervisor, if possible. Otherwise, see the section titled "Raising Concerns" for a list of other possible reporting avenues.

The Media and Others

In order to ensure that all information about the company provided to the media and other related parties is accurate, non-confidential and in compliance with all applicable laws, contact with the media and such other parties is restricted to designated NFP spokespersons. This extends to communications with the public, regulators and other government officials. If a member of the press contacts you to discuss the company or any of its subsidiaries or vendors, please contact the managing director before responding to any questions or requests for interviews.

For more information regarding the disclosure of information about the company, refer to the *Policy on Communication with the Media*.

Note the person's name, telephone number, the name of the publication or company, the applicable deadline and the nature of the inquiry. Once contacted, the company will provide guidance regarding an appropriate response.

If a regulator or other government official contacts you to discuss NFP or any of its subsidiaries or affiliates, please contact the head of Compliance and Training. If you receive a subpoena, enforcement inquiry from a regulator, litigation documents or inquiries from outside counsel, forward the information to Compliance. Contact information may be found at the end of this code.

Q: If I am asked to comment about NFP's business or financial condition by a member of the media, may I give my opinion if I position it as merely my opinion?

A: No. You should not provide any comments, even personal opinion, to the press without prior approval from NFP. Further, comments about financial matters may seriously impact our business and are generally considered highly confidential.

Gifts, Meals & Entertainment

Gifts, meals and entertainment for customers must support a legitimate business interest of the company and should be reasonable and appropriate under the circumstances. When you act on NFP's behalf and provide or receive third-party gifts and entertainment in your corporate capacity, you're expected to exercise good judgment in each case, taking into account the circumstances, including the character of the gift or entertainment, its purpose, its appearance, the positions of the persons providing or receiving the gift or entertainment, the business context, reciprocity, and applicable laws and social norms.

Don't accept gifts, meals or entertainment, or any favors, from vendors or customers if doing so could compromise, or appear to compromise, our ability to make objective business decisions in the best interests of NFP. Please refer to NFP's Travel and Expense Policy and the Anti-Bribery and Corruption Policy for specific guidelines and approval requirements for gifts, meals and entertainment. All hospitality and gifts of any kind irrespective of their value must be reported to complianceUK@nfp.com.





UPHOLDING INTEGRITY: AVOIDING CONFLICTS OF INTEREST

Personal Conflicts of Interests

You're expected to exhibit honest and ethical conduct, including the ethical handling of conflicts of interest in personal and professional relationships. You must avoid conflicts of interest involving the company or its business. A "conflict of interest" occurs when an individual's private interest interferes in any way, or even appears to interfere, with the interests of the company. A conflict situation could arise if you take action or have an interest that makes it difficult to perform your work for NFP objectively and effectively. Conflicts of interest could also arise if you receive improper personal benefits as a result of your position with the company.

Personal conflicts of interest may not always be obvious or easy to resolve, so if you're engaged in, or otherwise aware of, any conduct that creates an actual, apparent or potential conflicts of interest, you must promptly seek guidance from your manager, the Compliance department or a HR representative. In addition, certain transactions between executive officers and NFP or any of its subsidiaries require prior approval. For more information, please refer to NFP's Conflict of Interest Policy or seek guidance from compliance on the Independence Rules.

Q: It's my job to select a vendor for the company. One of the vendors being considered is a company that I have an investment in. Do I need to take any precautions?

A: In this situation, your interest in the vendor conflicts – or at least appears to conflict – with your responsibility to select the best vendor for NFP. The best course of action is either for not to be involved in the selection process or for your interest in the vendor to be disclosed to your manager and others involved in the selection process.

Directorships with Outside Entities

Members of the Executive Management Committee are prohibited from serving on the board of directors (or similar governing body) of a for-profit outside entity without the prior approval of NFP's chief executive officer, after consultation with NFP's general counsel. All other NFP employees, officers, directors and managing directors are prohibited from serving on the board of directors (or similar governing body) of a public for-profit outside entity without the prior approval of NFP's chief executive officer, after consultation with NFP's general counsel.

After joining the board of directors (or similar governing body) of an outside entity, whether for-profit or not-for-profit, company employees, officers, directors and managing directors must avoid any actual or perceived conflicts of interest. This also needs to be reported to Compliance.

Examples of a conflict of interest:

- Engaging in a business that competes with NFP
- Working for, or serving as a director or advisor to, a competitor
- Acting on behalf of NFP in a business transaction involving a family member or close friend
- Allowing your activities to interfere with your job performance
- Direct equity investments in related parties to NFP – where you have any form of direct equity investment, you will need to fill out a Personal Account Dealing form. Please ask compliance for this form if required.

This list is not exhaustive.

UPHOLDING INTEGRITY: CLIENTS

Fair Dealings

We expect to outperform our competition fairly and honestly. We seek competitive advantages through superior performance, not through unethical or illegal business practices. You're expected to deal fairly with the company's customers, suppliers, competitors and employees. Don't take unfair advantage of anyone through manipulation, concealment, misrepresentation of material facts or any other unfair-dealing practice in connection with the company's business. Stealing proprietary information, possessing or utilizing trade secrets obtained without the owner's consent or inducing such disclosures by past or present employees of a competitor is strictly prohibited.

Q: My manager has asked me to share customer information from my former employer. Can I do that?

A: No. You're not permitted to disclose customer information of your former employer. You have an obligation to protect your former employer's confidential information after leaving that company, just as you would be expected to protect our confidential information should you leave to work somewhere other than NFP. It is not only a breach of this code and the Conduct Rules to share your ex-employer's confidential information: it may create liability for yourself and NFP.

Anti-Bribery

Transactions with local and foreign governments are governed by certain laws and aren't the same as conducting business with private parties. There are laws that restrict payments or reimbursements of expenses incurred by government officials, in addition to the receipt of gifts, meals and entertainment by government officials and their intermediaries. Consult NFP's Anti-Bribery and Corruption Policy to make sure you understand the laws and the company's policies when transacting with governmental entities.

You may not make or receive improper payments on behalf of the company. An improper payment means receiving or paying a bribe or giving, offering or promising to give money or anything else of value to any person, to improperly influence any act or decision of a person, or to otherwise gain an improper benefit for the company. There are also state laws that govern bribery in the commercial context. Generally, it's acceptable to have reasonable and customary interactions with commercial parties in the form of gifts, entertainment and hosting business meetings; however, commercial bribery laws prohibit attempts to influence an employee's conduct in relation to his or her employer's affairs without the knowledge of the employer and contrary to the best interests of the employer.

Please review NFP's **Anti-Corruption Legal Compliance Guide** and its index of state bribery laws for more information. Violation of certain state bribery laws may result in a felony conviction and/or incarceration.

Q: A consultant the company uses to assist with government relations recently asked us for a large increase in commission. I suspect the consultant may intend to pass this money on to local officials. What should I do?

A: Report your suspicions to the Compliance department at once. No such payments should be made to the consultant until the company has investigated your concerns.

Anti-Money Laundering

It's NFP's policy to prohibit and actively prevent money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities. To protect NFP from those engaged in money laundering activities, ensure that you know your clients and obtain all client information required by laws, regulations and policies. Be sure to alert your supervisor of any unusual or potentially suspicious activities that constitute money laundering or the financing of terrorism or that involve proceeds from unlawful activity.

Be alert to:

- Large cash payment
- Payments to someone not a party to a contract
- Payments in an unusual currency
- Payments from an unusual account
- Multiple money orders
- Volume purchases of prepaid products like gift cards
- Unusual fund transfers

Privacy of Personal Information

NFP respects the privacy of all its business partners and customers, as well as its employees. You're expected to handle personal data responsibly and in compliance with all applicable privacy laws, including the UK Data Protection Act 2018. You must handle personal information in accordance with any relevant contractual obligation, and only use such information for legitimate business purposes in line with the services provided. Limit access to the information to those who have a legitimate business purpose, and take care to prevent unauthorized disclosure. Always use a secure transfer portal such as SharePoint when dealing with personal, sensitive, and/or corporate confidential information. Don't review or discuss confidential information in public places or in places where you may be overheard.

The Enterprise Security Program outlines NFP's Information Technology systems and controls. There are additional policies available on the Navex system for different aspects of IT procedures. You're expected to fully understand and comply with these policies.

Q: I emailed some protected information to the wrong client. I've asked the client to delete the information. Do I need to do anything else?

A: Yes. Report the incident to the Compliance department who will guide you with further steps to take.

UPHOLDING INTEGRITY: PERSONNEL

Equal Employment Opportunity

The company's focus when making personnel decisions is on merit and contribution to the company's success. Concern for the personal dignity and individual worth of every person is an indispensable element in the standard of conduct that we have set for ourselves. The company affords equal employment opportunities to all qualified persons without regard to any impermissible criterion or circumstance. For a more detailed discussion on NFP's policies on equal opportunities and non-discrimination, please refer to the [Employee Handbook](#).

Sexual Harassment

NFP values its employees and prohibits all forms of sexual harassment and conduct of a sexual nature that interfere with an individual's work performance. It's the responsibility of every employee and supervisor to ensure compliance with this code and report sexual harassment promptly. Please refer to the Employee Handbook for more information on our sexual harassment policy.

Examples of improper conduct may include, but are not limited to: unwelcome sexual advances, sexual remarks or jokes, inappropriate touching, gesturing or physical interference which impedes or blocks another's movement, or demeaning posters, cartoons, photographs, graffiti or drawings.

If you're a victim of sexual harassment and are uncomfortable reporting the conduct to your supervisor, you may report the incident(s) to your department head, local HR representative, the Human Resources department or the managing director. Please follow the guidelines in the Whistleblowing Policy. Supervisors are required to report any employee complaints or incidents of alleged harassment to their supervisor or department head and their local HR representative or the Human Resources department.

Other Forms of Harassment

The company is committed to maintaining a working environment free from harassment — whether based on race, colour, religion, sex, sexual orientation, gender identity, age, national origin, disability, other characteristics protected by law or any other identifying characteristic. Actions that create a hostile working environment are strictly prohibited. Please refer to the [Employee Handbook](#) for more information on our harassment policy.

Examples of unacceptable conduct include inappropriate jokes, threats, derogatory comments, physical contact, teasing, bullying, intimidation or other offensive actions related to an individual's diversity protected in our code and Employee Handbook.

Workplace Safety

Violence or threats of violence in any form are unacceptable and will not be tolerated. The company believes that all employees should be able to enjoy a work environment free from all forms of violence. Any incident or threat of violence, regardless of whether the offender is an employee or third party, must be immediately reported to HR for the prompt investigation of all allegations. Depending on the circumstances, relevant authorities may also be contacted. Any report of an act of violence will be kept confidential to the greatest extent possible to the extent deemed appropriate by the company and in accordance with law.

Please refer to the [Employee Handbook](#) for more information on our workplace violence policy.



WAIVERS AND AMENDMENTS

Any waiver of this code may be made by NFP's general counsel and chief executive officer or the board of directors of NFP Corp. Any amendments of this code must be approved by Compliance, Human Resources or the board of directors of NFP Corp.

CONTACTS

Human Resources Department
nfpeurhr@nfp.com

Finance Department
financebirminghamuk@nfp.com

Compliance Department
complianceUK@nfp.com

COPIES OF THIS CODE

Copies of this code are available from the Legal department or the Human Resources department.



About NFP

NFP is a leading property and casualty broker, benefits consultant, wealth manager, and retirement plan advisor that provides solutions enabling client success globally through employee expertise, investments in innovative technologies, and enduring relationships with highly rated insurers, vendors and financial institutions.

Our expansive reach gives us access to highly rated insurers, vendors and financial institutions in the industry, while our locally based employees tailor each solution to meet our clients' needs. We've become one of the largest insurance brokerage, consulting and wealth management firms by building enduring relationships with our clients and helping them realize their goals.

For more information, visit [NFP.co.uk](https://www.nfp.co.uk)