

WHISTLEBLOWER POLICY

PURPOSE

The purpose of this Whistleblower Policy (the “Policy”) is to reinforce the business integrity of Hagerty, Inc., The Hagerty Group, LLC and all subsidiaries and any ventures that are controlled by Hagerty, Inc. or The Hagerty Group, LLC (all of which are individually and in the aggregate referred to as “Hagerty”) by providing a safe and reliable means for employees and others to report concerns they may have about conduct at Hagerty. By following this Policy, you can raise concerns, confidentially and anonymously if desired, and free of any retaliation, discrimination, or harassment.

At Hagerty, we are committed to the highest levels of ethics and integrity in the way that we do business and understand that this is crucial to our continued success and reputation. Hagerty’s Core Values, Employee and Supplier Codes of Conducts (the “Codes of Conducts”), and Employee Handbook guide our everyday conduct and we have a professional responsibility to speak up and report unethical behavior.

This Policy is an important element in detecting corrupt, illegal or other undesirable conduct. Hagerty strongly encourages you to speak up if you suspect or witness any matters of concern as all reports made under this Policy will be taken seriously.

WHAT TO REPORT

Whether you are an employee, an officer or director, an independent contractor, or someone who does business with us, we ask that you bring to light good faith concerns regarding Hagerty's business practices.

We ask that you follow this Policy to report good faith concerns regarding any of the following:

- Suspected violations of our Codes of Conducts or Employee Handbooks, which we refer to in this policy as "Ethics Violations."
- Suspected violations of any other Hagerty policies or procedures, which we refer to in this policy as "Corporate Policy Violations."
- Questionable accounting, violations of internal accounting controls, or any other auditing or financial matters, or the reporting of fraudulent financial information, which we refer to in this policy as "Fraudulent Auditing and Accounting Activities."
- Suspected violations of law or fraudulent activities other than Fraudulent Auditing and Accounting Activities, which we refer to in this policy as "Legal Violations," and collectively with Ethics Violations and Corporate Policy Violations as "Violations."

WHO DOES THIS POLICY COVER?

This Policy applies to all employees, officers, directors, and independent contractors of Hagerty, all of whom are referred to collectively as "employees" or "you" throughout this policy. In this policy, “we,” and “our” refers to Hagerty.

As a Hagerty employee, if you are aware of a potential Violation or Fraudulent Auditing and Accounting Activity and do not report it according to this Policy, your inaction may be considered a Violation itself, which may result in disciplinary action, up to and including termination of your employment or any other relationship that you may have with Hagerty.

REPORTING AND INVESTIGATION

If you believe that any Violation or Fraudulent Auditing and Accounting Activity has occurred or is occurring, or you have a good faith concern regarding conduct that you reasonably believe may be a Violation or Fraudulent Auditing and Accounting Activity, we encourage you to promptly take one or more of the following actions:

- Discuss the situation with your manager.
- If you are uncomfortable speaking with your manager or believe your manager has not properly handled your concern, or is involved in the Violation or Fraudulent Auditing and Accounting Activity, contact the Chief Legal Officer or Human Resource Business Partner.
- If you do not believe your concern is being adequately addressed, or you are not comfortable speaking with one of the above-noted contacts, report your concern using Hagerty's [WE LISTEN Reporting Procedure](#), through which you may choose to identify yourself or remain anonymous.
 - **Toll-free Anonymous Telephone Reporting:** Callers in the United States and Canada should dial 1-866-841-3288. Callers in the United Kingdom should dial the ITFS for your location plus 0800-032-8483.
 - **Internet Reporting:** To file a report anonymously using any computer connected to the Internet, visit www.hagerty.ethicspoint.com. For answers to Frequently Asked Questions about the anonymous reporting process click [here](#).

This Policy provides a mechanism for Hagerty to be made aware of any alleged wrongdoings and address them as soon as possible. However, nothing in this Policy is intended to prevent any employee from reporting information to federal or state law enforcement agencies when an employee has reasonable cause to believe that the violation of a federal or state law has occurred. A report to law enforcement, regulatory, or administrative agencies may be made instead of, or in addition to, a report directly to Hagerty through the WE LISTEN reporting options or any other reporting method specified in this Policy.

All reports of a Violation or Fraudulent Auditing and Accounting Activity will be taken seriously and will be promptly and thoroughly investigated. The specific action taken in any particular case depends on the nature and gravity of the conduct or circumstances reported and the results of the investigation.

If a Violation or Fraudulent Auditing and Accounting Activity has been reported, investigated, and confirmed, the Company will take corrective action proportionate to the seriousness of the offense. This action may include disciplinary action against the accused party, up to and including termination of employment or any other working relationship that the offending party may have with Hagerty.

Reasonable and necessary steps will also be taken to prevent any further Violation or Fraudulent Auditing and Accounting Activity.

However, a party who knowingly and intentionally files a false report or provides false or deliberately misleading information in connection with an investigation of a report may face disciplinary action, up to and including termination of employment or other legal proceedings.

HANDLING REPORTS

Reports of Violations, Fraudulent Auditing and Accounting Activity, or other questionable conduct that are submitted by any means specified in this Policy will be handled as follows:

All reports received relating to accounting and auditing, including Fraudulent Auditing and Accounting Activity, will be captured in the We Listen database, which will include, among other things:

- (1) the date the report was received,
- (2) a description of the report,
- (3) the reporting party (if provided), and
- (4) the status and disposition of an investigation of the report.

The Chief Legal Officer will report to the Audit Committee:

- (1) reports of Ethics Violations or Fraudulent Auditing and Accounting Activity,
- (2) any Violation or Fraudulent Auditing and Accounting Activity involving the Company's executive officers or directors, and
- (3) such other matters as the Chief Legal Officer deems significant.

The Audit Committee shall direct and oversee an investigation of such reports, as well as any reports initially directed to the Audit Committee, as it determines to be appropriate. The Audit Committee may also delegate the oversight and investigation of such reports to management, including the Chief Legal Officer or outside advisors, as appropriate.

All other reports regarding accounting or auditing matters shall be reviewed under the direction and oversight of the Chief Legal Officer who will involve such other parties (such as the Compliance Department, the Internal Audit Department, members of the Finance Department or outside advisors) as deemed appropriate.

The Chief Legal Officer shall provide the Audit Committee with a quarterly report of all accounting or auditing reports received and an update of pending investigations. The Audit Committee may request special treatment for any report and may assume the direction and oversight of an investigation of any such report.

All other reports will be logged separately and shall be reviewed under the direction and oversight of the Chief Legal Officer, who will forward them to the appropriate person or department for investigation (for example, labor and employment matters will be forwarded to the Human Resources Department), unless the Chief Legal Officer determines that other treatment is necessary.

CONFIDENTIALITY

Information disclosed during the course of the investigation will, to the extent practical and appropriate, remain confidential, except as may be reasonably necessary under the circumstances to facilitate the investigation, take remedial action, or comply with applicable law.

For any Violation or Fraudulent Auditing and Accounting Activity not reported through an anonymous report, we will advise the reporting party that the Violation or Fraudulent Auditing and Accounting Activity has been addressed and, if we can, of the specific resolution. However, due to confidentiality obligations, there may be times when we cannot provide the details regarding the corrective or disciplinary action that was taken.

RETALIATION

Hagerty strictly prohibits and does not tolerate unlawful retaliation against any employee for reporting a Violation or Fraudulent Auditing and Accounting Activity or suspected Violation or Fraudulent Auditing and Accounting Activity in good faith or otherwise cooperating in an investigation of a Violation or Fraudulent Auditing and Accounting Activity. All forms of unlawful retaliation are prohibited, including any form of adverse action, discipline, threats, intimidation, or other form of retaliation for reporting under or complying with this Policy. Hagerty considers retaliation a Violation itself, which will result in disciplinary action, up to and including termination of employment or any other working relationship with Hagerty.

If you have been subject to any conduct that you believe constitutes retaliation for having made a report in compliance with this Policy or for having participated in any investigation relating to an alleged Violation or Fraudulent Auditing and Accounting Activity, please immediately report the alleged retaliation to the Chief Legal Officer or Human Resource Business Partner. If, for any reason, you do not feel comfortable discussing the alleged retaliation with these people, please report the alleged retaliation using the [WE LISTEN Reporting Procedure](#). These individuals will ensure that an investigation is conducted in a timely fashion.

Your complaint should be as detailed as possible, including the names of all individuals involved and any witnesses. Hagerty will directly and thoroughly investigate the facts and circumstances of all perceived retaliation and will take prompt corrective action, if appropriate.

Additionally, any manager or supervisor who observes retaliatory conduct must report the conduct to the Chief Legal Officer or Human Resources Business Partner so that an investigation can be made and corrective action taken, if appropriate.

Any employee, regardless of position or title, who has been determined to have engaged in retaliation in violation of this Policy, will be subject to appropriate disciplinary action, up to and including termination of employment or any other working relationship with Hagerty.