

Utica National Insurance Group

Fraud Policy

The Utica National Insurance Group is committed to doing business in an environment of honesty and integrity.

Therefore, Utica National will not tolerate any dishonest or fraudulent act. "Fraud" is the deliberate practice of deception in order to receive unfair or unlawful gain. It is the policy of Utica National to establish and maintain controls and procedures intended to provide reasonable assurance that dishonest or fraudulent acts, by outsiders or employees, are prevented or promptly detected.

Employees of Utica National should be sensitive to the possibility that someone may try to defraud the Company. Employees have an obligation to promptly report any and all suspected acts of dishonesty and fraud. Suspected fraudulent activity may be reported to the employee's Supervisor/Manager or directly to the General Auditor, Compliance Officer or Human Resources Director. There will be no retaliation against any employee who raises legitimate concerns regarding violations of Company policy. All cases of suspected fraud will be handled with the utmost confidentiality.

The General Auditor and the Internal Audit Department have the primary responsibility for the investigation of any situation involving possible dishonest or fraudulent activities in matters relating to our Companies, with the following exception: instances of suspected fraud concerning Claims or Underwriting files are to be reported to the Special Investigations Unit in the Home Office Claims Department.

It is Utica National's policy to report all cases of fraud to appropriate law enforcement authorities for prosecution. Utica National will also fully cooperate in the investigation and prosecution of perpetrators.

Some examples of fraudulent activity include, but are not limited to:

- Forgery, falsification or alteration of documents (for example: receipts submitted for expense account reimbursement, cash receipts, checks, vendor agreements, purchase orders, other financial documents, electronic files);
- Misapplication of funds, supplies, or other assets;
- Impropriety in the handling or reporting of money or financial transactions;
- Profiteering as a result of insider knowledge of company plans and activities;
- Unauthorized disclosure of confidential and proprietary information to outside parties;
- Employees or members of their immediate family receiving any gratuities, gifts of property or service, discounts or other like favors which exceed courtesies customarily accepted as business practices, which might place, or be construed as placing, an employee under obligation to act on behalf of the Companies in a manner that conflicts with the Conflict of Interest policy;
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment; and/or
- Any similar or related irregularity, or actions related to concealing or perpetrating the above-mentioned activities; and
- Any fraudulent or dishonest act.