



The Hanover Insurance Company | 440 Lincoln Street, Worcester, MA 01653  
Citizens Insurance Company of America | 645 West Grand River Avenue, Howell, MI 48843

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**CORPORATE POLICIES**

**Code of Conduct**

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## To All Employees

A Company's reputation, like any person's reputation, is to be highly valued and carefully protected. Our reputation for integrity and fairness has been earned over many years. We are committed to the highest standards of professional and ethical performance in our relationships with our employees, policyholders, Agents, suppliers, regulatory agencies, shareholders, and the public.

As an employee, you represent The Hanover Insurance Group, Inc. You make decisions and take actions on behalf of the company. Those decisions and actions must at all times be legal, ethical, fair and avoid the appearance of impropriety. Guiding us in upholding our ethical commitment is a set of policies on key business and professional issues. All officers and employees must comply not only with the letter of these policies, but also their spirit.

This Code of Conduct sets forth our expectations regarding business and professional conduct and is intended to help employees recognize and deal with ethical issues; but this Code cannot possibly cover every situation that might raise questions of appropriate business conduct. When in doubt about a decision you have to make, or if you are concerned about an action by another employee, please discuss your concern with your manager, a compliance officer, the Office of the General Counsel ("OGC"), the Human Resources Department or call our anonymous Employee Alert Line at 1-866-656-4232. Nothing should ever compromise our commitment to integrity.

Underlying our policies is our shared interest in preserving and protection a reputation for integrity—for you and for the Company alike.

Frederick H. Eppinger  
President and Chief Executive Officer

# The Hanover Code of Conduct

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Reference Guide

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## I. Ethical Business Conduct and Good Business Practices

High standards of behavior, ethical business conduct and good business practices are required of all employees, officers and directors, regardless of position or location. No director, officer, manager or employee has the authority to require conduct that is in violation of this Code of Conduct.

The Hanover's Code of Conduct is designed to deter wrongdoing and, among other things, requires:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Full, fair, accurate, timely and understandable disclosure in reports and documents that The Hanover files with, or submits to, the Securities and Exchange Commission and in other public communications made by the company;
- Compliance with applicable governmental laws, rules and regulations;
- The prompt internal reporting to an appropriate person or persons of violations of The Hanover's standards and policies; and
- Accountability for adherence to the standards and policies.

All employees and directors must adhere to these ethical business practices and understand the importance of compliance. The company has designated individuals who are available to assist in resolving issues that may arise. If you are unsure whether a situation constitutes improper business conduct, seek advice from any of a number of contacts, including the Office of the General Counsel (OGC), Human Resources or Internal Audit departments, or compliance officers of the Company. A list of references for existing policies is included. A current list of names and phone numbers is available on The Hanover's Corporate Governance web site at [www.hanover.com](http://www.hanover.com) under "Company Policies—Reference Guide".

In addition, you may call the Employee Alert Line at 1-866-656-4232. Calls to this number may be kept anonymous if you prefer. Calls to this number are answered by Communication Specialists, an independent, third-party company which will report all complaints and concerns directly to the Director of Internal Audit and the General Counsel and, if appropriate, the Audit Committee of the Board of Directors.

This Code of Conduct and The Hanover's other policies and procedures are applicable to all officers (including the senior financial officers of the company) and employees and, to the extent appropriate, all directors, of The Hanover and of each of its direct or indirect subsidiaries (collectively, the "Company"). Compliance with the Code, as in effect from time to time, and The Hanover's other policies and procedures is a condition of employment and continued employment with the Company. Likewise, we expect our Agents, contract employees, contractors and others with whom we do business to conduct themselves in all of their dealings with us or on our behalf according to these same high standards.

## II. Compliance

### *A. General Compliance*

Our reputation depends on public confidence in the Company's integrity and devotion to the interests of our policyholders, clients and shareholders. We are determined to justify that confidence by maintaining the highest standards in the conduct of our affairs and avoiding any appearance of dubious conduct. A serious responsibility rests with all of us, on whose character and judgment the confidence of the public ultimately rests.

### *B. Legal and Regulatory Compliance*

The insurance and financial services businesses are heavily regulated industries that are subject to a variety of state and federal laws. These laws include state laws and regulations pertaining to the business of insurance, federal laws and regulations pertaining to securities, fiduciary duties, money laundering and corporate governance and state and federal privacy, antitrust, environmental, health and safety and employment laws.

Regulation of our insurance and financial services businesses include matters affecting pricing, marketing and sales, advertising, policy forms, underwriting and risk selection, financial transactions, accounting and reporting, processing funds, policy issue and administration, complaints and claim handling. It is our philosophy and intention to comply fully with all applicable laws and regulations. Although employees are not expected to be experts in legal or regulatory matters, they are expected to be familiar with the laws and regulations pertaining to their areas of responsibility, and to contact the OGC whenever a question arises concerning the necessary course of action to assure that the Company is in compliance with applicable laws.

### *C. Policy on Financial Integrity*

Financial records and reports shall reflect the Company's commitment to financial integrity. Financial integrity comprises three elements:

- (1) Compliance with applicable laws, regulations and Company policies. This element requires that the Company's general accounting procedures be followed, as well as all generally accepted accounting principles, statutory accounting principles, laws and regulations for accounting and financial reporting of transactions, estimates and forecasts.
- (2) Rigorous business processes and internal controls to ensure that financial disclosures and management decisions are based on complete and accurate information. This element requires the maintenance of complete, accurate and timely books and records and maintenance of sound processes and controls.
- (3) Integrity in communications to ensure timely and accurate reporting and analysis of financial information and forthright and candid disclosure to management, regulators and shareholders. This element requires open and frank internal communications and complete, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission, insurance departments of various states and other regulators and in other public communications.

### *D. Insider Trading and Stock Tipping*

Insider trading and stock tipping are criminal offenses. Directors and employees must strictly obey all laws prohibiting the trading of securities based on inside information, that is, prior knowledge of material, non-public information about the Company. "Insider trading" means using inside information for personal profit. "Stock tipping" means disclosing inside

information about the Company, for example, to a relative, colleague or friend, to enable that person to buy or sell stock of the Company on the basis of such information. If you are in possession of inside information that could influence an investor's decision to purchase or sell a security, you must not act upon that information or pass the information along to others. You may not trade the Company's stock, nor the stock of any other company for which you acquired non-public information, nor recommend to others that they trade in such stock, until such information has been publicly disclosed.

#### *E. Unfair Business Practices*

We should at all times deal fairly with our competitors. Our goal is to win on the merits of our products and service. Inappropriate comparisons to our competitors reflect negatively on us, not on them. Disparagement is not to be used as a sales or marketing tactic.

We will not seek to acquire by unfair means trade secrets or other proprietary information about our competitors. Nor will we improperly induce others to breach binding contracts with competitors.

#### *F. Antitrust Compliance*

We will observe the letter and spirit of all federal and state antitrust laws and engage in free and fair competition in the marketing of our insurance products and other services.

You must avoid transactions or practices prohibited under antitrust laws and refrain from any action which may give the appearance of collusion or unfair competition. Examples include entering into any agreement or understanding with a competitor to fix or tamper with prices or terms of sale or territories in which we market. You should avoid discussions or agreements with competitors, either directly or through trade associations or others, about price, profits, terms or conditions of sale, products, market share or the dividing of sales territories.

#### *G. Privacy Policy*

In our increasingly information-based society, individual policyholder information, medical, financial and other sensitive personal information must be adequately protected. We are committed to protecting personal information that we collect from or maintain about policyholders or others, including employees. Each of us must take care to protect individually identifiable policyholder information and other sensitive personal information, including with respect to employees, from inappropriate or unauthorized use or disclosure.

#### *H. Money Laundering Prevention*

People who are involved in criminal activities, including but not limited to terrorists, may try to "launder" money. Money laundering schemes essentially take "dirty" money that comes from criminal activity and passes it through legitimate businesses, creating "clean" money that appears to come from reputable sources.

We will comply fully with all applicable anti-money laundering laws and will conduct business only with reputable customers who are involved in legitimate business activities and whose funds are derived from legitimate sources. All employees need to be aware of the Company's anti-money laundering policy and to enforce the procedures of such policy.

### III. Conflict of Interest/Outside Activities

#### *A. Conflict of Interest*

Directors and employees should avoid all situations that present or create the appearance of a conflict between personal interests and those of the Company. This includes any situation in which your personal interest in a matter is or may be inconsistent or incompatible with an employee's obligation to exercise best judgment on behalf of the Company. You should never extend preferential treatment to a customer or a potential customer or any other person in exchange for personal gain. If a potential conflict of interest arises, or if a particular situation presents the potential for, or the appearance of, a conflict of interest, you must disclose the situation to your manager (preferably in writing), who should consult with the General Counsel or the Director of Internal Audit in appropriate circumstances.

Employees may not offer, solicit or accept bribes, kickbacks or other similar types of payment or payments in kind to or from an individual vendor or organization doing business, seeking to do business, or competing with the Company, or to or from any other person. Receipt of such offers should be immediately reported to appropriate management, the Director of Internal Audit or the OGC.

#### *B. Entertainment and Gifts*

Offers or receipt of gifts, gratuities, meals or entertainment may create conflicts of interest. Employees may not accept gifts or gratuities of more than nominal value, or benefit from meals and entertainment, except in moderation and consistent with accepted goodwill building practices, from suppliers, service providers, customers or others. This is especially important if an employee is in a position to influence Company decisions that might affect or appear to affect the outside person or concern. Likewise, we will not put those with whom we do business in uncomfortable positions by offering gifts, gratuities, meals or entertainment that we ourselves would not be permitted to accept. Questions concerning the appropriateness of gifts, gratuities, meals or entertainment from or to third parties or from sources within the company should be referred to your manager or the OGC.

The Company reimburses employees for legitimate and reasonable business and entertainment expenses. These expenses should be incurred and reported in compliance with the Company's Travel and Entertainment Policy. Employees should submit receipts or other appropriate documentation to their managers.

#### *C. Employment Outside the Company*

Employment at our Company is the full-time employee's primary job responsibility. Any outside employment, investment, other source of income or activity must not interfere with the expected performance of your duties or the obligation of loyalty to the Company and to maintain confidentiality of proprietary information. Employees are prohibited from working for a competitor, or with any other party that may create a conflict of interest, while employed by The Hanover.

Employees are prohibited from conducting outside business during The Hanover working hours, whether this work is for another company or for a personal business. This includes the use of company assets — telephone, computer, copier, etc. for these outside purposes.

#### *D. Directorships and Positions with Other Organizations and Businesses*

From time to time, employees have the opportunity to accept a directorship, trusteeship or other position with an outside organization. These may involve community or charitable organizations, educational institutions, professional groups, or publicly held or private businesses. While the Company generally encourages involvement in community and professional organizations by employees, advice on assuming specific positions should be sought from either the

employee's manager or the OGC. You may not serve in any such capacity with a company that in any way competes or does business with the Company without the consent of the General Counsel, or with a public company without the consent of the Chief Executive Officer.

#### *E. Non-Solicitation*

Employees may not, directly or indirectly, during the term of their employment with the Company, hire, cause to be hired away, solicit, entice away or interfere with the Company's relationship with, any of its policyholders, customers, clients, Agents, employees or others, or in any way assist or encourage a third party to do so. Certain employees, through individual agreements or other considerations, will have these non-solicitation provisions extend beyond the period of their employment with the Company.

#### *F. Personal Activities*

Employees are entitled to their private lives and activities, free from restraints from their workplace. The Company respects the individual's right to privacy. However, all of us are representatives of the Company. The values we espouse and live by in our private lives may reflect on our business and professional lives. Care should always be taken to ensure that non-business activities are kept strictly separate and apart and do not interfere with business activities, reflect poorly on you or the Company or undermine confidence in you or our collective integrity or judgment.

#### *G. Political Contribution and Activities*

The Company has one or more political action committees, and contributions may be solicited from eligible employees on a voluntary basis. No employee will be required to make a personal or corporate contribution to any candidate or political party or to a political action committee. Also, federal and state laws restrict political contributions and activities by corporations. No Company funds, time or other resources may be devoted to any political activities without prior approval of the OGC.

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## IV. Confidentiality and Disclosure of Information

#### *A. Disclosure of Non-Public Information*

Because of our positions within the Company, we may from time to time have knowledge of or access to non-public information about the Company. In such cases we have a duty to keep this information confidential and not to use it except for the benefit of the Company. Disclosure or other improper use of non-public information about the Company is a violation of this Code of Conduct and your duty of loyalty to the Company, and may be a breach of securities or other laws and carry significant personal and corporate penalties.

#### *B. Proprietary Information*

The responsibility belongs to each of us to protect the confidentiality of proprietary Company information, policyholder or other personal information, computer vendors' software and other confidential or proprietary information. Any contractual agreements must be treated as trade secrets belonging to the Company. It is vital that all employees realize that systems proprietary information such as program code, record formats/layouts and vendor documentation must not be used inappropriately or disclosed to unauthorized persons.

### *C. Information Security*

Information resources (for example, data, reports, e-mail, communications, memos) are corporate assets and must be protected against all forms of unauthorized access, use, disclosure, modification or destruction, whether accidental or intentional. Security controls exerted over these resources should be consistent with the value of the information resource.

Further detail of this policy can be found in the The Hanover Information Security Policies and Procedures.

### *D. Software Piracy*

The Hanover licenses software from various external vendors. Employees and affiliates of the Company are required to use this software in accordance with the licenses for the software.

Only software purchased or licensed by the Company or developed for a business application by, or for, the Company may be installed on computers owned or leased by the Company.

The Company's PC Software Piracy Policy or the software license should be referred to when questions regarding the use of software arise.

### *E. Copyright and Trademark Protection*

Employees should respect the copyright and trademark protection of any materials utilized, including written materials, software programs and recordings. Such materials should not be copied unless authorized.

The Company has a license that grants authorization to photocopy copyrighted titles registered with the Copyright Clearance Center. This license covers copying for internal use at all Company locations within the United States. The license does not authorize the production of cover-to-cover copies, that is, books or magazines in their entirety.

Employees should respect the trademark rights of other entities. Any use of another entity's trademark must be authorized in writing by that entity. The use of marketing slogans by The Hanover companies should be pre-cleared through the OGC to ensure the slogans do not encroach on anyone else's trademark rights.

We must also protect the Company's own copyrights, tradenames and trademarks. Use of the Company's copyrights, tradenames and trademarks must always conform to the Company's then current standards and policies.

### *F. Ownership of Work Product*

Any work product created on Company time and/or using Company resources or information or work created at the direction of Company officials or in connection with or related to company business, shall be the sole and exclusive property of the Company. All rights and privileges associated with such work product will be exclusively the Company's to own, sell or lease, at its sole discretion.

### *G. Media Relations*

Information related to the Company (except routine material provided to shareholders, customers and suppliers) should be released only through Corporate Communications. If inquiries are made by members of the media, they should be referred to an authorized media relations spokesperson.

## V. Workplace Conduct

### *A. Conduct of Employees*

Rules and regulations regarding employee conduct are necessary for the proper operation of the Company and for the benefit and safety of all employees. Appropriate employee conduct extends beyond the workplace environment to any business or work-related functions or activities which may reflect on the Company. Conduct that interferes with operations, discredits the Company, is inappropriate or interferes with the efficient and legitimate use of corporate assets, will not be tolerated.

### *B. Employment-At-Will*

The Hanover (and its subsidiaries) is an employment-at-will company. An employee can choose to leave the Company at any time. The Company can terminate an employee's employment and his/her compensation at any time. No officer or representative of the Company, other than the president and CEO of The Hanover Insurance Group, Inc., has any authority to enter into any agreement for employment for any specific period of time or to make any agreement to the foregoing.

### *C. Equal Opportunity/Diversity*

The Company values diversity in the workplace and among our customers. The Company provides equal opportunity for employment and promotion to all qualified employees and applicants on the basis of experience, training, education and ability to do the available work without regard to race, religious creed, color, age, sex, sexual orientation, national origin, ancestry or disability.

### *D. Policy Against Harassment*

Employees must conduct themselves in a manner acceptable to the Company and its employees. Conduct which is not acceptable may be considered a basis for termination. The Hanover is committed to a workplace free of harassment, including harassment based on race, color, religion, age, gender, sexual orientation, national origin, ancestry or disability. Harassment includes verbal or physical conduct designed to threaten, intimidate or coerce. Sexual harassment is defined as "unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature." Individuals who feel aggrieved should raise this issue with their managers, a representative from Human Resources, or a representative from the OGC, and may do so without fear of embarrassment or reprisal. Managers are responsible for monitoring behavior which can be construed to be harassment and for initiating action to eliminate such behavior. Employees engaged in harassment practices will be disciplined appropriately. Such disciplinary action may include termination.

The Company's Harassment Policy should be referred to for specific procedures.

### *E. Electronic Communications*

Employees who have access to the Company's electronic communication systems (e.g., facsimile, e-mail, voice mail, Internet and Intranet) should utilize these systems for business purposes. When using these systems, employees are expected to communicate in a professional and courteous manner. These systems are corporate property, and the Company has the right to monitor and review any use of these systems and the content of any communications.

Employees should be aware that Internet access is monitored and actual web site connections are recorded and may be reported to management.

For additional information, refer to the following Hanover Technology Group policies: Internet Access Policy, Internet Security Policy, Internet Virus Protection Policy and the E-mail Policy, as well as the Corporate Communications Policy.

### *F. Workplace Violence Policy*

The Hanover is concerned with and strongly committed to providing employees and others authorized to be on our premises with a safe work environment. The Company refuses to tolerate violence, threats of violence, or harm in or related to the workplace and will endeavor to prevent such incidents from occurring. Management should take immediate action if they suspect or actually know that any employee has a problem or could become violent. Further details of this policy can be found in the The Hanover Workplace Violence Policy.

### *G. Policy Against Fraud*

The Hanover does not tolerate fraudulent behavior, including fraudulent financial reporting, and will promptly investigate any possibility of such dishonest activity and, when appropriate, will pursue legal remedies available under the law. When suspected fraudulent incidents or practices are observed by, suspected by, or made known to an employee, it is the employee's responsibility to report it. The employee may report directly to his/her supervisor, the next higher level of management, the Office of the General Counsel, the Internal Audit, Department or by calling the Employee Alert Line, the Company's third party reporting hotline, at 1-866-656-4232.

### *H. Company Resources*

Company resources—its assets, equipment, systems, software, personnel, information and employee time—are to be used only for the benefit of the company. Employees may not use company property or services for their personal benefit unless use of such property and services has been properly approved for general employee or public use. Anyone using company resources should ensure that the use is proper and that the company receives appropriate value in return. Anyone approving use of such resources should ensure that the use is proper under the circumstances and for the best interest of the company. We should guard and respect the company's resources as we would our own personal property.

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## VI. Safety

### *A. Employee Health and Safety*

The Company seeks to comply with all applicable federal, state and local health and safety regulations and to provide a work environment free from recognized hazards. You should comply with all safety and health requirements whether established by the Company or by federal, state or local law.

### *B. Workplace Safety*

The Company expressly forbids the possession of lethal weapons, such as, but not limited to, guns and knives on Company property, in Company vehicles, at Company-related events, or while conducting Company business, even if the person has a permit or license to carry a weapon. Employees found in possession of a lethal weapon on Company property may be subject to immediate termination.

Employees with a permit, if so required, may carry non-lethal weapons, such as pepper spray or mace on Company property. However, they must inform Security and such devices must be kept out of sight, preferably under lock and key while on Company property. Employees found in possession of non-lethal weapons without proper authorization are likewise subject to disciplinary action.

The Company is committed to providing a safe workplace and to promoting a productive work environment. Verbal or physical conduct by any employee which harasses, disrupts or interferes with another's work performance or which creates an intimidating, offensive or hostile environment is not tolerated.

### *C. Alcohol and Drug Use*

The Company's objective is to provide a drug-free, safe and secure work environment. The Company recognizes alcohol and drug abuse as potential safety and security problems. An employee needing help in dealing with a drug or alcohol abuse problem is advised to seek assistance through the Employee Assistance Program.

The unlawful possession, use or sale of drugs or alcohol by an employee on Company property or at or in connection with any Company-related activity or function, may result in the immediate discharge of that employee. Anyone who observes or suspects any such activity should contact a manager or Human Resources.

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## VII. Enforcement and Non-Retaliation

### *A. Enforcement*

The responsibility for adherence to and enforcement of this Code of Conduct lies with each of us. It is our duty to report potential violations of this Code of Conduct or other The Hanover policies to our managers or other appropriate persons, including the Human Resources Department, the Office of the General Counsel or the Internal Audit Department. If you do not believe that the matter has been adequately handled, it should be reported in writing to the General Counsel or the Director of the Internal Audit Department, or in appropriate circumstances involving issues regarding the integrity of the Company's financial statements, to the Chairman of the Audit Committee of the Board of Directors.

Such matters may also be reported anonymously to the Employee Alert Line, an independent, third-party company, by calling 1-866-656-4232.

### *B. Non-Retaliation*

In no event will the Company tolerate harassment of or discrimination or retaliation against any person who in good faith reports a potential violation of this Code of Conduct or any other policy of the Company. Any employee who engages in any such harassment, discrimination or retaliation, or any supervisor who permits such conduct, shall be subject to immediate dismissal. Reprisals or retaliation of any kind should be reported to the General Counsel and the Director of Internal Audit. Any employee who reports a potential violation or a reprisal and feels that the response was inadequate, should notify in writing the Chief Executive Officer of The Hanover.

### *C. Waivers*

In the unusual circumstance where a waiver of this Code of Conduct or other policies may be appropriate, such waivers may only be granted by the General Counsel, except that waivers with respect to any executive or senior financial officer or director may only be made by the Nominating and Corporate Governance Committee of the Board of Directors of the Company. Any such waivers must be in writing, with a copy to the Director of Internal Audit. Waivers of or amendments to this Code of Conduct applicable to executive officers or directors shall be publicly disclosed in accordance with legal, regulatory or stock exchange listing requirements.

### *D. Investigation and Disposition*

Investigations of potential violations of this Code of Conduct or other policies of the Company shall be conducted fairly and expeditiously. Employees whose conduct is questioned shall be afforded a fair opportunity to explain their conduct. Violations of the Code of Conduct or other policies of the Company may result in disciplinary action, up to and including immediate dismissal, criminal prosecution and civil litigation. Violations by any executive or senior

financial officer of the Company shall be reported to the Nominating and Corporate Governance Committee and, if appropriate, to the Audit Committee of the Board of Directors. Any fraud, whether or not material, that involves management or other employees who have a significant role in the Company's financial reporting, disclosure or internal controls shall be reported to the Audit Committee. The Internal Audit Department will advise law enforcement agencies of any criminal violations and assist in prosecution of those responsible. The Company reserves the right to take any and all actions which, in its sole discretion, are warranted given the facts and circumstances of each situation.

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## If In Doubt...

The Code of Conduct is intended to communicate the Company's high standards of behavior and ethical business practices, which are expected of all employees.

Each of us, no matter what our role or job, will eventually have to make choices about right or wrong business conduct. There may be situations where you are uncertain about the legal or ethical course or about whether a business practice or transaction is ethical. As you consider a particular situation, ask yourself these questions:

- Is my action or the action of a co-worker consistent with approved Company practices?
- Can I defend my action to my supervisor, other employees and to the general public?
- Could I comfortably explain my action if it was reported in the newspaper?
- Does my action meet my personal code of behavior?
- Does my action or the action of a co-worker conform to the spirit and guidelines of the Code of Conduct or other Company policies?

The Hanover has a number of resources, people and processes in place to answer questions and offer guidance with difficult decisions. You should feel free to contact your manager or the areas listed in the Reference Guide to discuss any concerns.

## Reference Guide

*For questions concerning:*

*Please contact:*

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Anti Money Laundering . . . . . Office of the General Counsel (OGC)

Competition & Antitrust Practices

Conflict of Interest

Disclosure of Non-Public Information

Insider Trading Rules

Regulation FD (Fair Disclosure)

SEC Standards of Professional Conduct for Attorneys

Central Procurement Policies and Procedures . . . . . Central Procurement

Confidentiality Agreements . . . . . OGC or Human Resources

Privacy Policies

Harassment

Workplace Violence

Business Entertaining/Gifts/Expenses . . . . . OGC

Insurance Compliance . . . . . Chief Compliance Officer

Misappropriation of Funds, Theft or Fraud . . . . . Director of Internal Audit

Personnel Files . . . . . Human Resources

Copyright/Trademark/Clearance/Protection . . . . . OGC/Marketing Services

Information Security Policies and Procedures . . . . . Hanover Technology Group

Internet Access Policy

Internet Security Policy

Internet Virus Protection Policy

Electronic Mail Policy

PC Software Piracy Policy

Software License Compliance Policy

Corporate Communications Policy . . . . . Corporate Communications or OGC

OSHA Regulations . . . . . Facilities Management

If you are unable to report violations of the Code to your manager or one of the contacts listed above, or are uncomfortable doing so, you may report violations anonymously to the Employee Alert Line by calling 1-866-656-4232.

*A current list of names and phone numbers of contact persons for these policies are available on The Hanover's Corporate Governance web site at [www.hanover.com](http://www.hanover.com) or in The Hanover Intranet under Human Resource Contacts.*



**The Hanover Insurance Company** | 440 Lincoln Street, Worcester, MA 01653  
**Citizens Insurance Company of America** | 645 West Grand River Avenue, Howell, MI 48843

[www.Hanover.com](http://www.Hanover.com)