

## **BANCINSURANCE CORPORATION AND SUBSIDIARIES POLICY ON ACCOUNTING AND AUDITING PRACTICES**

Bancinsurance Corporation (“Bancinsurance”) and its subsidiaries must maintain accurate financial statements and business records. Failure to do so could constitute a violation of law, accounting standards, internal accounting controls, auditing standards or other regulations. All documents, ranging from personal timesheets and expense reports to corporate financial statements, must be prepared honestly and carefully so that they present an accurate and complete record of events.

Any employee of Bancinsurance or any of its subsidiaries may report a known or reasonably-suspected violation of the foregoing policy or any concerns regarding questionable accounting, internal accounting controls, or auditing matters to (a) any Bancinsurance Officer, (b) the employee’s supervisor or manager, or (c) the Bancinsurance Audit Committee by contacting Dan Harkins, Audit Committee Chairman, at (614) 451-4447. Reports to the Bancinsurance Audit Committee also may be made confidentially and anonymously by delivering a written report in a sealed envelope marked “Confidential” to the following address:

Bancinsurance Corporation  
Dan Harkins  
Audit Committee Chairman  
4369 Donington Road  
Columbus, Ohio 43220

It is recognized that confidentiality and anonymity cannot be guaranteed and that the very act of investigating a particular concern or complaint could inadvertently lead to disclosure of the submitter’s identity. The Bancinsurance Audit Committee will take reasonable steps to minimize the risk of disclosure. Even if the identity of a submitter becomes known or is implied, retaliation or harassment of the submitter of a concern or complaint is prohibited and appropriate action will be taken. The submitter should report any such retaliatory or harassment action to the Bancinsurance Audit Committee.