

HUB International New England

DISCLOSURE - HUB ADVANTAGE

HUB International is dedicated to maintaining and upholding the highest standards of ethical conduct and integrity in all of our dealings with you, our client. We want to be your trusted risk advisor, and as such, we need to earn your confidence. So we are making a promise. We call it the HUB Advantage. Our mission is to make the advantage yours – and this is our commitment.

- We strive to secure the most favorable terms from insurers, taking into account all of the circumstances – the risk you need to insure, the cost of insurance, the financial condition of the insurer, the insurer's reputation for service, and, of course, any other factors that are specific to your situation.
- We are open and honest as to how we are paid for placing your insurance. Our answers to your questions will be forthright and understandable. When we intend to seek a fixed fee for our efforts, we will disclose it to you, in writing, and obtain your approval prior to coverage being bound.
- You make the ultimate decision as to both the terms of, and the insurance company providing, your insurance coverage. Our objective is to provide you with choices that meet your insurance needs and to educate you so your decision is fully informed and best suited to your circumstances.
- We comply with the laws of every jurisdiction in which we operate, including those that apply to how insurance brokerages and agencies are paid. If the laws change, we will respond in a timely and appropriate manner.
- We take our responsibility to our customers very seriously. If at any time you feel that we are not fulfilling your expectations – not meeting our Client Commitment – please contact your account executive or call our toll-free number at 1-866-857-4073, and your concerns will be addressed as soon as possible.

The HUB Advantage – the privilege is ours, but the advantage is yours.

Privacy Policy

HUB International New England, LLC, appreciates your business and is committed to protecting the privacy of your personal information. **We do not sell your personal information to anyone.** We do business with multiple insurance carriers and financial institutions, and for certain lines of coverage, your personal information is fundamental in our ability to serve you better. We are delivering this Notice to inform you about the information that we may collect about you, and the practices that we use in handling this information.

Information We May Collect

In order to service your accounts and better understand your needs, we may collect non-public personally identifiable information about you from the following sources:

- Applications or other completed forms that we receive from you (such as your name, address and social security number);
- Your transactions with us, our affiliates, or others (such as your payment history and claims information);
- Consumer reporting agencies and State Motor Vehicle Departments;
- Our websites or the Internet, including information obtained through the use of Internet "cookies," and
- Other sources, such as your employer, information clearinghouses, and/or other third parties.

The above is "Personal Information" for the purposes of this Privacy Notice. We may disclose Personal Information to affiliates and non-affiliated third parties as described in the following sections.

Personal Information about Health or Medical Conditions

We do not disclose or share Personal Information about your health, medical conditions or treatment, except as necessary to process or service requested or authorized transactions, or as otherwise permitted or required by law.

Necessary Disclosures of Personal Information

We may disclose your Personal Information to affiliated and non-affiliated third parties as necessary to process or service requested or authorized transactions, such as to secure quotations for insurance, obtain insurance coverage, or to report or process claims. We may also disclose Personal Information to other companies that perform services on our behalf and to other institutions, such as insurance companies, with whom we have joint marketing arrangements. We do not disclose Personal Information to non-affiliated third parties except to the extent permitted by law. We do not disclose "Non-transactional Personal Information" that does not arise directly from our transactions or experiences with you, as described under the Fair Credit Reporting Act, such as information we receive from consumer reporting agencies.

Former Customers & Additional Insureds

This Privacy Statement describes our privacy practices for both current and former customers. If there is more than one person insured under a policy, only the named insured on that policy will receive this notice, though any policyholder may request a copy of this notice.

Security

With respect to Personal Information that we maintain, we restrict access to such information to those employees or service providers who need to know such information in order to provide the requested services or products. We also maintain reasonable physical, electronic, and procedural safeguards that comply with federal regulations to guard Personal Information.

Online Customers

You may find additional information about our practices with respect to the online collection of personally identifiable information at www.hubinternational.com.

We appreciate your trust, and thank you for your business. You are a valued customer. If you have any questions about this Privacy Notice or would like more information, please contact us by writing to:

Attention: Chief Legal Officer, HUB International Limited, 55 E. Jackson Boulevard, Chicago, IL 60604-4187, 312.922.5000.

Locations of HUB International New England, LLC:

30 Nagog Park, Ste. 100 Acton, MA 01720 978-263-9577	96 Shaker Rd. East Longmeadow, MA 01028 413-733-3131	100 Central St., Ste. 201 Holliston, MA 01746 800-649-9111	124 W Town Street Norwich CT 06360 860-886-1400	300 Ballardvale St. PO Box 696 Wilmington, MA 01887 978-657-5100
1070 Suffield St. Agawam, MA 01001 800-243-8134	777 Commerce Dr. P.O. Box 320309 Fairfield, CT 06825 203-337-1800	564 Center St. Ludlow, MA 01056 413-583-6424	79 Lyman St. South Hadley, MA 01075 413-538-7862	
555 Pleasant St., Ste. 101 Attleboro, MA 02703 508-222-3240	222 Milliken Blvd. Fall River, MA 02721 508-676-1971	1667 Elm St., Ste. 3 Manchester, NH 03101 603-668-0400	369 Main St. (Rte. 9) Spencer, MA 01562 508-885-9999	
5 Community Drive Augusta, ME 04330 207-377-2239	177 Main St. Falmouth, MA 02540 508-548-1596	265 Orleans Rd. N. Chatham, MA 02650 508-945-0446	1489 Baltimore Pike, Ste. 105 Springfield, PA 19064-3958 800-228-0481	
396 Commonwealth Ave Boston, MA 02215 617-916-0335	90 Parker St. Gardner, MA 01440 978-632-3400	600 Longwater Dr. Norwell, MA 02061 781-792-3200	156 Worcester Providence Turnpike, Ste. 12 Sutton, MA 01590 781-229-9500	
275 U.S. Rte. 1 Cumberland Foreside, ME 04110 800-777-5244				

HOW WE GET PAID

HUB International takes pride in the services our brokerages provide to you, our client, for insurance and risk management programs. For our efforts, we are compensated in a variety of ways, primarily in the form of commissions and contingency amounts paid by insurance companies and, in some cases, fees paid by clients or third parties. The means by which we are compensated are described, below.

Commission income — Commissions, normally calculated as a percentage of the premium paid to the insurer for the specific policy, are paid to us by the insurer to distribute and service your insurance policy. Our commission is included in the premium paid by you. The individuals at HUB International who place and service your insurance may be paid compensation that varies directly with the commissions we receive.

Contingency income — We also receive income through contingency arrangements with most insurers. They are called “contingent” because to qualify for payment we normally need to meet certain criteria, usually measured on an annual basis. Contingency arrangements vary, but payment under these agreements is normally the result of growing the business by attracting new customers, helping the insurance company gather and assess underwriting information, achieving certain loss or claims results and/or working to renew the policies of existing insureds. There is generally no meaningful method to determine the exact impact that any particular insurance policy has on contingency arrangements; however, brokers tend to receive higher contingency payments when they grow their business and retain clients through better service. In other words, the amount of earned contingency income depends on the overall size and/or profitability of a group of accounts, as opposed to the placement or profitability of any particular insurance policy. For this reason, the individuals involved in placing or servicing insurance are rarely, if ever, compensated directly for the contingent income that we receive.

Supplemental Commissions – Some insurance companies have recently replaced contingent commissions with supplemental commissions. These commissions, in fixed amounts, are established annually in advance based on historical performance measured by criteria comparable to those by which contingent commissions are calculated. We refer to these commissions as guaranteed supplemental commissions, or “GSCs.”

Fees paid by clients – On occasion, with more complex business insurance programs and where additional resources, products or services are appropriate, a fee may be negotiated for placement of insurance coverage or additional services.

Fees charged for the placement of insurance will be outlined in a proposal and approved, usually, in writing,

prior to the insurer binding coverage. On occasion, we may receive both commissions and client-paid fees for placing insurance, which generally will be disclosed, in writing, to you in advance. In certain circumstances clients pay us mutually agreed-upon fees for additional services, such as third party administration of employee benefits or workers’ compensation programs.

Wholesale Operations – We own wholesale insurance brokerages in both the U.S. and Canada. These are intermediaries through which other brokers, typically retail brokers that have a relationship and deal directly with their clients, place coverage. Our own retail brokers may place client policies through HUB-owned wholesale brokers. In such cases, both the HUB retail broker and the HUB wholesale broker will earn commissions, and the client’s premium payment is generally not impacted. Ordinarily wholesale brokers, whether owned by HUB International or not, are included in the transaction because they offer products not available through normal insurance brokerage retail channels that are particularly suitable to a client’s needs.

Other Compensation and Benefits – We may receive revenue or further benefits from our insurance brokerage activities in other ways, including, but not limited to, from insurance company promotional events, payments from insurers for promotional marketing and/or employee training and development, fees or a percentage of the interest paid to us for the administration of premium finance contracts, interest paid to us by financial institutions earned on fiduciary or trust accounts in which we hold your premium payments pending remittance to the insurance company, and fees paid to us for policy and/or claims administration and/or loss control services that we provide.

Customer Centric Carriers – We have access to the products and services of hundreds of insurers; however, we believe our ability to provide the best combination of products, service, value and ongoing access to capacity is enhanced by focusing on a manageable number of carrier relationships. These strategic relationships include many of the most respected national and regional insurance companies in the insurance industry (the “Strategic Carriers”). Although we will continue to access our other insurance company relationships, where appropriate, we expect that many of our clients’ insurance needs may be met through the Strategic Carriers. The Strategic Carriers may pay us enhanced compensation, which we intend to use in part to invest in initiatives to improve our ability to serve our customers and to optimize their insurance buying experience. A portion of any enhanced compensation from our Strategic Carriers may be used to incentivize our employees to prioritize, investigate and access the products and services of our Strategic Carriers for the purpose of consolidating the number of insurance markets with which we deal, while at the same time

addressing the needs of our clients. In limited circumstances, our employees may serve on boards or committees of these or other insurers with whom policies are placed. More information regarding our Strategic Carrier relationships is available upon request from your HUB International insurance advisor, or by visiting our website at www.hubinternational.com.

Our goal is to be your insurance brokerage of choice. We know you have many brokerages to choose from, so to earn your confidence, we hold ourselves to the highest standard of service, a standard reflected in our written Client Commitment - we call it the “The HUB Advantage.” We hope you will review the principles embodied in The HUB Advantage. You should also feel free to visit our website at www.hubinternational.com for more information regarding HUB International and how we do business.

Please also feel free to ask any questions about our compensation generally, or as to your specific insurance proposal or placement, by contacting your HUB broker or customer service representative directly, or by calling our Chief Executive Officer, Charles Brophy, at 1-800-370-0642.

We want you to choose a HUB International broker to be your insurance advisor—and we intend to make your decision an educated one.

