

Harleysville Group Inc.
REGULATION FD-RELATED PROCEDURES AND POLICIES

Authorized Spokespersons

- **CEO, Senior IR Executive** (Mark R. Cummins), **CFO**, and **Investor Relations Officer (IRO)** (Mark R. Cummins) will be the only spokespersons authorized to speak to analysts under Reg. FD.
- Executives and employees **are not to speak to analysts except when authorized** to do so by the **Senior IR Executive, CFO or IRO**.
- When a non-authorized employee is requested to speak to analysts, the executive must **notify** one of the above and, as a matter of policy, one of these authorized spokespersons (generally the IRO) should be present during the conversation.

FD Committee

A committee consisting of the Secretary and General Counsel, CFO, Senior IR Executive, and IRO will determine when and if public dissemination is required in the event material information is disclosed.

Day-to-day Analyst/Investor Contacts

- Because FD requires public dissemination **when** material information is **selectively disclosed**, a log of contacts and responses will be kept.
- The **IRO** is the primary contact and coordinator of outsider contacts with senior management.

Procedure for when an analyst or investor bypasses IRO and makes direct contact with a senior manager

- The senior manager (unless one of the authorized spokespersons) should **decline to talk** and **refer** the analyst/investor to the **IRO**.
- In **ALL** instances (whether authorized or unauthorized spokespersons) the **IRO must be** notified (ASAP) of the contact.
- Authorized spokespersons shall hold a **conference call that includes the IRO**. If contact is nevertheless made without the IRO, the IRO should be notified as quickly as possible and the IRO will debrief the manager on the nature of the contact and information disclosed. The conversation will be evaluated for “selective disclosure” and materiality and included in the contact log.

Press Releases. Harleysville will include annual earnings guidance in the year-end quarterly release of earnings and in the Webcast conference call, but will not provide guidance on quarterly earnings.

Approximately 10-14 days before Harleysville expects to release earnings it will issue a press release detailing the anticipated time and date it will report earnings. It will post this release on its Web site and disseminate it through PR Newswire. It will include the scheduled time of the conference call as well as information on how to access the call.

Conference Calls. Harleysville will hold quarterly EPS conference calls/Webcasts that are open to analysts (participative) and the public (listen only). It will release information on how to access the call approximately 10 days before our expected reporting date. Access to the recordings of the calls will be available via our Web site for one year after the call.

- **Participants.** The CFO, Senior IR Executive, Chief Actuary and a Senior Operations manager will participate in all calls. The CEO will participate selectively. The IRO and an attorney will be present as monitors.
- **Material Announcements.** In the event of a non-scheduled “announceable” event (for example, an acquisition or an earnings related release, etc.), the FD Committee will determine whether a conference call is needed in addition to a press release.
- **Conference Presentations.** Harleysville will follow a similar procedure to the above relating to conference presentations. In addition, if the conference will be Webcast, Harleysville will include access information in a press release.
- If Harleysville plans to include previously undisclosed material information in its presentation, Harleysville will include that information in a press release issued immediately prior to the call.

Quiet Periods. Harleysville imposes a quiet period 15 days before the end of each quarter, ending when earnings are released. To comply with Reg. FD, Harleysville restricts its comments on any material information (or EPS guidance) publicly disseminated in compliance with Reg. FD to a period of 30 days after the dissemination.

During quiet periods, Harleysville may conduct conversations with analysts as long as discussions are limited to non-earnings information. Generally permissible topics include long-term strategies, missions, goals, management philosophy, strength and depth of management, general business trends, competitive advantages/disadvantages and previously disclosed information. Harleysville will never address comfort with EPS estimates or specific drivers of earnings at these meetings.

One-on-Ones. Harleysville will continue to conduct one-on-ones with analysts and potential investors limiting the sessions to permissible topics. A minimum of two authorized spokespersons should always be present during a one-on-one meeting. The IRO should participate in all one-on-ones to preclude selective disclosure—or initiate the process to evaluate whether the disclosure requires dissemination.

Procedure when material information is inadvertently selectively disclosed. If the IRO or any of the authorized spokespersons learns of a selective disclosure by an authorized spokesperson, they will immediately consult with the **FD Committee members or their designees**.