

California Mutual Insurance Company Audit Committee Complaint Procedures

The Audit Committee of the Board of Directors of California Mutual Insurance Company (the "Company") hereby establishes the following procedures for:

- A. The receipt, retention, and treatment of complaints received by the Company regarding accounting, internal accounting controls, or auditing matters; and
- B. The confidential, anonymous submission by employees of the Company of concerns regarding questionable accounting or auditing matters.

Procedures for Receiving Complaints

Any employee, officer, director or other interested party (a "Reporting Individual") who has any complaint or concern regarding any accounting, internal accounting controls, or auditing matters relating to the Company (a "Complaint") may confidentially report such Complaint directly to the Audit Committee. Reporting Individuals should provide as much detail as possible. The Reporting Individual may choose to remain anonymous.

Procedures for Handling Complaints

The Audit Committee will evaluate each Complaint received within ten (10) business days of receipt. The Audit Committee will make the determination of whether the Complaint requires immediate investigation, whether it can be discussed at the next regularly scheduled meeting of the Audit Committee, or whether it does not involve the Company's accounting, internal accounting controls, or auditing practices and should be reviewed by a party other than the Audit Committee.

In any event, each Complaint involving the Company's accounting, internal accounting controls, or auditing practices will be discussed at a meeting of the Audit Committee's full membership (which may be via telephone) at which point the Audit Committee may elect to investigate the Complaint in one of the following ways or in another agreed upon manner:

- A. The Audit Committee may choose to investigate the Complaint on its own or with the assistance of counsel;
- B. The Audit Committee can retain an independent party to investigate the Complaint; or
- C. The Audit Committee can select a responsible designee within the Company to investigate the Complaint, provided that the identity of the Reporting Individual shall not be disclosed to such designee. Under no circumstances will a party who has direct supervisory control or who may be responsible for the action-giving rise to the Complaint be charged with its investigation.

The designated investigating party will hold the imprimatur of the Audit Committee in its investigation and will be permitted reasonable access to the Company, its employees, its documents, and its computer systems for the purposes of conducting the investigation. At the conclusion of the investigation, which shall be completed no more than sixty (60) days after referral of the Complaint (absent good cause warranting an extension), the investigating party will be responsible for making a full report to the Audit Committee with respect to the Complaint and to make recommendations for corrective actions, if any, to be taken by the Company.

The Audit Committee will then report to the full Board of Directors at its next regularly scheduled meeting with respect to the Complaint and any recommended corrective actions. The Company may discipline not only those employees who played a role in the improper conduct but also those who should have and failed to detect the conduct. At no time, however, will there be any retaliation by the Company against the Reporting Individual for making a Complaint.

Under certain circumstances, the matter which forms the basis of a Complaint may be required to be reported to a federal or state governmental or regulatory authority or disclosed to shareholders or the public. In such cases, the identity of the Reporting Individual will not be disclosed without his or her consent unless required by law.

Procedures for Retaining Complaints

The Audit Committee will be responsible for ensuring that all Complaints received by the Audit Committee, together with any documents pertaining to the Audit Committee (or its designee's) investigation and treatment of the Complaint, are retained for at least five (5) years.

Posting of Procedures

These Procedures shall be posted on the Company's web site.

Review of Procedures

The Audit Committee will annually review and reassess the adequacy of these Procedures and make such amendments to these Procedures, as the Audit Committee deems necessary or desirable.