

Disclosure Policy and Regulation FD

In keeping with the requirement of Regulation FD of the United States Securities and Exchange Commission, all queries from news reporters, financial analysts and research firms must be funneled through the Chief Financial Officer of PICO Holdings, Inc. (the "Company"), who will ensure that no selective disclosure of information occurs. The Company is committed to disclosing information about itself fully and promptly in accordance with applicable law, and constantly seeks to improve its financial communication program. Following are the standards by which the Company will disclose information about itself.

1. **Earnings Guidelines:** We currently do not provide guidance with respect to projected future earnings. We will not comment one way or the other on individual earnings estimates or street consensus, including First Call or any other service.
2. **Analysts' Models:** We will not review analysts' financial models and research reports. We will assist with historical data and previously disclosed public information.
3. **Updates:** We will not give running updates during the quarter on current business performance, including orders, sales (revenues), earnings, or any material income statement and balance sheet information.
4. **One-on-One Meetings:** These meetings will be limited to previously released financial information and historical data; information regarding markets, products, processes, etc., will be discussed as long as it is not considered to be material information.
5. **Analyst and Investor Conferences:** We continue to look forward to participating in and presenting at these meetings. We will put the formal presentation on our Web site prior to the meeting. We will encourage the organizer to make webcasting connectivity available for the formal presentation.
6. **Earnings Phone Conference:** We currently do not have quarterly earnings or investor conference calls. In the event that we decide to implement such call, we will issue a press release prior to the phone conference announcing the date and time and that there will be a live webcast. We would open the phone conference to the news media.
7. **Quiet Period:** Our quiet period will begin the last two weeks of the quarter up to the earnings release. We will have no one-on-one meetings during this time, and access to senior executives will be restricted.

If you have any questions please contact the Chief Financial Officer.