

**CODE OF ETHICS FOR
CHIEF EXECUTIVE OFFICER AND
SENIOR FINANCIAL OFFICERS**

Approved August 4, 2003

POLICY STATEMENT

PMA Capital is committed to conducting its business in accordance with applicable laws, rules, regulations and the highest ethical standards. This Code of Ethics applies to the Chief Executive Officer ("CEO") of PMA Capital and its Senior Financial Officers (as defined herein). This Code of Ethics is intended to supplement PMA Capital's Business Ethics and Practices Policy, which is applicable to all officers and employees of PMA Capital. Accordingly, the CEO and Senior Financial Officers are bound by the requirements of the Business Ethics and Practices Policy, as well as this Code of Ethics.

The CEO and Senior Financial Officers have a responsibility to conduct themselves in an honest and ethical manner, and have leadership responsibilities that include creating a culture of high ethical standards and commitment to compliance, maintaining a work environment that encourages employees to communicate with the CEO and Senior Financial Officers, (or other designated Company officials) about the ethical conduct of our business and promptly addressing employee compliance concerns.

It is PMA Capital's policy to:

- Promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Make full, fair, accurate, timely and understandable disclosure in reports and documents that PMA Capital files with, or submits to, the Securities and Exchange Commission (the "SEC") and in other public communications made by PMA Capital;
- Comply with applicable governmental laws, rules and regulations;
- Require the prompt internal reporting of violations of this Code; and
- Ensure accountability for adherence to this Code.

Definitions

"PMA Capital" is used herein to mean PMA Capital Corporation and its subsidiaries.

"Senior Financial Officer" is used in the Code of Ethics to mean the Chief Financial Officer, Chief Accounting Officer, any Vice President of Finance and Internal Audit of PMA Capital Corporation and any employee (including any officer) who is serving as controller of PMA Capital, as well as the President, Chief Actuary, Chief Financial Officer, and any employee

**CODE OF ETHICS FOR
CHIEF EXECUTIVE OFFICER AND
SENIOR FINANCIAL OFFICERS***Approved August 4, 2003*

(including any officer) who is serving as chief accounting officer or controller of any business segment.

Code

In addition to the Business Ethics and Practices Policy, the CEO and Senior Financial Officers of PMA Capital are subject to the following additional specific policies:

1. The CEO and all Senior Financial Officers are responsible for full, fair, accurate, timely and understandable disclosure in the periodic reports required to be filed by PMA Capital with the SEC. Accordingly, it is the responsibility of the CEO and each Senior Financial Officer to promote compliance with this policy by all employees and to promptly bring to the attention of the Disclosure Committee any material information of which he or she may become aware that affects the disclosures made by PMA Capital in its public filings or otherwise assist the Disclosure Committee in fulfilling its responsibilities.
2. The CEO and each Senior Financial Officer shall promptly bring to the attention of any member of the Disclosure or Audit Committees any information he or she may have concerning:
 - (a) significant deficiencies in the design or operation of internal controls which could adversely affect PMA Capital's ability to record, process, summarize and report financial data; or
 - (b) any fraud, whether or not material, that involves management or other employees who have a significant role in PMA Capital's financial reporting, disclosures or internal controls.
3. The CEO and each Senior Financial Officer must comply with the Business Ethics and Practices Policy, including the provisions dealing with any actual or apparent conflicts of interest between personal and professional relationships. Before making any investment, accepting any position or benefits, participating in any transaction or business arrangement or otherwise acting in a manner that creates or appears to create a conflict of interest, the CEO or any Senior Financial Officer must make full disclosure of all facts and circumstances to, and obtain prior written approval from, the Audit Committee. Further, the CEO and Senior Financial Officers must disclose to the General Counsel or any member of the Audit Committee any information concerning a violation of the Business Ethics

**CODE OF ETHICS FOR
CHIEF EXECUTIVE OFFICER AND
SENIOR FINANCIAL OFFICERS**

Approved August 4, 2003

and Practices Policy involving any other employees who have a significant role in PMA Capital's financial reporting, disclosures or internal controls.

4. The CEO and each Senior Financial Officer shall promptly bring to the attention of PMA Capital's General Counsel or any member of the Audit Committee any information he or she may have concerning evidence of a violation of the securities or other laws, rules or regulations applicable to and the operation of its business by PMA Capital or any employee or agent thereof.
5. Alternatively, any information required hereunder may be brought to the attention of the Chairman of the Audit Committee on an anonymous basis in accordance with the Audit Committee's process for handling complaints about accounting matters.
6. Neither the CEO nor any Senior Financial Officer may discharge, demote, suspend, threaten, harass, or in any other manner discriminate against an employee in the terms and conditions of employment because of any good faith act by the employee:
 - (a) to provide information, cause information to be provided or otherwise assist in an investigation regarding conduct which the employee reasonably believes constitutes a violation of any rule or regulation of the Securities and Exchange Commission, or any provision of Federal law relating to fraud against shareholders, when the information is provided to or the assistance given in relation to an investigation conducted by a Federal regulatory agency or law enforcement agency; any member or committee of Congress, any person with supervisory authority over the employee, or any person who has the authority within PMA Capital to investigate misconduct.
 - (b) to file, testify, participate in or otherwise assist in a current or pending proceeding relating to an alleged violation of any rule or regulation of the Securities and Exchange Commission or any Federal law relating to fraud against shareholders.

**CODE OF ETHICS FOR
CHIEF EXECUTIVE OFFICER AND
SENIOR FINANCIAL OFFICERS**

Approved August 4, 2003

Violations

1. The Audit Committee of PMA Capital Corporation's Board of Directors shall determine, or designate appropriate persons to determine, whether a violation of this Code has occurred and take appropriate disciplinary action in the event of violations of this Code. The Audit Committee or its designee shall conduct a prompt investigation of any suspected violation of this Code through the use of internal and/or external resources. The Audit Committee shall notify the subject(s) of any investigation of a violation of this Code. The findings of any investigation shall be set forth in writing and provided to the subject of the investigation. The subject shall have twenty (20) business days to respond in writing to a finding of a violation of this Code by the Audit Committee or its designee. If after considering the subject's response, the Audit Committee or its designee still determines that a violation of this Code has occurred, the Audit Committee shall take appropriate disciplinary action.
2. Such disciplinary action shall be reasonably designed to deter wrongdoing and to promote accountability for adherence to this Code, and may include disciplinary censure by the Audit Committee, demotion or re-assignment, suspension with or without pay or benefits and/or termination of employment. In determining what action is appropriate in a particular case, the Audit Committee or its designee shall take into account all relevant information, including the nature and severity of the violation, whether the violation was a first or single occurrence or a repeated occurrence, whether the violation appears to have been intentional or inadvertent, whether the individual in question had been advised prior to the violation as to the proper course of action and whether or not the individual in question had committed other violations of this Code or any other PMA Capital policy in the past. All disciplinary decisions by the Audit Committee shall be in writing and provided to the subject.
3. No retaliation or adverse action will be taken against any person who in good faith reports a suspected violation under this Code. Moreover, the identity of the subject of an investigation or an employee making any allegation of a violation of this Code will be kept confidential to the fullest extent possible, consistent with the need to conduct an adequate investigation and except as may deemed necessary by the General Counsel or his or her designee.

**CODE OF ETHICS FOR
CHIEF EXECUTIVE OFFICER AND
SENIOR FINANCIAL OFFICERS***Approved August 4, 2003***EXCEPTIONS**

Only a majority of the non-employee directors of the Board of Directors may grant waivers under this Code of Ethics. Any officers seeking a waiver under this policy must request such waiver in writing explaining the waiver requested and the reasons for it. Such written request shall be directed to PMA Capital's General Counsel who shall promptly deliver such request to the Chairman of the Board who shall place the request on the agenda for the next regular meeting of the Board or who, in his or her discretion, may call a special meeting of the Board to consider such request. The Chairman shall promptly inform the General Counsel of the Board's decision with respect to the request for a waiver so that any waiver may be reported as required under SEC, Nasdaq or stock exchange rules, as applicable.

RELATED POLICY

Business Ethics and Practices Policy
Disclosure Policy