

# SIRIUSPOINT LTD. CODE OF BUSINESS CONDUCT AND ETHICS

*INNOVATING WITH INTEGRITY*



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# WHAT WE BELIEVE

## MISSION

It is our mission to be an exceptionally innovative partner, combining data and creative thinking to underwrite risks with skill and discipline, building a sustainable business for all.

## PURPOSE

Our purpose is to help our clients and communities grow and thrive, to support them when they need it the most.

## VISION

To be the most adaptive and responsive (re)insurer for the changing world.

## VALUES

### Be Yourself

We celebrate the diversity of our people and foster an environment that is supportive and fun, to encourage everyone to bring their whole selves to work every day, to enjoy what they do and take pride in themselves, their role, and the Company.

### Be Entrepreneurial

We encourage each other to seek out innovative ways to create value for the people and businesses that we support. In a culture where ideas and opinions are openly shared, we apply our skill and passion to make a positive impact, helping us all to move forward, grow, and succeed.

### Be Open

We always speak our minds and do the right thing. Bravery, collaboration, and honesty are at the core of everything we do, ensuring we build open, trusted, and valuable relationships.

### Be Pioneering

We challenge convention, and explore new and better solutions for our clients, partners, and communities. It is our responsibility to discover, learn and adapt, to support others in the ever-changing global environment.



## An Introduction to the Code

This Code of Business Conduct and Ethics (“the Code”) applies to SiriusPoint Ltd. and all of its subsidiaries (“SiriusPoint” or the “Company”). At SiriusPoint, our mission, purpose, vision, and values inspire every action we take. While our day-to-day focus is seeking new ways to create value for our clients, we understand that it’s the way we serve them and our impact on our communities that matter most. That’s why we will strive to do what’s right – for them, our Company, and each other.

That is what SiriusPoint expects of each of us – giving our clients our best and making decisions that reflect who we are and what we believe as a Company. But we know it isn’t possible to always know the right thing to do, and a variety of laws apply to us that can make work even more complicated.

The Code is your most important ethical resource. It’s here to guide you in the right direction and help you make good decisions.

## Complying with Laws and Regulations

SiriusPoint is committed to compliance with all laws, rules, and regulations that apply to our business. It is impossible to anticipate every question you may have or situation you might face so, in addition to the Code, SiriusPoint also has other resources that can be of help. These additional resources are listed throughout the Code. As always, we rely on you to use good judgment and to seek help when you need it.

We operate in multiple countries, so it’s important to be aware of different laws and customs that may apply. While we respect the norms of our clients, business partners, and colleagues throughout the world, all colleagues must, at a minimum, comply with the standards and principles in this Code. If any provision of our Code conflicts with a local law or requirement, you should seek guidance from the [Legal and Compliance Department](#), or the [Ethics Hotline](#).



## Who Must Follow this Code

All colleagues of SiriusPoint and its subsidiaries, including executives, corporate officers, and members of our Board of Directors, are required to read, understand and follow our Code.

Consultants, contractors, agents, suppliers, vendors, temporary employees, and other business partners who serve as an extension of SiriusPoint are also expected to follow the spirit of our Code, as well as any applicable contractual provisions.

## Accountability and Discipline

Violating our Code, our policies, or the law, or encouraging others to do so, exposes our Company to liability and puts our reputation at risk. If you see or suspect a violation, report it to the [Legal and Compliance Department](#), or the [Ethics Hotline](#).

Anyone who violates our Code will be subject to disciplinary action, up to and including termination of their employment with SiriusPoint. You should also understand that violations of laws or regulations may also result in legal proceedings and penalties including, in some circumstances, criminal prosecution.

## Waivers and Changes to the Code

On rare occasions, limited waivers of the Code may be necessary. Any waiver of this Code for directors or executive officers may be made only by the Board of Directors or a committee of the Board and will be promptly disclosed to stockholders as required by applicable laws, rules, and regulations.



## Asking Questions and Reporting Concerns

If you see or suspect any violation of our Code, our policies, or the law, or if you have a question about what to do, talk to your manager or contact the [Legal and Compliance Department](#), or the [Ethics Hotline](#).

### What to Expect When You Use the Ethics Hotline

The Ethics Hotline web portal and phone line are available 24 hours a day, seven days a week. Trained specialists from an independent third-party provider will answer your call, document your concerns, and forward a written report to SiriusPoint for further investigation.

When you contact the Ethics Hotline, you may choose to remain anonymous where permitted by local law. All reports received will be treated seriously, whether they are submitted anonymously or not.

After you make a report, you will receive an identification number so you can follow up on your concern. Following up is especially important if you have submitted a report anonymously, as we may need additional information in order to conduct an effective investigation. This identification number will also enable you to track the resolution of the case. However, please note that out of respect for privacy, SiriusPoint will not be able to inform you about individual disciplinary actions.

Details of all reports made to the Ethics Hotline will be kept confidential to the extent feasible during the investigation process and permitted by applicable law.

## Our Commitment to Non-Retaliation

We will not tolerate any retaliation against any colleague who, in good faith, asks questions, makes a report of actions that may be inconsistent with our Code, our policies, or the law, or who assists in an investigation of suspected wrongdoing.

Reporting “in good faith” means making a genuine attempt to provide honest, complete, and accurate information, even if it later proves to be unsubstantiated or mistaken.

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[LEARN MORE](#)

[Whistleblower Policy](#)



# WE LOOK OUT FOR EACH OTHER



## Diversity, Equal Opportunity, and Non-Discrimination

SiriusPoint helps bring together colleagues with a wide variety of backgrounds, skills, and cultures. Combining such a wealth of talent and resources creates the diverse and dynamic teams that consistently drive our results.

Our colleagues, job applicants, and business partners are entitled to respect. We are committed to ensuring that they feel welcomed and valued and that they are given opportunities to grow, contribute, and develop with us. To uphold that commitment, we support laws prohibiting discrimination and provide equal opportunity for employment and advancement in all our departments, programs, and worksites.

We base employment decisions on qualifications, demonstrated skills, and achievements – and never on race, color, religion, sex (including pregnancy, sexual orientation or gender identity), national origin, age, disability, genetic information, citizenship, veteran status, familial status, marital status, ethnicity, education, political opinion, social origin, or any other characteristic protected by law.

## Harassment-Free Workplace

We all have the right to work in an environment that is free from intimidation, harassment, bullying, and abusive conduct. It is expected that our colleagues conduct themselves in a professional manner when interacting with other colleagues, vendors, clients or any other person at the office, over video calls, at conferences or any other times when representing SiriusPoint.

### Sexual Harassment

A common form of harassment is sexual harassment, which in general occurs when:

- Actions that are unwelcome are made a condition of employment or used as the basis for employment decisions, such as a request for a date, a sexual favor, or other similar conduct of a sexual nature.
- An intimidating, offensive, or hostile environment is created by unwelcome sexual advances, insulting jokes, or other offensive verbal or physical behavior of a sexual nature.

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**LEARN MORE**

[Respectful Workplace Policy](#)



## Health and Safety at Work

Ensuring safety is an integral part of everything we do. Each of us is responsible for acting in a way that protects ourselves and others. No matter what job you do or where you do it, we count on every employee to actively promote a safe and healthy workplace, and report any situations that may pose a health, safety, or security risk.

Reporting risks and hazards is not just the right thing to do, it's a requirement, because a failure to speak up about an incident, or to participate in an investigation into an incident, can have serious repercussions for you, for our Company, and for every colleague on the job, every day. Do your part to keep everyone in the SiriusPoint family injury-free.





# WE PROTECT INFORMATION AND ASSETS

## Our Company Assets

Each of us is entrusted with Company assets – the resources we own (whether tangible or intangible) that enable us to operate. We are personally responsible for using them with care and protecting them from fraud, waste, and abuse. Personal use of Company assets is discouraged, but where permitted, should be kept to a minimum.

### Physical and Electronic Assets

Physical assets include SiriusPoint facilities, materials, and equipment. Electronic assets include computer and communication systems, software, data, and hardware. Files and records are also Company assets, and we have a responsibility to ensure their confidentiality, security, and integrity.

Be aware that any information you create, share, or download onto Company systems belongs to SiriusPoint, and we have the right to review and monitor system use at any time, without notifying you, to the extent permitted by law.

#### [LEARN MORE](#)

[Acceptable Use Policy and Information Security Policy](#)

## Confidential Information

In the course of our work, many of us have access to confidential or proprietary information about the Company, fellow colleagues, our clients, business partners, or other third parties. Each of us must be vigilant to safeguard our confidential information as well as confidential information that is entrusted to us by others. SiriusPoint relies on each of us to be vigilant and protect confidential information and intellectual property – some of our most important and valuable assets. This means keeping it secure, limiting access to those who have a need to know in order to do their job and only using it for authorized purposes.

Be aware that your obligation to restrict your use of SiriusPoint confidential information and intellectual property continues even after your employment ends. Intellectual property created on the job or with Company resources belongs to SiriusPoint.

#### [LEARN MORE](#)

[Group Privacy Policy and Information Security Policy](#)

## Cooperation with Investigations and Audits

From time to time, colleagues may be asked to participate in internal and external investigations and audits that are conducted by the Company. All colleagues are expected to fully cooperate with all such requests and ensure that any information you provide is true, accurate, and complete.

You may also receive inquiries or requests from government officials. If you learn of a potential government investigation or inquiry, immediately notify your manager and the [Legal and Compliance Department](#).

## Public Communications

SiriusPoint is committed to maintaining honest, professional, and lawful internal and public communications.

We need a consistent voice when making disclosures or providing information to the public. For this reason, only authorized persons speak on behalf of SiriusPoint. Refer any communications with media, investors, stock analysts, and other members of the financial community to the [Head of Investor Relations](#).

No unauthorized employee shall make any public communications on behalf of the Company. Colleagues authorized to make public communications are limited to the CEO, CFO, Head of Investor Relations, and [Global Communications and Marketing](#).

### Full, Fair, and Timely Disclosures

As a public company, SiriusPoint is committed to meeting its public reporting obligations and ensuring the truth and accuracy of all reports and documents we publicly disclose that describe our business and financial results, and other public communications.

### Social Media

Be careful when writing communications that might be published online. If you participate in internet discussion groups, chat rooms, bulletin boards, blogs, social media sites, or other electronic communications, even under an alias, never give the impression that you are speaking on behalf of SiriusPoint.

If you believe a false statement about our Company has been posted, do not post or share nonpublic information, even if your intent is to “set the record straight.” Your posting might be misinterpreted, start false rumors, or may be inaccurate or misleading. Instead, contact the [Legal and Compliance Department](#), or the [Ethics Hotline](#).

### What to Watch For

- Giving public speeches, writing articles for professional journals, or other public communications that relate to SiriusPoint without review and approval of the [Marketing team](#) and the [Legal and Compliance Department](#), as applicable.
- Using your title or affiliation inappropriately outside of your work for SiriusPoint, for example when making unauthorized or improper statements or posts.
- Invitations to speak “off the record” to journalists or analysts who ask you for information about SiriusPoint, or its clients, or business partners.







# WE ARE GOOD PARTNERS

## Ethical Interactions

Always tell the truth about our services and capabilities and never make promises we can't keep. Do not take unfair advantage through manipulation, concealment, abuse of privileged or confidential information, misrepresentation, fraudulent behavior, or any other unfair practice. In short, always apply the same ethical principles of respect and integrity when working with fellow colleagues, business partners, and others.

Honor your commitments to previous employers and partners. Never engage in any anticompetitive behavior, such as a violation of a nondisclosure or nonsolicitation agreement.

Do your part to hold our business partners to our high standards and ensure they operate ethically, in compliance with the law and in a way that's consistent with our Code, our policies, and our values.

### Healthcare Professionals

We put patients first. In our interactions with healthcare professionals, we promote patient welfare by observing good business practices, meeting industry standards, and complying with SiriusPoint policies.

We also comply with federal and state laws that govern our relationships with healthcare professionals, including the U.S. Anti-kickback Statute and the Stark Law. Make sure that any interactions are professional and serve a legitimate business purpose, and never engage in any conduct that is intended to – or could even suggest the appearance of – improperly influencing a healthcare professional's decision.

## Government Contracting

We are committed to meeting the many special legal, regulatory, and contractual requirements that apply to our government contracts. These requirements may apply to bidding, accounting, invoices, subcontracting, employment practices, contract performance, gifts and entertainment, purchasing, and other matters. These requirements may also flow down to individuals and companies working on our behalf. Make sure you know and follow SiriusPoint's Code and policies as well as the laws and regulations that apply to government-related work.

## Data Privacy

We respect the personal information of others. Follow our policies and all applicable laws and regulations in collecting, accessing, using, storing, sharing, and disposing of sensitive information. Only use it – and share it with others outside of SiriusPoint – in a compliant manner for legitimate business purposes.

Make sure you know the kind of information that is considered personal information. It includes anything that could be used to identify someone, either directly or indirectly, such as a name, email address, phone number, or credit card number.

## What to Do

- Avoid receiving any personal data of business partners, clients, or any other person except to the extent such data is required for legitimate business purposes.
- Act with care so that personal data is accurate and only stored securely and only for as long as necessary.
- Only process personal data for specific purposes with only the necessary amount of information collected.



## What to Watch For

- Sending sensitive information to unattended fax machines or printers.
- Failing to shred or securely dispose of sensitive information.
- Using “free” or individually purchased internet hosting, collaboration, or cloud services that could put personal information at risk.



## Privacy, HIPAA, and GDPR

As a global business, SiriusPoint is subject to various privacy laws such as the General Data Protection Regulation (GDPR) and the Health Insurance Portability and Accountability Act (HIPAA), which protect the privacy of personally identifiable information (PII) and protected health information (PHI).

Consistent with the expectations of our clients, colleagues, and other stakeholders, SiriusPoint is committed to conducting its business in compliance with applicable data privacy laws and regulations.

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### LEARN MORE

[Group Privacy Policy](#)





## Conflicts of Interest

A conflict of interest can occur whenever you have a competing interest or activity that may interfere with your ability to make an objective decision on behalf or act in the best interest of SiriusPoint. Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict, because the perception of a conflict can undermine the trust others place in us and damage our reputation.

Conflicts of interest may be actual, potential, or even just a matter of perception. Since these situations are not always clear-cut, you need to fully disclose them to the [Legal and Compliance Department](#) so that they can be properly evaluated, monitored, and managed.

**Be alert to situations, including the following, which are common examples of potential conflicts of interest:**

### Corporate opportunities

If you learn about a business opportunity because of your job, it belongs to SiriusPoint first. This means that you should not take that opportunity for yourself unless you get approval from the Legal and Compliance Department, either directly or via query to the [Ethics Hotline](#).

### Friends and relatives

On occasion, it is possible that you may find yourself in a situation where you are working with a close friend or relative who works for a customer, vendor, business partner, competitor, or even our Company. Since it is impossible to anticipate every scenario that could create a potential conflict, you should disclose your situation to your manager to determine if any precautions need to be taken.

### Outside employment

To ensure that there are no conflicts and that potential issues are addressed, you must disclose and discuss outside employment with your manager. If approved, you must ensure that the outside activity does not interfere with your work at SiriusPoint. Working for a competitor, business partner, or customer may raise conflicts that will need to be resolved. Also, any approved side or personal business should not compete with SiriusPoint.

### Personal investments

A conflict can occur if you have a significant ownership or other financial interest in a competitor, business partner, vendor, or customer. Make sure you disclose any of such ownership to the Legal and Compliance Department and seek help with any questions.

### Civic activities

You must not accept a seat on the board of directors or advisory board of any entity without approval from the Legal and Compliance Department.

## Gifts and Entertainment

A modest gift may be a thoughtful “thank you,” or a meal may offer an opportunity to discuss business. If not handled carefully, however, the exchange of gifts and entertainment could be improper or create a conflict of interest. This is especially true if an offer is extended frequently, if the value is large enough that someone may think it is being offered in an attempt to influence a business decision or if the gift is made to a government official. Generally speaking, business meals that are not lavish are generally appropriate.

Only offer and accept gifts and entertainment that comply with our policies and make sure that anything given or received is accurately reported in our books and records.

Be aware that the rules for what we may give to – or accept from – government officials are much stricter. Don’t offer anything of value to a government official without appropriate approval. And remember: We do not accept or provide gifts, favors, or entertainment to anyone – even if it complies with our policies – if the intent is to improperly influence a decision.

### What to Do

- Only provide and accept gifts and entertainment that are reasonable complements to business relationships.
- Never offer gifts to – or accept them from – a business partner with whom you are directly involved in contract negotiations.
- Comply not only with our policies, but also with the policies of the recipient’s organization before offering or providing gifts or entertainment.
- Never give or accept cash or cash equivalents, including gift cards with cash value.
- Raise a concern whenever you suspect that a colleague or business partner may be improperly attempting to influence a decision of a customer or government official.



### What to Watch For

- Situations that could embarrass you or our Company.
- Gifts, favors, or entertainment that may be reasonable for a privately owned company but not for a government official or agency.





# WE FOLLOW THE LAW

## Compliance with Healthcare Insurance Laws/Regulations

We comply with all applicable laws that regulate our business. Many of these laws concern the way we promote and sell our products. It is never acceptable to try to influence purchasing decisions in any way that is unethical, inappropriate, or illegal, or creates a potential conflict of interest. We are honest, open, and up-front when we interact with those who may be interested in buying or prescribing our products.

### The Laws That Apply to Our Business

We abide by all laws, regulations, policies, and procedures that apply to our jobs, including:

- U.S. Anti-kickback Statute. We don't give anything of value to induce a healthcare professional to use or recommend pharmaceutical products that are paid for or reimbursed by the government.
- U.S. False Claims Act and similar laws in other countries. We don't submit or cause the submission of false claims for healthcare insurance reimbursement to the government.
- Food, Drug, and Cosmetic Act and similar laws in other countries. We don't promote a regulated product or an indication that has not received Food and Drug Administration (FDA) or other appropriate regulatory approval.
- Transparency Laws. We report certain payments to physicians and other clients, as required by transparency laws and regulations in every location where we operate.
- U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and similar laws in other countries. We do not participate in bribery or corruption and adhere to all local laws and regulations that cover bribery and corruption.

## Financial Integrity

The accuracy and completeness of our disclosures and business records are essential to making informed decisions and to supporting investors, regulators, and others. Our books and records must accurately and fairly reflect our transactions in sufficient detail and in accordance with our accounting practices and policies.

Some colleagues have special responsibilities in this area, but all of us contribute to the process of recording business results or maintaining records. Ensure that the information we record is accurate, timely, complete, and maintained in a manner that is consistent with our internal controls, disclosure controls, and our legal obligations.

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### LEARN MORE

[Records Retention and Destruction Policy](#)

## Bribery and Corruption

We believe that all forms of bribery and other corrupt practices are an inappropriate way to conduct business regardless of local customs. SiriusPoint is committed to complying with all applicable anti-corruption laws.

We do not pay or accept bribes or kickbacks, at any time for any reason. This applies equally to any person or firm who represents our Company.

It is especially important that we exercise due diligence and carefully monitor third parties acting on our behalf. We carefully screen all business partners who work on our behalf, particularly when dealing in countries with high corruption rates on the Corruption Perception Index and in any situations where “red flags” would indicate further screening is needed before retaining the business partner. Our partners must understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions. We never ask them to do something that we are prohibited from doing ourselves.

### Key Definitions

- **Bribery** means giving or receiving anything of value (or offering to do so) in order to obtain a business, financial, or commercial advantage.
- **Corruption** is the abuse of an entrusted power for private gain.
- **Facilitation payments** are typically small payments to a low-level government official that are intended to encourage or expedite the official to perform their responsibilities.
- **Government officials** include government employees, political parties, candidates for office, colleagues of public organizations, and government-owned entities.

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### LEARN MORE

[Global Anti-Bribery and Corruption and Anti-Money Laundering Policy](#)

## Fair Competition

We believe in free and open competition and avoid engaging in anti-competitive practices or trying to gain competitive advantages through unethical or illegal business practices. Antitrust laws are complex and compliance requirements can vary depending on the circumstances, so seek help with any questions about what is appropriate and what isn't.

In general, the following activities are red flags and should be avoided and, if detected, reported to the [Legal and Compliance Department](#):

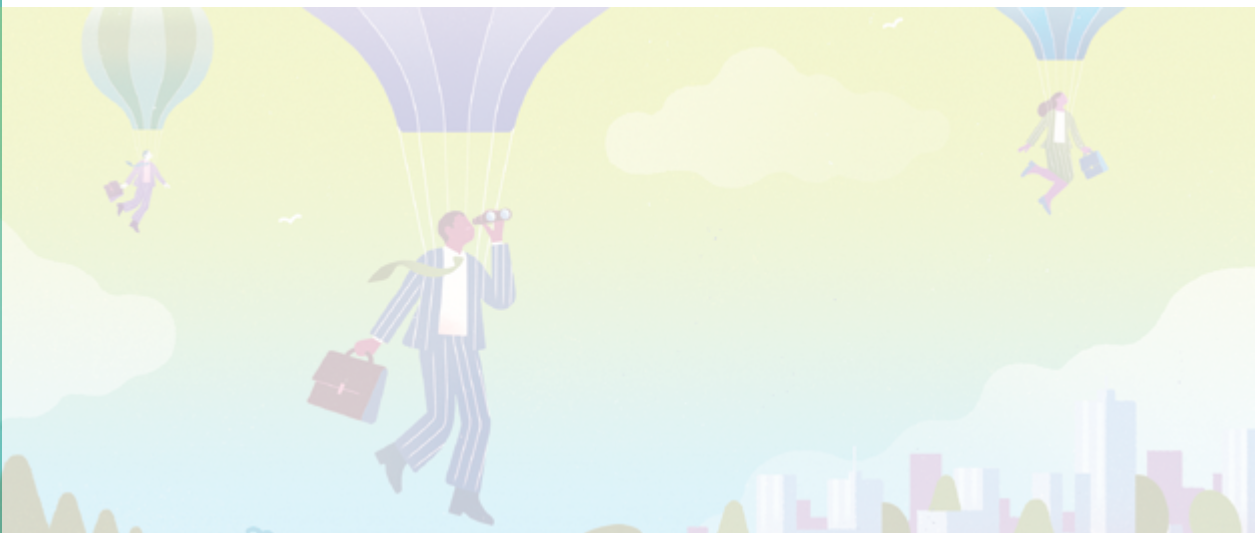
- Sharing our Company's competitively sensitive information (such as commission rates or pricing) with a competitor.
- Sharing competitively sensitive information of business partners or other third parties with their competitors.
- Attempting to obtain nonpublic information about competitors from new hires or candidates for employment.

## Fair Dealing

We seek to treat our clients and business partners fairly. We work to understand and meet their needs and seek competitive advantages through superior performance, not unethical or illegal practices. We tell the truth about our services and capabilities, and do not make claims that aren't true. In short, we treat our clients and business partners as we would like to be treated.

## Gathering Competitive Intelligence

Information about competitors is a valuable asset in today's competitive business environment, but in collecting business intelligence, you and others working on our behalf, must always live up to the highest ethical standards. Obtain competitive information only through legal and ethical means, never through fraud, misrepresentation, deception, or the use of technology to "spy" on others. Sharing competitively sensitive information with competitors (whether that information belongs to us or our business partners) is always prohibited.





## What to Watch For



- **Collusion** – when companies secretly communicate or agree on how they will compete. This could include agreements or exchanges of information on pricing, terms, wages, or allocations of markets.
- **Bid-rigging** – when competitors or service providers manipulate bidding so that fair competition is limited. This may include comparing bids, agreeing to refrain from bidding, or knowingly submitting noncompetitive bids.
- **Tying** – when a company with market power forces clients to agree to services or products that they do not want or need.
- **Predatory pricing** – when a company with market power sells a service below cost to eliminate or harm a competitor, with the intent to recover the loss of revenue later by raising prices after the competitor has been eliminated or harmed.
- **Pressure** from colleagues or managers to cut corners on quality or delivery standards.
- **Retaining papers or computer records** from prior employers and sharing with SiriusPoint in violation of laws or contracts.
- **Using anyone else's confidential information** without appropriate approvals.
- **Not honoring restrictive covenants with prior employers**, including among other items non-solicitation and non-competition clauses.

## Business Licenses

We strive to conduct our business in compliance with all local laws and regulations. This means we seek to make sure we obtain appropriate business licenses where necessary. In the event that you or your colleagues would like to enter a new market but don't know if SiriusPoint is appropriately licensed, contact the [Legal and Compliance Department](#).

## Insider Trading

We respect every company's right to protect its material, nonpublic ("inside") information, and we comply with insider trading laws. In the course of business, you may learn confidential information about SiriusPoint or about other publicly traded companies that is not available to the public. Trading securities while aware of material, nonpublic information, or disclosing it to others who then trade ("tipping"), is prohibited by various laws.

### Material Information

Material information is the kind of information a reasonable investor would take into consideration when deciding whether to buy or sell a security. Some examples of information about a company that may be material are:

- A proposed acquisition or sale of a business
- A significant expansion or cutback of operations
- Release of earnings
- Extraordinary management or business developments
- Changes in strategic direction such as entering new markets

## What to Do

- Do not buy or sell securities of any company when you have material nonpublic information about that company, including SiriusPoint.
- Protect material nonpublic information from the general public and from individuals within SiriusPoint without a legitimate business need for the information, including information in both electronic form and in paper copy.
- Discuss any questions or concerns about insider trading with the [Legal and Compliance Department](#), or the [Ethics Hotline](#).



## What to Watch For

- Requests from friends or family for information about SiriusPoint or other companies with whom we do business or about which we have confidential information. Even casual conversations could be viewed as illegal “tipping” of inside information.
- Sharing material nonpublic information with anyone, either on purpose or by accident, unless it is essential for SiriusPoint-related business. Giving this information to anyone else who might make an investment decision based on your inside information is considered “tipping” and is against the law regardless of whether you benefit from the outcome of their trading.



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### LEARN MORE

[Insider Trading and Confidentiality Policy](#)

## Anti-Money Laundering

Money laundering is a global problem with far-reaching and serious consequences. It is defined as the process of moving funds made from illegal activities through a legal business to make them appear legitimate. Involvement in such activities undermines our integrity, damages our reputation, and can expose our Company and the individuals involved to severe sanctions, including criminal prosecution.

We are committed to conducting business in a way that prevents money laundering and complying with applicable anti-money laundering, financial crimes, and anti-terrorism laws wherever we operate. Report any suspicious financial transactions and activities to the [Legal and Compliance Department](#), or the [Ethics Hotline](#) and, if required, to appropriate government agencies.

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### LEARN MORE

[Global Anti-Bribery and Corruption and Anti-Money Laundering Policy](#)

## Anti-Boycott Regulations

We are subject to the anti-boycott provisions of U.S. law that require us to refuse to participate in foreign boycotts that the United States does not sanction. We promptly report any request to join in, support, or furnish information concerning a non-U.S.-sanctioned boycott.

## Sanctions

The Company is committed to compliance with applicable sanctions laws and regulations in the countries in which we operate, including but not limited to those of the Departments of Commerce, State, and Treasury of the United States of America, and where applicable, Her Majesty's Treasury (UK), the United Nations Security Council, Bermuda's Ministry of Legal Affairs Financial Sanctions Implementation Unit, the European Union or its Member States and the Monetary Authority of Singapore.

We have no risk appetite to carry out any activities which will knowingly, or are very likely, to cause a breach of applicable sanctions, or for sanctions-related activities that may result in the impairment of critical business relationships.

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### LEARN MORE

[Global Sanctions Compliance Policy](#)

## Human Rights

We conduct our business in a manner that respects the human rights and dignity of all, and we support international efforts to promote and protect human rights, including an absolute opposition to slavery and human trafficking.

Each of us can help support efforts to eliminate abuses such as child labor, slavery, human trafficking, and forced labor.

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### LEARN MORE

[Modern Slavery Statement](#)





# WE ARE GOOD STEWARDS

## Good Corporate Citizenship

We believe in making a positive difference in people's lives and maintaining the health and welfare of the communities where we live and work. We promote, encourage, and support a diverse range of corporate social responsibility activities. We strive to be good stewards of capital for our shareholders and protect corporate resources. You are encouraged to get involved in the many initiatives SiriusPoint supports.

We also encourage you to make a difference on a personal level, but, in general, ask that you do so on your own time and at your own expense, making sure that your activities are lawful and consistent with our policies. Unless you receive approval in advance, please do not use SiriusPoint funds, assets, resources, or the SiriusPoint name to further your personal volunteer activities.

## Political Activities

Each of us has the right to voluntarily participate in the political process, including making personal political contributions. However, you must always make it clear that your personal views and actions are not those of SiriusPoint, and never use Company funds, time, resources, or the SiriusPoint name for any political purpose without proper authorization.



# MAKING YOUR COMMITMENT

All SiriusPoint colleagues must complete and submit this Acknowledgement Form annually and participate in all required ethics and compliance training.

Submitting this form indicates that you have read and understood our Code of Business Conduct and Ethics and:

- » Have complied with the Code to the best of your knowledge.
- » Have reported any possible conflicts of interest.
- » Will contact management or use any of the reporting methods included in this Code if you have concerns related to a team member or business conduct that may violate this Code.

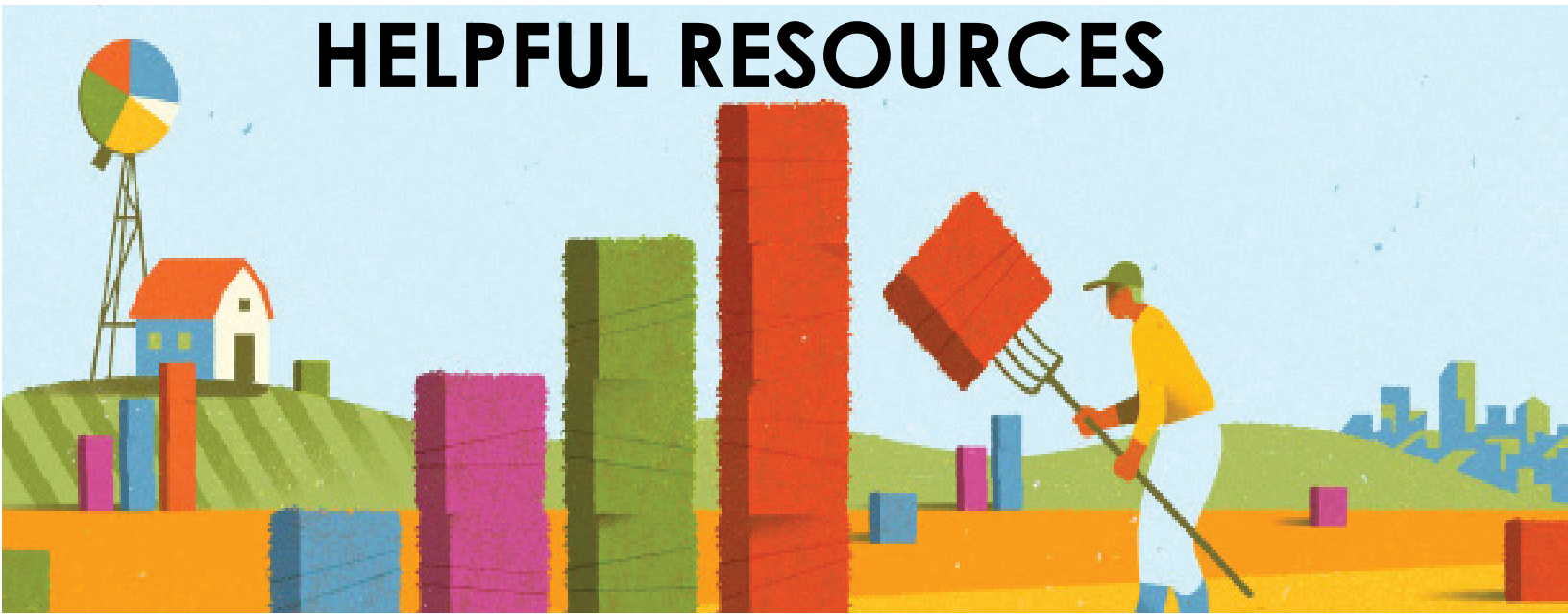
Signature: \_\_\_\_\_

Date: \_\_\_\_\_





# HELPFUL RESOURCES



Resource:	Contact:																		
Human Resources	<a href="mailto:HRGuidance@siriuspt.com">HRGuidance@siriuspt.com</a>																		
Compliance Department	<a href="mailto:group.compliance@siriuspt.com">group.compliance@siriuspt.com</a>																		
Legal Department	<a href="mailto:legaldepartment@siriuspt.com">legaldepartment@siriuspt.com</a>																		
Ethics Hotline	<a href="https://secure.ethicspoint.com/domain/media/en/gui/48395/index.html">https://secure.ethicspoint.com/domain/media/en/gui/48395/index.html</a> <table border="1"> <tr> <td>Via Telephone from Bermuda</td><td>971-371-7843</td></tr> <tr> <td>Via Telephone from Belgium</td><td>0-800-100-10</td></tr> <tr> <td>Via Telephone from Canada</td><td>855-866-3866</td></tr> <tr> <td>Via Telephone from Germany</td><td>800-225-5288</td></tr> <tr> <td>Via Telephone from Singapore</td><td>800-110-2223</td></tr> <tr> <td>Via Telephone from Sweden</td><td>0201408107</td></tr> <tr> <td>Via Telephone from Switzerland</td><td>0-800-890011</td></tr> <tr> <td>Via Telephone from the UK</td><td>0808-234-2941</td></tr> <tr> <td>Via Telephone from the United States of America</td><td>1-855-866-3866</td></tr> </table>	Via Telephone from Bermuda	971-371-7843	Via Telephone from Belgium	0-800-100-10	Via Telephone from Canada	855-866-3866	Via Telephone from Germany	800-225-5288	Via Telephone from Singapore	800-110-2223	Via Telephone from Sweden	0201408107	Via Telephone from Switzerland	0-800-890011	Via Telephone from the UK	0808-234-2941	Via Telephone from the United States of America	1-855-866-3866
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Global Communications and Marketing	<a href="mailto:CorporateRelations@siriuspt.com">CorporateRelations@siriuspt.com</a>																		
Investor Relations	<a href="mailto:investor.relations@siriuspt.com">investor.relations@siriuspt.com</a>																		

# APPENDIX

## Switzerland Appendix

[To page 18 \(Bribery and Corruption\)](#)

### Key Definitions

- **Bribery of Swiss public officials** means offering, promising or giving a member of a judicial or other authority, a public official, an officially-appointed expert, translator or interpreter, an arbitrator, or a member of the armed forces an undue advantage, or offering, promising or giving such an advantage to a third party in order to cause the public official to carry out or to fail to carry out an act in connection with his official activity which is contrary to his duty or dependent on his discretion.
- **Granting an advantage to Swiss public officials** means offering, promising or giving a public official (see above) an undue advantage for that person or for a third party in order that the person carries out his official duties.
- **Bribery of private individuals** means offering, promising or giving an employee, partner, agent or any other auxiliary of a third party in the private sector an undue advantage for that person or a third party in order that the person carries out or fails to carry out an act in connection with his business activities which is contrary to his duties or dependent on his discretion.