



GLOBAL CODE OF BUSINESS CONDUCT AND ETHICS

SIRIUS
POINT

TABLE OF CONTENTS

What we believe: Vision, Culture and Values

A message from the CEO

We do the Right Thing

An introduction to the Code

Asking questions and Reporting Concerns

Our Commitment to Non-Retaliation

We look out for each other

Inclusion, Equal Opportunity, and Non-Discrimination

Harassment-Free Workplace

Health and Safety at Work

We Protect Information and Assets

Our Company Assets

Confidential Information

Cooperation with Investigations and Audits

Public Communications

We Are Good Partners

Ethical interactions

Government Contracting

Data Privacy

Conflicts of Interest

Gifts and Entertainment

3

4

5

6

7

7

8

9

9

9

10

11

11

11

12

13

14

14

14

15

15

We Follow the Law

Compliance with Healthcare Insurance Laws/Regulations

Financial Integrity

Bribery and Corruption

Fair Competition

Business Licenses

Anti-money laundering

Anti-Boycott Regulations

Sanctions

Human Rights

Anti-fraud

We Are Good Stewards

Good Corporate Citizenship

Political Activities

When to Ask for Help

16

17

17

18

18

20

21

21

21

21

21

22

23

23

24



WHAT WE BELIEVE: VISION

To be recognized as a best-in-class specialty underwriter, utilizing deep risk capabilities to protect our customers. Blending our talent, expertise and data to provide intelligent risk solutions

CULTURE

ONE SIRIUSPOINT ONE TEAM

We are all on the same team. To achieve the sum of the parts, we all know our role and are empowered to deliver. We win together, we lose together

PURPOSEFUL AND FOCUSED

Our organization is aligned to how we trade. We want to take risks, but we don't gamble. Data provides our guiding star. Contextual performance matters – we benchmark every aspect of performance to tell us whether we have done a good job

DEEP EXPERTISE AND SMART OPERATORS

Our people are our experts. We treat every dollar like it's our dollar. We are 'underwriting first'. Good enough is sometimes good enough. We know where we want to be best in class and where best in cost

ROLE MODELING BEHAVIORS

Open and transparent. We say, "yes/and" rather than "yes/ but". When there is a problem, we help. Integrity, trust, respect, listen, care, engage, we hear. There will be moments of give and take for all of us, and both matter

INTENSELY PERFORMANCE DRIVEN

Performance, intensity and keeping our commitments matter. Performance culture runs through our veins, and is transparent, consistent and aligned with shareholders. Making superior returns is our consistent intent

VALUES

INTEGRITY

INTEGRITY, RESPECT AND TRUST ARE OUR CORE PRINCIPLES

CUSTOMER FOCUSED

OUR CUSTOMERS ARE THE REASON WE EXIST

SOLUTION DRIVEN

CREATING SOLUTIONS IS OUR MINDSET

DIVERSITY

DIVERSITY, INCLUSION AND ALLYSHIP MAKE US STRONGER

COLLABORATION

COLLABORATION DRIVES OUTPERFORMANCE



A MESSAGE FROM THE CEO

At SiriusPoint, our culture shapes how we work, the decisions we make, and how we deliver for our colleagues, clients, partners, and shareholders. It is built on respect, collaboration, ambition, accountability, and leadership. These are not abstract ideas - they show up in the choices we make every day.

Our Code of Business Conduct and Ethics helps guide the behaviors that shape our culture. It sets out the standards we expect of ourselves, and each other, and provides practical guidance for doing the right thing, especially when the answer is not always obvious.

The Code is grounded in a few simple expectations:

- **Do the right thing.** Act with honesty, transparency, and sound judgment.
- **Look out for each other.** Treat people with respect and help maintain a workplace where everyone can do their best work.
- **Protect our information and assets.** Safeguard the data, systems, and resources entrusted to us.
- **Follow the law and our policies.** Understand your responsibilities and ask for guidance when you are unsure.
- **Speak up.** Raise concerns early – asking questions and escalating issues helps protect our culture and our company.

Integrity is not something we turn to only when there is a problem. It is part of how we operate every day. The Code gives us a common framework and points us to the people and resources available to help, including HR, Legal, Regulatory & Compliance, and the EthicsPoint Helpline.

As SiriusPoint continues to grow and evolve, our culture and our Code remain our compass. Thank you for living these standards, and helping to build a company defined by trust, performance, and integrity.

Scott Egan
Chief Executive Officer

WE DO
THE RIGHT
THING





AN INTRODUCTION TO THE CODE

This Code of Business Conduct and Ethics (the “Code”) applies to SiriusPoint Ltd. and all of its subsidiaries (collectively “SiriusPoint” or the “Company”). Our purpose, vision, values and culture guide every action we take. While we focus each day on delivering value for our clients, we recognize that how we serve them – and the impact we have on our colleagues, partners and communities – matters just as much.

SiriusPoint expects each of us to act with integrity, give our best to our clients, and make decisions that reflect who we are as a Company. We also understand that determining the “right” course of action is not always straightforward, particularly given the wide range of laws and regulations that apply to our business. The Code is designed to be your primary ethical resource. It provides guidance to help you navigate challenging situations, uphold our values, and make sound, principled decisions.

COMPLYING WITH LAWS AND REGULATIONS

SiriusPoint is committed to complying with all laws, rules and regulations that apply to our business. While the Code offers important guidance, it cannot anticipate every situation you may encounter. For that reason, we have included additional resources throughout the Code to support you. We trust you to exercise sound judgment and to seek assistance whenever you are unsure of the appropriate course of action.

Because we operate in multiple jurisdictions, we navigate a wide range of legal and cultural requirements. Although we respect the customs and practices of our clients, business partners, and colleagues around the world, all SiriusPoint employees are expected to follow the standards set out in this Code. If you encounter a situation where a provision of the Code appears to conflict with local laws or regulatory requirements, please contact the [Legal, Regulatory and Compliance Department](#) or reach out to the [EthicsPoint 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 comply with this Code.

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

ACCOUNTABILITY AND DISCIPLINE

Any violation of the Code, Company policies, or applicable laws, or encouraging others to violate them, may expose the Company to risk and harm our reputation. If you observe or suspect misconduct, you must report it to the Legal, Regulatory and Compliance Department, or through the [EthicsPoint Hotline](#).

Individuals who violate the Code may face disciplinary action, up to and including termination of employment. In addition, breaches of laws or regulations may lead to legal consequences, including civil or criminal penalties.

WAIVERS AND CHANGES TO THE CODE

In limited circumstances, a waiver of the Code may be necessary. Any waiver of this Code for directors or executive officers may be granted only by the Board of Directors or an authorized Board committee and will be promptly disclosed to shareholders as required by applicable laws, rules, and regulations.



ASKING QUESTIONS AND REPORTING CONCERNS

If you observe or suspect a breach of the Code, any Company policy, or the law, or if you are unsure how to proceed, please speak with your manager, contact the Legal, Regulatory and Compliance Department, or reach out to the EthicsPoint Hotline for guidance.

WHAT TO EXPECT WHEN YOU USE THE ETHICSPPOINT HOTLINE

- The EthicsPoint Hotline is available 24/7 through both the web portal and phone line. Calls are answered by trained specialists from an independent third-party provider who document your concern and forward a written report to SiriusPoint for further review and investigation.
- You may report anonymously, where permitted by local law. All reports, anonymous or not, are treated seriously and handled with care.
- After submitting a report, you will receive a unique identification number that allows you to follow up on your concern. Following up is especially important when reporting anonymously, as investigators may need additional details to conduct a thorough review. The identification number also allows you to track the status of the case; however, out of respect for privacy, SiriusPoint cannot provide information about specific disciplinary actions.
- All reports made through the EthicsPoint Hotline are kept confidential to the fullest extent possible during the investigation process and as allowed by applicable law.

OUR COMMITMENT TO NON-RETALIATION

We will not tolerate any form of retaliation against any colleague who, in good faith, asks questions, reports potential violations of our Code, policies, or applicable law, or participates in an investigation of suspected misconduct.

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.



**LEARN MORE
WHISTLEBLOWER POLICY**

A man in a dark suit and tie is smiling and looking down at a woman with red hair wearing glasses and an orange top. They are in an office setting with large green plants in the background. A semi-transparent purple rectangle is on the left side of the image, containing the text 'WE LOOK OUT FOR EACH OTHER'. The Sirius Point logo is on the man's suit.

WE LOOK
OUT FOR
EACH OTHER

SIRIUS
POINT

INCLUSION, EQUAL OPPORTUNITY, AND NON-DISCRIMINATION

SiriusPoint brings together colleagues from a broad range of backgrounds, experiences, and cultures. This diversity of talent and perspective enables the dynamic and collaborative teams that drive our results.

We believe that all colleagues, job applicants, and business partners are entitled to be treated with respect. We are committed to fostering an environment where individuals feel welcomed, valued and supported, and where they have meaningful opportunities to grow, contribute, and develop. In support of that commitment, we uphold laws prohibiting discrimination and provide equal opportunity for employment and advancement across all departments, programs, and worksites.

Employment decisions at SiriusPoint are based solely on qualifications, demonstrated skills, and performance. We do not make decisions on the basis of 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. Colleagues are expected to conduct themselves professionally when interacting with others including fellow employees, vendors, clients or any other individuals they engage with in the office, on video calls, at conferences, or any other time they are representing SiriusPoint.

SEXUAL HARASSMENT

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

- Unwelcome conduct is made a condition of employment or is used as the basis for employment decisions, requests for dates, sexual favors, or other similar behavior of a sexual nature.
- An intimidating, offensive, or hostile environment is created through unwelcome sexual advances, inappropriate jokes, or other offensive verbal or physical conduct of a sexual nature.

HEALTH AND SAFETY AT WORK

Safety is fundamental to everything we do. Each of us has a responsibility to act in ways that protect our own wellbeing and that of others. Regardless of your role or location, we rely on every employee to actively support a safe and healthy workplace, and to report any conditions or behaviors that may pose a health, safety, or security risk.

Speaking up about risks and hazards is not only the right thing to do, it is required. Failing to report an incident, or declining to participate in an investigation, can have serious consequences for you, for our Company, and for your colleagues. Do your part to help keep everyone in the SiriusPoint community safe and injury-free.



LEARN MORE
RESPECTFUL WORKPLACE POLICY



WE PROTECT
INFORMATION
AND ASSETS



OUR COMPANY ASSETS

Each of us is entrusted with Company assets – both tangible and intangible – that enable us to operate effectively. We are individually responsible for using these resources appropriately and safeguarding them against fraud, waste, and abuse.

Personal use of Company assets is discouraged, but where permitted, must be limited and kept to a minimum.

PHYSICAL AND ELECTRONIC ASSETS

Physical assets include SiriusPoint facilities, materials, and equipment. Electronic assets encompass our computer and communication systems, software, data, and hardware. Company files and records are also important assets, and we each share responsibility for maintaining their confidentiality, security, and integrity.

Please be aware that any information you create, share, or download on Company systems is the property of SiriusPoint. To the extent permitted by the law, the Company may review and monitor system use at any time, without prior notice.



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ACCEPTABLE USE POLICY



LEARN MORE
INFORMATION SECURITY POLICY

CONFIDENTIAL INFORMATION

In the course of our work, many of us have access to confidential or proprietary information relating to the Company, our colleagues, clients, business partners, or other third parties. We each have a responsibility to safeguard this information, as well as any confidential information entrusted to us by others. SiriusPoint relies on all of us to protect confidential information and intellectual property – some of the Company's most important and valuable assets. This includes keeping such information secure, limiting access to those who need it to perform their job duties, and using it only for authorized purposes.

Your obligation to protect SiriusPoint's confidential information and intellectual property continues even after your employment ends. Any intellectual property created in the course of your work or using Company resources belongs to SiriusPoint.



LEARN MORE
GROUP PRIVACY POLICY



LEARN MORE
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 conducted by the Company. All colleagues are expected to cooperate fully and ensure that any information provided is truthful, accurate, and complete.

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

PUBLIC COMMUNICATIONS

SiriusPoint is committed to ensuring that all internal and external communications are honest, professional, and compliant with applicable laws.

To maintain a consistent and accurate public voice, only designated individuals are authorized to speak on behalf of SiriusPoint. All inquiries from media, investors, stock analysts, or other members of the financial community must be referred to the Global Head of Marketing and External Communications.

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, and Global Head of Marketing and External Communications.

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

Exercise caution when sharing any content online. If you take part in discussion forums, chat rooms, blogs, social media, or other digital platforms – even under a username or alias – ensure you never suggest or imply that you are speaking on behalf of SiriusPoint.

If you come across what you believe is an inaccurate statement about our Company, do not respond by posting or sharing nonpublic information – even if you intend to correct the misinformation. Doing so may be misinterpreted, create further confusion, or inadvertently spread inaccurate details. Instead, report the issue to the [Legal, Regulatory and Compliance Department](#), or contact the [EthicsPoint Hotline](#).



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SOCIAL NETWORKING POLICY

WHAT TO WATCH FOR

- Engaging in public speaking, publishing articles in professional journals, or making any other public communications related to SiriusPoint is not permitted unless they have been reviewed and approved by the Global Head of Marketing and External Communications and the [Legal, Regulatory and Compliance Department](#) as applicable.
- Using your SiriusPoint title or affiliation inappropriately outside of your role – for example, when making unauthorized or improper statements or posts.
- Receiving invitations to speak “off the record” with journalists or analysts seeking information about SiriusPoint, its clients, or its business partners.



TO MAINTAIN
A CONSISTENT
AND ACCURATE
PUBLIC VOICE,
ONLY DESIGNATED
INDIVIDUALS ARE
AUTHORIZED TO
SPEAK ON BEHALF
OF SIRIUSPOINT.

WE ARE
GOOD
PARTNERS



ETHICAL INTERACTIONS

Always be truthful about our services and capabilities and never make commitments we cannot honor. Avoid gaining unfair advantage through manipulation, concealment, misuse of privileged or confidential information, misrepresentation, fraudulent conduct, or any other improper practice. Uphold the same standards of respect and integrity in all interactions with colleagues, business partners, and others.

Honor your commitments to former employers and partners and refrain from any anticompetitive conduct, including violating nondisclosure or non-solicitation agreements.

Do your part to ensure our business partners meet the same high ethical standards and operate in a lawful manner 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 relationship 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 complying with the special legal, regulatory, and contractual obligations that apply to our government contracts. These requirements may cover areas such as bidding, accounting, invoices, subcontracting, employment practices, contract performance, gifts and entertainment, purchasing, and other related activities and may also extend to individuals or companies acting on our behalf. Ensure you understand and follow SiriusPoint's Code, policies, and all laws and regulations governing government-related work.

DATA PRIVACY

We respect the privacy of personal information. Always follow our policies and all applicable laws when collecting, accessing, using, storing, sharing, or disposing of sensitive information. Only use it – and disclose personal information only – in a compliant manner for legitimate business purposes.

Be sure you understand what qualifies as personal information. It includes any data that can directly or indirectly identify an individual, such as a name, email address, phone number, or credit card number.

WHAT TO DO

- Avoid receiving any personal data from business partners, clients, or any other individuals unless it is genuinely required for a legitimate business purpose.
- Take care to ensure that personal data remains accurate, is stored securely, and only for as long as necessary.
- Process personal data only for defined, legitimate purposes, and limit collection to the minimum information necessary.

WHAT TO WATCH FOR

- Sending sensitive information to printers that are left unattended.
- Not properly shredding or securely disposing of sensitive information.
- Using “free” or individually purchased internet hosting, collaboration, or cloud services that may expose personal information to risk.

PRIVACY, HIPAA, GDPR AND PIPA

Because we operate globally, SiriusPoint must comply with a range of privacy regulations, including the General Data Protection Regulation (GDPR), Personal Information Protection Act (PIPA) and the Health Insurance Portability and Accountability Act (HIPAA), which protect the privacy of personally identifiable information (PII) and protected health information (PHI).

In line with the expectations of our clients, colleagues, and other stakeholders, SiriusPoint remains committed to conducting its operations in full compliance with all applicable data privacy laws and regulations.



LEARN MORE
GROUP PRIVACY POLICY

CONFLICTS OF INTEREST

A conflict of interest arises when a personal interest or activity could compromise – or appear to compromise – your ability to make objective decisions or act in SiriusPoint’s best interest. Even the perception of a conflict can erode trust and harm our reputation, so we are all expected to exercise good judgment and avoid situations that may create such concerns.

Conflicts may be actual, potential, or perceived. Because these situations are not always straightforward, you must promptly disclose any such conflict to the [Legal, Regulatory and Compliance Department](#) so it can be properly assessed, monitored, and addressed.

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

BOARD APPOINTMENTS

Appointments to a Board must be disclosed and pre-approval obtained.

CORPORATE OPPORTUNITIES

Any business opportunity discovered due to your job belongs to SiriusPoint first. You may not take that opportunity for yourself or direct it to a third party.

FRIENDS AND RELATIVES

If you are or plan to be working with a close friend or relative who works for a customer, vendor, business partner, competitor, or the 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

Outside employment must be disclosed and pre-approved by your manager and Legal, Regulatory and Compliance Department. 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 and/or any side business is generally unacceptable and will only be approved in certain circumstances with significant mitigation and sign-off.

PERSONAL INVESTMENTS

Any significant ownership or other financial interest in a competitor, business partner, vendor or customer must be disclosed.

CIVIC ACTIVITIES (INCLUDING SERVING AS A PUBLIC OFFICIAL/ELECTED OFFICE)

No employee may run for or accept a position as a public official or seek elected or appointed office without the prior approval of the Legal, Regulatory and Compliance Department.

GIFTS AND ENTERTAINMENT

Modest gifts or occasional business meals can be appropriate and may help strengthen professional relationships. However, if not managed carefully, gifts and entertainment can become improper or create a conflict of interest – particularly when they are offered frequently, are of significant value, could be perceived as an attempt to influence a business decision, or involve a government official. While reasonable, non-lavish business meals are generally acceptable, you must ensure that any gift or entertainment you give or receive complies with our policies and is properly recorded.

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 standards for giving to – or receiving anything from – government officials are far more stringent. Do not offer anything of value to a government official unless you have obtained the required approval. And at all times, we avoid giving or accepting gifts, favors, or entertainment from anyone if the purpose – or even the perception – 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.



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GLOBAL GIFTS AND ENTERTAINMENT POLICY



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 upfront 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

Accurate and complete disclosures and business records are critical to sound decision-making and to meeting the expectations of our investors, regulators, and other stakeholders. Our books and records must fairly and accurately reflect our transactions in appropriate detail and in accordance with our accounting practices and policies.

While certain colleagues have specific responsibilities in this area, all of us play a role in recording business results and maintaining records. Ensure that any information you create or update is accurate, timely, complete, and maintained in accordance with our internal controls, disclosure requirements, and legal obligations.



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RECORDS RETENTION AND DESTRUCTION POLICY



BRIBERY AND CORRUPTION

We do not consider any form of bribery or corruption to be an acceptable way of doing business, regardless of local practices. SiriusPoint is committed to full compliance with all applicable anti-corruption laws.

We never offer, pay, request or accept bribes or kickbacks – under any circumstances. This standard applies equally to anyone acting on our behalf.

We must conduct robust due diligence and closely monitor third parties who represent us. All business partners must be appropriately vetted, especially when operating in higher-risk jurisdictions or where other ‘red flags’ suggest enhanced scrutiny is needed. Every partner must understand that they are required to comply with our standards and maintain accurate, complete records of all transactions. We never ask a third party to engage in conduct that we ourselves are prohibited from doing.

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.



LEARN MORE
GLOBAL ANTI-BRIBERY AND CORRUPTION
AND ANTI-MONEY LAUNDERING POLICY

FAIR COMPETITION

We are committed to fair and open competition and do not participate in anti-competitive behavior or seek advantages through unethical or unlawful practices. Because antitrust rules can be complex and context-specific, you should reach out for guidance whenever you are unsure about what conduct is appropriate.

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

- Sharing our Company’s competitively sensitive information (such as commission rates or pricing) with a competitor, former employees or other third parties.
- 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 are committed to treating our clients and business partners with fairness and respect. We strive to understand their needs and deliver value through strong performance rather than through any unethical or unlawful means. We communicate honestly about our services and capabilities and avoid making statements that are inaccurate or misleading. Ultimately, we engage with our clients and partners in the same principled way we would expect to be treated.

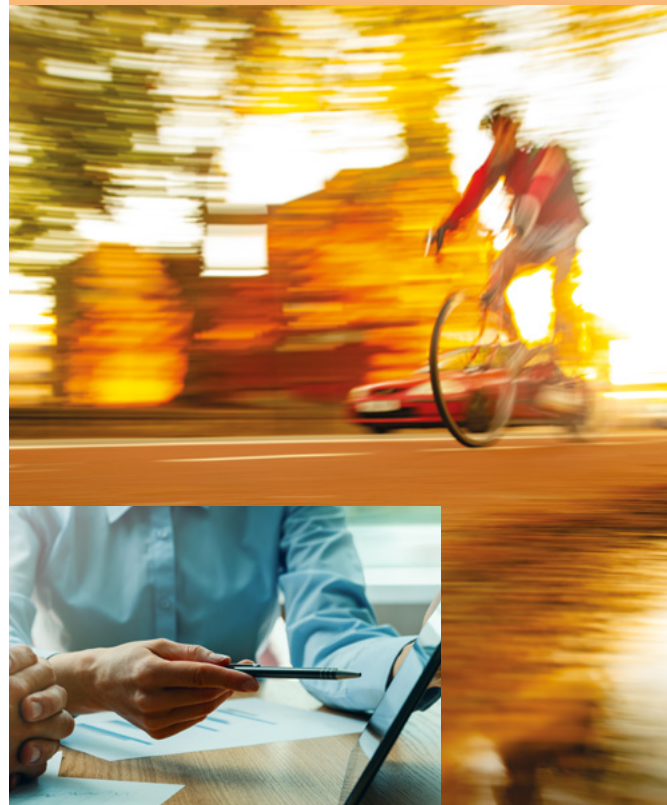
GATHERING COMPETITIVE INTELLIGENCE

Competitive intelligence can be valuable, but it must always be gathered responsibly. You and anyone acting on our behalf, must adhere to the highest ethical standards when collecting information about competitors. Only obtain such information through lawful 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 SiriusPoint or our business partners, is strictly 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 non-competitive 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 costs 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.

WE ARE COMMITTED
TO MAINTAINING THE
HIGHEST STANDARDS
OF HONESTY,
TRANSPARENCY, AND
ACCOUNTABILITY IN
ALL ASPECTS OF OUR
BUSINESS.



BUSINESS LICENSES

We are committed to operating in full compliance with all applicable local laws and regulations, including securing any required business licenses. If you or your team are considering entering a new market and are unsure whether SiriusPoint holds the necessary licenses, please reach out to the [Legal, Regulatory and Compliance Department](#).

INSIDER TRADING

We recognize and respect every company's right to safeguard its material, nonpublic ("inside") information, and we adhere strictly to applicable insider trading laws. In your role, you may become aware of confidential information about SiriusPoint or other publicly traded companies that have not been released to the public. Trading securities while in possession of material, nonpublic information – or sharing that information with anyone who might trade ("tipping") – is prohibited.

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, Regulatory and Compliance Department](#) or the [EthicsPoint 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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INSIDER TRADING POLICY



ANTI-MONEY LAUNDERING

Money laundering is a serious global issue with significant legal and reputational consequences. It involves channeling funds derived from unlawful activity through legitimate business to disguise their origin. Participation in any form of money laundering compromises our integrity, harms our reputation, and may expose both the Company and the individuals involved to severe penalties, including criminal prosecution.

We are committed to conducting our business in full compliance with applicable anti-money laundering, financial crime, and anti-terrorism laws wherever we operate. If you observe or suspect any unusual or potentially illicit financial activity, you must escalate it promptly to the [Legal, Regulatory and Compliance Department](#), or report it through the [EthicsPoint Hotline](#) and, when required, to the appropriate regulatory authorities.



LEARN MORE
GLOBAL ANTI-BRIBERY AND CORRUPTION
AND ANTI-MONEY LAUNDERING POLICY

ANTI-BOYCOTT REGULATIONS

We must comply with U.S. anti-boycott laws that require us to decline participation in any foreign boycott that is not endorsed by the United States. If you receive any request to take part in, support, or provide information related to a boycott not sanctioned by the U.S., you must report it immediately to the [Legal, Regulatory and Compliance Department](#) or through the [EthicsPoint Hotline](#).

SANCTIONS

The Company is committed to compliance with applicable sanctions laws and regulations in every jurisdiction where we conduct business, including, among others, those issued by U.S. regulatory authorities, His Majesty's Treasury in the UK, the United Nations Security Council, Bermuda's Ministry of Legal Affairs Financial Sanctions Implementation Unit, the European Union or its Member States.

We will not engage in any activity that we know – or have good reason to believe – is likely to violate sanctions requirements or that could jeopardize critical business relationships through sanctions related exposure.



LEARN MORE
GLOBAL SANCTIONS POLICY



LEARN MORE
GLOBAL SANCTIONS GUIDELINES

HUMAN RIGHTS

We conduct our business in a way that upholds the human rights and dignity of every individual. We support global efforts to advance and safeguard these rights, including maintaining a zero-tolerance stance toward slavery and human trafficking.

Each of us plays a role in helping to prevent and eliminate abuses such as child labor, forced labor, slavery, and human trafficking.



LEARN MORE
HUMAN RIGHTS AND SUBSIDIARY MODERN
SLAVERY STATEMENTS

ANTI-FRAUD

We are committed to maintaining the highest standards of honesty, transparency, and accountability in all aspects of our business. We have zero tolerance for fraud in any form. Fraud – including false reporting, false accounting, financial or other misrepresentation, abuse of position, or any other dishonest act – undermines our integrity, puts our clients and stakeholders at risk, and may result in severe legal and disciplinary consequences.

Every employee must comply with all applicable fraud related laws and with our Global Anti-Fraud Policy. You are responsible for staying alert to potential indicators of fraud and for promptly reporting any suspicious behavior, concerns, or actual misconduct. Reports may be made through [Legal, Regulatory and Compliance Department](#), or through the [EthicsPoint Hotline](#).



LEARN MORE
GLOBAL ANTI-FRAUD POLICY



WE ARE
GOOD
STEWARDS



GOOD CORPORATE CITIZENSHIP

We are committed to making a meaningful, positive impact in the communities where we live and work. SiriusPoint actively promotes and supports a wide range of corporate social responsibility initiatives, and we ask each of you to help strengthen these efforts. As good stewards of our shareholders' capital, we safeguard Company resources and use them responsibly. We encourage you to participate in the many community and charitable programs SiriusPoint supports.

We also encourage you to contribute personally to causes that matter to you. However, these activities should generally be undertaken on your own time and at your own expense, and must always be lawful and consistent with SiriusPoint's policies. Unless you have obtained prior approval, you may not use SiriusPoint funds, assets, resources, or the SiriusPoint name to support your personal volunteer activities.

SUSTAINABILITY AND CORPORATE RESPONSIBILITY

We recognize that our impacts as a business extend beyond our company. We actively engage with opportunities to support and improve the communities where we live, work, and do business.



LEARN MORE
SUSTAINABILITY REPORT

POLITICAL ACTIVITIES

While you are free to participate in the political process, including making personal political contributions, you must clearly distinguish your own views and actions from those of SiriusPoint. You may not use Company funds, time, resources, or the SiriusPoint name for any political purpose unless you have received prior authorization.

INTELLECTUAL PROPERTY

At SiriusPoint, we rely on the creation, protection, and responsible use of intellectual property (IP) to support our business, safeguard our competitive position, and maintain trust with our stakeholders. Intellectual property can include copyrights, trademarks, patents, trade secrets, proprietary methodologies, models, data, and all other forms of confidential or creative work developed for or owned by SiriusPoint.

YOUR RESPONSIBILITIES

- **Protect SiriusPoint's IP** - All work you create during your role is the property of SiriusPoint. You are responsible for safeguarding this information from unauthorized use, access, disclosure, or theft.
- **Respect the IP rights of others** - We must never use third party materials, such as data, research, images, models, or written content, without proper authorization, licensing, or attribution.
- **Maintain confidentiality** - Trade secrets and proprietary information must be handled carefully and shared only with those who have a legitimate business need. This obligation continues even after your employment ends.

By respecting intellectual property – ours and that of others – we protect SiriusPoint's ability to innovate, compete responsibly, and uphold our commitments to integrity.

ARTIFICIAL INTELLIGENCE

Artificial Intelligence (AI) is rapidly transforming the insurance industry. We are committed to ensuring that AI is used responsibly, ethically and in a manner that is consistent with our values and regulatory obligations. Strong governance and data ethics help us maintain trust with our clients, employees, partners, and regulators.

KEY REMINDERS

- **Follow SiriusPoint's AI governance requirements** - Use AI tools and systems in accordance with company policies, standards, and approval processes. AI tools should be evaluated for risk, properly documented, and monitored to ensure they operate as intended.
- **Maintain human accountability** - AI may support decision making, but it does not replace good judgement. Employees remain responsible for decisions, analyses, and actions taken with the assistance of AI. Do not rely on AI tools as the sole basis for decisions that affect clients, colleagues, partners, or third parties.
- **Promote Fairness and avoid bias** - AI systems must be designed and used in ways that avoid unfair, discriminatory, or harmful outcomes. If you observe results that appear biased, inaccurate, or inconsistent with our values, raise the concern immediately.
- **Use data ethically** - AI is only as responsible as the data it relies on. Always ensure that data used for AI or analytics is collected, accessed, and used lawfully, accurately, and with respect for privacy. Never manipulate, misuse, or circumvent data controls.
- **Protect confidentiality and security** - AI tools must not compromise the confidentiality, integrity, or security of SiriusPoint's data. Do not upload confidential, proprietary, or personal information into any AI system unless it has been approved and authorized for such use.
- **Exercise caution with third party AI** - External AI tools, vendors, and platforms must meet SiriusPoint's standards for privacy, security, fairness, and legal compliance. Engage the appropriate teams (such as Compliance, IT Security, and Procurement) if you have questions or concerns.



LEARN MORE
GENERATIVE ARTIFICIAL INTELLIGENCE
ACCEPTABLE USE POLICY

WHEN TO ASK FOR HELP

We recognize that it is not possible to anticipate every situation in which you may be required to exercise judgment regarding ethical conduct or compliance with laws, regulations, or company policies. When faced with uncertainty, you should pause and consider whether your actions align with SiriusPoint's values and commitment to integrity.

The following questions may help guide your decision making:

- Is the proposed action ethical, lawful, and consistent with SiriusPoint's policies and values?
- If the action were disclosed publicly, including through the media, would it negatively impact SiriusPoint's reputation, your colleagues, or your own professional standing?
- How would you feel if your manager, colleagues, or family were aware of the action?
- Would you be comfortable explaining or justifying the action to senior leadership or a regulator?

If you are ever unsure, you are encouraged to ask questions and seek guidance. At SiriusPoint, speaking up is an important part of our culture, and raising concerns in good faith is always the right course of action. There are no negative consequences for asking questions or seeking clarification – only for failing to do so.

WHERE TO GET HELP

If you need guidance or wish to raise a concern, you may contact your Manager, Business Unit or Function Lead, Local Legal or Compliance representative or any of the following resources:

Human Resources

HRGuidance@siriuspt.com

Compliance Department

group.compliance@siriuspt.com

Legal Department

legaldepartment@siriuspt.com

EthicsPoint Hotline

<https://secure.ethicspoint.com/domain/media/en/gui/48395/index.html>

Via Telephone from Bermuda	1 (866) 719-2080
Via Telephone from Belgium	0800 13 778
Via Telephone from Canada	855-866-3866
Via Telephone from Sweden	010-337 31 90
Via Telephone from Switzerland	0800 070 077
Via Telephone from the UK	0808 196 8055
Via Telephone from the United States of America	1-855-866-3866

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