



RELATED PERSON TRANSACTION POLICY

August 4, 2021

RELATED PERSON TRANSACTION POLICY

1. Purpose and Objective

SiriusPoint Ltd. (the “**Company**”) recognizes that a Related Person Transaction (as defined below) may raise a potential or actual conflict of interest between the Related Person (as defined below) and the interests of the Group. The Company’s Code of Business Conduct and Ethics, which applies to all directors, officers and employees when engaged in the business of the Company and its controlled affiliates (collectively, the “**Group**”), provides that all conflicts of interest should be avoided. It is the Group’s policy to review any Related Person Transaction.

2. Scope and Policy Statement

For the purposes of the Related Person Transaction Policy (the “**Policy**”), a “**Related Person Transaction**” is any transaction, arrangement or relationship (or any series of similar transactions, arrangements or relationships) in which the Group was, is or will be a participant and any Related Person had, has or will have a direct or indirect¹ material interest. This also includes any material amendment or modification to an existing Related Person Transaction.

For purposes of this Policy, a “**Related Person**” means:

1. any person who is, or was (at any time since the beginning of the Group’s last fiscal year for which the Group has filed an annual report on Form 10-K or a proxy statement, even if such person does not presently serve in that role), an executive officer, director or nominee for director of the Company;
2. any person who is known to be or may be deemed to be the beneficial owner of more than 5% of the Group’s voting securities;
3. any immediate family member of any of the foregoing persons; and
4. any firm, corporation or other entity in which any of the foregoing persons is a general partner or, for other ownership interests, a limited partner or other owner in which such person has a beneficial ownership interest of 10% or more.

¹ Indirect interest will depend on the particular facts and circumstances, including an analysis of whether a reasonable investor would consider the person’s interest in the transaction important, together with all other available information, in deciding whether to buy, sell or hold the Company’s securities. In administering this policy, the Committee may rely upon such determination of materiality made by the Company’s Group General Counsel in consultation with the Chief Financial Officer.

² For purposes of this Policy, an “immediate family member” shall include any child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law of the director, executive officer, nominee or

RELATED PERSON TRANSACTION POLICY

more than 5% beneficial owner, and any person (other than a tenant or employee) sharing the household of such director, executive officer, nominee or more than 5% beneficial owner.

A list of current Related Persons of the Group is maintained by the legal department.

Nepotism Policy

No immediate family member of a director or executive officer shall be hired as an employee of the Group unless the employment arrangement is approved by the Audit Committee of the Board of Directors of the Company ("Committee"). In the event a person becomes a director or executive officer of the Group and an immediate family member of such person is already an employee of the Group, no material change in the terms of employment, including compensation, may be made without the prior approval of the Committee (except, if the immediate family member is himself or herself an executive officer or an officer of the Group who reports directly to the Chief Executive Officer of the Group, any proposed change in the terms of employment shall be reviewed and approved in the same manner as other executive officer compensatory arrangements by the Compensation Committee).

Disclosure

All Related Person Transactions that are required to be disclosed in the Group's filings with the SEC, pursuant to the Securities Act of 1933 and the Securities Exchange Act of 1934 and related rules and regulations, shall be so disclosed in accordance with such laws, rules and regulations.

The material features of this Policy shall be disclosed in the Group's annual report on Form 10-K or in the Group's proxy statement, as required by applicable laws, rules and regulations.

3. Roles and Responsibilities

The Board of Directors of SiriusPoint Ltd. (the "Board"), acting through the Committee or as otherwise described herein, shall review the Related Person Transaction in question to determine whether the Related Person Transaction is in, or is not inconsistent with, the best interests of the Group, including but not limited to situations where the Group may obtain products or services of a nature, quantity or quality, or on other terms, that are not readily available from alternative sources or when the Group provides products or services to Related Persons (as defined below) on an arm's length basis on terms comparable to those provided to unrelated third parties or on terms comparable to those provided to associates generally. If, after any such review,

RELATED PERSON TRANSACTION POLICY

a Related Person Transaction is determined to be in, or not inconsistent with, the best interests of the Group, then the Related Person Transaction may be approved or, to the extent necessary, ratified as set forth in the procedures below.

4. Procedures

Approval Procedures

Related Person Transactions may only be entered into, completed or amended if prior approval of the Committee is received in accordance with the following steps:

Prior to entering into the Related Person Transaction (a) the Related Person, (b) the director, executive officer, nominee or beneficial owner who is an immediate family member of the Related Person, or (c) the business unit or function/department leader responsible for the potential Related Person Transaction shall notify the General Counsel in writing of the facts and circumstances of the proposed Related Person Transaction, including: (i) the Related Person's relationship to the Group and interest in the transaction; (ii) the material facts of the proposed Related Person Transaction, including whether the Related Person has a material interest in the proposed transaction; (iii) the benefits to the Group of the proposed transaction; (iv) if applicable, the availability of other sources of comparable products or services; and (v) an assessment of whether the proposed transaction is on terms that are comparable to the terms available to an unrelated third party or to associates generally. The General Counsel or her delegate will undertake an evaluation of whether the proposed transaction would constitute a Related Person Transaction that requires approval of the Committee in accordance with this Policy. In conducting this evaluation, the General Counsel may consult other members of management and/or outside counsel as necessary or appropriate.

If the evaluation determines that the proposed transaction would constitute a Related Person Transaction, the General Counsel will report the proposed Related Person Transaction, together with a summary of the material facts, to the Committee for consideration at the next regularly scheduled Committee meeting or, in those instances in which the General Counsel, in consultation with the Chief Financial Officer of the Group, determines that it is not practicable or desirable for the Group to wait until the next regularly scheduled Committee meeting, to the Chair of the Committee (who shall possess delegated authority to act between Committee meetings).

RELATED PERSON TRANSACTION POLICY

The Committee, or where submitted to the Chair, the Chair, shall consider all of the relevant facts and circumstances of all Related Person Transactions that require the Committee's approval and either approve or disapprove of the entry into the Related Person Transaction, subject to the exceptions described below. In determining whether to approve or ratify a Related Person Transaction, the Committee shall take into account, among other factors it deems appropriate, (i) whether the proposed transaction was undertaken in the ordinary course of business of the Group, (ii) whether the Related Person Transaction was initiated by the Company, a subsidiary or a Related Person, (iii) whether the transaction with the Related Person is proposed to be, or was, entered into on terms no less favorable to the Group than terms that could have been reached with an unrelated party, (iv) the purpose of, and the potential benefits to the Company, of the Related Person Transaction, (v) the approximate dollar value of the amount involved in the Related Person Transaction, particularly as it relates to the Related Person, (vi) the Related Person's interest in the proposed transaction and (vii) any other information regarding the Related Person Transaction that would be material to investors in light of the circumstances of the particular proposed transaction. The Committee may approve the Related Person Transaction only if the Committee determines in good faith that the transaction is not inconsistent with the interests of the Group and its shareholders. The Committee, in its sole discretion, may impose such conditions as it deems appropriate on the Group or the Related Person in connection with its approval.

The Committee, as applicable, shall convey the decision to the General Counsel, who shall convey the decision to the appropriate persons within the Group.

No member of the Committee shall participate in any review or approval of any proposed Related Person Transaction with respect to which such member or any of his or her immediate family members or related entities is the Related Person. However, such director shall provide all material information concerning the proposed transaction to the Committee and may be counted in determining the presence of quorum at a meeting of the Committee that considers such proposed Related Person Transaction.

The Chair of the Committee shall report to the Committee at the next Committee meeting any approval under this Policy pursuant to the delegated authority.

RELATED PERSON TRANSACTION POLICY

5. Ratification Procedures

Ratification Procedures

In the event the Chief Executive Officer of the Group, Chief Financial Officer of the Group or the General Counsel becomes aware, as a result of the accounts payable/accounts receivable reports described above or otherwise, of a Related Person Transaction that has not been previously approved under this Policy the proposed transaction shall be reviewed in accordance with the procedures set forth herein, and if the Committee determines it to be appropriate, ratified at the Committee's next regularly scheduled meeting.

In the event that the Committee determines not to ratify the Related Person Transaction that has been commenced without approval, the Committee may direct additional actions including, but not limited to, immediate discontinuation, rescission or modification of the Related Person Transaction to make it acceptable for ratification.

In addition, the Committee may request that the General Counsel evaluate the Group's controls and procedures to ascertain the reason the transaction was not submitted to the Committee or Chair for prior approval and whether any changes to these procedures are recommended.

Review of Ongoing Transactions

6. At least once each fiscal year, the Committee shall review any previously approved or ratified Related Person Transactions that remain ongoing and have a remaining term of more than six months to ensure that the ongoing Related Person Transactions are in compliance with the guidelines above and that the Related Person Transaction remains appropriate. **Standing Pre-Approval for Certain Interested Transactions**

The Committee has reviewed the types of Related Person Transactions described below and determined that each of the following types of Related Person Transactions shall be deemed to be pre-approved or ratified, as applicable, by the Committee, unless specifically determined otherwise by the Committee. In connection with each regularly scheduled meeting of the Committee, a summary of each new Related Person Transaction deemed pre-approved pursuant to this section shall be provided to the Committee for its review.

RELATED PERSON TRANSACTION POLICY

6.1 *Employment of executive officers.* Any employment by the Company of an executive officer of the Group if:

(a) the related compensation and benefits are reported in the Company's proxy statement under Item 402 of Regulation S-K (generally applicable to "named executive officers"); or

(b) the executive officer is not an Immediate Family Member of another executive officer or director of the Company, the related compensation and benefits would be reported in the Company's proxy statement under Item 402 of Regulation S-K if the executive officer was a "named executive officer," and the Company's Compensation Committee approved (or recommended that the Board approve) such compensation.

6.2 *Director compensation.* Any compensation paid to a member of the Board of Directors of the Company, in its capacity as such, if the compensation is reported in the Company's proxy statement under Item 402 of Regulation S-K.

6.3 *Certain transactions with other companies.* Any transaction with another company at which a Related Person's only relationship is as (i) an employee (other than an executive officer) or director, (ii) a beneficial owner of less than 10%, together with his or her Immediate Family Members, of that company's outstanding equity, or (iii) in the case of partnerships, a limited partner, if the limited partner, together with his or her Immediate Family Members, has an interest of less than 10% and the limited partner does not hold another position in the partnership, if the aggregate amount involved does not exceed two percent of the other company's consolidated gross revenues.

6.4 *Certain charitable contributions.* Any charitable contribution, grant or endowment by the Group to a charitable organization, foundation or university at which a Related Person's only relationship is as an employee (other than an executive officer), if the aggregate amount involved does not exceed two percent of the charitable organization's total revenues.

6.5 *Transactions where all shareholders receive proportional benefits.* Any transaction where the Related Person's interest arises solely from the ownership of a class of equity securities of the Company and all holders of that class of equity securities received the same benefit on a pro rata basis.

6.6 *Indemnification.* Indemnification and advancement of expenses made pursuant to the Company's Certificate of Incorporation or bye-laws or pursuant to any agreement.

RELATED PERSON TRANSACTION POLICY

7. Related Information

Code of Business Conduct and Ethics
Employee Handbook

8. Policy Approval

This Policy has been approved by the Board.

This Policy is effective as of August 5, 2021, and supersedes any previous versions thereof.