



# VENDOR CODE OF CONDUCT





# INTRODUCTION



SiriusPoint Ltd. and its subsidiaries (collectively, “we”, “us”, the “Company” or “SiriusPoint”) strive to conduct business in an economically, socially and environmentally responsible manner and in accordance with the highest standards of business ethics and workplace behavior. We are committed to complying with applicable laws and regulations and expect those with whom we do business to do the same. We also expect our commercial partners to adhere to similar values and principles, which are described in more detail in this Vendor Code of Conduct (the “Vendor Code”). We expect our Vendors to manage their workforce and professional environments to achieve the results listed in the Vendor Code.

This Vendor Code applies to all vendors and suppliers (collectively, “Vendors” or “you”) and sets the expectations for all Vendors providing services to SiriusPoint. A copy of this Vendor Code shall be available on the Company’s website at [www.siriuspt.com](http://www.siriuspt.com).



# SIRIUSPOINT'S EXPECTATIONS OF VENDORS

## Business Integrity, Ethical Interactions & Compliance with Laws

### Competition, Fair Dealing and Conflicts of Interest

We act with integrity and conduct our business in an ethical manner.

We expect our Vendors to:

- compete fairly in the marketplace
- comply with all applicable laws regarding fair trade, including free competition, antitrust and competition laws and regulations
- disclose to SiriusPoint all real and potential conflicts of interest
- calculate, quote and submit pricing, proposals and terms to the Company without collusion, consultation, communication or agreement with any other competing third party

### Data Privacy

We respect the personal information of our partners, employees and clients.

We expect our Vendors to comply with all applicable privacy, data protection and information security laws and regulations, including laws and regulations regarding the cross-border transfer of personal information.

### Confidential Information and Intellectual property

We safeguard our confidential information as well as confidential information that is entrusted to us by others.

We expect our Vendors to:

- not disclose proprietary and sensitive information of the Company, including non-public personal information, received from, processed on behalf of, or disclosed by, the Company without written authorization from the Company
- not use the Company name, logo, assets (including, without limitation, its intellectual property), facilities or services for marketing, advertising or other purposes without prior written authorization from the Company
- keep their relationship with the Company confidential, in each case without prior written authorization from the Company





# SIRIUSPOINT'S EXPECTATIONS OF VENDORS

## CONTINUED

### Bribery and Corruption

SiriusPoint rejects the use of all forms of bribery and other corrupt practices in conducting its business, regardless of local customs.

We expect our Vendors to:

- comply with all applicable anti-corruption and anti-bribery laws, including the United States Foreign Corrupt Practices Act, the Bermuda Bribery Act, the United Kingdom Bribery Act 2010, and all other applicable laws that prohibit corruption, extortion, kickbacks, or bribery
- maintain books and records that accurately reflect the true nature of the Vendor's dealings with the Company

### Insider Trading

We respect every company's right to protect its material, nonpublic ("inside") information, and comply with insider trading laws. When doing business with us, you may come into possession of confidential information about SiriusPoint or clients or other business partners.

We expect our Vendors to:

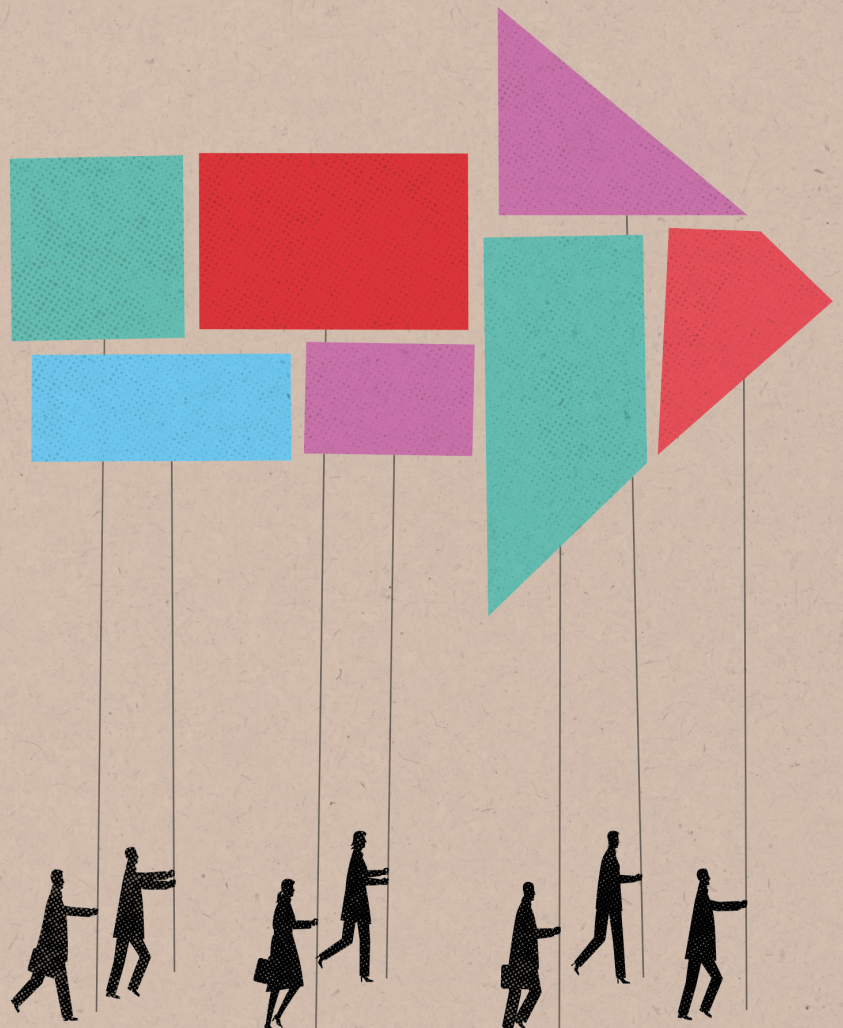
- comply with all insider trading laws regarding Company securities
- never transact in securities of other companies, or advise others to do so, while in possession of material non-public information gained in connection with any engagement with the Company

### Financial Crime

We are committed to conducting business in a way that prevents financial crime and to complying with applicable anti-money laundering, sanctions, export control, anti-boycott and anti-terrorism laws.

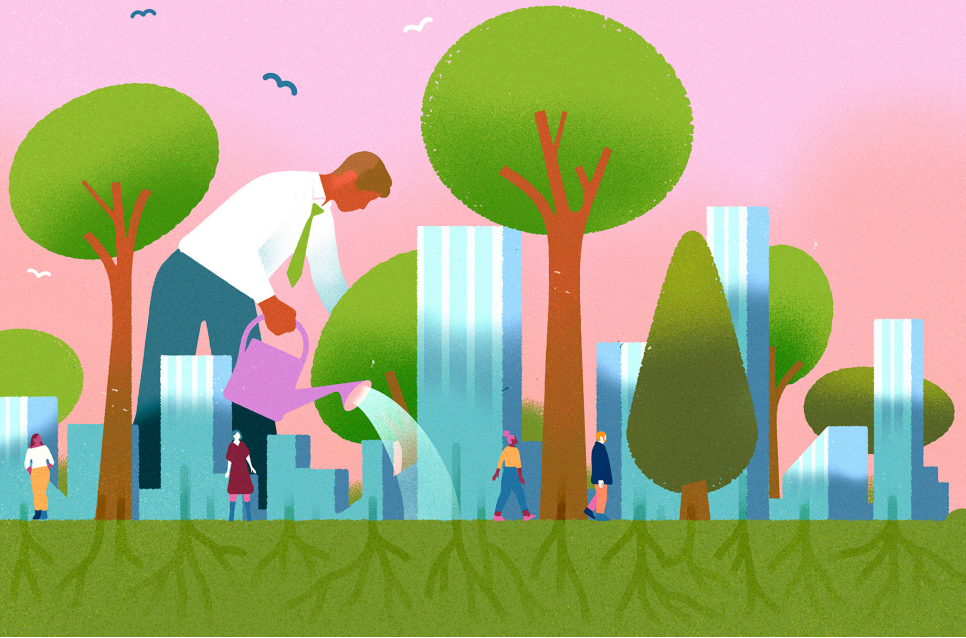
Vendors shall:

- comply with all applicable laws and regulations pertaining to detection, prevention, and reporting of potential money laundering and terrorist financing activities
- comply with all applicable economic sanctions laws and regulations
- comply with all applicable export control, re-export and import restrictions
- comply with all applicable anti-boycott or restrictive trade practices





# COMMITMENT TO ESG



## Diversity & Inclusion, Non-Discrimination and Human Rights

The SiriusPoint workplace is free from intimidation, harassment, bullying, and abusive conduct. We expect our colleagues to 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.

We expect our Vendors to:

- comply with all applicable laws prohibiting discrimination, harassment and retaliation
- provide a work environment that is free from harassment and discrimination
- respect all applicable human rights laws
- take steps to ensure their sub-contractors abide by the same

## Health and Safety at Work

We actively promote a safe and healthy workplace and have reporting mechanisms to escalate situations that may pose a health, safety, or security risk.

We expect our Vendors to:

- comply with all applicable laws respecting fair and ethical employment practices, including those relating to child and forced labor, immigration, wages, days of service, rest periods, hours, overtime, benefits, leaves and occupational health and safety
- refrain from employing workers by means of force, threats of force or physical restraint, or by means of actual or threatened abuse of law or legal process, or by any other means of scheme, plan or pattern intended to cause the person to believe that if that person did not perform such labor or service that person or another person would suffer serious harm or physical restraint
- provide a workplace free from inhumane treatment

## Environmental Protection and Sustainability

SiriusPoint's commitment to the environment and sustainability are central to our mission and values as a global provider of risk protection to communities, businesses and governments.

We expect our Vendors to:

- comply with all applicable environmental laws
- actively work to reduce the consumption of energy (electricity, heating), water, and fuel, and reduce any associated emissions



# REPORTING VIOLATIONS

Vendors may raise concerns or report instances of potential non-compliance with this Vendor Code by contacting the SiriusPoint Group Chief Compliance Officer directly at [group.compliance@siriuspt.com](mailto:group.compliance@siriuspt.com).

Suppliers will cooperate with any information requests or audits we may initiate to confirm their fulfillment of these responsibilities. Though we seek to work with suppliers to improve conditions, we may terminate or decline to renew our relationship with any supplier that fails to meet these responsibilities.

Vendors may also contact Group Compliance online at [www.siriuspoint.ethicspoint.com](http://www.siriuspoint.ethicspoint.com) or via SiriusPoint’s toll free reporting system by calling:

Via Telephone from the U.S.	1-855-866-3866
Via Telephone from Belgium	0-800-100-10
Via Telephone from Bermuda	971-371-7843
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

Communications using [www.siriuspoint.ethicspoint.com](http://www.siriuspoint.ethicspoint.com) or the SiriusPoint’s toll free reporting system may be left anonymously.

## Questions

For any questions regarding the Vendor Code of Conduct, please contact the Company’s Group Chief Compliance Officer at [group.compliance@siriuspt.com](mailto:group.compliance@siriuspt.com).

## Related documents

[Link](#) to the SiriusPoint ESG website.

[Link](#) to the SiriusPoint Code of Conduct.

