



# WHISTLEBLOWER POLICY

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## 1. Purpose and Objective

The purpose of the SiriusPoint Ltd. (the “Group”) **Whistleblower Policy** (the “Policy”) is to establish procedures for the submission of complaints or concerns regarding financial statement disclosures, accounting, internal accounting controls, auditing matters or violations of the Group’s Code of Business Conduct and Ethics (the “Code”).

This Policy is intended to comply with the requirements of Section 301 of the Sarbanes-Oxley Act, Section 922 of the Dodd-Frank Act of 2010 and the New York Stock Exchange’s listing standards.

## 2. Scope

Appropriate subjects to report under this Policy include but are not limited to financial improprieties, accounting or audit matters, ethical violations, or other similar illegal or improper practices by any employee, agent or representative of the Company, such as:

- (a) Fraud.
- (b) Theft.
- (c) Embezzlement.
- (d) Bribery or kickbacks.
- (e) Misuse of the Company's assets.
- (f) Undisclosed conflicts of interest.
- (g) Harassment, discrimination or retaliation.

## 3. Roles and Responsibilities

It is the Policy of the Group to encourage employees and other interested parties, when they, in good faith, reasonably believe that any questionable conduct regarding any of the above categories has occurred, is occurring or is about to occur, to report those concerns immediately. Such reports may be made anonymously and the identity of the reporter will be treated as confidential where possible and/or legally required.

The Group strictly prohibits retaliation of any kind by any Group officer, director, associate or agent against any employee, associate or other interested party who in good faith reports or participates in an investigation of reported complaints of questionable or illicit conduct.

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## 4. Procedures

In accordance with the Code, if you have concerns about Group account practices, internal controls or auditing matters, it is your responsibility to report the concern.

### Reporting Procedures

The Audit Committee of SiriusPoint Ltd. has adopted the following procedures:

- Any employee of the Group or third-party may submit, on a confidential and anonymous basis if such person so desires, any concerns regarding financial statement disclosures, accounting, internal accounting controls, auditing matters, legal issues or violations of the Code.
- Complaints described in item two (2) above can be submitted as follows:

<b>In Writing</b> (openly or anonymously)	
Internally	Externally
By delivery to the General Counsel of the Group, the Group Chief Compliance Officer, or Chairman of the Audit Committee in an envelope labelled with a legend such as: "Attention Audit Committee. Submitted pursuant to the Group's Whistleblower Policy."	Through our third-party hotline service provider. Please refer to our website or the home page of our Intranet for contact details and further information.
The reporting individual should provide names, dates, places and other details sufficient to facilitate an effective investigation of the matter reported. If the reporting individual would like to discuss any matter with the Audit Committee, he or she should so indicate in the submission and include a telephone number at which he or she can be reached, should the Audit Committee deem such communication is appropriate.	
<b>Via Email</b>	
To the Group Compliance Mailbox: <a href="mailto:group.compliance@siriuspt.com">group.compliance@siriuspt.com</a>	
<b>Telephonically</b> (openly or anonymously)	
<b>Via Hotline</b>	
To the Navex EthicsPoint 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>	

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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

## ***Collection and Screening of Communications***

3. The General Counsel will collect and review all communications addressed to the Audit Committee (or any of its members) and related matters covered by the Code, legal issues, accounting or audit matters and will act as the agent of the Audit Committee for that purpose. Any communications that are not within this scope will be excluded from further review and processing under this Policy and will instead be processed under the Board of Directors Communication Policy.
4. The General Counsel and Group Chief Compliance Officer (the "Group CCO") will conduct a preliminary review of any submissions to the EthicsPoint hotline, the Chief Audit Officer will coordinate the investigation into any matters involving either the General Counsel or Group CCO.

## ***Investigations***

5. Upon receiving a complaint under this Policy, the General Counsel will notify the Chairman of the Audit Committee that a complaint has been received. No person who is the subject of a complaint will receive such a notification.
6. The General Counsel, in conjunction with the Group CCO, to the extent the General Counsel deems necessary or appropriate, will undertake a preliminary investigation on behalf of the Audit Committee to determine if the information can be substantiated. Upon receiving the results of the preliminary investigation, the Chairman of the Audit Committee will determine if any further action is required to follow up on the complaint.
7. The Chairman of the Audit Committee has the power to take any appropriate action including, among other things to: (1) refer the matter to the full Audit Committee; (2) refer the matter to the full Board of Directors; (3) further investigate the matter; (4) direct that a further

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internal investigation be conducted; or (5) retain outside counsel, accountants or other third-party advisors to investigate.

8. The Group CCO will maintain a log of all complaints received, tracking their receipt, investigation, and resolution. The Group CCO will share the log with the General Counsel. A periodic summary report will be provided by the General Counsel to the Audit Committee for all complaints received.
9. All information disclosed during the course of any investigation will remain confidential, except as necessary to conduct, conclude, and, if appropriate, prosecute the investigation. In the case of any anonymous complaint, a person who reports a suspected violation may not be informed of the results of an investigation.
10. All employees (including members of management) have a duty to promptly cooperate and provide accurate information in connection with any investigation of reports of questionable conduct, or of discrimination, retaliation or harassment resulting from the reporting or investigation of such matters.
11. Prompt and appropriate corrective action will be taken when and as warranted. The specific action taken in any particular case depends on the nature and gravity of the conduct or circumstances reported, and the facts proven by investigation. The persons responsible for any misconduct, or those failing to cooperate or who provide false information during an investigation, will be subject to disciplinary action, up to and including termination.

## ***Modification***

12. The Audit Committee or the Board of Directors can modify this Policy at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with applicable legal requirements or to accommodate Company organizational changes.

## **6. Related Information**

Code of Business Conduct and Ethics

Board of Directors Communication Policy