

## MODERN SLAVERY STATEMENT

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and applies to SiriusPoint International Insurance Corporation ("SiriusPoint International"). The company operates in the UK through a licensed local branch office.

Modern Slavery encompasses slavery, servitude, human trafficking and forced labour. SINT has a zero tolerance approach to any form of Modern Slavery. We are committed to acting ethically and with integrity and transparency in all business relations and putting effective systems and controls in place to safeguard against any form of Modern Slavery taking place within our business or supply chain.

#### **About SiriusPoint International**

We are an insurance undertaking which obtained regulatory approval by the Swedish Financial Supervisory Authority, Finansinspektionen, on 2<sup>nd</sup> March 1995 and are a 100% owned subsidiary of SiriusPoint Ltd.

### **Our Supply Chains**

As an insurance undertaking, SINT has a very limited supply chain. We partner with select service providers and third party suppliers as part of our business model, such as IT services, Audit services and Exposure Management. Our business consists of underwriting Insurance and Reinsurance and associated policy management and claims activities. We do not act as a producer or retailer of physical goods and have no supply chains relating to such activities. Enhancements we are making to our due diligence procedures and our outsourcing and supplier frameworks are specifically designed to ensure that our suppliers, agents and partners are both compliant with the Modern Slavery Act and more broadly committed to human rights and ethical corporate practices.

#### **Our Policies**

Being part of the SiriusPoint Ltd Group ("the Group"), we recognise our obligations to all those with whom we have dealings — shareholders, employees, customers, clients, regulatory authorities, suppliers, competitors and the wider community. The Group demands and maintains the highest ethical standards in carrying out our business activities. Our reputation and the trust and confidence of those with whom we deal are of fundamental importance to the Group. Our values determine our behaviour and we must support and uphold them so that they are an integral part of day to day life. Our Code of Business Conduct aims to guide our actions and those of people with whom we work closely, encouraging a way of working which is honest, responsible and respectful, generating trust. We ensure that the standards in this code are communicated to and understood by our staff.

As a strictly regulated company, we operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include for example:



### Code of Business Conduct

This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act. Our aim is to develop a culture of openness and for our business to be conducted with the highest standards of integrity and honesty. Any form of malpractice or wrongdoing is taken very seriously. The code also includes our standards for management of conflicts of interest that may arise.

# Whistleblowing policy

The policy enables all SINT employees and others to air genuine concerns they may have about suspected malpractice or wrongdoing within SINT (whistleblowing).

## Remuneration Policy

This policy ensures that we pay employees a salary in line with the local market conditions and requirements set out by the financial supervisory authorities.

### **Conduct Risk Policy**

This policy ensures that we pay due regard to the interests of our customers and treat them fairly.

### **Risk and Capital Tolerance Statement**

This policy sets the overall approach towards risk taking and provides the basis for risk guidelines and risk limits governing the day-to-day business operations. This statement sets a standard with low appetite for breach of regulations.

## Fit and proper policy

This policy sets the basic principles for the standards and background controls for determining the fitness and propriety of persons who hold or are being considered for appointment to a Key person position.

### **Privacy Policy**

This policy defines standards, roles and responsibilities regarding the Processing of Personal Data carried out by SINT in order to protects the rights of Data Subjects (such as employees, customers and claimants).

## Outsourcing policy

The purpose of this policy is to ensure that the development and implementation of any outsourcing, including intra-group outsourcing as well as outsourcing to cloud service providers, is carried out in a prudent and transparent way and that the risks and challenges that arise from the outsourcing arrangement are considered to maintain the interests and sound internal control of SINT.

# **Training**

SiriusPoint International will communicate this statement to our UK employees and include it as part of the induction materials to all new members of UK staff, in order to promote awareness of Modern Slavery.

This statement has been approved by the SiriusPoint International Board.

## **Rob Gibbs**

#### **Chief Executive Officer**