

WHISTLEBLOWING POLICY

Argo Group International Holdings, Ltd.

Effective December 14, 2022

General Policy

It is Argo Group International Holdings, Ltd.'s (the "Company" or "Argo Group") policy to adhere to all applicable Whistleblower regulations, in jurisdictions in which the Company and its subsidiaries operate and ensure that all employees are aware of the opportunity to report any illegal or unethical act on a confidential, anonymous basis.

Such reports may also address any concerns regarding financial statement or other disclosures, accounting, internal accounting or disclosure controls, auditing matters or violations of Argo Group's Code of Conduct & Business Ethics by their colleagues, management, customers and others.

In applying this Policy, Argo Group will ensure that all employees understand the types of suspected or actual financial, legal, or ethical impropriety which should be disclosed and will also have in place an appropriate procedure to manage whistleblowing and investigate and report acts of suspected or actual financial, legal, or ethical impropriety. On an annual basis a review of whistleblowing procedures will occur taking account of reasonable best practice and industry guidance and monitor the outcome of any whistleblowing reports. Argo Group will provide an ethics helpline to enable employees to report any activity or business practice that they suspect or consider to be unethical or illegal.

It is the policy of Argo Group not to retaliate against its employees for reports made in good faith of suspected or actual financial, legal, or ethical impropriety. Employees are expected to cooperate in internal investigations of suspected or actual financial, legal, or ethical impropriety.

Purpose

The purpose of this Policy is to ensure Argo Group complies with all whistleblowing legislation and regulations in the jurisdictions in which it operates as well as ensuring effective systems and controls are in place.

Background

The act of “Whistleblowing” is defined as ‘raising concerns about misconduct within an organization or within an independent structure associated with it’.

A “Whistle-blower” is a person who informs on a person or organization regarded as engaging in an unlawful or immoral activity.

A “Whistleblowing Report” is a report made by a whistle-blower within the organization concerned or to an outside authority who informs on a person or organization regarded as engaging in an unlawful, unethical or immoral activity.

Legal and Financial Impropriety

Examples of the types of activities which could potentially amount to “suspected or actual financial, legal, or ethical impropriety” (non-exhaustive list):

- Any criminal offence (theft, fraud, computer misuse, and insider training);
- Financial irregularity, to include false or inaccurate accounting;
- Corruption, bribery, or blackmail;
- Failure to comply with legal, regulatory or statutory obligations;
- Money laundering or breaches of financial sanctions;
- Conflicts of interest
- Violation of any Company policy or procedure
- Miscarriage of justice;
- Endangering the health and safety of any individual;
- Endangering the environment; or
- Deliberate concealment of any of the above

It is important to note that no disciplinary action will be taken against you on the grounds of a disclosure made in accordance with this Whistleblowing Policy and the Company will not subject you to any retaliation because of a disclosure that is made by you pursuant to this Whistleblowing Policy.

Reporting

Argo Group will provide adequate mechanisms for employees to make a Whistleblowing Report through different means ensuring there are no barriers to reporting. A Whistleblowing Report can be made verbally or in writing. It can be made anonymously although the claim might not be able to be taken further if all the information needed is not provided. When a report is received an investigation will be undertaken. The investigation will be conducted under the direction of the Legal and Compliance Department.

Audit Committee Chair

The Chair of Argo Group Audit Committee will receive any reports directly from the Company's ethics helpline or the Company's General Counsel. The General Counsel will report to the Audit Committee Chair and the Audit Committee on at least a quarterly basis.

Guidance & Training

Argo Group will provide appropriate guidance and training to all employees regarding whistleblowing law and regulation and this Whistleblowing Policy.

Application

This Policy applies to Argo Group including its employees (whether full-time, fixed-term, permanent or trainees), directors and officers. It also applies to agents, vendors, consultants and contractors who are all expected to comply with this Policy in their business activities with or on behalf of Argo Group.

Policy Review

The Executive Committee shall review this Policy at least annually.

Questions about this Policy should be directed to the Argo Group General Counsel.

