

ANTI-MONEY LAUNDERING POLICY

Argo Group International Holdings, Ltd.

Effective December 14, 2022

General Policy

Argo Group International Holdings, Ltd. (the “Company” or “Argo Group”) is committed to the highest standards of anti-money laundering (“AML”) compliance and requires its employees, agents, service providers and subsidiaries to adhere to these standards to prevent the use of Argo Group products and services for money laundering activities, terrorism financing activities and any other activity that facilitates money laundering or the funding of terrorist or criminal activities.

All Argo Group employees are under an obligation to have an understanding of money laundering and the different offenses that would amount to money laundering. There are certain offenses that relate directly to all members of Argo Group staff and failure to comply could lead to criminal prosecution resulting in a fine and/or imprisonment. The main offenses which staff should be aware of are failure to report a suspicion of money laundering and tipping off a client that is suspected of money laundering.

Purpose

The purpose of this Policy is to ensure Argo Group complies with all money laundering legislation and regulation applicable in the jurisdictions in which it operates as well as ensuring effective systems and controls are in place for mitigating any money laundering risk.

Background

Money Laundering is the participation in any transaction that seeks to conceal or disguise the nature or origin of funds derived from illegal activities such as, for example, fraud, corruption, organized crime, or terrorism etc.

Generally, the money laundering process consists of three “stages”:

- **Placement**

The introduction of illegally obtained monies or other valuables into financial or non-financial institutions.

- **Layering**

Separating the proceeds of criminal activity from their source through the use of layers of complex financial transactions. These layers are designed to hamper the audit trail, disguise the origin of funds and provide anonymity.

- **Integration**

Placing the laundered proceeds back into the economy in such a way that they re-enter the financial system as apparently legitimate funds.

These “stages” are not static and overlap broadly. Firms may be misused at any point in the money laundering process.

Money Laundering Offenses

- **Concealing**

A person commits an offense if he/she/they conceal, disguise, convert, or transfer criminal property, or removes criminal property from its place of origin. Concealing or disguising criminal property includes concealing or disguising its nature, location, disposition, movement, ownership or any rights connected with it.

- **Arrangements**

A person commits an offense if he/she/they enters into, or becomes concerned in an arrangement which he/she/they know or suspect facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person.

- **Acquisition, Use or Possession**

A person commits an offense if he/she/they acquire, use or have possession of criminal property.

- **Failure to Disclose**

Failure to make a report to the Money Laundering Reporting Officer (“MLRO”) if you know or suspect, or have reasonable grounds for knowing or suspecting, that another person is engaged in money laundering is a criminal offense. The MLRO commits a separate offense if, as a result of an internal disclosure made to them, they know or suspect, or have reasonable grounds for knowing or suspecting, that another person is engaged in money laundering and they fail to disclose this to the relevant government body or agency as soon as is practicable.

- **Tipping Off (Disclosing a Suspicious Activity Report (“SAR”))**

It is an offense to disclose to a third person that a SAR has been made by any person if that disclosure might prejudice any investigation that might be carried out as a result of the SAR.

- **Tipping Off (Disclosing an Investigation)**

It is an offense to disclose that an investigation into a money laundering offense is being contemplated or carried out if that disclosure is likely to prejudice that investigation.

AML Principles

Argo Group will comply with the following basic principles in respect of AML:

- **Suspicious Transaction Reporting**

If you know or suspect or have reasonable grounds to know or suspect that a client is engaging in money laundering a report must be made to the Legal & Compliance Department as soon as is reasonably possible. A Suspicious Transaction Report (“STR”) will be used to report and evidence the matter. The matter as well as the associated documentation will be deemed confidential at all times. Once an STR has been filed with the Legal & Compliance Department an investigation will be undertaken into the matter. Should the STR be substantiated and the

Legal & Compliance Department deem it appropriate the relevant authorities will be notified of the matter.

Do not make the person that you have reported aware of your suspicion. Doing so is a criminal offense. If you expect the person to speak to you again, after you have reported your suspicion to the Legal & Compliance Department, check with the Legal & Compliance Department on how to handle that conversation. It is important that you do not inadvertently tip the person off that you have made the report. Even where you decline to enter into a business relationship with a person because you have doubts about their bona fides, you should still provide an audit trail. Where practicable, get and retain copies of the relevant identification documents. In addition, report your suspicion to the Legal & Compliance Department and make sure you do not let the person know that you did. If there is the suspicion of money laundering but this suspicion is confirmed to be unfounded you may still enter into the proposed business arrangement. If this is done it should be carried out with the necessary due, care and skill with the clearance having been received from Executive Management.

- **Due Diligence**

Where it is reasonably possible customer identity will be ascertained when entering into a lasting business relationship or when performing a single transaction or deal. When entering into a lasting business relationship Argo Group will obtain information on kind and purpose thereof, if this is not clear from the business relationship itself. The record will be maintained with the client file. Whenever Argo Group is required to identify a Customer, where it is reasonably possible it will establish and verify the identity of the beneficial owner.

- **Staff Reliability**

Through the utilization of Human Resources policies, processes and protocols Argo Group will endeavor to employ staff that are deemed reliable.

- **Systems and Controls**

Argo Group will utilize adequate customer and business-related systems and controls to

mitigate the risk of money laundering activities, terrorism financing activities and any other activity that facilitates money laundering or the funding of terrorist or criminal activities.

- **Financial Crime Risk Assessment**

To ensure that the Company has in place anti-money laundering controls that are adequate, the Company has established a Financial Crime Risk Assessment process to identify and manage the financial crime risk arising from its business transactions. Annually, the Compliance Function will conduct a Financial Crime Risk Assessment and communicate the results accordingly.

The purpose of an annual Financial Crime Risk Assessment is to evaluate each business unit's exposure to financial crime risks and determine if adequate systems and controls have been established and are being utilized by the Company to mitigate potential sanctions exposure.

- **Communication**

All Argo Group employees (whether full-time, fixed-term, permanent or trainees), are provided with access to a copy of the Anti-Money Laundering Policy. A copy of the Anti-Money Laundering Policy is kept on Argonet.

Guidance & Training

Argo Group will provide appropriate guidance and training to all employees regarding money laundering law and this Anti-Money Laundering 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.