

Whistleblowing Policy

Argo Group International Holdings, Inc.

July 1, 2025

Scope

This Whistleblowing Policy (this “**Policy**”) applies to all directors, officers, employees and temporary workers¹ (collectively, “**you**” or “**Employees**”) of Argo Group International Holdings, Inc. and its wholly-owned subsidiaries (collectively, “**we**,” “**us**,” “**our**,” or the “**company**”).

All Employees are required to comply with applicable whistleblowing laws and with the whistleblowing provisions set out in the company’s Code of Business Conduct and Ethics (the “**Code**”). This Policy supplements the provisions set forth in the Code and is intended to raise awareness of our approach to whistleblowing among our Employees.

Purpose

The company is committed to providing a mechanism for Employees to report suspected **wrongdoing** or dangers in relation to the company’s activities and have those concerns addressed in a timely and confidential manner. In scenarios where one Employee suspects another Employee of wrongdoing, or has other concerns covered by the Code that Employee should refer to this Policy and to the Code on the appropriate course of action.

Responsibilities

All Employees are responsible for ensuring this Policy and the procedures set forth herein are used correctly, in line with the expectations of the company and in compliance with applicable legislation.

Whistleblowing Procedure

The company is committed to conducting its business with honesty and integrity and all staff are expected to maintain high standards and act in accordance with the Code.

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to the company’s activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment, any breach (acts or omissions) of legal or professional obligations, complaints regarding accounting, internal accounting controls, or auditing matters, and any other matter detailed in the Code. Any suspected wrongdoing should be reported as soon as possible.

How to raise a whistleblowing concern

If an Employee has a whistleblowing concern, the company hopes that in most cases they will feel able to raise those concerns with their supervisor. However, where they prefer not to raise it with their supervisor for any reason, they should contact the Human Resources (“**HR**”) Department or the company’s internal legal counsel or Head of Group Compliance.

¹ For purposes of this Policy, “temporary workers” include non-full-time employees, volunteers, paid and unpaid trainees and consultants and contractors etc. that work on our premises.

In the event you do not want to report violations to your supervisor, HR, or internal legal counsel or compliance, you can always make a report through the company's reporting hotline (the "Reporting Hotline"). The Reporting Hotline is managed by an independent third party. The Reporting Hotline allows anyone to call or submit a report online anonymously (if they so choose) to report suspected unethical, illegal or unsafe behavior in English and other languages. The Reporting Hotline is available toll-free, 24 hours a day, 7 days a week. Refer to "Schedule A" to this Policy for the Reporting Hotline phone numbers and websites.

Once an Employee has raised a concern formally, the company will acknowledge receipt. When feasible, the company will arrange a meeting with the Employee as soon as practicable. The company will carry out a review and, where appropriate, consider whether the issue should be investigated more formally. Further investigation could be undertaken in a number of ways depending on the nature of the concern and the geographies involved and could include appointing an independent person to lead the inquiry, seeking further evidence and the accounts of witnesses. Where possible and practical to do so, the company will inform the Employee of any outcome and steps undertaken.

Confidentiality

The confidentiality of reported violations and the identity of the employees who raise a whistleblowing concern will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review and subject to applicable law. Employees may wish to identify themselves to facilitate our investigation of any report; however, you can make an anonymous report by calling the Reporting Hotline.

Reporting and Recording Process

The party receiving the initial report must record its receipt, document the concerns named in the report and how the situation was dealt with and file a report per company procedures, which will be retained for the record. All illegal and unethical conduct in violation of the Code will be reported to the company's Board of Directors, or a committee thereof as appropriate, and externally in accordance with applicable laws.

External Disclosures

The aim of this Policy and the Code is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases, Employees should not find it necessary to alert anyone externally.

The law recognizes that in some circumstances it may be appropriate for Employees to report their concerns to an external body such as a regulator. It will rarely, if ever, be appropriate to alert the media. The company strongly encourages Employees to seek advice before reporting a concern to anyone external. Employees can always contact the company's Reporting Hotline.

Zero Tolerance for Retaliation or Malicious Acts

Employees who raise a whistleblowing concern or participate in good faith in any investigation must not suffer any form of retaliation or victimization as a result. The company will treat very seriously any acts of

victimization or retaliatory action taken against Employees who, in good faith, raise a whistleblowing concern and/or participate in a whistleblowing investigation. Victimization or retaliation in these circumstances may be unlawful and any Employee who is found to have violated this provision will be subjected to disciplinary action under the company's disciplinary procedure, including but not limited to dismissal.

Employees who feel they are being or have been victimized or retaliated against should report this immediately to their supervisor or to the HR team. However, if a whistleblowing concern is found to have been deliberately falsified or made maliciously or in bad faith, the Employee concerned may be subjected to disciplinary action under the company's disciplinary procedure, including but not limited to dismissal.

Management is responsible for reviewing this Policy on an annual basis to ensure consistency and compliance with applicable law, the Code, and other applicable corporate policies.

SCHEDULE A
CONTACT INFORMATION

REPORTING HOTLINE

The company has partnered with Navex Global, a third-party service provider to host the EthicsPoint hotline and web intake services. The access to EthicsPoint can be found on the bottom of the Argonet home page under Employee Resources. You can also access EthicsPoint on the Legal & Compliance page of Argonet. To access the EthicsPoint hotline:

visit: www.argolimited.ethicspoint.com or call Hotline phone#: 1-888-361-5796

Ethics and Compliance Hotline Reporting through the Ethics and Compliance Hotline will be treated confidentially and can be made anonymously if desired.

LEGAL & COMPLIANCE CONTACTS:

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HUMAN RESOURCES CONTACTS

Monica Dallio

Head of Human Resources

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OFFICER & DIRECTOR CONTACTS:

Chief Executive Officer – **Christopher Donahue**

Christopher.donahue@argogroupus.com

Chief Financial Officer – **David Chan**

david.chan@argogroupus.com

CHAIR OF THE BOARD OF DIRECTORS:

Jonathan Bayer – jonathan.bayer@brookfield.com

LEGAL NOTICE

The company reserves the right to modify, suspend or revoke the Code and any related policies, procedures, and programs at any time. The company also reserves the right to interpret and amend the Code and these policies in its sole discretion. Any amendments to the Code will be disclosed and reported as required by applicable law.

To the extent the company or its subsidiaries employ unionized employees, if the Code conflicts with a collective bargaining agreement governing the wages and/or conditions of employment for unionized employees, the collective bargaining agreement will prevail. If a collective bargaining agreement is silent with respect to an area addressed in the Code, or if the Code supplements a collective bargaining agreement, unionized employees are expected to abide by the Code.

Neither the Code, nor any of the policies referred to herein, confer any rights, privileges or benefits on any employee, create an entitlement to continued employment at the company, establish conditions of employment for the employee, or create an express or implied contract of any kind between employees and the company. In addition, the Code does not modify the employment relationship between employees and the company.

The Code is posted on our website and intranet. The version of the Code on our website and intranet may be more current and supersedes any paper copies, should there be any discrepancy between paper copies and what is posted online.