Environmental Management Policy

Rationale

Argo Group (the “Company”) is committed to maintaining the highest standards of environmental management performance and adopting a long-term sustainable approach to caring for and safeguarding the environment as it relates to its business operations.

The Company is committed to complying with all local legal and regulatory requirements as they apply to environmental management and monitoring compliance with these requirements on an ongoing basis. Over the long-run, a sustainable approach will benefit our clients, shareholders, employees, and communities we serve by both meeting our business goals and protecting and improving the quality of the environment in which we operate.

The two key Environmental Management objectives are to minimize the impact of Argo’s business operations on the environment in terms of using the principles of reducing, reusing, and recycling of materials to mitigate as far as is reasonably practicable the depletion of natural resources. Secondly, to focus on improving energy efficiency in the buildings, we operate from using energy conservation best practices. Such measures reduce energy costs as well as supporting innovative technology solutions.

Environmental impact risk exposures are recognized as an enterprise risk exposure with the Company’s enterprise, risk management framework and appropriate controls are maintained in place to reduce this risk to acceptable levels. Failure to adequately manage these environmental exposures is recognized as potentially creating a material reputational risk exposure.

Climate risk has been classified by Argo as one of its material emerging risks, and as such, it is regularly monitored by the risk management function for the primary purpose of assessing the potential impact of climate change on the Company’s business operations, insurance products, and clients. The Argo Group emerging risk monitoring process includes scanning available resources for information regarding climate change related current events, litigation, regulation, legislation, the political environment, and industry groups’ actions that may have an impact on the Company’s strategy.

The Company is a founding member of ClimateWise, a global insurance industry leadership group facilitated by the University of Cambridge Institute for Sustainability Leadership. As part of our membership, we endeavor to adhere to the ClimateWise Principles, which guide members’ contribution to the transition to a low-carbon, climate-resilient economy.

Through its commitment to ClimateWise, the Company has formally recorded its support the Task Force on Climate-Related Financial Disclosures (TCFD) recommendations and is committed to working towards these objectives over time.

Environmental management procedures and arrangements will be proportionate to the level of environmental risks arising from the Company’s activities.

This Policy will be communicated to all employees and stakeholders who may be affected by the Company’s operations.
Argo is committed to continual improvement in performance related to the way that environmental risks are managed.

**Background**

Argo recognizes the importance of environmental management, and the Code of Conduct & Business Ethics commits the Company, employees and key functionaries to complying with all applicable environmental laws and regulations.

This Policy defines clear roles and responsibilities across the organization for maintaining environmental management standards in promoting a corporate culture in which we are accountable to our communities, for our environmental performance.

Environmental building standards are a key consideration in selecting new office facilities, including measures to enhance energy efficiency and greenhouse gas emission performance.

Environmental performance and sustainability are key considerations when partnering with an organization for marketing and sponsorship initiatives.

The Company is committed to continuing to invest in telecommunication technologies such as videoconferencing in order to further reduce the need for business travel.

Recycling programs are in place in all Company operated facilities with a minimum recycling of paper, plastics, glass, and metals where it is supported by local municipal schemes.

Procedures are in place for the safe handling of hazardous waste, and this is disposed of in a responsible manner using registered carriers and removed to register disposal sites in place and compliant with local environmental guidelines.

The Company communicates progress through regular monitoring of our environmental management initiatives to its employees and encourages involvement in local community initiatives.

The Company will periodically monitor compliance against this Environmental Management Policy.

The Company is committed to recording, managing, investigating, and reporting all environmental incidents that occur on its premises or associated within its operational through its Facilities Management procedures to management and where appropriate to the relevant external regulatory bodies in a timely manner.

Every employee, contractor, and temporary worker on the Company’s premises are expected to follow this Policy and to report any environmental concern to management. Managers are expected to take prompt action. Where an environmental incident occurs, measures must be put in place to prevent a recurrence.

The Company will continue to support efforts to improve environmental protection and consider how to apply these to our own performance.

The Company recognizes the importance of maintaining the same standards in its supply chain and through its Outsourcing Policy, has established and maintains systems and controls to mitigate the risks associated with outsourced activities. The Company will,
when relying on a third party or affiliated entities for the performance of operational function maintain oversight and accountability for these activities as if they were performed internally and subject to the Company’s own standards for corporate governance and internal control and ensure that the outsourcing service agreements include the applicable requirements for compliance with jurisdictional laws and regulations and timely access to data and records.

**Authority, Responsibility and Accountability**

**Argo Group Board**
- Approve the Environmental Management Policy (the “Policy”) and any changes made to it;
- Retain primary responsibility for the Policy and oversee compliance with the Policy;
- Delegate day to day responsibility for the implementation and maintenance of the Policy, including the risk management framework, to the Chief Risk Officer; and
- Evaluate the Policy and compliance with the Policy, to include adoption of any changes deemed necessary, on an annual basis.

**Chief Risk Officer**
- Implement and maintain the Policy;
- Ensure compliance with the Policy;
- Report to the Company’s Board and CEO as required or appropriate regarding compliance with the Policy;
- Consult and coordinate with the various functions with respect to implementation of this Policy; and
- Evaluate the Policy and compliance with the Policy and recommend adoption of any changes deemed necessary to the Board on an annual basis.

**Compliance or designated legal counsel**
- Review the Policy at least annually;
- Provide appropriate guidance as requested or required;
- Provide appropriate continuing education and training programs and guidance as request or required;
- Undertake periodic monitoring of compliance with the requirements of this Policy;
- Report to the Chief Risk Officer and/or CEO as required or appropriate; and
- Maintain a record of relevant correspondence, inquiries and investigations related to this Policy.
Heads of Business Divisions, Business within the Divisions, and Corporate Departments

- Responsible for working with their respective Executives, Senior Management and all employees to promote and maintain awareness of the Policy and its standards;
- Responsible as the first line of defense, for establishing procedures that are intended to ensure that all employees are complying and continue to comply with this Policy;
- Report immediately any breaches of this Policy to the relevant Business Division’s Executive local compliance Officer and/or designated legal counsel, and the appropriate Group Compliance employee and/or designated legal counsel;
- Provide timely and accurate information as required by the applicable procedures to the relevant Business Division’s Executive local Compliance Officer and/or designated legal counsel, and appropriate Group Compliance employee and/or designated legal counsel; and
- Refer requests for Policy and/or Procedure interpretation and/or application to the relevant Business Division’s Executive, local Compliance Officer and/or designated legal counsel, and the appropriate Group Compliance employee and/or designated legal counsel.

Policy Considerations

Exceptions or Waiver
None

Revision
The Chief Risk Officer, in consultation with the CEO and senior management of the Company, shall review this Policy at least annually and propose any recommended major changes to the Board.

Adoption
This Policy and any change made during the reviews shall be adopted by resolution of the Board.
Ownership:

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<td>Chief Risk Officer</td>
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Version Control:

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<td>12/2019</td>
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Document Governance:

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<td>Argo Group Enterprise Risk Management Steering Committee on behalf of Argo Group Risk &amp; Capital Committee</td>
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Related Materials:

| Argo Group Code of Conduct & Business Ethics |