

Human Rights Policy

Rationale

Argo Group (the “Company”) respects the rights of all people. We are committed to treating everyone with dignity and respect and strive to promote human rights in accordance with the UN Guiding Principles on Business and Human Rights, and we expect the third parties we work with do the same. We recognize that business has the responsibility to respect human rights and the ability to contribute to positive human rights impacts.

The Company is committed to complying with all local legal and regulatory requirements as they apply to Human Rights, including wage, benefit, safety, and discrimination laws, and monitoring compliance with these requirements on an ongoing basis.

The Company is committed to allowing for freedom of association and collective bargaining and providing a workplace free from discrimination and harassment, forced or child labor, and are committed to safe, healthy working conditions and the dignity of the individual.

The key Human Rights objective is to minimize incidences of infringement of human rights in the Company’s operations, including those managed by third parties.

Human Rights 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 Human Rights exposures is recognized as potentially creating a material reputational risk exposure.

This Policy will be communicated to all employees and stakeholders who may be affected by the Company’s operations.

We are committed to ensuring that our suppliers and third-party partners adopt their own Human Rights strategies.

It is every employee’s responsibility to maintain a work environment that reflects respect for human rights and is free from all discrimination and harassment, aligned with our Human Rights Policy. If an employee believes that someone is violating the Human Rights Policy and/or the law, they are expected to report this immediately to their manager, Compliance, designated legal counsel, or the Whistleblower Hotline. The Group Whistleblower Policy and Procedure will apply to the resulting investigation.

Argo is committed to continual improvement in performance related to the way that Human Rights risks are managed.

Background

Argo Group (the “Company”) is committed to providing and maintaining a respectful workplace as outlined in the Code of Conduct & Business Ethics.

This Policy defines clear roles and responsibilities across the organization for maintaining Human Rights standards.

The Company strives to create and maintain an environment that provides equal opportunities for all individuals and freedom from discrimination and harassment.



The Company will not tolerate any illegal discrimination or harassment based on race, color, religion, age, gender, sexual orientation, gender identity, family status, national origin, or other legally protected classes.

The Company recognizes the rights of employees to the benefits of freedom of association and collective bargaining.

The Company is committed to taking the necessary steps to ensure slavery, child labor, and human trafficking are not taking place in its supply chain or any part of our operations.

The Company provides annual mandatory training to all employees and functionaries on maintaining a respectful workplace.

The Company will periodically monitor compliance against this Human Rights Policy.

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 performance 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 Human Rights 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;
- 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:

Policy Owner(s)
Chief Risk Officer

Version Control:

Version:	Effective Date:	Reviewed By:
12/2019	12/2019	Chief Risk Officer

Document Governance:

Implementation	
Approved by:	Argo Group Enterprise Risk Management Steering Committee on behalf of Argo Group Risk & Capital Committee
Approval Date:	12 December 2019

Related Materials:

Argo Group Code of Conduct & Business Ethics
Argo Group Whistleblower Policy & Procedure
Argo Group Diversity & Inclusion Policy
Argo Group Occupational Health & Safety Management Policy