

## **Occupational Health & Safety Management Policy**

### **Rationale**

Argo Group (the “Company”) accepts its duty to prevent injury and ill health to employees, visitors, contractors, and temporary workers, as well as any members of the public who might be affected by the Company’s operations. Every employee has the right to feel safe at work.

The Company is committed to complying with all local legal and regulatory requirements as they apply to Health and Safety and monitoring compliance with these requirements on an ongoing basis.

The key Occupational Health & Safety objective is to minimize the number of instances of occupational accidents and illnesses and ultimately achieve an accident-free workplace and activities.

Workplace safety 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 Health & Safety exposures is recognized as potentially creating a material reputational risk exposure.

Occupational health and safety procedures and arrangements will be proportionate to the level of safety and health 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 Occupational Health and Safety risks are managed.

### **Background**

Argo Group (the “Company”) is committed to providing safe and healthy working conditions, as outlined in the Code of Conduct & Business Ethics.

This Policy defines clear roles and responsibilities across the organization for maintaining Health & Safety standards.

The Company strives to provide a safe and healthy environment for its key functionaries, employees, and customers. Each employee and functionary has responsibility for maintaining a safe and healthy workplace by following environmental, safety, and health rules and practices and reporting accidents, injuries, and unsafe equipment, practice and conditions. It is everyone’s responsibility to contribute to a healthy and safe workplace.

All work activities, environments, equipment, and substances are required to be assessed and appropriately controlled to reduce risks to acceptable levels.

All Company offices are considered to be non-smoking environments.

Procedures must be in place to manage building risks associated with hazardous substances, gas, and electrical safety, as well as lifting and electrical equipment.

Procedures must be in place to help prevent and manage work-related stress and sickness absence as well as targeting improved wellbeing.

Procedures must be in place to provide adequate medical first aid coverage on all sites.

Procedures must make provision for out-of-hours and lone-working arrangements.

Systems and procedures must in place to protect life safety against fire and explosion risk and ensure adequate evaluation plans on all sites.

### Business Continuity and Emergency Management

Business Continuity and Emergency Management plans should address the life safety aspects of natural hazards associated with flooding, windstorms, earthquakes, and wildfires where these Company facilities are exposed to these risks.

### Additional Measures

The Company is committed to recording, managing, investigating, and reporting all accidents and injuries that occur to its employees and/or on its premises through its Human Resources procedures to management and where appropriate to the relevant external regulatory bodies in a timely manner.

Where an accident or injury occurs, measures must be put in place to prevent a recurrence.

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.

This Policy applies equally to contractors operating within Argo's premises or on the Company's behalf.

This Policy applies equally to homeworkers, and Argo will ensure as far as is reasonably practicable that appropriate Occupational Health & Safety arrangements are maintained.

### **Authority, Responsibility and Accountability**

#### **Argo Group Board**

- Approve the Health & Safety 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 via the Risk & Capital Committee 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;

- o 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
- o 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:**

<b>Policy Owner(s)</b>
Chief Risk Officer

#### **Version Control:**

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

#### **Document Governance:**

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

#### **Related Materials:**

Argo Group Code of Conduct & Business Ethics
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