

THIS IS STARR'S TERRITORY.

GLOBAL CODE OF BUSINESS ETHICS AND CONDUCT

STARR

INSURANCE COMPANIES

APRIL 2022

PROPERTY | CASUALTY | ACCIDENT | AVIATION | MARINE

STARRCOMPANIES.COM

GLOBAL CODE OF BUSINESS ETHICS AND CONDUCT

I. INTRODUCTION

It is essential to Starr International Company, Inc., C. V. Starr & Co., Inc. and each entity's subsidiaries and affiliates (collectively, "Starr Insurance Companies", "Starr" or the "Company") that each director, officer and employee of the Company ("you", "Employee" or "Personnel") perform his or her duties with honesty and integrity. In addition, all Personnel must act in full compliance with their obligations to the Company, their fellow employees, customers, business associates and counterparties and in accordance with all applicable laws¹. Behaving ethically is of vital importance to the Company and ultimately impacts our overall brand and reputation within our market and our community.

All Personnel are subject to this Code of Business Ethics and Conduct ("Code") both during and after the course of your employment or service. Certain Starr Insurance Companies business partners, such as agents and consultants, represent the Company to the public, and they are expected to adhere to the spirit of the Code, and to any applicable contractual provisions, when working on behalf of Starr Insurance Companies. To memorialize the obligations of our business partners, we have implemented a Third Party Code of Conduct, which is attached hereto as **Appendix M**.

This Code establishes standards of business conduct for Personnel. As a practical matter, this Code cannot cover every possible scenario, or set forth every possible policy and procedure. Accordingly, Personnel are expected to make themselves aware of all policies that apply to their job functions, and to exercise good judgment in those instances where none exist.

Starr Insurance Companies developed this Code to establish and help you understand appropriate standards of business conduct, as well as to establish compliance requirements. This Code is also intended to emphasize the need for Personnel to be honest and ethical in their business conduct. Following this Code helps all of us avoid unwanted business risk.

The Starr Insurance Companies Office of the General Counsel is responsible for overseeing the application and enforcement of practices and policies pursuant to this Code, and supporting, fostering and furthering the ethical conduct of our business. Individual business units and operating departments may have established additional requirements that supplement the provisions of this Code. You can learn more about these additional requirements from your supervisor or the head of your department.

Personnel will receive compliance training regarding this Code, which is the foundation to our Compliance and Ethics program; they will be required to re-certify their compliance with this Code annually.

If you encounter a situation in which you believe our principles of compliance and integrity are being compromised, we encourage you to discuss those concerns with your supervisor, the head of your department, or your Human Resources representative. However, if raising an issue in this way makes you uncomfortable, you may anonymously report suspected violations of law or Company policy by calling the Starr Hotline Program in your jurisdiction.

The Starr Hotline Program has been established to provide you with an additional way to communicate a concern, if you feel your efforts have been unsuccessful or you are uncomfortable raising an issue directly. This service is provided by an independent company that allows you to protect your anonymity when you wish to report issues that concern you. The system is available to all Personnel, 24 hours a day and 365 days a year. The Company is committed to addressing any issue brought to its attention through a report to the Starr Hotline Program in a prompt, fair and sensitive manner.

To access the Starr Hotline via the internet, visit the following web address: **<https://starr.gan-compliance.com/p/compliance-hotline>**. To call the Starr Hotline from the United States, call the following number: **(866) 921-6714**. You can also call the Starr Hotline from outside of the United States, and a list of contact numbers is available on the Starr Portal at the following web address:

<https://starrit.sharepoint.com/sites/Portal/Starr%20Numbers/Starr%20Hotline%20Numbers%202020.pdf>

All Personnel are expected to cooperate in an honest, ethical and forthcoming manner during internal investigations of misconduct or suspected or potential violations of any provision of this Code, Company policy or applicable law. Failure to do so is a violation of this Code.

¹When used herein "law(s)" means any federal, state, local or foreign law, statute, code, ordinance, regulation, rule, administrative or judicial order or consent decree or other similar legal requirement.

Important Notice:

This Code is not a contract. Nothing in this Code should be construed as a promise of any kind, or as creating a contract regarding any aspect of employment. Personnel have the unqualified right to terminate their employment relationship at any time for any reason. Starr Insurance Companies retains the right to discharge or discipline any Employee in accordance with laws of the jurisdiction in which the relevant Starr Insurance Companies office is located. For example, in the United States, Starr Insurance Companies retains the right to discharge or discipline any Employee with or without cause or warning. In the United States, the reciprocal right to end the employment relationship takes priority over any other provision in this Code and any promise, oral or written, made by Personnel of Starr Insurance Companies.

The obligations to comply with this Code continue to apply after your employment with Starr Insurance Companies has ended.

If any provision of this Code is either not permitted by or in conflict with applicable laws of a country or jurisdiction in which an Employee work, then such law shall supersede that provision of the Code with respect to relevant people. Where the applicable laws of a country or jurisdiction require adherence to standards stricter than those outlined in this Code, Starr Insurance Companies follows the applicable standard.

This Code and other Starr Insurance Companies policies and procedures may be updated or amended from time to time. Personnel are required to stay informed of any updates or amendments and to comply with all provisions of this Code. Any questions regarding any element of this Code should be directed to your local compliance contact or to Starr Insurance Companies' Compliance Director.

II. OUR COMMITMENT TO ENVIRONMENTAL, SOCIAL, AND GOVERNANCE (“ESG”) MATTERS

The core business of the Company involves providing appropriate risk management solutions to clients in a responsible manner. Starr works together with its global network of Personnel, clients, and communities to promote an overall culture of integrity and ethical values.

Through its international insurance company subsidiaries, Starr is principally engaged in providing insurance to primarily commercial organizations that have both a national and global scale.

Starr has historically stated its mission is to operate in an ethical manner and has developed a tradition of doing the right thing. The culture encourages all Personnel to do the same in all instances, and to not compromise our integrity, despite the potential impact on business objectives.

Starr strives to influence and drive meaningful and sustainable progress globally while achieving its business objectives utilizing sound governance principles. Starr continues to evaluate and address specific focus areas that will align ESG objectives with its business and develop its ESG oversight. Starr is incorporating the oversight of ESG activities and objectives into its overall enterprise risk management framework.

III. CONFLICTS OF INTEREST

To ensure the continued growth and profitability of the Company, we must have the full confidence of our customers, our fellow employees, business associates, the financial community and the general public.

In exercising our responsibilities as Personnel, we are guided by the best interests of Starr Insurance Companies and those customers with whom we have fiduciary relationships. A decision involving Starr Insurance Companies business must be based upon business considerations. Specifically, all Personnel are required to conduct their personal and professional affairs in such a way as to avoid conflicts of interest – or even the appearance of conflicts of interest – with the interests of Starr Insurance Companies and its customers. A conflict of interest exists when a person's private interest interferes in any way with the interests of the Company.

Each of us must exercise care to avoid actual or potential conflicts of interest that arise because of our activities, or the activities of close family members or other members of our households, or individuals with whom we have close personal relationships. It is not possible to list every conceivable conflict of interest. Therefore, if you believe you may be involved in a conflict of interest situation that is not described below, you should discuss your particular situation with your supervisor, the head of your department, your local compliance contact or Starr Insurance Companies' Compliance Director. You should also disclose your potential conflict of interest to the same parties using GAN Integrity by following the instructions below.

Receiving and/or paying for meals, gifts and entertainment in excess of the limits established in this Code; being employed by an entity other than Starr Insurance Companies or providing consulting or commercial services to third parties in an individual capacity; participating on a panel or speaking in a public forum not authorized or sponsored by the Company; and publishing an article or other written material not authorized or sponsored by the Company (collectively “Supervised Activities”) all raise the potential for a conflict of interest. Prior to engaging in a Supervised Activity, Personnel shall seek approval from their supervisors and then preclear the activity using GAN Integrity, a web-based compliance platform. The Company maintains the right to deny a request to participate in a Supervised Activity. Requests for approval shall be evaluated on a case-by-case basis, and each evaluation shall be fact specific. Decisions shall be subject to the discretion of the approver and shall be based on risk factors that are subject to change. Therefore, approval in one instance does not ensure approval of subsequent requests.

To request preclearance for Supervised Activities, first, log into GAN Integrity either by (1) following the link on the Starr Insurance Companies portal that is located under the heading GAN Integrity or by (2) entering the following web address into a web browser that is connected to the Starr Insurance Companies network: <https://starr.gan-compliance.com> and then entering your Starr email address and network password. Second, follow the “**Conflict of Interest**” link or the “**Gifts and Entertainment**” link, depending on the nature of the matter.

A. Personnel may not use their affiliation with Starr Insurance Companies for personal benefit.

Examples of such prohibited activities include:

- Personnel permitting any business decision (such as a decision as to whether the Company will do business with a customer, vendor, intermediary, reinsurer, prospect, counterparty or supplier), to be influenced or appear to be influenced by interests unrelated to the Company.
- Personnel having a financial interest in an entity that sells goods or services to Starr Insurance Companies where Personnel can influence Starr Insurance Companies’ business transactions with that entity.
- Personnel using any confidential, proprietary or “inside” information obtained as a result of their employment with Starr Insurance Companies for their own personal gain or for the benefit of others.
- Personnel misappropriating to themselves or to others the benefit of any business venture or opportunity about which Personnel learn or develop in the course of their employment with Starr Insurance Companies and which is related to a current prospective business of Starr Insurance Companies without the prior written approval of your local compliance contact or Starr Insurance Companies’ Compliance Director.
- Personnel seeking to engage in outside business activities either on a volunteer or paid basis are required to disclose the details of such work to the local compliance contact or Starr Insurance Companies’ Compliance Director.
- Personnel who operate personal businesses, whether formally or informally, seeking to utilize the business contacts and/or other intellectual property of Starr Insurance Companies.
- Personnel who operate personal businesses, whether formally or informally, using Company information systems—including hardware, software, networks, or otherwise—for such personal businesses.

B. Gifts and Entertainment

In all matters related to gifts or entertainment, it is the responsibility of Personnel to exercise good judgment.

The term, “gift,” as used herein, is any item of monetary value presented to an employee by a non-employee, or any item of monetary value presented to a non-employee by a Starr Insurance Companies employee.

Offering or accepting unsolicited gifts and entertainment may be appropriate provided there is a specific business purpose, the expenses incurred are ordinary and necessary, the gift or entertainment is given and accepted without obligation and the gift or entertainment falls within the guidelines of this Code and all applicable laws. Personnel must never ask for gifts, entertainment or any other business courtesies from people doing business with the Company.

Personnel may not accept or offer a gift or entertainment (including beverages, meals, recreation, lodging, transportation and tickets) for the purpose of improperly influencing good business judgment in any business dealings or transactions involving Starr Insurance Companies or any business or enterprise associated with Starr Insurance Companies.

Entertainment (including beverages, meals, recreation, lodging, transportation and tickets) is not considered a gift if Personnel attend the entertainment along with the third party.

Please note that *prior* to providing gifts or entertainment that exceed a “minimal value” threshold, Personnel must request and receive preclearance using the GAN Integrity compliance platform. First, log onto GAN Integrity either by (1) following the link on the Starr Insurance Companies portal that is located under the heading GAN Integrity or by (2) entering the following web address into a web browser that is connected to the Starr Insurance Companies network: <https://starr.gan-compliance.com> and then entering your Starr email address and network password. Second, follow the “Gifts and Entertainment” link.

The term, “minimal value,” varies according to the jurisdiction in which the Starr Insurance Companies office is located. For example, in the United States, “minimal value” is defined as \$100.00 or less for gifts; as \$200.00 or less per person for entertainment when entertaining a non-government employee; and \$100.00 or less per person for entertainment when entertaining a government employee.

Accepting Gifts

- *Gifts of cash or cash equivalents (including gift certificates, securities, below-market loans, etc.) in any amount are prohibited and must be returned promptly to the gift giver regardless of amount.*
- Personnel may accept and retain gifts of minimal value if the value of the gift is in line with customarily and commonly accepted business practices and could not be construed, in the view of an objective and reasonable third party, as improperly influencing good business judgment. Personnel may not receive gifts on a regular or frequent basis from the same source. Personnel are responsible for determining that a gift is of minimal value at the time of acceptance.

Accepting Gifts cont'd

- Please note that a gift need not consist only of a traditional present, such as sports tickets, jewelry, glassware, liquor or other store-bought items. For example, a gift may consist of free travel on a corporate jet owned by a vendor, insured or other entity. Personnel should be aware that income tax implications can arise when certain types of gifts, such as free travel, are received. Specifically, a gift may be seen as having sufficient value that it can be equal to income given by a third party.
- Personnel who have been offered a gift or entertainment that exceeds minimal value, which therefore cannot be accepted by Personnel under this Code, may accept the gift on behalf of the Company if refusal, reimbursement at the fair market value of the gift or return thereof would cause offense or embarrassment or would otherwise adversely affect the relationship of the Company to the gift giver. If a gift of more than minimal value is deemed to have been accepted on behalf of the Company, upon acceptance, it shall become the property of the Company.
- If Personnel accept a gift of more than minimal value, Personnel must disclose the details of the gift via GAN Integrity within thirty days. Subsequently, the Compliance Director shall determine the appropriate disposition for the gift.

Offering Gifts

- Gifts must be in good taste and without excessive expense.
- Personnel who are considering making a gift to any person should review Starr Insurance Companies' Anti-Corruption Policy, attached hereto as **Appendix F**, to ensure that any contemplated gift is permitted under the Anti-Corruption Policy. You are prohibited from providing gifts or anything of value to government officials or private sector employees in connection with the Company's business for the purpose of obtaining or retaining business or securing any improper advantage. Any question regarding such gifts should be directed to the local compliance contact or Starr Insurance Companies' Compliance Director.

Accepting Entertainment

- Invitations for excessive or extravagant entertainment or invitations for entertainment not in good taste or without a specific business purpose must be declined.
- If an entertainment event is paid for by an employee of another company and at least one employee of that other company does not attend the entertainment event, the entertainment should be regarded as a gift and therefore subject to the monetary gift limitation discussed above. For example, if Starr Personnel are offered tickets to a sporting event that is not attended by an employee of the company that gave the tickets, those tickets must be considered a gift.

Offering Entertainment

- Entertainment offered by Personnel must be for a specific business purpose and in good taste.
- If an Employee is not present at an entertainment event paid for by the Employee, the entertainment will be deemed a gift and therefore subject to the monetary gift limitations described in **Appendix F**.

C. Personnel may not be employed by or affiliated with a competitor

Personnel owe a duty of loyalty to Starr Insurance Companies and to Starr Insurance Companies' business and assets. This duty of loyalty forbids Personnel from either aiding a competitor or taking Company business for themselves.

This duty of loyalty to Starr Insurance Companies requires Personnel to take appropriate steps not to: compete with the Company; disclose any trade secret or proprietary or confidential information of the Company or its customers; engage in harmful speech, insubordination, neglect, disparagement, disruption of employer-employee relations; or dishonor or disparage Starr Insurance Companies' business name, product, reputation or operation. This duty of loyalty also requires Personnel to affirmatively disclose any information to Starr Insurance Companies that he or she believes the Company needs to know to protect its business name, products, reputation and operations. Such disclosure should be made to the employee's supervisor, head of department, local compliance contact or Starr Insurance Companies' Compliance Director, as appropriate.

Personnel planning to leave the Company may not solicit or encourage other Personnel to leave the employment of the Company.

Serving as an employee, director, officer, partner, consultant, agent of, or having a significant ownership interest in an organization that competes, in whole or in part, with Starr Insurance Companies violates your duty of loyalty to Starr Insurance Companies and is prohibited. Under certain, limited circumstances, waivers of the restrictions described in this paragraph may be granted by Starr Insurance Companies' Office of the General Counsel. Personnel seeking such a waiver shall contact Starr Insurance Companies' Office of the General Counsel, which shall take appropriate steps to ensure that granting such a waiver is consistent with the best interests of the Company and applicable law.

D. Employment Outside of Starr Insurance Companies

Personnel may not hold outside positions which interfere with job performance, or which otherwise pose a conflict of interest. Employees who engage in business activities outside of Starr must disclose these activities and receive approval as described in this section of the Code. Even when outside service will not create a conflict of interest, Personnel should independently consider the comparative cost and benefit of holding such a position with an organization other than Starr Insurance Companies, including Employees' own business activities. Personnel should also determine independently, and with the assistance of his or her own counsel, whether the organization provides sufficient protection for the interests of the employee, including defense and indemnification against potential liability, as well as Directors and Officers liability insurance coverage. Finally, Personnel should either abstain from actions or resign from an outside position if it addresses issues that are in conflict with Starr Insurance Companies. Personnel also have the responsibility to avoid outside activities that might affect their objectivity or the independence of their judgment on matters relating to the Company, activities that might embarrass, disparage and/or harm the Company, or activities which, without advance approval, involve the use of Starr Insurance Companies information or resources.

Personnel seeking to engage in outside business activities on a paid basis must disclose the details of such work to the local compliance contact or Starr Insurance Companies' Compliance Director via Starr's compliance platform, GAN Integrity, and to receive approval to engage in the activity. Personnel seeking to engage in volunteer positions must disclose the nature of the position and receive approval if the proposed volunteer position is of the type described in the below section titled "**Not-For-Profit.**"

Not-For-Profit

Personnel desiring to serve as a director, trustee, officer, owner or equivalent of a not-for-profit organization as a volunteer and without compensation (for example, on the board of a school, hospital, cooperative or social organization) need to obtain prior approval by submitting a request via Starr's compliance platform, GAN Integrity. Disclosure must be made even if no actual, potential or perceived conflict of interest exists. If an actual, potential or perceived conflict of interest does arise, Personnel must avoid even the appearance of impropriety in association with their conduct. All actual, potential or perceived conflicts of interest should be disclosed to Starr Insurance Companies' General Counsel and Compliance Director.

Volunteer activities which are not of the type describe above do not require disclosure and approval. Activities not requiring disclosure and approval are those that:

- Occur outside of normal working hours;
- Do not require material time commitments;
- Are not leadership in nature (e.g., director, officer, principal, etc.); and
- Are either temporary or done on a one-off basis.

The following are examples of volunteer activities not requiring disclosure and approval:

- Volunteering with a school's parent-teacher association to organize a dance;
- Volunteering in support of a Girl Scouts troop's annual cookie sales;
- Volunteering at a soup kitchen; or
- Similar activities not done during hours that Personnel are ordinarily engaged in Starr-related business.

If you have any doubt as to whether engaging in a particular volunteer activity should be disclosed to Starr, contact your local compliance contact or the Company's Compliance Director.

As Personnel of Starr Insurance Companies, we have an obligation to fully support the Company's business interests on behalf of our customers. No Personnel should hold an outside position in any business, trade, civic, governmental or social association, which, because of time obligations or subject matter, interferes with or prevents Personnel from fulfilling his or her job responsibilities.

The Company recognizes that Personnel will volunteer their time, talents and financial resources to various social, political and community organizations. While Starr Insurance Companies encourages Personnel to be good neighbors and active citizens, job performance should not suffer because of such activities. Service on boards of directors or advisory boards of outside organizations can be beneficial in serving the community, for personal development and, in some cases, developing business relationships.

E. Honoraria

Personnel who are compensated for making an oral presentation, writing a magazine article, or engaging in similar activities prepared or conducted using the time or facilities of Starr Insurance Companies must seek prior written approval from his or her supervisor or Starr Insurance Companies' Compliance Director. Such compensation, other than a nominal honorarium (\$150.00 or less) appropriate under the circumstances, shall either be declined or paid to the Company.

F. Responsibility to Disclose Actual and Potential Conflicts

Transactions involving Starr Insurance Companies and Personnel or a member of Personnel's immediate family (e.g., spouse, child, sibling, parent or in-law), or an individual who has a close personal relationship with Starr Personnel, that may create a potential, apparent or actual conflict, must be brought to the attention of the Employee's supervisor to determine if the transaction poses a perceived, potential or actual conflict of interest and written approval from your supervisor, or department head and Starr Insurance Companies' General Counsel must be obtained via GAN Integrity.

XV. INTERNATIONAL TRADE PRACTICES: ANTI-CORRUPTION AND ECONOMIC SANCTIONS LAWS

A. Anti-Bribery

As Personnel of a company with a wide range of international activities, Personnel may become involved in business relationships with foreign governments and their officials. Among the many laws regulating our international business activities are the United States Foreign Corrupt Practices Act of 1977, as amended. As more fully set out in the Anti-Corruption Policy attached hereto as **Appendix F**, these anti-bribery laws make it unlawful for you to do any of the following:

- Pay, authorize payment, or give anything of value directly or indirectly to a foreign official or a private sector employee in a corrupt effort to induce the official to do any of the following:
 - Assist Starr Insurance Companies in obtaining or retaining business or gaining an unfair business advantage;
 - Direct a business opportunity to any third party;
 - Influence any official act or decision by the official;
 - Induce the official to do (or omit to do) an act in violation of law or the official's duties; or
 - Induce the official to utilize his or her influence with a foreign government to affect any act or decision of such government.

For purposes of these anti-bribery laws, foreign officials include the following:

- Employees of government agencies;
- Politicians, party officials and political candidates;
- Family members, agents or other persons or entities acting on behalf of any of the above officials;
- Employees of public international organizations (e.g., the United Nations or the World Bank); and
- Employees of state-owned or controlled enterprises.

B. Anti-money Laundering and Economic Sanctions

The laws of some governments, such as the United States, prohibit Starr Insurance Companies from engaging in business with certain individuals or governments for national security or foreign policy reasons. As such, all Personnel are prohibited from engaging in business with “specially designated nationals” and countries, including North Korea. This prohibition extends to those individuals, entities and vessels listed on the List of Specially Designated Nationals and Blocked Persons maintained by U.S. Department of Treasury's Office of Foreign Asset Controls (“OFAC”).

All Personnel should review the OFAC Policy attached hereto as **Appendix G**, to understand the Company's overall policy and specific evaluation procedures in place to ensure that business is not transacted with a “specially designated person” or country.

Personnel are prohibited from providing any advice or assistance to individuals who either attempt to violate or circumvent the applicable laws relating to the prevention of money laundering. Accordingly, Personnel should be alert and aware of indications of suspicious activity and other red flags regarding this activity. For additional guidance regarding the prevention of intentional or unintentional facilitation of money laundering activities, refer to the Anti-Money Laundering Policy attached hereto as **Appendix H**.

Personnel should contact their supervisor, local compliance contact or Starr Insurance Companies' Compliance Director for further guidance.

Personnel must exercise appropriate business judgment when selecting a third party to represent Starr Insurance Companies and must conduct adequate due diligence before the third party is retained. You cannot use agents, consultants, independent contractors or other representatives to do indirectly that which Personnel could not do directly under this Code, or applicable law.

Personnel must not permit customers, vendors, agents or suppliers to exploit their relationship with Starr Insurance Companies and such persons must not use the Company's name in connection with any fraudulent, unethical or dishonest transactions.

For additional guidance on Starr Insurance Companies' policies regarding the selection and retention of third parties, refer to the Anti-Corruption Policy attached hereto as **Appendix F**.

XIX. REPORTING VIOLATIONS OF CODE OF BUSINESS ETHICS AND CONDUCT AND CONCERNS REGARDING FINANCIAL INTEGRITY: NON-RETALIATION

Complying with this Code and maintaining the financial integrity of Starr Insurance Companies is our collective responsibility. Any Personnel or other interested person may submit a good faith complaint regarding compliance with the standards of conduct set forth in this Code or regarding accounting or internal control matters without fear of dismissal or retaliation of any kind. However, Personnel should refrain from investigating known or suspected violations. Instead, Personnel who have concerns regarding a known or suspected violation of any provision of this Code, company policy, or applicable law should refer such matter to a local compliance contact, supervisor, or Starr Insurance Companies' Compliance Director.

A. Reporting Violations or Concerns Regarding Financial Integrity

The Audit Committee oversees the financial integrity compliance process and has established the following procedures:

The Company's directors, Chief Executive Officer, senior financial officers, and chief legal officer shall promptly report any known or suspected violations of this Code to the Company's Audit Committee.

All other Personnel, or other interested persons with concerns regarding accounting or internal control matters, should forward complaints on a confidential basis to Starr Insurance Companies' Office of the General Counsel through e-mail or regular mail. Reports may be made confidentially. However, if raising an issue in this way makes you uncomfortable, you may anonymously report suspected violations of law or Company policy by calling the Starr Hotline Program in your jurisdiction.

Concerns regarding questionable accounting or auditing matters may include items such as:

- Deficiencies in or noncompliance with internal accounting controls.
- Fraud or deliberate errors in the preparation, evaluation, review or audit of any financial statement of any Starr Insurance Companies entity.
- Fraud or deliberate error in recording and maintaining of financial records of any Starr Insurance Companies entity

All Personnel should review the Anti-Money Laundering Policy attached hereto as **Appendix H**, to understand the Company's overall policy and specific procedures in place to ensure that fraudulent accounting and financial fraud do not occur.

Complaints will be reviewed by such person(s) as the Audit Committee determines to be appropriate. Prompt and appropriate action will be taken. Confidentiality will be maintained, to the extent reasonably possible, consistent with the need to conduct an adequate review.

Due to certain requirements under applicable data protection laws in certain jurisdictions, the Company may be obligated to inform the subject of a reported violation that the report was filed and how he or she may exercise his or her right to access and correct the information regarding the allegation. However, this right to access information does not entitle the subject of the allegation to information identifying the person who reported the allegation.

No retaliatory action of any kind will be permitted against anyone making such a report in good faith.

The Audit Committee's designee(s) will maintain a log of all complaints regarding financial integrity, tracking their receipt, investigation and resolution and will provide a periodic summary report to the Audit Committee.

B. Reporting Violations or Concerns or Seeking Advice Regarding the Code of Business Ethics and Conduct

Starr Insurance Companies' Office of the General Counsel oversees the overall compliance activities of Starr Insurance Companies. Personnel may seek guidance and advice regarding this Code or report potential or actual conduct that violates the Code, Company policy or applicable law without fear of retaliation. Personnel may forward such inquiries or reports (on a confidential basis if they prefer) to their local compliance contact or Starr Insurance Companies' Compliance Director. No retaliatory action of any kind will be permitted against anyone making such a report in good faith. Starr Insurance Companies encourages Personnel to consult with their supervisors or department management regarding compliance matters. **Please do not attempt to investigate a known or suspected violation on your own; instead, please contact the appropriate individuals.**

You are not prohibited or in any way restricted from reporting possible violations of law to a governmental agency or entity, and you are not required to inform Starr Insurance Companies if you make such reports.

If you encounter a situation in which you believe our principles of compliance and integrity are being compromised, we encourage you to discuss those concerns with your supervisor, the head of your department, your Human Resources representative, your local compliance contact or Starr Insurance Companies' Compliance Director. While raising concerns in an identifiable manner can greatly assist in investigating a known or suspected violation, if raising an issue in this way makes you uncomfortable, you may anonymously report suspected violations of law or company policy to the Starr Hotline Program. To access the Starr Hotline via the internet, visit the following web address: <https://starr.gan-compliance.com/p/compliance-hotline>. To call the Starr Hotline from the United States, call the following number: **(866) 921-6714**. You can also call the Starr Hotline from outside of the United States, and a list of contact numbers is available on the Starr Portal at the following web address: <https://starr.sharepoint.com/sites/Portal/Starr%20Numbers/Starr%20Hotline%20Numbers%202020.pdf>

C. Accountability for Violations

In the case of proven violations of any provision of this Code, the Company's policies or applicable law, offending Personnel may be disciplined with penalties up to and including removal from office or dismissal, to the extent permitted by applicable law. Such penalties may include written notices to the individual involved that a violation has been determined, demotion or re-assignment of the individual involved and suspension with or without pay or benefits. Violations of any provision of this Code may also constitute violation of law and may result in criminal penalties and civil liabilities for the offending employee and the Company. **All Personnel are expected to cooperate in internal investigations of misconduct or suspected or potential violations of any provision of this Code, Company policy or applicable law. Failure to do so is a violation of this Code.**