

# Catalina Re

Group Whistleblowing Policy

## Policy on Whistleblowing

Catalina has zero-tolerance for any form of misconduct. We encourage Staff to come forward and raise genuine concerns they have without fear of recrimination. Catalina hopes that by doing so, genuine concerns will be reported which can then be acted on promptly and professionally by senior management.

This Policy is applicable to Catalina Holdings (Bermuda) Ltd. and all current and future wholly owned subsidiaries (together, “**Catalina**”) and all individuals working for Catalina at all levels, including employees whether permanent, fixed-term, at-will, or temporary staff (together, “**Staff**”).

The purpose of this Group Policy is to:-

- A. Ensure Staff are aware of the available channels they can use to report genuine concerns;
- B. Ensure Catalina’s senior management take appropriate action to investigate reports of genuine concerns and to protect the reporting Staff from recrimination. ‘Genuine concerns’ would include actions which are potentially criminal, as well as other unethical behaviours / forms of misconduct that may break the law or violate Catalina’s own internal policies and procedures. Some examples to illustrate this are as follows:

- Dishonest preparation, evaluation, review or auditing of financial statements;
- Non-compliance with internal accounting controls including falsifying documents and expense fraud;
- Theft and misuse of property including information which is confidential to or otherwise sensitive to Catalina;
- Offering or accepting bribes, including the failure to follow internal policies and procedures for reporting and clearing corporate gifts and entertainment;
- Failure to follow internal policies and procedures for reporting and clearing personal conflicts of interest;
- “Tipping-off” others to trade in securities while in possession of market sensitive information;
- Where Staff health and safety are at risk; and
- The deliberate concealment of misconduct.

Allegations which are evidently not genuine, and are made in bad faith, including where someone knowingly makes false statements about another person, will be considered an abuse of this important Policy and considered under disciplinary procedures.

Staff will be required to confirm they have read and understood this Policy and the procedures described on the next page at least annually.



## Procedure for Reporting a Concern

To make it as easy as possible for Staff to report concerns, we have created a number of ways to do so - and so it is up to Staff to decide which one is the most appropriate, or is the one that they are most comfortable with.

Staff are encouraged to report concerns to their nominated *Local Whistleblowing Champion*. However, if they feel more comfortable doing so or if it is simply more convenient, Staff may report concerns directly to the Chair of the Catalina Holdings (Bermuda) Ltd. Audit Committee: **Mr Anthony Cunningham**, who is the *Group Whistleblowing Champion*.








Catalina also operates a **Whistleblowing Hotline** (which is run by a service provider called “NAVEX Global™”) that is available to all Staff 24-hours-a-day, seven days a week to report concerns via a website or telephone service. Use of the Whistleblowing Hotline can be made anonymously – Staff will be given the choice whether to disclose or withhold their identity.

The Whistleblowing Hotline forwards all reports (on either an anonymous or attributed basis) to the **Group Whistleblowing**

**Champion** who will determine the appropriate course of action and engage with the local Whistleblowing Champion as necessary.

Catalina exercises the utmost care with regard to the confidentiality of whistleblowing reports and the anonymity of the Staff making them - if anonymity is requested - within the limits of applicable laws and regulations. Staff should be aware that in order to conduct an appropriate investigation into matters raised, it may be necessary for the substance of their report to be advised to others. When this happens, the identity of Staff may then become apparent - and this should be considered before submitting your report.

The names and contact emails of the Group and Local Whistleblowing Champions are as follows:-

 Group	 Bermuda	 US	 Ireland	 UK	 Singapore	 Malaysia
Catalina Holdings (Bermuda) Ltd., Audit Committee Chair: Anthony Cunningham <a href="mailto:cunningham@cwgsy.net">cunningham@cwgsy.net</a>	Catalina General Insurance Ltd. Independent Non-executive Director, James O'Shaughnessy <a href="mailto:james.oshaughnessy64@gmail.com">james.oshaughnessy64@gmail.com</a>	Head of Catalina US Compliance:  Tess Leopold <a href="mailto:tessleopold@catalinare.com">tessleopold@catalinare.com</a>	Independent Non-executive Director, Tony Mason: <a href="mailto:tonydmason@btintern.et.com">tonydmason@btintern.et.com</a>	Chairman of the UK Boards Tony Mason <a href="mailto:tonydmason@btintern.et.com">tonydmason@btintern.et.com</a>	ACR Group Audit Chair Hwee Cher Sim: <a href="mailto:Hweecher.sim@asiacapitalre.com">Hweecher.sim@asiacapitalre.com</a>	Datuk Najib Bin Hj. Abdullah: <a href="mailto:ACRMAuditChair@asiacapitalre.com">ACRMAuditChair@asiacapitalre.com</a>

External Whistleblowing Reporting Website and Telephone Hotline service: <https://secure.ethicspoint.eu/domain/media/en/gui/106500/index.html>

## Key Information

POLICY NAME	Group Whistleblowing Policy
INTERNAL CONTROL FRAMEWORK	Ethics and Conduct
PURPOSE	<ul style="list-style-type: none"> <li>The Policy records the CHBL Board’s commitment to a strong corporate culture of “Integrity”.</li> <li>To provide a mechanism for Staff to report confidentially concerns regarding compliance deficiencies or breaches. And ensure that, where similar safeguards/procedures must exist at regional office level in compliance with applicable law / regulation, they are complementary of and integrate with this Group Policy.</li> </ul>
POLICY OWNER	Group Head of Compliance
EFFECTIVE DATE	1 March 2020
NEXT REVIEW s	1 December 2023

## Version Control

Version	Reason	Version Approver	Date:
1.0	Transition local Policies to Group.	A Jenkins	5 November 2019
1.0	Initial Group version	CHBL Risk Committee (approved as a conduct risk control)	11 December 2019
1.0	Initial Group version	CHBL Audit Committee	12 December 2019
1.1	Update: ACR Champion and UK details	A Jenkins	6 May 2021
1.2	Update: U.S. Champion changed following Staff departure	A Jenkins	2 September 2022
2.0	Update: Group Champion changed, reformatted structure / text and removed typos. Adding Appendix A	A Jenkins	21 February 2023

## APPENDIX A: Exceptions to Group Policy

The following jurisdictions require addenda or exceptions from the requirements of this Group Policy due to regulatory, legislative or operational conflicts:-

- USA:** This Policy does not require any exceptions to it for entities established in or operations conducted from or in the United States of America.
- Bermuda:** This Policy does not require any exceptions to it for entities established in or operations conducted from or in Bermuda.
- Ireland:** This Policy does not require any exceptions to it for entities established in or operations conducted from or in Ireland.
- United Kingdom:** Procedural exception required for UK Regulatory accountability rules (SMCR) which require handling of investigations to remain under the oversight of the Local UK Whistleblowing Champion
- Asia:** This Policy does not require any exceptions to it for entities established in or operations conducted in Asia.