CODE OF BUSINESS CONDUCT AND ETHICS

Sagicor

A MESSAGE FROM SAGICOR'S PRESIDENT & CEO

At Sagicor, trust is foundational to everything we do. Our clients, shareholders, regulators, business partners, and communities expect us to act with integrity, exercise sound judgment, and do the right thing, consistently. Protecting that trust is the responsibility of every one of us.

Our core values, Integrity, Community, Accountability, and Responsiveness, shape our culture and guide how we work, decide, and serve. This Code of Business Conduct and Ethics (Code), together with our related policies, helps turn those values into everyday action. It sets out the standards that apply to all directors, officers, advisors, and employees across Sagicor Financial Company Ltd. and its subsidiaries (together, Sagicor), wherever we operate.

This Code is about how we show up: how we treat one another, how we serve our clients, how we protect information, how we manage conflicts, and how we make decisions when the right course is not always obvious. Our reputation has been built over nearly two centuries and each of us plays a part in protecting and strengthening it.

We expect everyone at Sagicor to know the Code, follow it, and use it as a guide in the decisions you make every day. If you are unsure what to do, ask. If something does not feel right, speak up. Raising concerns is part of our responsibility to one another and to Sagicor.

No code can anticipate every situation you may face. But if you act in alignment with our values, apply good judgment, and seek guidance when needed, you will help sustain the culture of trust, accountability, and ethical conduct that defines Sagicor.



Andre Mousseau, *President & CEO*

> Building a great company starts with trust, and trust is earned through the choices we make every day. Each of us is accountable for doing the right thing, living our values, and protecting the reputation we have built together.

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HOW THE CODE SHOWS UP

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HOW THE CODE SHOWS UP

The Code is built upon a foundation of strong corporate values and business practices.

The guidelines that follow are intended to describe how the Code is implemented, how to respond to the Code. It also describes how the Board monitors or satisfies itself regarding compliance with the Code, and how it governs behaviour in response to the Code. And finally, where stakeholders can obtain a copy of the Code.

ORGANIZATIONAL SCOPE AND ACCOUNTABILITY

This Code applies equally to all directors, officers, advisors, and employees throughout Sagicor, regardless of role, location, or how long you've been here.

Third-party business associates are also expected to abide by all applicable provisions of the Code and adhere to the principles and values set out in the Code when representing Sagicor. The Code reinforces our commitment to conducting business with integrity and accountability for the benefit of our stakeholders, including shareholders, investors, lenders, partners, clients, employees, suppliers, regulators, and the communities we serve.

Ultimate accountability for the Code rests with the President and CEO of Sagicor, who has delegated responsibility for its administration to the Group Chief Compliance Officer.

Risk Governance and Escalation

The standards in this Code are part of Sagicor's broader risk management and control environment. Concerns involving ethical conduct, legal or regulatory compliance, privacy, confidential information, cybersecurity, technology misuse, artificial intelligence, third-party information handling, fraud, or other control weaknesses must be raised promptly through the appropriate management, Compliance, Technology & Information Security, Legal, Human Resources, or risk channels, as applicable, so they can be assessed and managed in accordance with Sagicor's governance framework.

Compliance Contacts

For purposes of this Code, "Compliance Contact" means the appropriate Compliance contact for your role, business unit, entity, function and jurisdiction, including the relevant Entity or Regional Compliance Officer, or the Group Chief Compliance Officer, as applicable. Where this Code requires reporting, approval, consultation, or disclosure, individuals must contact the appropriate Compliance function identified in the escalation protocol applicable to them.

WHY THE CODE EXISTS

The Code provides our stakeholders with a clear understanding of the standards that guide how we conduct business.

You are expected to be thoroughly familiar with its provisions and to conduct yourselves according to both the spirit and letter of the Code. Behaving consistently in alignment with the Code is how we maintain the foundation of trust we've built since 1840.

The Code addresses the essential areas where ethical conduct and standards matter most emphasizing deterrence of wrongdoing that could lead to fraud and misconduct:

- Conflicts of interest
- Corporate opportunities
- Confidentiality
- Fair dealing
- Protection and use of company assets
- Compliance with laws, rules and regulations (including insider trading laws)
- Encouraging the reporting of any illegal or unethical behaviour

Note: The individual standards in the Code have been extracted from various internal policies and procedures, which are more comprehensive in detail. References are shown as appropriate within the Code for obtaining additional information.

Internal Communications Procedures

If you are unsure of the legal, ethical or reputational implications of a particular situation, or would like further guidance related to a matter referenced in this Code, you should consult first with a People Leader and if necessary, go next to your Compliance Contact. Directors should consult the Chair of the Board or the Chair of the Corporate Governance and Ethics Committee.

If you believe there is a conflict between this Code, any Business Practices and Procedures, and any legal or regulatory requirements, do reach out to your Compliance Contact.



A FOUNDATION OF TRUST SINCE 1840

Sagicor is in the business of trust. Clients hand us their financial futures. Investors hand us their capital. Communities give us a place at the table. None of that works without a clear, shared understanding of how we conduct ourselves — with each other, and with everyone who depends on us.

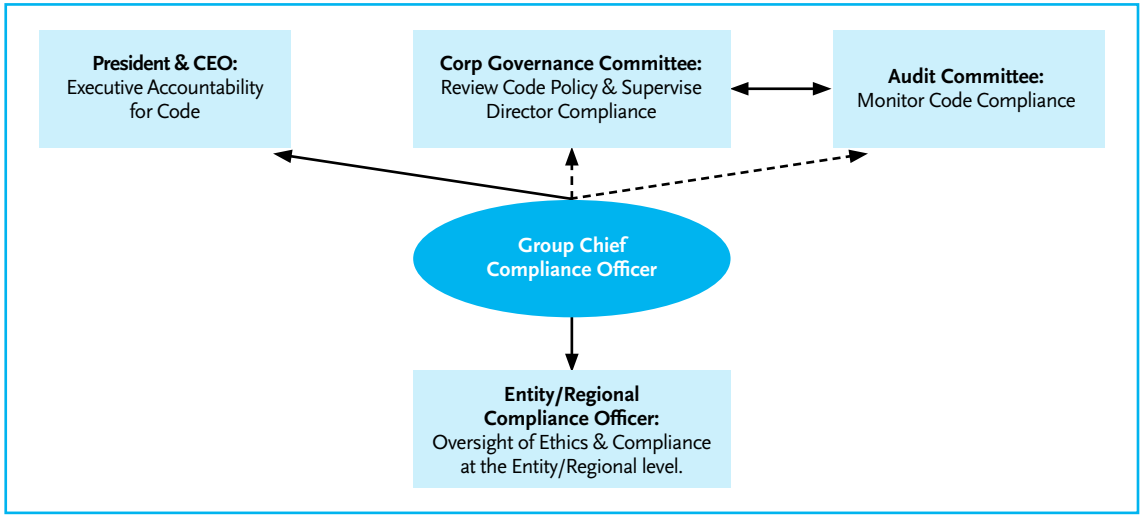
ABOUT DUTY

The Code is about duty — to ourselves, to each other, to our clients, to our shareholders, and to the communities we serve. For all of us, it shows up as the everyday obligation to act honestly, in good faith, and with the interests of others in mind.

Guiding Principles of Duty for Directors, Officers, Advisors, and Employees

Duty To Self	A duty to themselves for conscionable conduct in the performance of their business responsibilities.
Duty To Uphold The Law	A personal, civic, and business duty to comply with the law both in letter and spirit.
Duty To The Company	A moral and ethical (and in some cases legal) duty to act honestly and in good faith with a view to the best interests of the company above all other persons.
Duty to Shareholders (and Investors)	A duty to shareholders, as owners of the company, to operate the company for their benefit.
Duty to Clients	A duty to clients to provide them with transparent service solutions that address their real needs and service entitlements, within an institutional environment that protects their confidentiality and privacy.
Duty to Employees	A duty to their colleagues to respect their human and civic rights and to enhance their business well-being.
Duty to Society	A duty to harmonize the operation of the company with the aims of communities in which it operates.

Accountability for the Code



WHERE THE CODE EXISTS

This Code, along with some related policy documents, are available at: **www.sagicor.com**



ACCESSING CONFIDENTIAL REPORTING

To report a potential violation of the Code, you may do so using:

www.sagicor.EthicsPoint.com

You may choose to remain anonymous. You will never be asked to provide your name or any other form of identifying information. No identifying data will be tracked. Select your method of anonymous communication and provide the desired information.

SHOWING UP AS ONE

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SHOWING UP AS ONE

Before the policies, before the procedures, before the pages of detail that follow — there is this: Who we are, what we believe, and what we are committing to. Everything else in this Code rests on what is in this section.

Start here. So that what comes next feels less like rules and more like us and how we are building One Sagicor.

One Sagicor

One Sagicor is defined by cultivating a culture where collaborative behaviours empower people to unite their strengths to drive successful and sustainable business results.

LIVING OUR VISION, PURPOSE AND VALUES

Our Vision

Our vision is to be a great company committed to improving the lives of the people in the communities in which we operate.

Our vision is rooted in the reason Sagicor was started in 1840 and reflects a legacy of commitment to others above self. Our business positively impacts lives, starting with the lives of our team members who are the heartbeat of our success and extends to our various external stakeholders.

What does our vision mean for our Employees, Clients, Investors, Communities, and the Environment?

Employees

A commitment to fostering a respectful, inclusive, and performance-oriented workplace where employees are treated fairly, supported in their development, and recognized for their contributions. We seek to attract, develop, and retain capable people who live our values, serve our clients, and contribute to Sagicor's long-term success.

We support employee growth through meaningful work, learning opportunities, fair and responsible people practices, and a culture that encourages accountability, collaboration, and speaking up.

Clients

A commitment to offering products and services designed to meet client needs and deliver fair value, supported by clear information and responsible practices.

Investors

A commitment to creating long-term value through prudent business practices, disciplined risk management, sound governance, and sustainable performance. We seek to maintain the financial strength, resilience, and strategic focus needed to serve our clients, support our communities, and meet the expectations of shareholders and other capital providers over time.

Communities

A commitment to contributing positively to the communities in which we operate. Through community investment, partnerships, and employee volunteerism, we support initiatives that align with our focus areas of health, education, community and youth development, and sport. Our goal is to help strengthen community well-being and create positive impact beyond the products and services we provide.

Environment

A commitment to conducting our business in a responsible manner and considering environmental risks and opportunities in our operations, decision-making, and risk management practices. We support efforts to improve resilience, use resources responsibly, comply with applicable environmental laws and standards, and contribute to the long-term well-being of the communities in which we operate.

Our Purpose

Our purpose, "Wise financial thinking for life", defines the core of why we do what we do and how we do it. It is the reason our clients choose us and stay with us.

By living our purpose, we enable people to make sound choices today that impact their future and the futures of their loved ones. We stand out as a trusted partner who helps guide our clients to make sound decisions as we educate them about our products and services. Through our purpose, we provide solutions that minimize worry and empower people to survive and thrive when navigating life's uncertainties and risks.



At Sagicor we have a solution that is relevant to all stages of life which enables our clients to make beneficial financial decisions today, about their future.

Our Values

We believe that our collective mindsets and behaviours demonstrated through living our values will continue to distinguish us from other businesses and the undeniable result will be that we are valued by our team members and respected by our competitors.

Integrity is the foundation of trust and ethical behaviour that drives our long-term reputation, stakeholder confidence, and consistent and strategically aligned decision-making.

Community enables collaboration and alignment across diverse teams and with our external stakeholders. Through living the behaviours of our community core value, we enhance innovation and organizational effectiveness.

Accountability drives consistent and effective execution. It ensures ownership of results, follow-through, and continuous improvement.

Responsiveness enhances adaptability and our ability to remain relevant while supporting our competitiveness and consistent delivery of service excellence. We are accountable to each other and to our stakeholders and we are committed to showing up in alignment with our core values.

COMMITMENT AND ACKNOWLEDGEMENT

ONE doesn't grow in big moments. It grows in small ones; a meeting, a decision, a client call, a conversation, a deliverable, a mistake.

I Commit

I will show up with integrity — especially when no one is checking.

I will be accountable — for what I deliver, and for what I do not.

I will treat community as a verb — something I do, not somewhere I work.

I will stay responsive — to clients, colleagues, and the needs of the moment, guided by our values.

I will trust my instincts, ask when I am unsure, and speak up when something feels off.

I will remember that one is built by me, along with everyone else.

Making It Official: Your annual acknowledgement

The commitment is yours: a way to set your intention for how you show up at Sagicor. The acknowledgement is its formal counterpart: a yearly confirmation that you have read the Code, understand it, and are conducting yourself in line with it.

What it is: The Internal Disclosure Certificate is a short form you complete once a year. It confirms three things:

- You have reviewed the Code.
- You are complying with it in your role.
- You have disclosed any actual or potential conflicts of interest, outside directorships, or other matters the Code requires you to disclose.

Why it matters: It is how Sagicor, and you, keep a clear record that ethical conduct is something we actively reaffirm, not assume. It also gives you a structured moment each year to surface anything that is changed: a new outside role, a new relationship, a new question.

When and how: You will be prompted to complete the Certificate annually. If something changes mid-year that should be disclosed, do not wait for the next cycle — raise it with your People Leader or your Compliance Contact.

After your initial orientation and each year subsequently, you will be asked to acknowledge that you have read the Code, that you understand your obligations under it, and that you agree to comply with it. You will be asked to confirm that you are in compliance with the Code during the prior year, that you have reported any breaches of the Code as required, or if necessary, have taken the opportunity to report any current breaches.

Mandatory Training and Certification

All directors, officers, advisors, and employees must complete Code training at onboarding. Thereafter, an annual acknowledgment of compliance with the Code is required.

Additional role-based training may be required for higher-risk roles, including leadership, client-facing roles, technology roles, procurement, finance, compliance, and individuals handling personal, confidential, or sensitive information. Failure to complete the required training or certification may result in disciplinary action, up to and including termination of employment or engagement.

> "Every value exists in a person before it exists in a company. Our values are not aspirations we reach for; they are the operating cadence of how we work, decide, collaborate, and serve. When we behave consistently in alignment with our core values, we collectively create experiences that make Sagicor a great place to work and a great company to do business with for our external stakeholders."

The form used to document these internal disclosures is used for this purpose. However, in no event will compliance with the Code create any right to continued employment or appointment. If you are unsure whether something needs to be disclosed, that is usually a signal it is worth a conversation. Reach out to your People Leader or your Compliance Contact before completing the form.

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SHOWING UP IN THE WORK

Values are easy to name. They are harder to live — especially in the moments when no one is watching, the deadline is tight, or the right answer is not the convenient one. This section is about those moments. It is where our values stop being words and start being decisions: how we act, what we comply with, how we handle conflicts, how we treat information, how we do business with the people who trust us.

It all starts with personal integrity and a duty to self.

ACTING WITH INTEGRITY

Integrity is the foundation of trust at Sagicor. It guides how we make decisions, how we serve clients, how we work with one another, and how we protect the Company's reputation.

In practice, integrity shows up in three ways:

- **Personal Integrity**: Acting honestly, ethically, and responsibly, even when no one is watching.
- **Professionalism:** Bringing care, competence, respect, and sound judgment to the work we do.
- **Responsibility to Sagicor and its stakeholders:** Protecting the trust placed in us by clients, colleagues, shareholders, regulators, communities, and the Company.

Personal Integrity

Each director, officer, advisor, and employee is expected to act with honesty, fairness, accountability, and good judgment. In a financial services business, trust is earned through the decisions we make every day — including how we communicate, manage information, follow policies, serve clients, and raise concerns when something does not seem right.

- Know and follow the laws, regulations, Company policies, standards, and procedures that apply to your role.
- Base your actions on accurate information, sound judgment, and appropriate advice when needed.
- Be truthful and clear in communications, including sales materials, advertising, reports, records, regulatory filings, and other statements made on behalf of the Company.
- Take reasonable care to avoid errors, omissions, exaggerations, or misleading statements.
- Ensure transactions, documents, agreements, approvals, and business records are accurate, complete, timely, and maintained in accordance with applicable records management requirements.
- Avoid conduct, relationships, or activities, either inside or outside of work, that could reasonably call your honesty, integrity, judgment, or trustworthiness into question, or harm Sagicor's reputation.
- Speak up when policies are not being followed, when controls are not working as intended, or when something does not feel right, using the reporting channels described in *Showing Up When It Is Hard*.

Professionalism

Professionalism is about achieving excellence in our relations with others. It is about delivering the service and satisfaction that people expect, both in substance and form.

It is about our tangible and intangible relations, including those in which we represent the Company externally, what we communicate, how we communicate and how we conduct ourselves in the presence of others. The words we use, our body language, listening skills, appearance and attire all contribute to our professionalism.

Not least, the knowledge and skills we apply in the performance of our duties, our timeliness of response, our acceptance of accountability, and generally, our desire to please — these all reflect our professionalism. Indeed, the level of professionalism we seek in ourselves is a direct outcome of our self-commitment or duty to do the best that we can in the service of others.

A Duty to the Company

You share responsibility for ensuring that honesty and integrity prevail within the workplace, and for protecting the rights and assets of clients and the reputation of the Company.

If you become aware of any dishonest, fraudulent, or illegal activities, of any material transaction or relationship that reasonably could be expected to give rise to a conflict of interest, of the falsification of records or returns by another employee, officer, advisor or director, of any breach or material

DUTY TO SELF

You have been hired or retained by the Company on the presumption of your high moral character. In your employment with the Company, you are expected always to honour this trust in your integrity and be consistently guided by your conscience for choosing between right and wrong. The judgments you make must be independent of personal interests arising from other business dealings or obligations created by social relationships or personal favours.

waiver of this Code, or of any other serious infraction that has occurred either inside or outside the Company, report the matter following the guidelines outlined under the head *Speaking Up: Your Obligation to Report*.

Report also anything unusual that you might notice about a client's affairs that could adversely affect the client or the Company.



FOLLOWING THE LAW

Sagicor's ability to do business, to issue policies, manage investments, and operate across borders, exists because the law allows it to. That privilege comes with conditions. Compliance is not a checkbox; it is a duty to uphold the law and regulations.

This section covers four areas where the law and our work meet most directly: general legal compliance, inside information, copyright and licensed materials, and anti-money laundering. The principles are the same across all four. Know what applies to your role, follow it, and speak up when something feels off.

Compliance with Laws and Regulations

Sagicor's capacity to do business in its various forms is a privilege bestowed upon it by various Acts, Regulations and Conventions. These privileges remain available to the Company only to the extent that it complies with applicable requirements. Failure to do so could result in significant adverse consequences for the Company, its directors, officers, advisors, and employees.

You are expected to comply first with the laws, rules and regulations of all countries in which Sagicor operates; compliance with the Code is subservient to local laws and regulations. These laws and regulations include, but are not limited to, company law, insurance laws, investment banking laws, securities laws and regulations, corruption laws, and employment legislation.

Violations may result in legal proceedings and penalties, including, in some circumstances, civil and criminal penalties or regulatory fines that could affect you personally, in addition to consequences for the Company.

What is expected of you

- Understand the laws and regulations relating to the corporate responsibility assigned to you.
- Stay alert to changes in the law or new regulations and requirements that may affect your role and/or business unit.
- Do not take any action that could violate any applicable laws, rules or regulations. Seek the advice of internal counsel when in doubt.
- Report promptly to your People Leader any actual or contemplated violations of law or regulation.

Inside Information

The nature of your work may cause you to be privy to confidential information about the affairs of the Company, a client, a potential client, a supplier, or another company whose securities are publicly traded. This knowledge becomes "inside information" when two specific conditions are met:

1. The information has not been generally disclosed to the public
2. The information is "material," meaning it could have a significant effect on the company's investment rating, stock price, or securities values.

What is expected of you

- Scrupulously avoid using, sharing, or disclosing non-public information about Sagicor, its clients (current or prospective), except in the legitimate course of doing business.
- Do not engage in the illegal practice of "tipping," — passing inside information to another person who has no right or need to have it.

ON PERCEPTION

Insider trading rules don't only punish what's done. They also factor in how it looks. Even unintentional appearances of misuse can damage trust. Err on the side of caution. See also: *Disclosure and Insider Trading Policy.*

Inside information might include knowledge of a potential merger or acquisition, a breakthrough product or technology, or a significant financial loss or gain shared ahead of the information becoming public. Some Company positions are permanently deemed to be in possession of inside information; individuals occupying these positions are identified and are under the strictest obligation to observe Company policy regarding its use.

- Do not trade in stock or securities, or recommend or advise others to do so, on the basis of inside information you have acquired through your job.
- Before investing in Sagicor securities, familiarize yourself with Sagicor's guidelines on personal trading, including insider trading laws and Sagicor's securities trading policies, and consider the effect that even the perception of wrongdoing can have. If you have any doubts, refer to your People Leader or your Compliance Contact.

Copyright and Licensed Materials

Most printed, broadcast, recorded material, and software is protected by copyright laws. The prior approval of the copyright holder may be required before making copies of such material. If in doubt, consult guidelines issued by the Company or seek the advice of your People Leader or your Compliance Contact.

What is expected of you

- Do not copy any material covered by copyright protection without the prior approval of the copyright holder.
- Understand and follow the specific terms of any licensing agreement with computer software providers.
- Do not install or use any software not licensed for use by Sagicor on any company-owned computer.
- Do not copy software programs licensed to Sagicor for use by others, except as permitted by the copyright or licensing agreement. Use of any copies must strictly comply with the licensing agreement and Sagicor guidelines.

Anti-Money Laundering

Money laundering is a global problem with far-reaching and serious consequences. It is the process of converting illegal proceeds so that funds are made to appear legitimate, and it is not limited to cash transactions. Complex commercial transactions may hide financing for criminal activity such as terrorism, illegal narcotics trade, human trafficking, bribery, and fraud. Involvement in such activities undermines our integrity, damages our reputation, and can expose the Company and individuals to severe sanctions.

Sagicor forbids knowingly engaging in transactions that facilitate money laundering or result in unlawful diversion. We take affirmative steps to detect and prevent unacceptable or illegal forms of payment and financial transactions. Anti-money laundering laws, both in our operating countries and through international organizations, require transparency of payments and the identity of all parties to transactions. We are committed to full compliance with anti-money laundering laws throughout the world and will conduct business only with reputable clients involved in legitimate business activities and transactions. See also: *Anti-Money Laundering Policy* for full details.



MANAGING CONFLICTS AND DECISIONS

Most ethical missteps do not begin with bad intentions. They begin with a small overlap, a personal interest, a favour, an opportunity, that quietly competes with what is best for the Company or its clients. Left unchecked, those overlaps compound into harm: damaged trust, lost reputation, sometimes legal exposure.

This section covers five areas where personal interests and Company interests can collide, and what to do when they might. The principle running through all five is the same. When a conflict exists, or even appears to, surface it.

Conflict of Interest

Business decisions must be made with integrity and not influenced by a conflict of interest. A "conflict of interest" occurs when an individual's

ASK YOURSELF

A conflict does not have to be real to do damage. If a reasonable outsider could look at your situation and ask, "Whose interest am I serving here?", that is the moment to disclose, not the moment to decide it is fine.

Conflicts of interest damage the trust between you, the public and the Company. Even the appearance of a conflict may be harmful to the Company.

Fully committed to anti-money laundering laws and compliance. Report suspicious client activity, fraud indicators, or unusual transaction patterns in accordance with applicable anti-money laundering requirements.

private interest interferes in any way, or even appears to interfere, with the interests of Sagicor as a whole (Sarbanes-Oxley).

A conflict situation can arise when an employee, officer, advisor or director takes actions or has interests that may make it difficult to perform their company work objectively and effectively. It is not a question of whether or not specific persons may act inappropriately, only that they are in a situation in which conflict is made possible.

Generally, avoid situations in which you, or anyone personally associated with you (including friends and relatives), are exposed to self-enrichment at the expense of the Company.

What is expected of you

- Directors shall declare their interest in any matter coming to the Board for decision and shall not participate in debate or vote on such matters, unless otherwise approved by the Board and permitted by applicable law.
- Do not make a material investment in a business entity with or in which the Company transacts business, or is considering, intends to make, or has made an investment.
- Do not enter into any contract or transaction, directly or indirectly, for the provision of goods or services with the company unless: you have disclosed the situation in writing to Sagicor; you do not occupy a position that makes decisions for the procurement or use of the goods or services, or are responsible for accounting entries; the situation is clearly fair and reasonable from Sagicor's perspective at the outset; officers, advisors, and employees obtain approval in writing for the contract or transaction; and the director abstains from participation in debate and voting on any resolution to approve it.
- Do not make any significant investment in any competitor, supplier or client of Sagicor that could interfere with your objectivity or commitment in the performance of your duties with Sagicor.
- Do not approve a loan, product, service request, or transaction for yourself or for any client with whom you are personally associated, including friends and relatives. Refer these situations to your People Leader.
- Officers, advisors, employees, or members of their immediate family are not to acquire any assets or property from a client's estate, either directly or indirectly, nor accept executorships (paid or unpaid) for the settling of a client's estate, unless you can clearly demonstrate that the assets, property, or executorship appointment are totally independent of your employment status.
- Employees may accept other employment while employed by Sagicor provided it is legal, not with a competitor, does not expose the employee to a conflict of interest, and will not interfere with the employee's performance and time commitments with Sagicor. Approval should be obtained from the employee's People Leader or Human Resources Leader prior to accepting such external employment opportunities.
- Employees may work in the same unit or department with someone with whom they are personally associated, providing there is no conflict of interest, no reporting relationship, and the work arrangement does not result in a potential conflict of interest or security risk. Any such conflict must be immediately reported to the People Leader.

Corporate Opportunities

Through your familiarity with the Company's business and dealings, you may learn of economic opportunities available to or being contemplated by the Company. With that knowledge comes a real possibility of usurping a corporate opportunity, taking it for yourself something that belongs to the Company. You have a duty to the Company to advance its legitimate interests when the opportunity arises.

What is expected of you

- Do not appropriate for yourself economic opportunities discovered through the use of corporate property, information, or position.
- Do not use corporate property, information, or position for personal gain.
- Do not use corporate property, information, or position to compete with the Company.

Example: If Sagicor is considering investing in a particular business, you may not use the knowledge of that opportunity, acquired as a result of your relationship with Sagicor, to take that opportunity for yourself or anyone associated with you.

Disclosure of Outside Information

As fiduciaries, directors and officers have an obligation to disclose to Sagicor any information in their possession that may affect a vital aspect

"Generally, avoid situations in which you, or anyone personally associated with you (including friends and relatives), are exposed to self-enrichment at the expense of the Company."

of our business. You cannot conduct your relationship with the Company in good faith while withholding information about events or situations that could have a material adverse impact on the Company.

Example: If you are aware of something the Company should know, speak up. The threshold is whether it could matter, not whether you are certain it does.

Payments, Gifts, and Entertainment

You are encouraged to consider the motive behind business gifts and entertainment, given to or received from yourself or family, and to ensure they are offered only in the spirit of business courtesy and relationship management, not to set up reciprocal expectations of business favour.

Example: As a guide, a modest value of approximately US $100 (or equivalent) should be applied in assessing what is reasonable to accept. If in doubt about what is acceptable to give or receive, seek guidance from your People Leader or your Compliance Contact.

What is expected of you

- You are not to be involved in any act that could be interpreted as seeking, receiving, or dispensing a bribe, kickback, or questionable payment.
- You may supply or accept modest gifts, favours, entertainment, or services provided they: do not consist of cash, bonds, or negotiable securities; are unlikely to be interpreted as a bribe or other improper payment; conform with generally accepted ethical and legal standards as well as public disclosure requirements; will not cause reputational harm to the Company or the recipient.

Example: A useful gut check. Would you be comfortable if your gift, or the one you accepted, appeared in an internal memo, or a news story? If not, that is your answer.

Directorships in Outside Organizations

Employees and directors who are invited to sit on the Board(s) of external organizations, or to accept other appointments, may do so provided they observe the established Sagicor guidelines. Accepting directorships in other entities may not only compromise your loyalty but also demand significant time that may prevent you from performing your duties in full.

What is expected of you

- For executives, one outside board seat is acceptable contingent on permission from the Chair of the Board of Sagicor or the President and CEO.
- For directors, outside board seats are permissible provided they:

i. Are disclosed at the time of coming on to the Sagicor board.
ii. New outside boards are disclosed to the Sagicor Chair of the Board or President and CEO before they are accepted.
iii. Do not create material conflict or otherwise impair the duty of care

HANDLING INFORMATION AND ASSETS

What we know, what we are trusted with, and what we are permitted to use are among Sagicor's most valuable assets. Information, personal data, technology, systems, credentials, and digital tools must be handled responsibly, securely, and only for legitimate business purposes.

This includes the use of Sagicor information, assets, communication platforms, cloud services, and emerging technologies such as artificial intelligence. These obligations support Sagicor's values, protect stakeholder trust, and form part of Sagicor's broader risk management and control framework.

Confidentiality of Company Affairs

You owe a duty of confidentiality to the Company. This duty requires that you protect information about the Company which is confidential or proprietary to the Company, and which could be useful to competitors and harmful to the Company or its clients. This is intended to prevent those competitors from having access to such information and using it to their own advantage at the Company's expense.

You are responsible for protecting confidential information in your possession against theft, loss, unauthorized disclosure, access, destruction, or other misuse. Confidential information includes business plans, business forecasts, strategic initiatives, proposed acquisitions or divestitures, and current or proposed products and services.

You must also comply with the requirements related to the confidentiality of material non-public information contained in the *Disclosure and Insider Trading Policy*.

> "Confidentiality does not expire. When you leave Sagicor, the obligation to protect what you knew goes with you, indefinitely."

What is expected of you

- Only disclose confidential information to others within the Company on a need-to-know basis or when authorized to do so.
- Control access to confidential information. For example, do not leave it unattended in a conference room or discard it in a public place.
- Exercise discretion when discussing Company business, especially in public places such as restaurants, airplanes, over public or mobile phones and the internet.
- Do not disclose corporate information to outsiders, even if the outsider is a business associate, client, or client of yours. You are bound by a duty of confidentiality not to do so.
- Extend the use of confidentiality agreements to part-time, temporary, and contract employees, consultants, and vendors to the extent that they have access to confidential Company information.
- Do not remove any proprietary information from Company premises without permission from your People Leader.
- Do not give testimony about the Company or general industry policies or business practices in a court of law, in matters not involving Sagicor as a party, without prior authorization from Sagicor's legal counsel.
- Should you leave the service of the Company, you are obliged to continue safeguarding for an indefinite period the privacy and confidentiality of the affairs of the Company, clients, directors, officers, advisors, and employees. Specific client information, including names, lists, profiles, and data, is not to be used in subsequent employment situations. Any client or proprietary information you have in your possession is to be returned to the organization when you leave employment.
- Classify, label, store, share, retain, and dispose of information in accordance with Sagicor requirements, including applicable data classification and handling standards.
- Use only Sagicor-authorized devices, systems, applications, storage environments, and communication tools for Sagicor business, unless an approved exception applies.
- Follow the principle of least privilege and need-to-know when accessing, using, or sharing information.



- Do not copy, upload, download, transmit, print, remove, or store Sagicor information using unauthorized tools, applications, devices, cloud services, personal email accounts, or other unapproved locations.

Protection and Use of the Sagicor Name & Assets

All directors, officers, advisors, and employees have a duty to protect Company assets and ensure their efficient use for legitimate business purposes only.

What is expected of you

- The name "Sagicor," or any parts thereof, is to be used only for authorized Company business and never for personal activities.
- Do not identify yourself with the Company while pursuing personal, political, or not-for-profit activities, unless you obtain prior Company approval.
- Ensure that each use, acquisition, or disposition of an asset on behalf of the Company is undertaken with the general or specific authorization of management and is accurately and fairly recorded in reasonable detail in the Company's books of account and record.
- Company time, real property, intellectual property, financial assets, equipment, services, stationery, computers, communication

equipment, and mail services are not to be employed in personal or non-business uses.

- You may not remove or borrow any Company asset without prior and proper permission.

Use and Protection of Electronic Communications

The Company's information technology and communications systems are vital to enable us to conduct our business and reach out to our consumers. If you have access to our information systems and computer networks, you are responsible for using the highest standards of behaviour in all your usage and communications.

When you access our networks from remote locations (for example, at home or from non-Company locations), you are subject to the same standards of use as employees who access our networks while on Company premises.

The data transmitted, received, and stored by or within those systems — mobile phones, personal computers, data storage units, email — are valuable assets you must protect. This ensures resources remain accessible for business purposes, the Company's reputation is protected, and legal risk is minimized.

Limited personal use may be acceptable if it is authorized by your work location and does not interfere with your job responsibilities.

You must safeguard

Passwords: You are responsible for your corporate credentials. Passwords must meet corporate standards and must be kept private — not shared, coded into programs, or written down. IT Security must be informed if a password is suspected of having been compromised. You must not share your passwords with anyone at any time.

Mobile security: Treat your mobile device like any other corporate IT device. Mobile device security can be breached and infected just like a PC or laptop. You must never click links, download files, or execute programs on your mobile device unless required, and you are certain of the source and legitimacy of the content. Always protect such items from loss, theft, or damage.

Acceptable usage: You are not permitted to use the Company's information technology and communications systems (including email, instant messaging, the internet, or intranet) for activities that are harmful, unlawful, unethical, immoral, or otherwise contrary to the Code.

What is expected of you

- Use only Sagicor-authorized systems, applications, communication channels, storage locations, collaboration platforms, and remote-access methods for Sagicor business, unless an approved exception applies.
- Do not circumvent or attempt to disable security controls, logging, monitoring, filtering, system protections, or access controls implemented by Sagicor.
- Do not install or connect unauthorized software, hardware, removable media, extensions, plug-ins, artificial intelligence tools, personal networking tools, or communication tools on Sagicor systems or devices.
- Do not forward Sagicor communications or information to personal email accounts or use personal messaging platforms, storage tools, or accounts for Sagicor business unless explicitly authorized.
- Assume that use of Sagicor systems, networks, and communication resources may be monitored, logged, retained, reviewed, or audited by Sagicor where permitted by law and Sagicor policies.

Responsible Use of Artificial Intelligence (AI) & Automated Tools

Sagicor supports the responsible use of artificial intelligence, machine learning, automation and other emerging technologies where they improve efficiency, service, analysis, or decision support and are used in accordance with Sagicor requirements. These tools must be used lawfully, ethically, securely, and in a manner consistent with Sagicor's risk appetite, control expectations, and legal and regulatory obligations.

What is expected of you

- Use only AI tools, models, assistants, applications, or services that have been approved by Sagicor for the relevant business purpose.
- Do not input, upload, paste, prompt with, or otherwise expose confidential, sensitive, personal, client, proprietary, privileged, or other restricted information into public or unapproved AI tools.
- Review AI-generated outputs for accuracy, completeness, fairness, appropriateness, and compliance before using them in business communications, decisions, analysis, documentation, or client interactions.

MISUSE OF TECHNOLOGY

The unauthorized transmission of company data, access to inappropriate internet sites, and the transmission of inappropriate emails are all examples of misuse of technology.

See also: *Electronic Mail and Internet Security Policy; Password Policy; Information Security Policy*

Examples of Inappropriate Computer Use

Using electronic media to initiate, save, or send items that are hostile, harassing, offensive, threatening, or otherwise inappropriate.

Using electronic media to initiate, save, or send chain letters or other widespread non-business distributions.

Using electronic media to initiate or participate in any malicious, unauthorized, or fraudulent use of company resources.

Using the Company's electronic media for non-business purposes, in ways that don't comply with the policies of your business unit.

- Do not rely on AI outputs without appropriate human judgment, especially where the output may affect clients, employees, financial decisions, legal positions, risk assessments, controls, or regulatory obligations.
- Do not use AI or automation to mislead, fabricate records, circumvent controls, impersonate others, create deceptive content, or engage in unlawful, unethical, discriminatory, or otherwise inappropriate conduct.
- Escalate any suspected AI-related issue, including unauthorized use, inaccurate or harmful outputs, inappropriate data disclosure, bias concerns, or control failures, in accordance with applicable incident and risk escalation procedures.

Data Privacy, Confidentiality and Responsible Data Use

We respect and protect the privacy and confidentiality of the personal information, confidential information, and sensitive business information entrusted to us by clients, employees, directors, advisors, suppliers, and other third parties. Such information must be collected, accessed, used, shared, stored, retained, transmitted, and disposed of only for legitimate business purposes, only by authorized persons, and only in accordance with applicable laws, regulations, contracts, and Sagicor policies.

This obligation extends across every relationship Sagicor has with our clients, employees, directors, officers, advisors, vendors, suppliers, and business partners. It also extends across the full information lifecycle, from creation and access to storage, use, sharing, retention, and destruction.

What is expected of you

- Access personal information, confidential information, and sensitive information only where you have a legitimate business need and are authorized to do so.
- Use, share, transfer, and retain information only in accordance with Sagicor requirements, including data classification, handling, storage, transmission, retention and disposal requirements.
- Follow the principle of least privilege and need-to-know when accessing, using, or disclosing information.
- Use only Sagicor-authorized devices, platforms, communication tools, storage environments, and transfer mechanisms for Sagicor business, unless an approved exception exists.
- Do not store, copy, upload, transmit, print, remove, or disclose Sagicor or client information using unauthorized tools, locations, devices, cloud services, email addresses, applications, or media.
- Take extra care with sensitive data, including client financial information, health information, identity information, credentials, regulatory information, legal information, investigation information, and other restricted records.
- Ensure appropriate protections are used when sending or sharing information, including encryption or other secure methods where required.
- Report promptly any actual or suspected privacy breach, unauthorized access, data leakage, phishing event, loss of device, inappropriate disclosure, or other information security incident.

When handling information, ask yourself:

Does this person need this information to do their job?

Is this the right platform or channel?

Am I handling this information in a way that protects the client, Sagicor, and the trust placed in us?



ON ACCOUNTABILITY

Using a tool does not reduce your responsibility. If you use AI to assist with your work, you remain responsible for the result, for the integrity of the work product, and for ensuring that the output complies with Sagicor policies, the law, and the standards set out in this Code.

Client Privacy and Consent

Clients have a legal, regulatory, and ethical right to privacy and to the secure handling of their personal information as a condition of doing business with Sagicor.

Our reputation depends on how well we protect the information entrusted to us. We must handle client information lawfully, confidentially, securely, and only for authorized business purposes.

What is expected of you

- Comply at all times with applicable privacy, confidentiality, information security, and records handling requirements relating to client information.
- Ensure appropriate authority, consent, notice, or other lawful basis exists before sharing client information within or across Sagicor entities, functions, or with third parties.
- Share client information only where there is a legitimate business need, only with authorized persons, and only using approved methods and platforms.
- If you leave the service of Sagicor, you remain obligated to protect client privacy and confidentiality and must return all client and Sagicor information in your possession.

Employee Privacy and Consent

We respect the confidentiality of employee personal information, including medical, human resources, payroll, and other employment-related records. Access to such information is permitted only where there is a legitimate and lawful business reason and must be handled in accordance with applicable law and Sagicor policies.

Requests for confidential employee information from anyone outside Sagicor or from anyone within Sagicor, who doesn't have a legitimate access need, must be handled in accordance with Sagicor requirements.

Employees should also be aware that, where permitted by law and policies, Sagicor systems, devices, business communications, and certain activities carried out on Sagicor premises or resources may be monitored, reviewed, retained, or accessed for security, legal, regulatory, operational, or investigative purposes.

When We Are Also Clients

Most directors, officers, advisors, and employees have both a business and client relationship with Sagicor. When that is the case:

- Personal information about you as a client is confidential and is treated in the same manner as any other client. Cross-referrals or product or service promotions require your prior written consent.
- Personal information about you as an employee or director is also confidential. Any sharing or use of this information for client-related purposes requires your prior consent.
- Any inquiries about an employee, officer, advisor, or director, or requests for their information, including those concerning former employees, officers, advisors, and directors, are to be handled in strict compliance with applicable privacy policy.
- Should you leave the service of Sagicor, you are obliged to continue safeguarding director, officer, advisor, and employee privacy and confidentiality.

Information Shared with Third Parties

In the ordinary course of business, Sagicor may share information with vendors, service providers, intermediaries, consultants, business partners, or other third parties. Such sharing must be lawful, necessary, proportionate, and consistent with Sagicor requirements for confidentiality, privacy, information security, and third-party risk management.

What is expected of you

- Share Sagicor, client, employee, or third-party information only where there is a legitimate business purpose, appropriate authority, and appropriate contractual or legal protection in place.
- Share only the minimum information necessary for the intended purpose and only with the persons who need to know.
- Ensure third parties handling Sagicor information are subject to appropriate confidentiality, privacy, security, and incident reporting obligations.
- Do not provide third parties with broader access to systems, data, or environments than is necessary to fulfill their approved role or contractual obligations.



MISUSE OF DATA

Privacy starts with this distinction:

Does this person actually need this information to do their job, or am I just sharing because I can?

GUIDELINES

When handling the personal data of others, you must:

- Act in accordance with applicable laws.
- Act in accordance with any relevant contractual obligations.
- Collect, use, and process information only for legitimate business purposes.
- Provide clear and accurate privacy notices when collecting or processing personal data.
- Limit access to information to those who have a legitimate business purpose for seeing it.
- Securely store, transmit, and destroy personal information in accordance with applicable laws.
- Take extra care to prevent unauthorized disclosure.

- Escalate concerns where a third party may not be meeting Sagicor's expected security, privacy, or conduct standards.

Concerns involving privacy, confidential information, cybersecurity, artificial intelligence, technology misuse, control weaknesses, or third-party information handling must be escalated promptly through the appropriate management, Compliance, Technology & Information Security, Legal, and Risk channels so they can be assessed and managed in accordance with Sagicor's risk governance framework.

DOING BUSINESS FAIRLY

Trust is what we sell. Insurance, investments, financial advice — none of it works without it. Clients, suppliers, shareholders, and competitors all need to know that when Sagicor does business, it does it fairly.

This section covers what fairness looks like across our business relationships: how we deal with the people we buy from, the people we sell to, the people who invest in us, the companies we compete with, and the line we don't cross when handling Company funds and assets.

Fair Dealing with Suppliers

Each director, officer, advisor, and employee must endeavour to deal fairly with the Company's suppliers. You should not take unfair advantage of suppliers through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. Sagicor is committed to fair competition in all its dealings with suppliers, who are generally chosen on the basis of merit, competitiveness, price, reliability, and reputation.

What is expected of you

- You must not be associated in any way with agreements between the Company and suppliers in which you, or a member of your immediate family, have an interest, or which might result in personal gain for you or your family member.
- For relatively large contracts, use a bidding process involving Procurement and Risk Management for choosing suppliers.
- Do not endorse a supplier's product or service using the Company name without approval from your Compliance Contact.
- Do not suggest or imply to a supplier that the Company's patronage depends on the supplier becoming a client of the Company, or on the supplier continuing to do business with the Company.



> Trust — insurance, investments, financial advice — none of it works without it. Clients, suppliers, shareholders, and competitors all need to know that when Sagicor does business, it does it fairly.

Fair Dealing with Clients

Sagicor is committed to treating clients fairly and acting with honesty, integrity, professionalism, and due care throughout the client relationship. Clients come to us with real needs and questions, and they trust us to provide clear information, suitable solutions, responsible service, and fair outcomes.

Fair treatment applies across the full lifecycle of our products and services, including product design, marketing, distribution, advice, sales, underwriting, administration, servicing, claims handling, complaints handling, and privacy protection. It also applies whether clients are served directly by Sagicor or through advisors, agents, brokers, intermediaries, or other distribution partners.

What is expected of you

- Act honestly, fairly, and in good faith in all dealings with clients.
- Consider client needs, interests, circumstances, and intended outcomes when designing, recommending, selling, administering, or servicing products and services.
- Provide information that is clear, accurate, balanced, timely, and not

misleading, including in advertising, illustrations, product materials, disclosures, and client communications.

- Use only approved sales materials, illustrations, scripts, and communications, and do not make statements about Sagicor, its products, or competitors that are inaccurate, exaggerated, incomplete, or misleading.
- Do not use high-pressure, coercive, deceptive, unfair, or inappropriate sales practices, including tying or bundling practices that are prohibited by law or Company policy.
- Ensure recommendations, where provided, are suitable and based on appropriate information about the client, the product, and the relevant legal and regulatory requirements.
- Take reasonable steps to identify and support clients who may be vulnerable or who may need additional assistance to understand products, services, disclosures, or decisions.
- Honour valid claims and service obligations in accordance with applicable laws, contractual terms, Company policies, and fair claims-handling practices.
- Handle client complaints promptly, fairly, consistently, and in accordance with applicable complaints-handling procedures.
- Protect client information and privacy and use client information only for authorized and lawful business purposes.
- Escalate concerns about sales practices, client harm, unsuitable recommendations, misleading communications, complaints trends, product issues, intermediary conduct, or other conduct-risk concerns.

Fair Dealing with Shareholders and Investors

Sagicor is committed to fair, accurate, timely, and transparent communications with shareholders, investors, regulators, and the market, in accordance with applicable securities laws, stock exchange requirements, accounting standards, and Company policies.

Shareholders and investors rely on the integrity of the Company's financial reporting, public disclosures, and governance practices when making investment decisions. Information that may reasonably be considered material must be handled carefully, disclosed only through authorized channels, and not used for personal advantage.

What is expected of you

- Ensure that financial statements, books, records, reports, and regulatory filings are accurate, complete, timely, and prepared in accordance with applicable accounting standards, regulatory requirements, internal controls, and Company policies.
- Do not make, approve, or permit false, misleading, incomplete, or unsupported statements in financial records, public disclosures, investor communications, regulatory filings, or other Company records.
- Protect material non-public information and share it only with authorized persons who have a legitimate business need to know.
- Do not selectively disclose material non-public information to shareholders, investors, analysts, lenders, business partners, friends, family members, or any other person, except as permitted by law and Company policy.
- Do not buy, sell, recommend, or otherwise trade in Sagicor securities while in possession of material non-public information about Sagicor or its affiliates.
- Do not buy, sell, recommend, or otherwise trade in the securities of another company based on material non-public information learned through your role at Sagicor, including information about Sagicor's investment intentions, transactions, or business relationships.
- Do not tip or encourage another person to trade based on material non-public information.
- Refer questions from shareholders, investors, analysts, rating agencies, the media, or other external parties to the individuals authorized to speak on behalf of Sagicor.
- Escalate concerns about inaccurate records, disclosure issues, potential insider trading, selective disclosure, or other conduct that may affect the integrity of Sagicor's public reporting or market communications.



See also: *Disclosure and Insider Trading Policy; Records Management requirements; Enterprise Risk Management Framework.*

Free and Fair Competition

Sagicor is committed to competing fairly, honestly, and in compliance with applicable competition, antitrust, and fair dealing laws in the

jurisdictions where we operate. We compete based on the strength of our products, services, people, advice, and client relationships, not through improper agreements, misleading statements, misuse of confidential information, or conduct that restricts fair competition.

What is expected of you

- Do not enter into any agreement, understanding, arrangement, or discussion with a competitor that could restrict competition, including discussions about pricing, fees, commissions, product terms, markets, clients, suppliers, distribution channels, hiring practices, or business strategies.
- Do not exchange competitively sensitive information with competitors, including current or future pricing, costs, margins, sales plans, product launches, marketing strategies, underwriting practices, or client information, unless approved by Legal.
- Be careful in trade associations, industry meetings, benchmarking exercises, seminars, conferences, and informal interactions with competitors. If an inappropriate topic arises, stop the discussion, leave if necessary, and report the matter promptly to Legal or Compliance.
- Do not make false, misleading, or unfair statements about competitors, their products, or their services. Promote Sagicor's strengths honestly and professionally.
- Obtain appropriate business and Legal approval before participating in benchmarking, joint industry initiatives, information exchanges, or other activities involving competitors.
- Escalate concerns about possible anti-competitive conduct, improper information sharing, or discussions that may create competition-law risk.

Fraud, Misconduct and Misuse of Assets

Sagicor is committed to acting honestly, protecting the assets entrusted to us, and preventing fraud, theft, misconduct, and misuse of Company or client resources.

Each of us is responsible for using Company assets, client assets, information, systems, funds, time, and records appropriately and only for legitimate business purposes.



Fraud and misconduct can take many forms, including misappropriation of funds, falsification of records, misuse of Company systems, unauthorized use of client or Company information, improper expense claims, conflicts of interest, deception, concealment, or helping another person engage in improper conduct.

What is expected of you

- Protect Company and client funds, property, information, records, systems, services, and other assets from loss, theft, misuse, unauthorized access, improper disclosure, or personal use.
- Do not steal, misappropriate, borrow without authorization, convert, or misuse any asset belonging to Sagicor, a client, a colleague, a supplier, or another third party.
- Do not knowingly assist, conceal, ignore, or enable fraud, theft, misappropriation, falsification of records, improper payments, misuse of assets, or other misconduct.
- Use Company funds, expense accounts, purchasing cards, reimbursement processes, and approval authorities only for valid business purposes and in accordance with Company policy.
- Ensure all transactions, expenses, records, approvals, and supporting documents are accurate, complete, timely, and not misleading.
- Do not use your role, access, authority, Company information, or Company resources for personal gain or for the improper benefit of another person or organization.

DUE DILIGENCE

Diligence is active, not passive. The duty of care is not satisfied by reading what is put in front of you. It is satisfied by asking what is missing, questioning what does not add up, and seeking outside expertise when your own due diligence is not enough.

- Do not compete with Sagicor or take for yourself a business opportunity that belongs to the Company, except as permitted under Company policy and applicable approvals.
- Report promptly any suspected fraud, theft, misuse of assets, falsification of records, improper expense claims, conflicts of interest, or other misconduct.

FOR THOSE WHO LEAD: FIDUCIARY DUTY & DUTY OF CARE

Leadership at Sagicor carries significant responsibility. Directors and officers are expected to act with integrity, exercise sound judgment, and carry out their responsibilities in a manner consistent with applicable law, regulatory expectations, Company policies, and Sagicor's governance and risk management frameworks.

This section provides a high-level overview of certain legal and governance duties that apply to directors and officers. These duties may vary by jurisdiction and role, and should be interpreted in accordance with applicable law, governing documents, and legal advice where required.

Fiduciary Duty

Directors and officers are expected to act honestly and in good faith, with a view to the best interests of the Company. This duty is owed to the Company as a legal entity and must be carried out in a manner that is lawful, ethical, and consistent with sound governance and prudent risk management.

Acting in the best interests of the Company requires directors and officers to exercise independent judgment, avoid conflicts of interest, protect confidential information, and make decisions that support the Company's long-term resilience, reputation, and ability to create, preserve, and realize value for stakeholders.

What is expected of you

- Act honestly, in good faith, and with integrity in the performance of your responsibilities.
- Exercise independent judgment and make decisions in the best interests of the Company, consistent with applicable law, regulation, governance requirements, and ethical standards.
- Identify, disclose, and appropriately manage actual, potential, or perceived conflicts of interest.
- Protect the Company's assets, confidential information, reputation, and control environment.
- Support a culture of accountability, effective challenge, transparency, and timely escalation.
- Consider relevant risks, opportunities, stakeholder impacts, and long-term implications when making decisions or providing oversight.

Duty of Care

Directors and officers are expected to exercise the care, diligence, and skill that a reasonably prudent person would exercise in comparable circumstances, subject to applicable legal standards in the relevant jurisdiction.

In practice, this means coming prepared, asking questions, understanding the matters under consideration, considering relevant information, and seeking appropriate advice or expertise where needed. Directors and officers may rely in good faith on information provided by management, advisors, or experts, but should follow up where information is incomplete, unclear, inconsistent, or raises concerns.

What is expected of you

- Devote sufficient time and attention to understand the matters requiring your review, approval, oversight, or decision.
- Review materials carefully and ask questions where information is unclear, incomplete, inconsistent, or does not appear to support the recommendation being made.
- Seek additional information, advice, or expertise where the matter requires specialized knowledge or where the potential impact is significant.
- Consider whether decisions are consistent with Sagicor's strategy, values, risk appetite, policies, and applicable legal and regulatory obligations.
- Escalate material risks, control weaknesses, compliance concerns, conflicts of interest, or other issues that may affect the Company's operations, reputation, financial condition, clients, or stakeholders.
- Support accurate, timely, and transparent reporting to the Board, Board Committees, senior management, regulators, and other stakeholders as required.



LEADERSHIP ACCOUNTABILITY

Leadership accountability does not mean having all the answers. It means asking the right questions, applying sound judgment, encouraging effective challenge, and ensuring that decisions are made on an informed, ethical, and risk-aware basis.

SHOWING UP WITH EACH OTHER

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SHOWING UP WITH EACH OTHER

We spend a significant part of our lives at work. The quality of that experience matters. People deserve to be treated with dignity and respect, and Sagicor is better able to serve clients, investors, regulators, and communities when our workplace supports trust, inclusion, accountability, and collaboration.

This section sets out the standards we hold ourselves to in our interactions with one another. These standards apply whether we are working in person, remotely, online, in meetings, at Company events, or in any setting connected to Sagicor's business.

A RESPECTFUL WORKPLACE

Sagicor is committed to maintaining a respectful, inclusive, and professional workplace that is free from unlawful discrimination, harassment, intimidation, bullying, workplace violence, and retaliation.

Respect at Sagicor means treating colleagues, clients, advisors, business partners, and others with fairness, dignity, and professionalism. It also means listening when concerns are raised, acting when something is not right, and helping create an environment where people can contribute fully and responsibly.

No Discrimination

Sagicor is committed to equal opportunity and fair treatment in employment and business relationships, in accordance with applicable laws, regulations, and Company policies in the jurisdictions where we operate.

We do not tolerate discrimination based on legally protected grounds. These may include, depending on the jurisdiction, race, colour, religion or creed, national or ethnic origin, age, disability, sex or gender, pregnancy, marital or family status, political opinion or affiliation, and any other status protected by applicable law.

What is expected of you

- Treat others fairly, respectfully, and professionally.
- Do not make employment, business, or workplace decisions based on prohibited or irrelevant personal characteristics.
- Do not engage in conduct that excludes, disadvantages, demeans, or unfairly targets another person based on a protected ground.
- Support a workplace where differences in background, experience, identity, perspective, and role are respected.
- Raise concerns promptly if you experience, observe, or become aware of discriminatory conduct

No Harassment, Bullying, or Workplace Intimidation

Directors, officers, advisors, employees, and others working with or on behalf of Sagicor have the right to work in an environment free from harassment, bullying, intimidation, and abusive conduct.

Harassment includes unwelcome conduct that a reasonable person would consider offensive, humiliating, intimidating, hostile, or abusive. It may occur in person, online, through electronic communications, at Company events, or in any other work-related setting. Bullying or intimidation may include repeated or serious conduct that undermines, threatens, humiliates, isolates, or unfairly targets another person.

What is expected of you

- Do not engage in conduct that is threatening, intimidating, abusive, humiliating, discriminatory, or harassing.
- Do not use slurs, insults, stereotypes, offensive jokes, demeaning comments, or other language that undermines dignity or respect.
- Do not misuse authority, position, influence, or workplace relationships to pressure, isolate, embarrass, or disadvantage another person.
- Do not share, display, access, or circulate offensive, discriminatory, harassing, or otherwise inappropriate material using Company systems, devices, platforms, or in any work-related setting.
- Do not record, photograph, screenshot, or circulate images or content from work-related interactions without appropriate authorization or consent.
- Do not dismiss, minimize, or retaliate against someone who raises a concern in good faith or participates in a review or investigation.

Reporting Concerns

If you believe you have experienced or witnessed discrimination, harassment, bullying, intimidation, workplace violence, retaliation, or other conduct inconsistent with this Code, report it promptly to your People leader, another member of management, Human Resources, Compliance, or through EthicsPoint.

Sagicor will treat concerns with appropriate sensitivity and confidentiality, subject to the need to review, investigate, escalate, report, or remediate the matter in accordance with applicable law and Company policy. Retaliation against anyone who raises a concern in good faith or participates in an investigation is prohibited and will itself be treated as a breach of this Code.

A HEALTHY AND SAFE WORKPLACE

Sagicor is committed to providing a safe, healthy, respectful, and inclusive workplace for employees, clients, visitors, and others on our premises or participating in our business activities.

Safety includes both physical and psychological safety and is supported by compliance with applicable health, safety, employment, human rights, accessibility, and workplace violence and harassment laws in the jurisdictions where we operate. Everyone has a role in maintaining a safe workplace. We are expected to act responsibly, follow Company policies, report unsafe conditions or conduct, and treat one another with respect.

Physical Health and Safety

Sagicor is committed to maintaining a workplace that protects physical health and safety in accordance with applicable laws, regulations, and Company policies.

Directors, officers, advisors, employees, and others working with or on behalf of Sagicor must not engage in conduct that endangers themselves, colleagues, clients, visitors, or Company property.

What is expected of you

- Know and follow Company policies and local requirements relating to workplace health and safety, alcohol and substance use, workplace conduct, access to premises, emergency procedures, and security.
- Immediately report accidents, injuries, occupational illnesses, unsafe practices, unsafe conditions, threats, intimidation, or workplace violence concerns to your People Leader, Human Resources, Security, or other designated reporting channel.
- Do not engage in threats, intimidation, aggressive conduct, jokes or comments about violence, or any behaviour that could reasonably create a safety concern.
- Cooperate with emergency procedures, safety investigations, drills, audits, and corrective actions.
- If you are a people leader, take reasonable steps to identify, escalate, and address workplace safety concerns promptly and appropriately.

Psychological Safety

A psychologically safe workplace is one where people can respectfully ask questions, raise concerns, challenge assumptions, admit mistakes, and offer different views without fear of retaliation or unfair treatment.

Psychological safety does not mean avoiding accountability. It means creating an environment where concerns, risks, mistakes, and opportunities are surfaced early enough to be understood and addressed. This supports better decision-making, stronger controls, responsible risk-taking, and continuous improvement.

What is expected of you

- Speak up when something does not feel right, even if you are not certain there has been a breach.
- Listen respectfully when others raise concerns or express a different view.
- Treat disagreement as an opportunity to improve decisions, not as personal conflict.
- Do not retaliate against, isolate, dismiss, or disadvantage someone for raising a concern in good faith or participating in an investigation.
- Learn from mistakes, control failures, and approved risk-taking that does not achieve the intended result, while remaining accountable for decisions, conduct, and outcomes.



FOR LEADERS

Psychological safety lives or dies at the team level and is shaped most by what leaders do when something hard is raised. The first time you punish a messenger, your team learns the lesson permanently.

Growth and Performance Recognition

Sagicor is committed to fostering a respectful, inclusive, and performance-oriented workplace where employees are treated fairly, supported in their development, and recognized for their contributions.

We seek to attract, develop, and retain capable people who live our values, serve our clients, and contribute to Sagicor's long-term success. We support employee growth through meaningful work, learning opportunities, fair and responsible people practices, constructive feedback, recognition, and a culture that encourages accountability, collaboration, and speaking up.

Liability Protection

Sagicor may, where appropriate and subject to applicable law, Company policy, governing documents, and the specific facts and circumstances, provide legal defence or reimbursement support to directors, officers, advisors, employees, or other eligible individuals in relation to claims arising from the good-faith performance of their Company duties.

This protection does not apply to conduct that is unlawful, fraudulent, dishonest, in bad faith, outside the scope of Company duties, or otherwise inconsistent with this Code or applicable Company policy. Each situation will be assessed on its merits.





SHOWING UP IN COMMUNITIES

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SHOWING UP IN COMMUNITIES

Sagicor's commitment to community is reflected in how we conduct business, how we support our clients and colleagues, and how we contribute to community well-being through community investment, partnerships, and employee volunteerism. Consistent with our Annual Report and Sustainability Report, Sagicor's community focus areas include health, education, community and youth development, and sport.

This section of the Code sets out the standards expected of each of us where our business intersects with society, including how we participate in civic and political activities, consider the community impact of our decisions, and support responsible business practices.

POLITICAL RELATIONS

Sagicor respects the right of individuals to participate in the political process in their personal capacity. At the same time, political contributions, lobbying, interactions with public officials, and the use of Company resources for political purposes can create legal, regulatory, reputational, and conflict-of-interest risks.

Sagicor will make political contributions only where permitted by applicable law, approved in accordance with Company policy, and made transparently for a lawful purpose. Political contributions are separate from Sagicor's corporate philanthropy and community investment activities.

What is expected of you

- Participate in civic and political activities only in your personal capacity, unless you are specifically authorized to act on behalf of Sagicor.
- Do not make or authorize political contributions in Sagicor's name, or using Sagicor funds, facilities, systems, employees, or other resources, unless specifically permitted by law and approved in accordance with Company policy.
- Do not use your title, role, or affiliation with Sagicor to suggest Company support for a political party, candidate, campaign, public position, or political activity unless you are authorized to do so.
- Do not offer, promise, give, or authorize gifts, entertainment, travel, hospitality, donations, sponsorships, employment opportunities, or anything else of value to a public official, government employee, political party, candidate, or government-related entity to obtain or retain business, influence a decision, or secure an improper advantage.
- Consult Legal, Compliance, or the appropriate approval authority before engaging in lobbying activity, government advocacy, political contributions, or interactions with public officials that may create legal, regulatory, conflict-of-interest, or reputational risk.
- Ensure any approved political or government-related activity is accurate, transparent, properly recorded, and consistent with applicable law and Company policy.

SOCIAL IMPACT AND COMMUNITY RESPONSIBILITY

Sagicor recognizes that our business decisions can have social and economic impacts in the communities in which we operate. We are committed to conducting business responsibly, exercising sound judgment, and considering the interests of clients, employees, shareholders, investors, suppliers, regulators, and communities where relevant to our roles and decisions.

Our commitment to community is reflected in responsible business practices, community investment, partnerships, and employee volunteerism. Consistent with our Annual Report and Sustainability Report, Sagicor's community focus areas include health, education, community and youth development, and sport.

What is expected of you

- Consider the potential social, economic, client, employee, community, reputational, and conduct impacts of business decisions where relevant to your role.
- Ensure community investments, donations, sponsorships, partnerships, and volunteer activities are lawful, transparent, properly approved, and consistent with Sagicor's values, policies, and community focus areas.
- Do not use charitable donations, sponsorships, partnerships, or community initiatives to improperly influence a business decision, public official, regulator, client, supplier, or other stakeholder.
- Be respectful of local communities, cultures, and stakeholders in the markets where Sagicor operates.

OUR COMMITMENTS

For more on Sagicor's commitments to society and environment see our Annual Report and Sustainability Report where we outline commitments, activities, and outcomes.

The line between citizen and representative

Your civic life is yours. The moment you involve Sagicor in it, even by association, the rules change.

- Escalate concerns where a business activity, investment, divestment, partnership, donation, sponsorship, or community initiative may create legal, regulatory, reputational, conduct, or conflict-of-interest risk.

ENVIRONMENTAL RESPONSIBILITY

Sagicor recognizes that environmental risks and opportunities may affect our business, clients, investments, operations, and communities. We are committed to conducting our business in a responsible manner, complying with applicable environmental laws and standards, and considering environmental matters as part of sound governance, risk management, and responsible business practices.

Our approach to environmental responsibility is reflected in our broader sustainability reporting and includes consideration of resilience, responsible resource use, operational practices, and the long-term well-being of the communities in which we operate.

What is expected of you

- Conduct business activities in compliance with applicable environmental laws, regulations, permits, standards, and Company policies.
- Use Company resources responsibly and support efforts to reduce waste, improve efficiency, and manage environmental impacts where relevant to your role.
- Consider environmental risks and opportunities where relevant to business decisions, operations, procurement, investments, products, services, or community initiatives.
- Do not make environmental or sustainability claims on behalf of Sagicor unless they are accurate, supportable, approved by the appropriate function, and consistent with Sagicor's public disclosures.
- Escalate environmental, sustainability, or disclosure concerns where they may create legal, regulatory, reputational, operational, or stakeholder risk.







SHOWING UP WHEN IT IS HARD

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SHOWING UP WHEN IT IS HARD

Most of this Code is about doing the right thing in the daily work. This section is about the moments when the right thing is not easy: when something looks wrong, when you are not sure what to do, when a colleague is acting in a way that does not sit right, or when you yourself have made a mistake.

These are the moments the Code comes alive. They are also the moments people most often look away. This section is here so you do not have to.

RECOGNIZING A BREACH

If you are in doubt as to whether you, or someone else, are in breach of the Code in any particular situation, consider the following when faced with a difficult decision or situation:

- *How would I feel about myself if I took this planned action?*
- *Who should I be discussing this planned action with?*
- *What about this action feels right or wrong based on the facts available?*
- *How would I feel if someone did this to me, or my company?*
- *Is the planned action consistent with the guidelines and spirit of the Code?*
- *Would I be comfortable if my actions became known to leadership or other stakeholders?*
- *Could I justify my actions to my team, leaders, friends or family?*

Getting Guidance

Sometimes you do not have a breach to report — you just have a question. A situation that does not quite fit, a decision with legal or ethical implications you want to think through, a policy you are not sure how to apply.

That is exactly the right time to ask. Reporting is for after something has gone wrong. Guidance is for before.

Where To Go

If you are an officer, advisor, or employee: Consult first with your People Leader. If necessary, go next to your Compliance Contact.

If you are a director: Consult the Chair of the Board or the Chair of the Corporate Governance and Ethics Committee.

If you believe there is a conflict between this Code, any business practices and procedures, and any legal or regulatory requirements that apply to you in your position with the Company, contact your Compliance Contact.

SPEAKING UP: YOUR OBLIGATION TO REPORT

We believe any employee with knowledge of wrongdoing should not remain silent. Even when you do not have all the details, you are encouraged to report what you know. Your concern will be treated seriously, fairly, and promptly, and will be investigated fully.

Who to report to

- **If you are an officer, advisor, or employee:** Report any breach or suspected breach to your People Leader, Compliance Contact, HR, Legal, Risk, or EthicsPoint.
- **If you are a director:** Report to the Chair of the Board or to the Corporate Governance and Ethics Committee.
- **If you are a people leader:** You have the same reporting responsibility as the people you lead. Report all violations or suspected violations within your personal knowledge, as well as those reported to you, to your Compliance Contact.
- **If you are a compliance contact:** Upon receipt of a report, notify the Group Chief Compliance Officer, the Chief Internal Auditor, and your local HR department.

REPORTING YOURSELF

If you believe you may have breached the Code, or any policy of the Company that applies to you, or if you have observed a breach of the same by another employee, or a serious weakness in the Company's policies, procedures, or controls that could enable breaches to occur or go undetected, you have the same responsibility to report immediately.

Asking is not escalating

Seeking guidance does not trigger an investigation, does not go on your record, and does not put anyone in trouble. It is just thinking out loud with someone who knows the

You should also report if you become aware of, or suspect, illegal or unethical conduct by any of the Company's clients or third-party business associates that may affect our business relationship with them or the Company's reputation.

You should report any suspected misuse of Sagicor systems, unauthorized use of AI tools, privacy concerns, inappropriate data handling, cybersecurity events, material technology control weaknesses, or third-party information security concerns that may affect Sagicor, its clients, or its stakeholders.

The Company will respect the confidentiality of those who report a concern and will not divulge a reporter's identity without their consent.

Reporting Through Third-party Services

You may also choose to report a concern anonymously through an independent third-party service. EthicsPoint is available 24 hours a day, 7 days a week.

Reports made through these services can be made in complete anonymity. Be aware, however, that the Company's ability to fully investigate an anonymous report may be limited if it cannot follow up with you for additional information.

Reporting by computer

1. Connect to the internet from a computer outside of work.
2. Go to www.sagicor.EthicsPoint.com directly or visit www.ethicspoint.com and search for Sagicor.
3. Select your method of anonymous communication and provide the desired information.

Internal Communications Procedures

If you are unsure of the legal, ethical or reputational implications of a particular situation, or would like further guidance related to a matter referenced in this Code, you should consult first with your People Leader and if necessary, go next to your Compliance Contact. Directors should consult the Chair of the Board or the Chair of the Corporate Governance and Ethics Committee.

If you believe there is a conflict between this Code, any Business Practices and Procedures, and any legal or regulatory requirements that apply to you in your position with the Company, you should contact your Compliance Contact.



HOW INVESTIGATIONS WORK

Genuine concerns, raised in good faith, will be investigated fully. All internal investigations are conducted by qualified people who have been trained to conduct investigations lawfully, promptly, thoroughly, professionally, fairly, and confidentially.

What you can expect when a report is made

- Only the necessary parties will be engaged to evaluate the reported concern. All information will be kept strictly confidential as far as reasonably practicable to effectively conduct the investigation.
- Everyone involved in the investigation will be treated with dignity and respect.
- Reporters will be provided with updates to the best extent possible.
- Prompt and appropriate action will be taken if the report is substantiated, and those involved in the investigation will be notified.
- All investigations and corrective actions will comply with the Code, local law, and applicable Company policy.

PLEASE DO NOT

Do not investigate on your own. The instinct is understandable. The consequence is often a tainted investigation, exposed evidence, or unintentionally tipping off the person involved. Report what you know and let the people trained for this do the rest.

In appropriate cases, and subject to applicable laws, the Company may notify government authorities and cooperate with any resulting prosecution or government action. When legally required or otherwise appropriate, the Company will self-report compliance violations to applicable authorities and cooperate with any official proceedings. The decision to refer a matter to government authorities, or to self-report, will be made by the Group Chief Compliance Officer the Company's General Counsel, or their designate.

Your Role in an Investigation

If you are involved in an investigation, you are expected to cooperate fully and honestly.

What is expected of you

- Report suspicious behaviour rather than engaging in your own fact-finding, which can interfere with the investigation.
- Cooperate in internal investigations, audits, accounting reviews, or direction from the Company's lawyers in connection with lawsuits or government investigative proceedings.
- Provide all requested documents or records as soon as possible. Searches of company-provided physical and information technology resources may be required. This includes records, logs, emails, messages, collaboration content, system activity, device information, and other digital evidence relevant to the concern, including where the concern relates to privacy, cybersecurity, technology misuse, or the use of artificial intelligence tools.
- Do not destroy or alter requested documents or records in any way.
- Comply with all specified protocols for confidentiality and secure sharing of data during remote investigations.
- Report any employees or managers who display retaliatory behaviour against you or others.

PROTECTION FROM RETALIATION

We believe it is essential to create a culture where employees can internally speak up on matters of genuine concern without fear of retaliation, and where they can be assured that their concerns will be taken seriously.

Any employee who reports a violation will be treated with dignity and respect and will not be subjected to any form of discipline or retaliation for reporting in good faith. Retaliation against anyone who provides information or otherwise assists in an investigation regarding conduct the employee believes, in good faith, constitutes a violation of laws, regulations, our Code, or related policies, is prohibited, and will, in itself, be treated as a violation of our Code.

That an employee has raised a concern honestly, or participated in an investigation, cannot be the basis for any adverse employment action, including separation, demotion, suspension, loss of benefits, threats, harassment, or discrimination.

If you become aware that you work with someone who has raised a concern or provided information in an investigation, you must continue to treat that person with courtesy and respect. If you experience retaliation yourself, or have evidence of it occurring to another person, report it immediately.

It is a breach of this Code to make a mischievous or malicious report. It is also a violation of the Code to interfere with, or refuse to cooperate with, an investigation.

WHEN THE CODE AND LOCAL LAWS CONFLICT

The Code and the policies of the Company have been written, first and foremost, to promote compliance with laws and regulations. If compliance with the Code or any Company policy brings you into conflict with applicable laws and regulations in any jurisdiction where the Company operates, you must obey the law first.

Once you have done so, immediately notify your People Leader of the conflict, so it may be promptly resolved. If you have questions or concerns about practices or policies that might violate the Code, bring them to the attention of your People Leader immediately.

CODE WAIVERS AND ADMINISTRATION

Sagicor (acting through its Board) may in its sole discretion from time to time permit departures from the terms hereof, either prospectively or retrospectively, and no provision of this Code is intended to give rise to civil liability of Sagicor or any of its directors, officers, advisors, or employees to shareholders, other security holders, lenders, clients, suppliers or employees of Sagicor or any other liability whatsoever, except as expressly provided herein.



RETALIATION IS ALSO A VIOLATION

Retaliating against someone for raising a concern is not a separate kind of mistake. It is a Code violation in its own right, with the same investigation, the same consequences, and the same protections for the person who reports it.

See also:
Fraud and Other Wrongdoing Policy.

How waivers work

- All requests for waivers are submitted to the Group Chief Compliance Officer, who ensures the request is supported by sufficient reasoning, evidence, and facts to base a rational decision on.
- The Group Chief Compliance Officer recommends a decision: to the President and CEO in the case of non-executive employees, or to the Chair of the Corporate Governance and Ethics Committee for executives and directors. The Corporate Governance and Ethics Committee makes its decision and presents its recommendation to the full Board for approval.
- The Group Chief Compliance Officer will maintain a record of waivers granted and report such waivers to the appropriate Board Committee as required

RELATED POLICIES AND STANDARDS

Each compliance requirement in the Code is backed up by standards and procedures that facilitate its effective operation. These ensure prompt and consistent action against violations. The elements of the Code are found in Company policies or corporate governance guidelines that support the Company's internal control framework.

Related policies and standards include:

- Disclosure and Insider Trading Policy
- Fraud and Other Wrongdoing Policy
- Information Security Policy
- Acceptable Use Policy
- Information Security Standards
- Electronic Mail and Internet Security requirements
- Password and Access Control requirements
- Records Retention / Records Management requirements
- Privacy / Data Protection requirements
- Cyber Security Incident Management procedures
- Enterprise Risk Management Framework
- Risk Appetite Framework



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