

AmTrust International Underwriters DAC Speaking Up User Guide

May 2023



AmTrust International

AmTrust International Underwriters DAC – Speaking Up

INTRODUCTION

AmTrust believes performance with **integrity** is about setting our goals and delivering on our commitments while adhering to our values and standards. Our reputation as a company that people can trust is our most valuable asset, and we make a great effort to ensure we continue to earn that trust.

To ensure integrity and transparency, AmTrust International Underwriters DAC (AIU) offers **secure and confidential escalation channels** to report **suspected or alleged wrongdoing** happening in a **work-related context**, either locally (AIU) or directly to the Group (AmTrust Financial Services Inc.).

AIU values confidentiality and will use all measures possible to ensure that the identity of the reporter and of the person involved or associated with the wrongdoing remains confidential. All employees involved in the investigation will be required to maintain confidentiality in relation to the concerns being raised.

If you are considering making a report, we refer you to the **procedure detailed below**.

WHO CAN MAKE A REPORT?

The reporting channels are made available to AIU employees, individuals acting on behalf of AIU, directors and shareholders, contractors, secondees, trainees, volunteers, interns, recruiters and job applicants, third-party contractors and people working under a contract for services, agency workers and people on work experience.

WHAT CONCERNS MAY BE REPORTED?

You are encouraged to report to us any suspected or alleged wrongdoing happening in a work-related context, including:

- A criminal offence including bribery, fraud and corruption;
- A breach of a legal obligation or of EU law;
- Concealment or destruction of evidence relating to an offence or breach;
- A serious infringement with respect to health and safety, human rights and fundamental freedoms resulting from AIU's activities, or resulting from any supplier or subcontractor's activities;
- Damage to the environment;
- A breach of AIU's policies and procedures
- A situation or behaviour contrary to the Group's Code of Conduct;
- Behaviour that harms or is likely to harm AIU's reputation or financial well-being.

WHAT SHOULD NOT BE REPORTED?

Complaints received from customers, breaches of an employee's contract of employment, personal grievances such as discrimination, harassment or bullying should all be reported via the Company's standard dedicated channels.

HOW TO REPORT A CONCERN?

You can use the following reporting channels to voice your concern

Confidential Whistleblowing Hotline & Webform	AmTrust Whistleblowing Hotline Available 24 hours a day, 7 days a week	Whistleblowing webform at www.AmTrusthotline.ethicspoint.com Irish Whistleblowing hotline: 1-800-248-322
To AIU	AIU Head of Compliance Letter to AIU DAC	speakup.dublin@AmTrustgroup.com AmTrust International Underwriters DAC Head of Compliance 6-8 College Green Temple Bar DUBLIN D02 VP48
To AmTrust Group	Global Compliance Officer	globalcompliance@AmTrustgroup.com Tel: 844.601.7763

HOW YOUR REPORT WILL BE HANDLED?

- **You will receive confirmation of receipt of your report within 7 days** of it being received by us.

When the report is made via AmTrust Whistleblowing Hotline, the acknowledgment of receipt will be sent to the "follow up" tab of the hotline.

- **Your report will be reviewed and assessed to identify whether the alleged wrongdoing or behaviour is evidenced** and if so, whether further actions will need to be taken to address the relevant wrongdoing or whether to close the procedure for lack of evidence.
- This report may be shared securely with relevant stakeholders within AIU who need the information to investigate and address the wrongdoing, in an appropriate and confidential manner.
 - **You will be informed, as soon as practicable, of the decision** to take further action or to close the report for lack of evidence.
 - **You will be provided feedback (no later than 3 months from the acknowledgment of your report)** on the actions envisaged or taken as follow-up and on the reasons for such follow-up. It is important to understand that information that can be shared with you may be limited due to the confidential or sensitive nature of the information or legal restrictions.
- **You will be informed of the outcome and closure of the investigation** to the extent possible and due to the confidential nature of the report.

You can also contact AIU on the progress of the investigations until your report is closed.

ANONYMOUS REPORTS

You can choose to remain anonymous by reporting your concern via AmTrust Whistleblowing Hotline and corresponding with the person in charge of handling your report via a secure "dialog box". Anonymous disclosures will be treated seriously and investigated to the extent possible. However, AIU encourages individuals to provide as much information as possible in relation to the allegations reported and to identify themselves. This will allow the alleged wrongdoing to be investigated effectively and efficiently.

WHAT PROTECTIONS ARE YOU ENTITLED TO?

AIU does not tolerate any act of retaliation or penalisation against an individual who makes a report in good faith. If you consider making a report, you will be entitled to protections, e.g. the confidentiality of your identity or a protection from penalisation (suspension, lay-off or dismissal, demotion or loss of opportunity for promotion).

EXTERNAL REPORTING

AIU acknowledges that there may be circumstances where individuals want to make a disclosure externally. The Protected Disclosures Act 2014 and the Protected Disclosures (Amendment) Act 2022 provide for several avenues in this regard:

Prescribed Persons, Bodies and Regulators

- The list of Prescribed Persons for external disclosures is accessible at <https://www.irishstatutebook.ie/eli/2020/si/367/made/en/print>

Central Bank of Ireland

- Email: **confidential@centralbank.ie**
- Telephone: **1890 130014** (Monday to Friday 9.30am - 5.00pm)
- Post: **Protected Disclosures Desk, Central Bank of Ireland, PO Box 11517, Spencer Dock, Dublin 1, D01 W920**
- Further details on reporting to the CBI: <https://www.centralbank.ie/regulation/protected-disclosures-whistleblowing>

An Garda Síochána

- Bribery and Corruption Confidential Reporting Line: **1800 40 60 80**

Protected Disclosures Commissioner

- Email: disclosures@opdc.ie
- Telephone: **01 639 5650**
- Post: Office of the Protected Disclosures Commissioner, 6 Earlsfort Terrace, Dublin 2, D02 W773, Ireland