

Arch Capital Group Ltd. and its subsidiaries (collectively, “Arch”) are committed to integrity in the conduct of their business and require all employees to perform their duties in a manner which is legally, ethically and morally irreproachable. We expect our contractors, consultants, suppliers and vendors (collectively, “Suppliers”) to follow our commitment to conduct business with the highest level of integrity.

This Supplier Code of Conduct (“Supplier Code”) sets forth the expectations for Suppliers providing goods or services to Arch. We expect our Suppliers to conduct their activities, services and operations in accordance with this Supplier Code and to maintain and enforce policies that support these values.

Suppliers may be screened and/or selected by Arch based in part on their demonstrated commitment to the values embodied in this Supplier Code. If selected by Arch to provide services, Suppliers who agree to abide by the terms of this Supplier Code are expected to be able to demonstrate their compliance. Suppliers which we reasonably believe to be acting inconsistently with this Supplier Code jeopardize their future relationship with us.

The expectations in this Supplier Code are not intended to conflict with the terms of a Supplier’s contract with us. In the event of a conflict between the terms of a Supplier’s contract and this Supplier Code, the contract terms will prevail and to the extent more specific terms and conditions are contained in the Supplier’s contract, the more specific terms and conditions control.

### **Commitment to Conducting Business According to the Highest Legal and Ethical Standards**

Arch expects Suppliers to conduct business in full compliance with all applicable laws and regulations.

In addition to the obligations that Suppliers assume in contractual agreements with Arch, Arch expects all Suppliers to comply with the obligations described below.

- Suppliers must comply with all applicable fair trade, anti-boycott, antitrust and competition laws, anti-money laundering, anti-corruption and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, applicable to the Supplier’s business and in the rendering of services to us.
- Suppliers may not give, offer, promise or accept any kickback, bribe, political contribution, gift, favor or anything of value when dealing with government officials or any other person for the purpose of improperly obtaining or retaining business, influencing action or obtaining any form of improper benefit for or on our behalf.
- Suppliers are expected to comply with data privacy, data protection, security laws and regulations, copyright laws, and are prohibited from reproducing, distributing or altering copyrighted materials without the permission of the copyright owner.
- Suppliers must comply with all applicable U.S. and international economic sanctions laws and regulations.

### **Reporting Suspicious Conduct**

If, in dealings with Arch, a Supplier sees any actual or proposed business conduct, which it believes in good faith to constitute a violation of Arch's Supplier Code or any applicable law or regulation, we strongly encourage the Supplier to report this conduct to the appropriate compliance officer within their organization and/or to also notify Arch about the conduct and, if appropriate, any actions to be taken to address the offending conduct. Arch encourages Suppliers to establish a reporting or "whistleblowing" process whereby Supplier employees may report suspicious conduct without repercussion. See also "Questions and Concerns" below for instructions on reporting concerns to Arch.

### **Human Rights**

Arch is committed to respecting all internationally recognized human rights standards. This is a fundamental part of our culture. Our commitment to protecting and preserving human rights is guided by the principles expressed in the United Nations Universal Declaration of Human Rights. We set forth our commitment to human rights in Arch's Human Rights Policy.

Arch is committed to working with Suppliers who share this value and commitment to promote individual human rights and equal employment opportunities. We expect our Suppliers to treat their employees, agents, customers and business partners with respect and dignity, free from abuse, harassment or discrimination based on race, color, religion, creed, sex, national origin, ancestry, disability, age, genetic information, citizenship status, pregnancy, gender identity or expression, affectional or sexual orientation, atypical cellular or blood trait, marital status, veteran status, membership in the armed services, political affiliation, or any other characteristic protected by applicable law. Suppliers are expected to comply with all applicable labor, health and safety, anti-discrimination, anti-retaliation and other workplace laws, including those addressing equal pay, and wage and hour laws.

Engaging in human trafficking, procuring commercial sex acts and the use of forced labor, whether in the form of indentured labor, bonded labor, or prison labor, is prohibited. The use of child labor is also prohibited, and Suppliers are expected to comply with applicable laws regulating the use of minors.

Arch respects and supports employees' rights to freedom of association and collective bargaining.

### **Supplier Diversity**

Arch is committed to a diversity and inclusion strategy that focuses on our ability to make a positive impact internally for our people and culture, and equally, externally in the communities and markets in which we serve. This includes purchasing goods and services from businesses owned by people of diverse backgrounds. Arch uses several classifications for diverse Suppliers, including business enterprises owned by minorities, women, veterans, service-disabled veterans, people with disabilities and people identifying as LGBTQ+. Our commitment helps to ensure that diverse suppliers will have an equal opportunity to be included in our strategic sourcing and procurement process. Our goal is to increase the proportion of our total spend with diverse Suppliers while maintaining competitive sourcing and selection standards. Companies that seek to do business with Arch must demonstrate the ability to

add value, and provide high-quality goods and services that are competitively priced, reliable, and aligned with our superior level of service. Arch also expects its Suppliers to incorporate the principles of supplier diversity in their operations and when making their own supply chain decisions.

**Environment**

Arch promotes responsible environmental practices that seek to reduce our carbon footprint. See our Sustainability Reports for more information regarding our actions to support sustainable environmental practices. Arch also expects our Suppliers to comply with all applicable environmental laws and to work to minimize any negative environmental impact from their operations, including reducing or mitigating emissions, increasing sustainable use of natural resources and reducing or eliminating waste.

**Monitoring**

Arch reserves the right to monitor, audit and investigate each Supplier's processes to ensure they are in line with this Supplier Code. Suppliers must be able to provide timely and accurate proof of compliance with this Supplier Code upon request from Arch. Supplier compliance with an audit request may include self-assessment questionnaires, and/or meeting with Arch personnel.

**Questions or Concerns**

For questions about this Supplier Code or to report a concern, please contact Arch's Director of Compliance, [ArchGlobalCompliance@archcapservices.com](mailto:ArchGlobalCompliance@archcapservices.com).