

Zero Tolerance Policy of Bribery & Corruption

EVEREN LIMITED ("EVEREN")

EVEREN SPECIALTY LTD. ("EVEREN SPECIALTY")

EVEREN MANAGEMENT SERVICES LTD. ("EMSL")

EVEREN INVESTMENT LTD. ("EIL")

EVEREN SPECIALTY INVESTMENT LTD. ("ESIL")

OCIL SPECIALTY LTD ("OSL")

(Hereinafter individually or collectively "The Everen Group," "Group" or the "Companies")

Everen Group maintains a zero-tolerance policy towards bribery and corruption. Everen Group is firmly committed to the highest standards of transparency, integrity, and accountability in all aspects of our operations. It is Everen Group's policy to conduct its business in a lawful, honest, and ethical manner at all times.

Bribery is defined as the offering, promising, giving, requesting, or receiving of any advantage as an inducement for an action that is illegal, unethical, a breach of trust, or constitutes the improper performance of a contractual obligation. Such inducements may include, but are not limited to, gifts, fees, rewards, employment opportunities, internships, academic grades, favors, or other personal or financial benefits.

Corruption involves the abuse of entrusted power for personal gain. It can encompass a range of unethical behaviors, including bribery and embezzlement, and may also involve practices that, while legal in certain jurisdictions, are contrary to the ethical standards upheld by Everen Group.

It is strictly prohibited for any employee, officer, director, or individual acting on behalf of Everen Group (including consultants, agents, suppliers, and other third parties) to engage in any form of bribery or corrupt activity, whether directly or indirectly, in connection with Everen Group's business, regardless of where the conduct occurs.