

Business Continuity Plan

1 INTRO

The purpose of this Policy is to outline how the RiskPoint Group ensures continuity in case of an event which has the potential to disrupt business operations. It is valid on a global level and covers both physical disruptions as well as IT disaster recovery.

2 BACKGROUND AND OBJECTIVES

RiskPoint Group has offices on the following locations:

Denmark

Hammerensgade 4
DK-1267, Copenhagen K

Norway

Bryggegate 7
NO-0250, Oslo

Germany - Frankfurt

Bockenheimer Anlage 46
DE-60325 Frankfurt

The Netherlands

Hoff Offices Amsterdam
Strawinskylaan 457
1077 XX Amsterdam

Spain

Calle de Manuel Silvela, 1, 1 Derecha
28010 Madrid

Singapore

23 Church Street #07-07
Capital Square
Singapore 049481

Switzerland

Seefeldstrasse 69
CH-8008 Zurich

Sweden

Humlegårdsgatan 20
114 46 Stockholm

Finland

Kalevankatu 4, 3rd Fl
00100 Helsinki

Germany – Hamburg

Unicorn Workspaces
Burchardstr. 14
DE-20095 Hamburg

United Kingdom

20 St. Dunstan's Hill
EC3R 8HL, London

United States of America

920 Broadway, 6th Fl,
New York, NY 10010

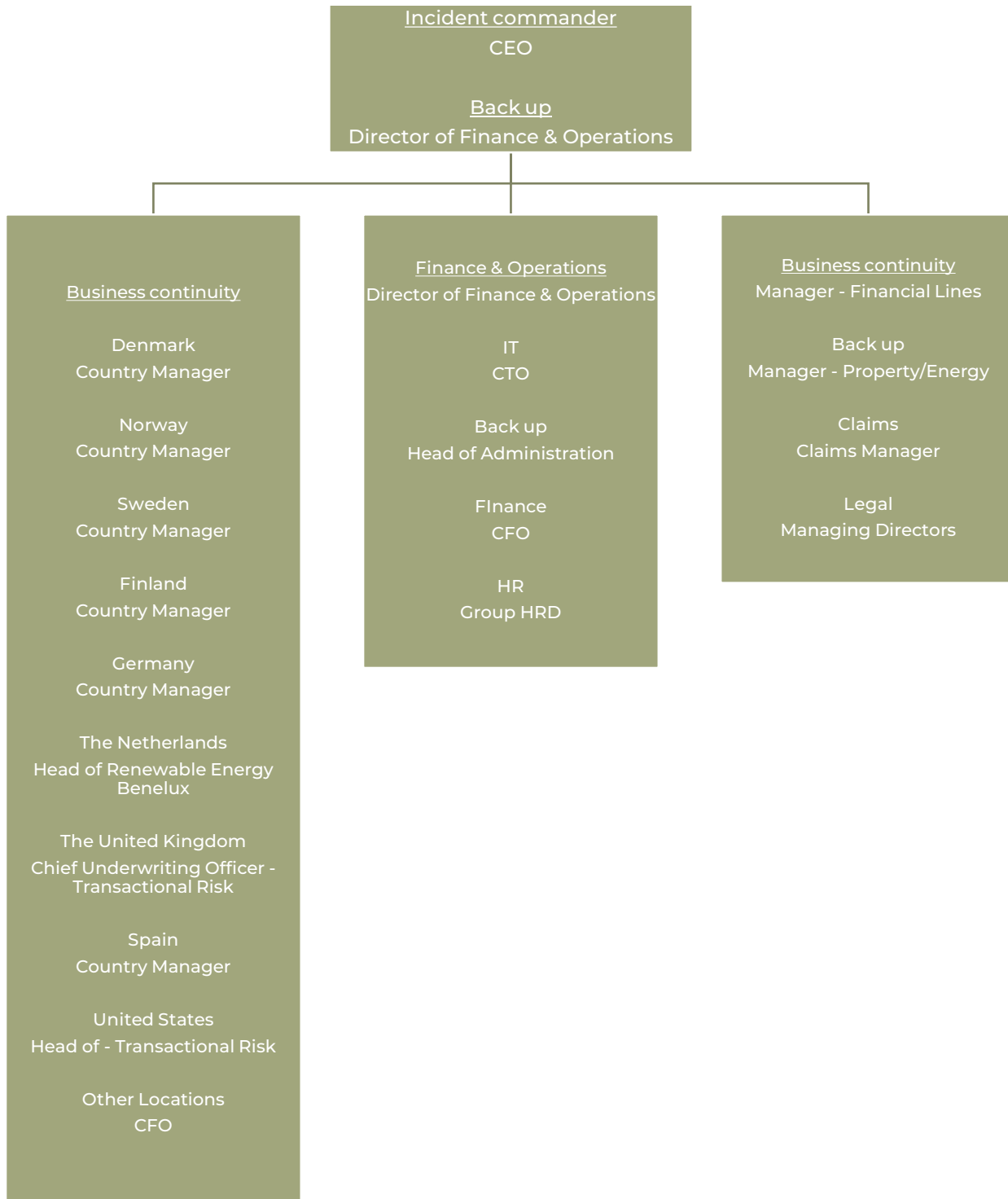
Canada

200 Bay St, North Tower, Suite 1200
Toronto, ON M5J 2J2

As activities, observations, and findings are similar for all locations, this assessment concerns all locations.

Contact details for employees, IT suppliers and Financial Supervisory Authorities are provided at the end of this document.

3 INCIDENT MANAGEMENT TEAM



4 WORKFLOW

RiskPoint Group's underwriting, policy issuance, endorsements, claims, invoicing and receivables, and insurer settlements are managed in a fully integrated system covering all locations. The core is a Microsoft Business Central based finance and accounting system which internally is called Navins. Document filing and retention is done on the platform iManage. Navins and iManage are connected via an API.

Navins is a customized underwriting administration, policy issuance, claims administration, and document generation system. Support is provided by the company Diastasy. Features include:

- Single database holding all client, policy, and claims information tagged to a unique client ID

- Ability to keep all underwriting, legal, and claims files digital
- Generation and issuance of policies as digital files. Only as an exception are physical policies issued
- All changes, payments and claims can be attached to the specific policy/underwriting year as well as the accounting year
- Claims and loss developments recorded and tracked by underwriting year
- Binding Authority Agreements (Binders) are set up in the system and the system controls that no policy can be booked against the specific binder, if;
 - It is outside the valid period of the binder
 - Line size exceeds the binder capacity – automatic currency calculation
 - Maximum share has been exceed

iManage features include storage of all documents, including policies, claims documents, and emails, created within the RiskPoint Group.

5 TECHNOLOGY RISKS

1. Hardware/software

RiskPoint Group is running all IT solutions in MS Azure (Cloud) as a sole dedicated tenant. These tenants are hosted in a datacenter provided by Microsoft in compliance with regulatory requirements as applicable. Azure Virtual Desktop (AVD) is used to connect via a thin client, and is managed by an external third party vendor - MB Solutions A/S.

The cloud hosted server solution means that no software is stored on RiskPoint Group premises. The only hardware placed on premises are laptops and “thin-clients” which acts as connectors to the server.

On RiskPoint Group premises, physical firewalls are installed to increase security. From outside the premises, access to the server can only be obtained via an AVD hosted server solution and encrypted with a VPN facility. Access requires a personal username and password as well as MFA approval.

Any update or installation of new software can only take place via a request to and approval by RiskPoint Group IT. This guarantees the authenticity/security of the software.

During workhours an inactive user will have its VPN access deactivated automatically after 120 minutes. If any user forgets to sign out, the system will automatically be password protected after 60 minutes.

The server at Microsoft Azure is physically located in Amsterdam. The back-up server is located in Dublin and is mirrored from the Amsterdam server. MB Solutions A/S have access to a secondary back-up also located in Dublin which is kept isolated from the others. Under a planned shut down or during maintenance, it takes approximately 2-3 minutes before the server is running again. With regards to unplanned breakdowns it takes 10-20 minutes before the server is running again.

A back-up retention of all file data is taken daily and is kept for a period of 7 years. This back-up is kept at the isolated Microsoft Azure back-up location in Dublin.

Separately from the back-up servers, the RiskPoint Group keeps a separate parallel standby environment which mimics the main server infrastructure without any data. In case of the loss of access to the main servers, it will allow the RiskPoint Group to switch platforms and continue work within 8 hours. This environment would consist of data from the main servers backed up on a daily basis, with the option of using older data for the recovery of the environment.

For practical steps performed during an ICT Incident, how it is documented, and how learnings from it are processed, please refer to the ICT Incident Management Policy.

2. Phones/mail correspondence

The majority of employees have a RiskPoint Group mobile phone.

Emails can be accessed via a cell phone or any other device with access to the internet. The email server is hosted at Microsoft Azure – Office 365 - under the same physical conditions as the other servers.

6 PHYSICAL RISKS

All RiskPoint Group premises have burglar and fire alarms. Doors are locked during office hours and visitors do not have access unless granted by an employee.

In case of major disaster during office hours, like fire or bomb-threat, the evacuation procedures are as follows.

1. Copenhagen

All employees have to leave the premises immediately and meet in front of Bistro Boheme, Esplanaden 8, 1263 Copenhagen. It is the responsibility of the Country Manager or back up person to make sure that everyone has left the premises and are present at the meeting point. Depending on the disaster and length of it, the Country Manager determines whether employees are sent home.

The Country Manager will inform the Incident Manager about the disaster and alternative office setup.

If a replacement office is deemed necessary for an interim period, an agreement with Regus has been entered. Contact details at the end of this document.

In case of a major disaster outside office hours affecting access to the premises, the Country Manager will contact all employees before 8.00 am the following morning regarding an alternative meeting place or to confirm that the employees should remain at home until further notice.

The alternative meeting point for Denmark is at Kromann Reumert, Sundkrogsgade 5, 2100 København Ø.

2. Oslo

All employees have to leave the premises immediately and meet at the fountain outside of Beer Palace, Holmens gate 3, 0250 Oslo. It is the responsibility of the Country Manager or back up person, or, in the case of fire, the fire attendant to make sure all people have left the premises and are present at the meeting point. Depending on the disaster and length of it, the Country Manager determines whether employees are sent home.

The Country Manager will inform the Incident Manager about the disaster and alternative office setup.

In case of a major disaster outside office hours, affecting access to the premises, the Country Manager will contact all employees before 8.00 am the following morning regarding an alternative meeting place, or to confirm that the employees should remain at home until further notice.

The alternative meeting point for Norway is at Anette Fuglesang Home address, Mosseveien 267, 1169 Oslo.

3. Stockholm

All employees have to leave the premises immediately and meet at Humlegårdsgatan 24 (Humlan), 114 46 Stockholm. It is the responsibility of the Country Manager or office assistant to ensure that all people have left the premises and are present at the meeting point. Depending on the disaster and length of it, the Country Manager determines whether employees are sent home.

The Country Manager will inform the Incident Manager about the disaster and alternative office setup.

In case of a major disaster outside office hours, affecting access to the premises, the Country Manager will contact all employees before 8.00 am the following morning regarding an alternative meeting place, or to confirm that the employees should remain at home until further notice.

The alternative meeting point for Sweden is Östermalmstorg 31 (Östermalms Saluhall), 114 39 Stockholm.

4. Helsinki

All employees have to leave the premises immediately and meet at Aleksanterinkatu 52 (Stockmannin kellon alla), 00100 Helsinki. It is the responsibility of the Country Manager or back up person to ensure that all people have left the premises and are present at the meeting point.

Depending on the disaster and length of it, the Country Manager determines whether employees are sent home.

The Country Manager will inform the Incident Manager about the disaster and alternative office setup.

In case of a major disaster outside office hours, affecting access to the premises, the Country Manager will contact all employees before 8.00 am the following morning regarding an alternative meeting place, or to confirm that the employees should remain at home until further notice.

The alternative meeting point for Finland is at Yrjönkatu 26 (Sokos Hotel Torni), 00100 Helsinki.

5. Frankfurt

All employees have to leave the premises immediately and meet at the front of the UBS Opernturm Bockenheimer Landstraße 2-4, 60306 Frankfurt am Main. It is the responsibility of the Country Manager or back up person to make sure that all people have left the premises and are present at the meeting point.

Depending on the disaster and length of it, the Country Manager determines whether employees are sent home.

The Country Manager will inform the Incident Manager about the disaster and alternative office setup.

In case of a major disaster outside office hours, affecting access to the premises, the Country Manager will contact all employees before 8.00 am the following morning regarding an alternative meeting place, or to confirm that the employees should remain at home until further notice.

The alternative meeting point for Frankfurt is at Steigenberger Frankfurter Hof, Am Kaiserplatz, Bethmannstraße 33, 60311 Frankfurt am Main.

6. Zürich

All employees have to leave the premises immediately and meet at the front of the Schiller Bar, Sechseläutenplatz 10, 8001 Zurich. It is the responsibility of the Country Manager or back up person to make sure that all people have left the premises and are present at the meeting point.

Depending on the disaster and length of it, the Country Manager determines whether employees are sent home.

The Country Manager will inform the Incident Manager about the disaster and alternative office setup.

In case of a major disaster outside office hours, affecting access to the premises, the Country Manager will contact all employees before 8.00 am the following morning regarding an alternative meeting place, or to confirm that the employees should remain at home until further notice.

7. Amsterdam

All employees have to leave the premises immediately and meet at Beatrix Park - Diepenbrockstraat 21, 1077VX Amsterdam. Depending on the disaster and length of it, the Head of Renewable Energy Benelux determines whether employees are sent home.

The Head of Renewable Energy Benelux will further inform the Incident Manager about the disaster and alternative setup for the time being.

If a replacement office is deemed necessary for an interim period, staff should work remotely from home until further notice.

The alternative meeting point is at Café Blauwe Engel - Strawinskylaan 143, 1077XX Amsterdam

8. London

All employees have to follow the guidelines specified in the Disaster Plan stored here:

Disaster Plans St. Dunstons Monument

The assembly point, in case of an evacuation is at St Dunstan's Steeple.

The Managing Director & Head of Transactional Risk EMEA will further inform the Incident Manager about the disaster and alternative setup for the time being.

If a replacement office is deemed necessary for an interim period, staff should work remotely from home until further notice.

9. Madrid

All employees have to leave the premises immediately and meet at the front door of Fismuler restaurant, Calle Sagasta 29, 28010, Madrid.

The Country Manager will further inform the Incident Manager about the disaster and alternative setup for the time being.

If a replacement office is deemed necessary for an interim period, staff should work remotely from home until further notice.

The alternative meeting point is at the front door of the Regus building, Calle Del Pinar 5, 28006 Madrid.

10. New York

All employees have to leave the premises immediately and meet at Starbucks, 14 W 23rd St, New York, NY 10010 (Hours: 5am – 8:30pm).

The Head of Transactional Risk Americas will further inform the Incident Manager about the disaster and alternative setup for the time being.

If a replacement office is deemed necessary for an interim period, staff should work remotely from home until further notice.

The alternative meeting point is at the Tarallucci e Vino Union Square, 15 E 18th St, New York, NY 10003.

11. Singapore

All employees have to leave the premises immediately and meet at Wine Connection Bistro (Capital Square) 25 Church Street, 01-01 Capital Square 3.

The Managing Director & Head of Transactional Risk, AsiaPac will further inform the Incident Manager about the disaster and alternative setup for the time being.

If a replacement office is deemed necessary for an interim period, staff should work remotely from home until further notice.

The alternative meeting point is at Genius Central, 7-13 Amoy Street, Far East Square.

12. Canada

All employees have to leave the premises immediately and meet at Stratus, TD South Tower, 79 Wellington St W tower 36th floor, Toronto, ON M5K 1J5, Canada.

The Head of Transactional Risk Americas will further inform the Incident Manager about the disaster and alternative setup for the time being.

If a replacement office is deemed necessary for an interim period, staff should work remotely from home until further notice.

The alternative meeting point is at Dineen Commerce Court. 199 Bay Street Commerce Court West Lobby.

13. Hamburg

All employees have to leave the premises immediately and meet at Chilehaus, Fischertwiete 2A, 20095 Hamburg.

The Country Manager will further inform the Incident Manager about the disaster and alternative setup for the time being.

If a replacement office is deemed necessary for an interim period, staff should work remotely from home until further notice.

The alternative meeting point is at Hotel Atlantic, An der Alster 72-79 20099 Hamburg.

14. Other Locations

For any location not listed above; all employees are to leave the premises immediately. Due to the current amount of staff on the offices, it is the applicable Managing Director who determines whether employees are sent home.

15. Power Failure or Breakdown of Internet

In case of power failure or break down of internet during office hours, it is the Country Manager who determines whether employees are sent home.

7 OTHER RISKS

In the event of a loss of a key partner/employee, the peer review process has ensured that at least 2 people have reviewed each risk. Further processes and systems are standardized across products so other team members can back up.

The Finance department is employing at a minimum five people, whom can all conduct the daily payment and bank reconsolidation task.

Regarding claims, RiskPoint Group have alternative adjusters and/or solicitors for each class/type/market who can provide claims service for RiskPoint Group as well as our carriers. RiskPoint Group performs regular reviews or audits of the work performed by these firms.

Withdrawal by an insurer is considered a commercial risk.

All employees are made aware of RiskPoint Group's "core values" as well as the expected high ethical standards when dealing on behalf of RiskPoint Group. This includes a requirement to keep updated on legislative matters impacting our business locally, as well as for the partners we represent. Similarly, it is required to keep updated about the business requirements internally and those of our partners including Lloyd's. This includes, the structure of Binders, data protection, Lloyd's by-laws, money laundering, employee law, corporate law etc.

Payroll. All employee payroll functions are outsourced to external parties. In the event of an unforeseen loss of access to RiskPoint Groups own systems, payroll will continue to run as not affected.

Lack of equity/financing is considered a commercial risk and addressed at each board meeting. It is up to the board to assess and ensure the necessary capital base is in place to adequately support the RiskPoint Group activities both in the short and long run.

Major claims or law suits against RiskPoint Group from our clients or carriers are considered a commercial risk. RiskPoint Group is current holding a PI insurance of EUR 20M, which the board has found sufficient for the current activity level and risk involved.

Currency fluctuation is considered a commercial risk. All premiums are collected and settled in original currency, whereby RiskPoint Group has eliminated any currency risk on the majority of the cash flow. Income is converted into local currency immediately after receipt to minimize currency exposures.

All payments, including the payment of claims require dual sign off. Peer review is conducted on any claims payment. Producers, claimants and loss adjusters can only be set up as payment receivers in the system by the Finance Department and must be requested in writing by either an underwriter or claims personnel.

8 MAJOR OBSERVATIONS AND FINDINGS

With regards to physical premises, the loss of or lack of access to any of the physical premises, is deemed to be of low to medium impact. The impact on the business continuity is categorized as low. RiskPoint Group business can be carried out from any premises, with access to the internet and thereby the hosted server. This can be in a new office facility, a temporary "office hotel" or from home.

A power failure or breakdown of internet would only cause temporary business interruption and would not be a threat against the business continuity.

IT is the main critical component, where a total breakdown would have a high impact on RiskPoint Group business continuity. The hosted server is mirrored at two different physical locations. The time to switch between the two servers is limited to approximately 10-20 minutes. In addition a back-up of all data is available at a third location. Estimated time for the installation of the backup on a new server is approximately 24-48 hours.

The likelihood of a break down and loss of data is therefore considered low.

9 TESTING OF THE BUSINESS CONTINUITY PLAN

The Business Continuity Plan is tested and subject to review on an annual basis.

Version 4

Last updated: February 5, 2025

Employee list & Phone numbers

Please refer to contact site on <https://rpgroup.com/contact/>

IT Supplier contact details

MB Solutions A/S
Innovations Allé 3
7100 Vejle
Denmark
Phone +45 76 49 83 00

Insly
Ustus Agur Building, Lõõtsa 8
11415 Tallinn
Estonia
Phone +372 5770 4457

Ascertainment Limited
1st Floor, St Vincent House
30 Orange Street
London
WC2H 7HH, UK
Phone +44 203 126 4960

TrueSec
Glentevej 69, 1.
2400 Copenhagen
Denmark
Phone +46 (0)8 10 00 10

Nubiz
Industriparken 21A – 2. Sal
2750 Ballerup
Denmark
Phone +45 72 72 72 64

Diastasy
38, Kleisthenous Ave.
GR 15344, Gerakas
Athens, Greece
Phone +30 210 6890400

Financial Supervisory Authority (FSA) Contact details

Denmark
Finanstilsynet
Strandgade 29
1401 København K
Phone +45 33 55 82 82

Sweden
Finansinspektionen
P.O. Box 7821
SE-103 97 Stockholm
Brunnsgatan 3
Phone +46 (0)8 408 980 00

Norway
Finanstilsynet
P.O. Box 1187 Sentrum
NO-0107 Oslo
Phone +47 22 93 98 00

Finland
Finanssivalvonta
Snellmaninkatu 6
P.O. Box 103
00101 Helsinki
Phone +358 9 183 51

United Kingdom
FCA Head Office
12 Endeavour Square
London E20 1JN
Phone 0800 111 6768
+44 207 066 1000 (international)

Alternative Office Facility Management contact details:

Denmark
Regus

Phone: +45 89 87 56 54