



**CODE of
BUSINESS
CONDUCT &
ETHICS**



A Message from the CEO

Dear Colleagues,

At IGI, working ethically and with integrity is central to everything that we do. Our culture is one of transparency, collaboration and doing what is right for the benefit of all of our stakeholders. The decisions we make, individually and collectively, are what shape our reputation. That is why our Code of Business Conduct & Ethics is so vitally important.

We have a clear set of values that define our behaviour and shape the IGI character. These values help to guide us in the choices, decisions, and actions we take every day.

IGI's Code of Business Conduct & Ethics outlines the standards and policies that apply to all our employees, our directors, officers and any other representatives of our Company. It guides us in our daily activities as IGI employees by defining our expectations for ethical behaviour.

Doing the right thing and making the right decisions is core to our reputation as a trusted partner to our stakeholders.

Thank you for your commitment to preserving the highest standards and ethics in all that we do as part of IGI.

Waleed W. Jabsheh
President & CEO



**INTERNATIONAL GENERAL INSURANCE HOLDINGS LTD.
CORPORATE CODE OF BUSINESS CONDUCT AND ETHICS
(Modified August 14th, 2025)**

I. General

The Board of Directors (the “Board”) of International General Insurance Holdings Ltd. (the “Company”) has adopted this Corporate Code of Business Conduct and Ethics (this “Code”), which is defined as standards as are reasonably designed to deter wrongdoing and necessary to promote:

- (1) honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- (2) full, fair, accurate, timely, and understandable disclosure in the periodic reports required to be filed by the Company;
- (3) compliance with applicable laws, rules and regulations;
- (4) the prompt internal reporting of violations of the code to an appropriate person or persons identified in the code; and
- (5) accountability for adherence to the code.

This Code does not cover every issue that may arise.

The Company complies with best practices when addressing the conduct of employees. The below standard conduct rules set the basic conduct standards to be complied with by directors, senior managers and all employees (excluding ancillary staff):

- (1) act with integrity
- (2) act with due skill, care and diligence and
- (3) be open and co-operative with regulators.
- (4) pay due regards to the interests of customers and treat them fairly.
- (5) observe proper standard of market conduct.

The Board reserves the right to add to, modify and rescind this Code or any portion of it at any time. This Code governs in the event of any conflict or inconsistency between this Code and any other materials distributed by the Company. If a law conflicts with a policy in this Code, you must comply with the law.

Each director, officer and employee has the responsibility to exercise good judgment so as to act in a manner that will reflect favorably upon the Company and the individual. The Company’s directors, officers and employees must comply with the spirit as well as the letter of this Code. Directors, officers and employees must not attempt to achieve indirectly, through the use of agents or other intermediaries, what is prohibited directly by this Code. For the avoidance of doubt, this Code does not apply to the Company’s shareholders and any of their directors, officers or employees (other than individuals who are also directors, officers and employees of the Company).

You should, at least annually, read this Code carefully, and where necessary to obtain an understanding, ask questions of the Company’s Chief Legal and Compliance Officer,



and promptly sign and return the certification attached as **Annex A**, acknowledging receipt of this Code to:

**International General Insurance Holdings Ltd.
74 Abdel Hamid Sharaf Street, P.O. Box 941428
Amman 11194, Jordan
Or by email to: Rawan.Alsulaiman@iginsure.com
Attention: Chief Legal and Compliance Officer**

The Company's Chief Legal and Compliance Officer is responsible for ensuring that all of the Company's directors, officers and employees promptly sign and return the attached certification acknowledging receipt of this Code.

II. Implementation

A. Condition of Employment

Each employee must become familiar with and agree to comply with this Code as a condition of such employee's employment. All officers and employees, regardless of level, must be provided with a copy of this Code shortly after its adoption or, with respect to employees hired after the adoption of this Code, at or shortly after the time of their employment. All managers are responsible both for ensuring that all employees under their supervision, regardless of level, are familiar with this Code and for promoting compliance with this Code.

B. Condition of Director Appointment/Election

Each director must become familiar with and agree to comply with this Code. All directors must be provided with a copy of this Code at or shortly after the time of their appointment or election to serve on the Board.

C. Compliance Certificate

The following persons must execute compliance certificates substantially in the form of **Annex A** to this Code:

- Directors, officers and employees of the Company in managerial or supervisory positions;
- Employees who are responsible for significant client relationships;
- Contractors who provide significant services to the Company;
- Employees whose regular responsibilities include the review, approval or payment of invoices for significant goods or services supplied to the Company; and
- Any employees requested by the designated Compliance Officer, Chief Legal and Compliance Officer or any officer or director of the Company to give a Periodic Compliance Certificate.

Each new officer and other new employee must execute the Periodic Compliance Certificate upon initial employment and on an annual basis



thereafter. In addition, each newly elected director must execute the Periodic Compliance Certificate upon election or appointment to serve on the Board and annually thereafter as set forth above.

The Company's Chief Legal and Compliance Officer is responsible for ensuring that all directors, officers and other appropriate employees noted above of the Company execute and return the Periodic Compliance Certificate to the Company's Chief Legal and Compliance Officer or another officer designated by the Company's Chief Legal and Compliance Officer.

D. Interpretation Questions

Directors, officers or employees who have questions on how to proceed or interpret this Code should consult their supervisor, the Company's Chief Legal and Compliance Officer or any other person(s) designated by the Board to supervise the application of this Code. In addition, please see **Annex B** for a listing of compliance procedures.

E. Violation and Enforcement of this Code

Compliance with this Code is essential. Violations will result in disciplinary action, including dismissal of any officer or employee where warranted. Decisions on disciplinary action, including dismissal, will be made by consultation between the individual's manager or above in conjunction with the human resources department (HR) and where involving violation of laws or regulations or any of the Company's board approved policies, with the Company's Chief Legal and Compliance Officer, who will report such actions to the Nominating/Governance Committee and Board of Directors. Where such violations involve an executive officer or director of the Company, the decision on disciplinary action, including dismissal will be made in conjunction with Nominating/Governance Committee and/or the Board of Directors. Any individual with an apparent or perceived conflict of interest (see III. A. below) will be excluded from such decision making.

III. Conflicts of Interest

A. General

A conflict of interest occurs when an individual's private interest interferes in any way with the interests of the Company as a whole. This situation can arise when a director, officer or employee receives improper personal benefits as a result of his or her position with the Company or has other duties, responsibilities or obligations that run counter to his or her duty to the Company.

No director, officer or employee, regardless of level, is permitted to engage in any business or conduct or enter into any agreement or arrangement that would give rise to actual or potential conflicts of interest, unless explicit approval is obtained in advance by the Company's Board of Directors or its Nominating/Governance Committee. Directors, officers and employees should not permit themselves to be placed in a position that might give rise to the appearance that, or results in, a conflict of interest.

While it is not possible to describe all circumstances where a conflict of interest involving a director, officer or employee exists or may exist, the following situations may involve actual or potential conflicts of interest:

- An officer's or employee's interest in, or position with, any supplier, service provider, customer or competitor of the Company (except for an investment in publicly traded securities as described below).
- The acceptance of gifts or favours of more than nominal value by a director, officer or employee (or a member of such person's immediate family) from an actual or prospective customer, service provider, supplier or competitor of the Company or any governmental official or employee. This does not preclude the acceptance by a director, officer or employee of reasonable business entertainment (such as a lunch or dinner or events involving normal sales promotion, advertising or publicity).
- The disclosure or use of confidential information gained by reason of employment with the Company (or, in the case of a director, election or appointment to the Board) for personal gain, profit or advantage by a director, officer or employee or anyone else related to or affiliated with the individual disclosing or using the confidential information.
- The use of employment status at the Company or any Company assets or resources for personal benefit, or anyone else related or affiliated with the individual using his employment status or company assets.
- Competition with the Company in the acquisition or disposition of rights or property, or other business arrangement.
- Any employment or business activities outside the Company or outside interests which might interfere with normal business activities, create a perception of impropriety or jeopardize the Company's integrity and/or reputation.

The following situations should not be considered conflicts of interest:

- Ownership of publicly traded securities of a supplier, customer or competitor of the Company that do not confer upon the holder any ability to influence or direct the policies or management of the supplier, customer or competitor.
- A transaction with one of the Company's banks, where the transaction is customary and conducted on standard commercially available terms (such as a home mortgage or bank loan).
- A transaction or relationship disclosed in accordance with this Code and determined by the Company's Legal Officer or outside legal counsel not to be a prohibited conflict of interest.

These examples are given only to guide directors, officers and employees in making judgments about conflicts of interest. If any director, officer or



employee finds himself or herself in a situation where a conflict of interest exists or may exist, he or she should immediately report the matter as provided below.

B. Reporting Conflicts of Interest Involving Non-Officer Employees

Actual or potential conflicts of interest involving a non-officer employee, or a member of such person's immediate family, must be reported in writing by the affected person (or by others having knowledge of the existence of the actual or potential conflicts of interest) to the employee's immediate supervisor, who shall consult with the Company's Chief Legal and Compliance Officer to determine whether a conflict of interest actually exists and to recommend measures to be taken to neutralize the adverse effect of the conflict of interest reported, if such measures are available or appropriate under the circumstances. This procedure will be applied so as to minimize its effect on the personal affairs of employees consistent with the protection of the Company's interests. The matter may also be referred to the Board for its approval or rejection.

C. Reporting Conflicts of Interest Involving Directors or Officers

An actual or potential conflict of interest involving a director or officer, or a member of such person's immediate family, must be reported by the affected person (or by others having knowledge of the existence of the actual or potential conflict of interest) to the Company's Chief Legal and Compliance Officer, who shall promptly disclose the possible conflict of interest to the Board at the earliest time practicable under the circumstances. The possible conflict of interest will be made a matter of record, and the Board will determine whether the possible conflict of interest indeed constitutes a conflict of interest. The Board's approval will be required prior to the consummation of any proposed transaction or arrangement that is determined by the Board to constitute a conflict of interest.

Notwithstanding any other provisions herein, with respect to conflicts of interests regarding directors (including officers who also serve as directors), the provisions contained in the Company's amended and restated Bye-laws shall govern and supersede.

In addition, for all purposes of Article III hereof, a prohibited conflict of interest hereunder shall not be deemed to exist by virtue of entering into, or consummating any transaction approved by the Company's Board of Directors.

IV. Record Keeping

A. Company Books and Records

1. *Books and Records.* The Company requires honest and accurate recording and reporting of information in order to make responsible business decisions. As such, the Company's books, records and accounts must accurately and fairly reflect the Company's transactions in reasonable detail and in accordance with the Company's accounting practices and policies. The following examples are given for purposes of illustration and are not intended to limit the generality of the foregoing in any way:



- No false or deliberately inaccurate entries (such as overbilling or advance billing) are permitted. Discounts, rebates, credits and allowances do not constitute overbilling when lawfully granted. The reasons for the grant should generally be set forth in the Company's records, including the party requesting the treatment.
- No payment shall be made with the intention or understanding that all or any part of it is to be used for any person other than that described by the documents supporting the payment.
- No undisclosed, unrecorded or "off-book" funds or assets are permitted.
- No false or misleading statements, written or oral, shall be intentionally made to any internal accountant or auditor or the Company's independent registered public accounting firm with respect to the Company's financial statements or documents to be filed with the SEC or other governmental authority.

B. Foreign Payments

The Company and its directors, officers and employees must comply with the Company's Anti-Bribery and Corruption Policy and the United States Foreign Corrupt Practices Act, which makes it illegal for U.S. companies to win, retain or direct business by offering, paying or approving payments to foreign government workers, political parties or their officials. For additional information, please contact the Company's Chief Legal and Compliance Officer.

V. Use of Company Property and Resources

A. Protection and Proper Use of Company Assets

The use of any Company funds or assets for any unlawful or improper purpose is prohibited. All employees should endeavor to protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's profitability. Any suspected incident of fraud or theft should be reported immediately for investigation. Company property should not be used for non-business related purposes, though incidental personal use may be permitted (such as occasional use of the Company's stationery, supplies, copying facilities or telephone when the cost to the Company is insignificant).

The obligation of employees to protect the Company's assets includes an obligation to protect the Company's proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business, marketing and service plans, databases, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information violates Company policy and could also be illegal and result in civil or criminal penalties.



All Company computer equipment, devices and software, and all electronic information including, but not limited to, hardware, software and any data generated or communicated using the Company's computer equipment, devices, software or electronic communication systems are considered proprietary to the Company.

No person using the Company's computer equipment, Internet facilities, electronic communication systems or electronic information has any proprietary interest or expectation of privacy in the computer equipment, Internet facilities, electronic communication systems or electronic information, or their use, including hardware, software, and any data generated or stored thereon.

All persons using the Company's computer equipment, Internet facilities, electronic communication systems and/or electronic information are subject to having their usage, including their incidental and occasional personal usage, monitored by the Company to the extent permitted under applicable law. Employees using the Company's computer equipment, Internet facilities, electronic communication systems and/or electronic information consent to such monitoring to the extent permitted under applicable law.

B. Electronic Communications Usage Policy

In order to enable Company employees to communicate and gather information efficiently for business purposes, the Company owns, maintains, and makes available to its employees and certain authorized individuals (collectively, "Employees" or "you") network facilities for electronic communications, including voicemail, email, Internet access and associated computing, storage, and networking technology ("Network Facilities"). The Network Facilities are powerful tools requiring careful use, and they are made available to Employees at considerable expense to the Company. Employees must follow rules and procedures established by the Company to protect the security of the Network Facilities and the data they contain. The Network Facilities may not be used in any manner that might damage the Company's interests or violates any applicable law or any Company Policy. You are therefore required to know and follow these policies governing their use, including changes to these policies that the Company may make from time to time.

C. Questionable or Improper Payments and Gifts

1. *Payments or Gifts Made.* No payments or gifts from the Company's funds or assets shall be made to or for the benefit of a representative of any domestic or foreign government (or subdivision thereof), official of a political party, holder of or candidate for public office, official in an international organization or employee of a state-owned or state-controlled enterprise, labor union or any current or prospective customer or supplier for the purpose of improperly obtaining a desired government action or any sale, purchase, contract or other commercial benefit. This prohibition applies to direct or indirect payments made



through third parties and employees and is also intended to prevent bribes, kickbacks or any other form of payoff.

2. *Payments or Gifts Received.* Directors, officers and employees of the Company shall not accept payments or gifts of the kind described in this Article V as an inducement or reward for making or fostering business arrangements with the Company.
3. *Gifts to Government Personnel.* Nothing of value (for example, gifts or entertainment) may be provided to government personnel unless permitted by law, any applicable regulation and the Company's Anti-Bribery and Corruption Policy.
4. *Gifts to Commercial Parties.* Commercial business entertainment and transportation that is reasonable in nature, frequency and cost is permitted provided it aligns with the Company's Anti-Bribery and Corruption Policy. Reasonable business entertainment or transportation includes, without limitation, a lunch, dinner or athletic or cultural event; gifts of nominal value; entertainment at the Company's facilities or other authorized facilities; or authorized and reasonable transportation in the Company's vehicles. In addition, reasonable business entertainment covers traditional promotional events sponsored by the Company.
5. *Third Party Arrangements – Proper Selection and Documentation.* All arrangements with third parties (such as distributors or agents) should be evidenced or memorialized in a written contract, order or other document that describes the goods or services that are in fact to be performed or provided and should be for reasonable fees or costs. Such third parties should be selected carefully, after the conduct of due diligence as appropriate, as the Company and certain of its personnel may be held responsible for the actions of such third parties.
6. *Extension of Credit by the Company.* No director or executive officer may seek, or accept from the Company, credit, an extension of credit or the arrangement of an extension of credit in the form of a personal loan. Any personal loan existing at the time of adoption of this Code shall not be materially modified, extended or renewed.

D. Corporate Opportunities

Without the written consent of the Board, directors, officers and employees are prohibited from taking for themselves an opportunity that is (1) a potential transaction or matter that may be an investment or business opportunity or prospective economic or competitive advantage in which the Company could reasonably have an interest or expectancy or (2) discovered through the use of corporate property, information or position. In addition, directors, officers and employees are prohibited from using corporate property, information or position for personal gain and competing with the Company directly or indirectly. Directors, officers and employees of the Company owe a primary duty to the Company to advance its legitimate interests when the opportunity to do so arises. This policy is subject to the provisions of the Amended and Restated Bye-laws of the Company and the Non-Compete Agreement and employment



agreements entered into in connection with the Business Combination Agreement and any amendment, extension, replacements or waiver thereto.

VI. Business and Trade Practices

A. Compliance with Laws, Rules and Regulations

1. *Compliance with Applicable Laws.* All directors, officers and employees must respect and obey the laws of the countries and local jurisdictions in which the Company operates. Although directors, officers and employees are not expected to know every law that is applicable to the Company, it is important that directors, officers and employees know enough to ask questions and seek advice from supervisors, managers, lawyers or other appropriate personnel if they have any doubt regarding the legality of an action taken, or not taken, on behalf of the Company.
2. *Insider Trading.* Purchasing or selling, whether directly or indirectly, the Company's securities while in possession of material non-public information is both unethical and illegal. Directors, officers and employees are also prohibited by law from disclosing material non-public information to others who might use the information to, directly or indirectly, place trades in the Company's securities. Directors, officers and employees also shall not recommend the purchase or sale of the Company's securities. All directors, officers and employees shall comply with the Company's Insider Trading Policy.
3. *Compliance with Anti-Bribery and Corruption Laws.* It is the Company's policy to comply with all applicable anti-bribery and corruption laws and regulations, including the United States Foreign Corrupt Practices Act (FCPA) which prohibits bribing foreign (i.e., non-U.S.) government officials on behalf of the Company in order to obtain or retain business for the benefit of the Company. All directors, officers and employees shall comply with the Company's Anti-Bribery & Corruption Policy.
4. *Compliance with Trade Laws.* It is the Company's policy to comply with all applicable trade laws, including country-specific import and export control laws, as well as applicable sanctions laws in every jurisdiction in which it operates, which may restrict the Company's provision of goods or services to particular countries or specific individuals.
5. *Seeking Legal Advice.* For additional information regarding any of the Company's legal obligations, including those summarized above, please contact the Company's Chief Legal and Compliance Officer.

B. Fair Dealing

Directors, officers and employees should endeavour to deal fairly with the Company's clients, suppliers, competitors or other counterparties as well as with employees. No director, officer or employee should take unfair advantage of anyone through manipulation, concealment, abuse



of privileged information, misrepresentation of material facts or any other practice involving unfair dealing.

It is the Company's policy that all of its interactions with competitors comply with all applicable competition laws, including U.S. antitrust laws.

C. *Confidentiality*

Directors, officers and employees shall maintain the confidentiality of information entrusted to them by the Company or its customers, except when disclosure is authorized or legally mandated. Confidential information includes all non-public information that, if disclosed, might be of use to competitors or harmful to the Company or its customers. Confidential information also includes written material provided and information discussed at all meetings of the Board or any committee thereof and all information that is learned about the Company's suppliers and customers that is not in the public domain. The obligation to preserve confidential information continues even after employment or agency with the Company ends. Any documents, papers, records, or other tangible items that contain trade secrets or proprietary information are the Company's property. Nothing contained herein shall limit the Company's ability to disclose information to regulators and potential regulators or rating agencies.

D. *Health, Safety and Environmental Policy*

The Company is committed to conducting its business in compliance with applicable health, safety and environmental laws, rules and regulations in a manner that has the highest regard for the health and safety of human life and the environment. Each employee has the responsibility for maintaining a healthy, safe and environmentally-friendly workplace by following health, safety and environmental laws, rules and regulations and reporting accidents, injuries and unsafe equipment, practices or conditions.

Directors, officers and employees should be aware that health and safety laws may provide for significant civil and criminal penalties against individuals and the Company for the failure to comply with applicable requirements. Accordingly, each director, officer and employee must comply with all applicable safety and health laws, rules and regulations, including occupational safety and health standards.

Directors, officers and employees should be aware that environmental laws may provide for significant civil and criminal penalties against individuals and/or the Company for failure to comply with applicable requirements. Accordingly, each director, officer and employee must comply with all applicable environmental laws, rules and regulations.

Employees should report to work in a condition allowing them to perform their duties free from the influence of drugs, alcohol or other



controlled substances. The use of illegal drugs in the workplace will not be tolerated.

Violence and threatening behavior are not permitted.

E. Retention of Documents and Records

It is the Company's general policy to cooperate lawfully with lawful and appropriate governmental or regulatory requests for information or investigations.

Each director, officer and employee shall retain any record, document or tangible object of the Company that is known to be the subject of an investigation or litigation. It is a violation of this Code for any director, officer or employee to knowingly alter, destroy, mutilate, conceal, cover up, falsify or make a false entry in any record, document or tangible object with the intent to impede, obstruct or influence the investigation or proper administration of this Code, the Company's other policies, or any other matter within the jurisdiction of any state, federal department or agency or any bankruptcy, or in relation to or contemplation of any such matter or case. All directors, officers and employees shall comply with the Company's Data Retention Policy.

VII. Employment Practices and Work Environment

A. Employee Relations

All directors, officers and employees, regardless of position, shall do their best to work together to meet the following objectives:

- Respect each employee, worker and representative of customers, suppliers and contractors as an individual, showing courtesy and consideration and fostering personal dignity;
- Make a commitment to and demonstrate equal treatment of all employees, workers, customers, suppliers and contractors of the Company without regard to race, color, gender, religion, age, national origin, citizenship status, military service or reserve or veteran status, sexual orientation or disability;
- Provide a workplace free of harassment of any kind, including on the basis of race, color, gender, religion, age, national origin, citizenship status, military service or reserve or veteran status, sexual orientation or disability;
- Provide and maintain a safe, healthy and orderly workplace; and
- Assure uniformly fair compensation and benefit practices that will attract, reward and retain quality employees.

In addition to the objectives set forth above, members of the management team are expected to:



- Use good judgment and exercise appropriate use of their influence and authority in their interactions with employees, customers, suppliers, contractors and partners of the Company; and
- Keep employees generally informed of the Company's policies, plans and progress through regular communications.

B. Non-Discrimination Policy

The Company values the diversity of its employees and is committed to providing an equal opportunity in all aspects of employment to all employees without regard to race, color, gender, religion, age, national origin, citizenship status, military service or reserve or veteran status, sexual orientation or disability. Directors, officers and employees should seek business partners for the Company that do not discriminate in hiring or in their employment practices, and who make decisions about hiring, salary, benefits, training opportunities, work assignments, advancement, discipline, termination and retirement solely on the basis of a person's ability to perform the tasks required by their position.

C. Freedom of Association

The Company recognizes and respects the right of employees to exercise their lawful rights of free association, including joining or electing not to join any association. The Company expects its business partners to also adhere to these principles.

D. Non-Harassment Policy

The Company does not condone any type of harassment, abuse or punishment, whether corporal, mental or physical, of an employee by a director, officer or employee or any partner, customer or supplier of the Company.

VIII. Reporting Violations

The Company proactively promotes ethical behaviour.

Directors, officers and employees should report violations of any provisions of this Code to their respective supervisors who should consult with the Company's legal and compliance department, as necessary. If an officer or employee is not comfortable speaking with his or her supervisor, or if he or she is not satisfied with the supervisor's response, the officer /employee is encouraged to speak to the Company's Chief Legal and Compliance Officer and/or Head of Human Resources, who, if appropriate, can escalate the matter to the Board of Directors or the relevant committee of the Board of Directors.

Supervisors, managers and above are required to report potential violations to the Company's Chief Legal and Compliance Officer.

If the matter involves a complaint or concern regarding an accounting, internal accounting controls or auditing matter, including related to fraud, where an officer or an employee is not satisfied or comfortable that the above stated escalation policy can or will appropriately address the matter officers and employees may report such complaints or concerns through an anonymous hotline. The hotline numbers +1 (917)



444 1781 and +442070728838, and can be reached 24 hours a day, seven days a week. Additionally, employees can access the hotline online at IGI's intranet. The email address is Whistleblower@iginsure.com.

To be considered a Whistleblower matter protectable under Sarbanes-Oxley Act Section 806 and the Dodd-Frank Act Section 922, the report must involve alleged violations of federal laws governing one or more of these activities: fraud (either mail, wire, bank, or securities fraud), and/or any SEC rule and regulation and/or any provision of federal law relating to fraud.

Directors, officers and employees are expected to cooperate in internal investigations of misconduct.

IX. Waivers of this Code

Any waiver of a provision of this Code may be made only by the Board for directors or executive officers, or by the Board or committee thereof for employees, and will be disclosed if and as required by the listing requirements of Nasdaq within four (4) business days either in a press release or, on Form 6-K, or on the Company's website if the Company has disclosed in its latest annual report an intentions to make such disclosures on its website. Any waiver of the code for executive officers or directors must be disclosed to shareholders along with the reasons for the waiver. =

X. Amendments to this Code

Any amendment to this Code shall be approved by the Board. If an amendment to the Code is approved by the Board, the amended Code shall be made publicly available in accordance with and as required by applicable rules and regulations of Nasdaq.

XI. Posting Requirement

The Company shall make this Code available publicly in accordance with and as required by applicable rules and regulations of Nasdaq.

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This document states a policy of International General Insurance Holdings Ltd. and is not intended to be regarded as the rendering of legal advice.



ANNEX A

CORPORATE CODE OF BUSINESS CONDUCT AND ETHICS CERTIFICATION

I have read and understand the Corporate Code of Business Conduct and Ethics (the “Code”) of International General Insurance Holdings Ltd. (the “Company”). I agree that I will comply with the policies and procedures set forth in the Code.

I understand and agree that, if I am an employee of the Company or one of its subsidiaries or other affiliates, my failure to comply in all respects with the Company’s policies, including the Code, is a basis for termination for cause of my employment with the Company and any subsidiary or other affiliate to which my employment now relates or may in the future relate.

Please tick as appropriate: Yes No

In addition, I agree to promptly submit a written report to the Company’s Chief Legal and Compliance Officer describing any circumstances in which:

1. I have reasonable basis for belief that a violation of the Code by any person has occurred;
2. I have, or any member of my family has or may have engaged in any activity that violates the letter or the spirit of the Code;
3. I have, or any member of my family has or may have an interest that violates the letter or the spirit of the Code; and
4. I or any member of my family may be contemplating an activity or acquisition that could be in violation of the Code.

Please tick as appropriate: Yes No

In terms of violations or suspected violations of the Code by any employee (Please tick as appropriate):

- I am unaware of any violations or suspected violations of the Code by any employee.
- I am aware of any violations or suspected violations of the Code by an employee as described below or on the attached sheet of paper

To the best of my knowledge and belief, neither I nor any member of my family has any interest or affiliation or has engaged in any activity that might conflict with the Company’s interest, except as described below or on the attached sheet of paper. (If no exceptions are noted, please check the space provided below.)

- No exceptions
- Exceptions are noted as described below or attached.

I am aware that this signed Certification will be filed with my personal records in the Company’s Human Resources Department.

Signature

Type or Print Name

Date



ANNEX B
CORPORATE CODE OF BUSINESS CONDUCT AND ETHICS
COMPLIANCE PROCEDURES

Directors, officers and employees must work together to ensure prompt and consistent action against violations of the Code. However, a director, officer or employee may encounter a situation in which it is difficult to determine how to proceed while also complying with the Code. Since not every situation that will arise can be anticipated, it is important to have a way to approach a new question or problem. When considering these situations, a director, officer or employee should:

1. ***Make sure to have all the facts.*** In order to reach the right solution, all relevant information must be known.
2. ***Consider what he or she specifically is being asked to do and whether it seems unethical or improper.*** This will enable the individual to focus on the specific question and the alternatives he or she has. If something seems unethical or improper, it probably is.
3. ***Understand his or her individual responsibility and role.*** In most situations, there is shared responsibility. Are other colleagues informed? It may help to get other individuals involved and discuss the problem.
4. ***Discuss the problem with a supervisor.*** In many cases, supervisors will be more knowledgeable about the question and will appreciate being brought into the decision-making process. Employees should remember that it is the responsibility of supervisors to help solve problems and ensure that the Company complies with this Code.
5. ***Seek help from Company resources.*** In the rare case in which it may not be appropriate to discuss an issue with a supervisor or a supervisor is not available to answer a question, employees should discuss it locally with the office manager or Human Resources manager. If that is not appropriate or if a satisfactory resolution is not obtained, call or send concerns to the Company's Chief Legal and Compliance Officer or follow the procedures outlined in the Company's Policy for Employee Concern and Complaints Procedures for Accounting, Accounting Controls and Auditing Matters.
6. ***Report ethical violations in confidence and without fear of retaliation.*** If the situation so requires, anonymity will be protected. The Company does not permit retaliation of any kind for good faith reports of ethical violations.
7. ***Always ask first, act later.*** When unsure of what to do in any situation, the individual should seek guidance and ask questions before the action in question is taken.