



AmTrust
FINANCIAL

Code of Business
Conduct and Ethics

Letter from Our CEO and President

Dear Colleagues,

Welcome to our Code of Business Conduct and Ethics (the “Code”). Our Code is a guidebook for all of our global business activities. It tells each of us what AmTrust expects of us in our daily business conduct. It also explains how we can uphold the highest values to ensure our Company’s future business success in becoming a market leader and thoughtful innovator in the insurance industry.

The Company is committed to the values of integrity, honesty, ethical business practices and compliance with the law throughout our global operation. Our Code helps us to meet these commitments. It shows us where to find additional information and who to go to with questions and concerns. We each have a responsibility to report any situations that we know or suspect violate our commitment to ethics and compliance with the law and this Code. The section of our Code titled “Seeking Guidance and Reporting Concerns” contains resources for reporting such situations, including our global hotline.

We are proud of the spirit of progress that drives us and we recognize that success is a long journey. We work to uphold our relationships with our key stakeholders, including our fellow employees, customers, suppliers, agents, brokers, other business partners, shareholders and local communities in which we operate around the world. Our Company is committed to maintaining our discipline, integrity and ethical culture as we continue to grow and succeed.

I would like to thank you for your continued commitment to reading, understanding and following our Code in all of your business activities. Together, we can sustain long-term profitable growth while making a positive impact on the communities where we do business for years to come.



Barry D. Zyskind

Chief Executive Officer and President



 **AmTrust**
FINANCIAL

Superior

E. 9th St



Table of Contents

Letter from Our CEO and President	1
Introduction to Our Global Code	4
Getting to Know Our Code	5
Knowing What is Expected of You	5
Complying with Applicable Laws	6
Complying with Company Policies	6
Seeking Guidance and Reporting Concerns.....	6
Hotline.....	7
Non-Retaliation Policy.....	7
Handling of Reports and Investigations.....	7
Disciplinary Action.....	7
Our Responsibilities to One Another	9
Diversity at AmTrust	10
No Discrimination or Harassment	10
Protecting Employee Information	11
Ensuring Workplace Health and Safety	12
Violence in Our Workplace.....	13
Preventing Substance Abuse.....	13
Our Responsibilities to Our Customers and Business Partners.....	14
Dealing Fairly with Our Customers and Partners.....	15
Treating Suppliers Equitably.....	15
Complying with Competition Laws.....	15
Competitive Information	16
Protecting Third-Party Information	16
Meeting Quality and Safety Standards.....	17
Doing Business with Government Entities.....	18
Our Responsibilities to Our Shareholders	19
Maintaining Accurate Books and Records	20
Records Management	20
Responding to Auditors and Government Inquiries	21
Conflicts of Interest	21
Preventing Money Laundering.....	23
Complying with Economic Sanctions.....	23
Anti-Boycott Laws	24
Complying with Anti-Bribery and Anti-Corruption Laws	24
Business Gifts and Entertainment – Private Persons.....	26
Business Gifts, Entertainment or Reimbursement of Expenses - Government Officials	26
Facilitating Payments	28
Protecting AmTrust’s Assets.....	28
Insider Trading	30
Our Responsibilities to Our Communities	32
Operating as a Good Corporate Citizen	33
Community Investment	33
Communication with the Public.....	33
Taking Part in Political Activities	33
Corporate Political Activities.....	34
Social Media and Networking Sites.....	34
Conclusion	35
Index.....	36
Certification and Acknowledgment Form.....	37

Introduction to Our Global Code

Getting to Know Our Code

Our Code is an integral part of our employment with the Company and is a useful guide that sets out the behaviors expected of us in our daily business conduct. While the Code does not cover every issue or scenario that may arise, by showing us how to make sound, honest, ethical decisions and directing us where to go when we need to seek guidance or report concerns our Code helps us to uphold the Company's standards of ethical and legal business conduct as we achieve our future goals.

Our various stakeholders rely on us to act with integrity and honesty and in accordance with the principles of ethical business at all times. By following our Code, we help maintain trust with our fellow employees, customers, insureds, suppliers, business partners, shareholders, governments and local communities where we operate.

We must all abide by both the letter and the spirit of our Code. The Code sets out the values and principles to guide all employees, directors and officers of AmTrust Financial Services Inc. and its subsidiaries (collectively, the "Company" or AmTrust). The Code applies to all

AmTrust employees, officers, directors and contractors. The Company also expects all of our suppliers, agents and business partners to follow similar principles when working with AmTrust. We are all expected to conduct the business of AmTrust with the highest personal and professional integrity while adhering to strong ethical standards.

**You are always
encouraged to report
any concerns to our
Hotline either by phone,
web or via email.**

In limited circumstances, AmTrust may find it appropriate to waive a provision of our Code. Waivers for non-executive employees require the prior approval of the Legal Department. Only the Board of Directors (the "Board") or an appropriate committee of the Board may waive a provision of our Code for executive officers and directors.

Knowing What is Expected of You

We have several shared responsibilities under our Code. First, we must all understand and strive to uphold our Code and related Company policies in all our business activities. Second,

we must familiarize ourselves with and follow the laws and regulations that apply to our work. Third, we must never try to avoid or violate our Code, Company policy or the law for any reason.

Managers and supervisors must lead by example as models of the AmTrust standards of ethical and legal business conduct. You must also do your part to promote a positive work environment. This means you should ensure that all employees and contractors who report to you feel comfortable raising questions and concerns. If you receive a question or concern, make sure to handle it properly and transparently. AmTrust encourages open dialogue about issues or concerns and prohibits retaliation against any employee for raising a question or concern.

Complying with Applicable Laws

Our operations reach around the globe, and laws may vary greatly from one country to the next. We must understand and follow the laws and regulations that apply to us and our operations at all times, regardless of where we are located. If you ever have questions about local laws or find that local laws conflict with the Code, you should seek guidance from the Legal Department.

Complying with Company Policies

We must all understand and follow the Company's policies. You can find these policies via the AmTrust Corporate Policy Manager and you should be familiar with those that apply to you.

Seeking Guidance and Reporting Concerns

By sharing our questions and concerns, we uphold the Company's commitment to integrity, honesty and ethical business practices. In addition, we contribute to our shared ethical culture, and by speaking up, we can improve the way in which we conduct our business. If you wish to raise a question or concern, you are encouraged to:

- Speak with a supervisor or manager
- Consult the Legal or Compliance departments
- Discuss the issue with appropriate department representatives
- File a confidential report by email via our Hotline at www.amtrusthotline.ethicspoint.com
- Call our Hotline
- Contact Global Compliance at globalcompliance@amtrustgroup.com

Hotline

You are always encouraged to report any concerns to our Hotline. Our Hotline is operated by a third party and has the ability to receive your call in more than 70 languages. If you choose to make an anonymous report, the Company will not try to identify you or trace your call. You may make anonymous reports to the Hotline, where local law permits.

Depending on which country you are located in, call the appropriate Hotline number below.

Bermuda	971.371.7834
Brazil	0800.892.0724
Canada	844.331.AFSI (2374)
People's Republic of China	4006013751
France	0800.91.4713
Germany*	0.800.225.5288
India*	000.117
Indonesia*	001.801.10
Ireland*	1.800.550.000
Italy	800.797237
Luxembourg	80085166
Malaysia	1800.81.8267
Mexico	001.844.285.0326
Netherlands	08002500035
Peru*	0.800.50.288
Spain*	900.99.0011
Sweden	020109185
Turkey*	0811.288.0001
United Kingdom	0808.234.6655
United States	844.331.AFSI (2374)
Vietnam*	1.201.0288

*At the prompt dial 844.331.AFSI (2374)

Non-Retaliation Policy

AmTrust will not tolerate any retaliatory acts against any employee or contractor for reporting, in good faith, known or suspected misconduct. Reporting in “good faith” means you provide all the information you have and believe your report to be true. In addition, we will not tolerate any act of retaliation for participating in an investigation of a report. Examples of retaliatory acts include dismissal, discipline or mistreatment.

By reporting our concerns, we are acting with integrity and helping to preserve our culture of acting ethically. Our Company will protect all those who report known or suspected misconduct in AmTrust’s operations. Individuals who engage in retaliation against anyone who asks questions, voices concerns or reports suspected or actual ethical or legal misconduct will be subject to disciplinary action, up to and including termination of employment.

Handling of Reports and Investigations

Our Company will maintain the confidentiality of all reports to the greatest extent possible, consistent with resolution of the issues and in compliance with applicable law. AmTrust will promptly investigate all reports of misconduct.

Disciplinary Action

This Code is an integral part of our employment with the Company and the vast majority of us believes in, and naturally adheres to, the high standards, values and principles set out in this Code.

Where a person fails to comply with the Code, or the laws, regulations and policies referred to in this Code (whether directly or indirectly), the Company may initiate an investigation which may lead to disciplinary action, up to and including termination of employment in a manner consistent with Company policy and applicable law.

Where the investigation identifies potential criminal activity, the Company reserves the right to contact the relevant authorities and participate in their investigation.

Our Responsibilities to One Another

Diversity at AmTrust

Our Company is global, and much of our success stems from the value we place on diversity. Our diverse workforce promotes an open, multicultural and inclusive working environment. It helps us deliver innovative solutions and exceptional service to our customers, as well as develop trusted relationships with our partners and the communities in which we do business.

We each possess different talents and strengths, and by working together and embracing this diversity, we continue to develop the culture that is critical to the continued success of our organization. AmTrust is committed in policy and practice to providing equal employment opportunities for all applicants and employees, based upon their training, experience, and overall qualifications. Consistent with this commitment, discrimination against an applicant or employee based on the individual's race, color, creed, religion, sex, gender, age, national origin, ancestry, citizenship status, marital or familial status, sexual orientation, gender identity, disability, military status, protected veteran status, genetic information, or any other condition or characteristic protected by law is strictly prohibited.

This policy applies to all aspects of the employment relationship, including, but not limited to, recruiting and recruitment advertising, hiring, rates of pay and other compensation, benefits, promotions, transfers, demotions, terminations, reductions in force, training, working conditions, disciplinary actions, and all other terms, conditions, or privileges of employment.

No Discrimination or Harassment

To ensure a work environment where we all can realize our potential, discrimination will not be tolerated in our Company. Our recruitment, appraisal, development and any other employment-related actions and decisions concerning our people must be based only on merit and not on any characteristics such as race, color, sex, age, religion, disability, sexual orientation, marital/family status, national origin, genetic information or veteran status, except to the extent required by local laws.

Our workplace must also be free from harassment for our fellow employees and our contractors. "Harassment" is a form of discrimination that can be physical, verbal or visual, and generally includes any form of conduct towards a person that is unwelcomed by that person and has the purpose

or effect of creating an intimidating, hostile or offensive work environment. Harassment will not be tolerated in our Company.

If you know or suspect that discrimination or harassment has occurred, you should report the situation immediately to a supervisor, manager, Human Resources manager, Legal or Compliance representative or any additional resource listed in the “Seeking Guidance and Reporting

Concerns” section above. You will not experience retaliation for making a good faith report.

Protecting Employee Information

When working for AmTrust, many of us entrust our Company with personally identifiable information (PII) about ourselves. Such information, also known as Non-Public Personal Information, refers to information that specifically identifies a person (such as a government-issued identification number) or a combination of such pieces of information (like a name and address together). To uphold the trust our fellow employees place in us, we must all be committed to properly managing and using the PII they provide. We must also manage and use the PII of prospective and former AmTrust employees properly. At AmTrust, we must only collect, access, use or disclose PII for appropriate business purposes. We have a duty to inform individuals about the PII we collect about them and how we will use it. Never share this information with anyone, whether inside or outside our Company, who does not have a legitimate business need to know it. In addition, take appropriate steps to secure any data to which you have access.

QUESTION

Charlotte is an AmTrust employee. After years of service, she feels she's earned a promotion. One night, she overhears her manager laughing with another employee. She hears him say that even though Charlotte is his best employee, he'd never actually consider promoting her because she's a woman. Charlotte doesn't feel comfortable confronting her manager about his comment. What should she do?

ANSWER

Charlotte should report the situation immediately to her Human Resources representative, the Legal Department or our Hotline. A decision not to promote Charlotte based on her gender is a violation of our Company's policies on discrimination. AmTrust will not tolerate employment – related actions or decisions made on the basis of a person's legally protected characteristics.

QUESTION

I overheard my manager discussing with one of her peers some private information contained in a co-worker's medical records. What should I do?

ANSWER

Medical information is strictly confidential and considered personal information. Inappropriate sharing of such information is a violation of AmTrust Policy and a breach of our Code. You should raise this issue with the appropriate management personnel. If you are uncomfortable raising this issue with management, then report the matter to Human Resources or the Legal or Compliance departments. Additionally, you may contact AmTrust's Hotline.

Many countries have their own legal requirements governing the use of PII. We must know and uphold the requirements that apply in the locations where we work. In particular, the U.S. Health Insurance Portability and Accountability Act (HIPAA) requires that our health plans protect certain health-related PII known as Personal Health Information, or PHI, about our fellow employees. Therefore, AmTrust may not receive such personally identifiable information from our health plans without our permission. In addition, our Company cannot use this PHI to make employment-related actions or decisions. We must understand and follow the standards for access, use,

transmission, storage and disposal of employee personal information. We must limit access to personal information to authorized persons with a legitimate business need for the access. If you believe personal information may have been or is inadvertently or improperly accessed or distributed, please contact a supervisor, manager, Human Resources manager, Legal or Compliance representative or any additional resource listed in the "Seeking Guidance and Reporting Concerns" section above.

For more information on data security and privacy please review: (1) Data Classification Policy; (2) Data Security Breach Policy; (3) Desktop Security Policy; (4) Electronic Communications Policy; (5) Mobile Device Policy; (6) Password Policy; (7) Network Access Policy; (8) Acceptable Use Policy; and (9) Employee Privacy Policy.

Ensuring Workplace Health and Safety

Our people are our Company's, and their families', most valuable asset. We all have a responsibility to ourselves, our colleagues and the public to ensure a safe working environment, to speak up about safety issues, immediately address any safety concerns, and to support the continuous development of our culture of safety. AmTrust is committed to conducting business in a manner that protects the health and safety of employees and others while in our facilities.

If you become aware of or suspect unsafe working conditions or safety issues, report the situation immediately.

Take Your Breaks

If you are a non-exempt U.S.-based employee, you are required to take “duty free” meal periods and breaks as outlined in our Employee Handbook. Meal periods and breaks must be “duty free,” meaning that they must not be interrupted by work-related matters or tasks. If your meal period or break is interrupted, please immediately contact your manager or supervisor. The Company wants to make sure employees are paid for all the work they perform.

Accurate Timekeeping

All non-exempt employees are responsible for accurately reporting all time worked. Employees may not begin work until they have clocked or logged in. Working “off the clock” for any reason is a violation of Company policy and the Code. A non-exempt employee works “off the clock” when, for example, he or she works during a meal period or break, continues to work after clocking out for the day, or starts working before clocking in for the day. Working off the clock will result in discipline, up to and including termination of employment. Supervisors are responsible for ensuring that non-exempt employees take duty-free meal periods and breaks and are paid for all hours worked.

For more information on AmTrust’s time-keeping policies please read the Employee Handbook and the Non-Exempt Travel Time Policy.

Violence in Our Workplace

Our commitment to workplace health and safety means that there is no place for violence at AmTrust. This includes acts and threats of violence on AmTrust premises, as well as off-site in connection with Company-related activities. If you experience, witness or are otherwise aware of a violent or potentially violent situation, you should report the situation right away. If you or someone else is in immediate danger, contact the local authorities.

In addition, other than a limited exception for security personnel, we are not permitted to possess weapons on Company property or while conducting business on behalf of AmTrust.

Preventing Substance Abuse

To ensure workplace health and safety, we must all be free from the improper influence of alcohol, drugs and improperly used prescription medicine when conducting business on our Company’s behalf. This is true whether you are on or off Company premises. Using, selling, possessing or working under the influence of illegal drugs is prohibited at AmTrust. You may consume alcohol at business functions or certain Company events, but your use should be moderate.

Our Responsibilities to Our Customers and Business Partners

Dealing Fairly with Our Customers and Partners

We are committed to a culture of performance that both demands and rewards outstanding results throughout our business. We are devoted to sustaining and building long-term and prosperous business relationships with all parties with whom we interact. To uphold our culture of performance and maintain our integrity, we must deal fairly with our customers, policy holders, producers, vendors, suppliers, service providers and other business partners at all times. Those of us involved in selling, promoting and marketing our products and services must engage in these pursuits with integrity and honesty. We must accurately and truthfully represent the quality, features and availability of our products and services. We may never make unfair or inaccurate comparisons between our competitors' products and services and our own.

Treating Suppliers Equitably

We must treat our suppliers equitably and engage in honest and fair supplier selection. We must always:

- Communicate to our suppliers that we expect them to compete fairly for our business

- Comply with applicable Company and/or regulatory sourcing or purchasing policies or guidelines
- Select suppliers objectively and strictly on merit and in accordance with applicable Company and/or regulatory bidding and supplier selection process guidelines as specified in the Vendor Management Policy
- Communicate to our suppliers that we expect them to acknowledge and uphold the principles of integrity, honesty and ethical business practices; acknowledge and support our commitment to safety; and behave in a manner that reflects the principles set out in this Code

Complying with Competition Laws

As part of our culture of performance, we engage in fair competition while always acting with integrity. We must abide by all applicable competition laws in place in the locations where we do business, including U.S. antitrust and EU competition laws.

We must avoid making any formal or informal agreements with competitors, customers, suppliers or other business partners regarding activities that might limit competition or restrict free trade.

Therefore we may not discuss or enter into any formal or informal agreement with competitors, customers, suppliers or other business partners related to the following topics insofar as they are in violation of anti-competition laws:

- Pricing or pricing policy, costs, marketing or strategic plans
- Proprietary or confidential information
- Fixing or agreeing on prices to charge customers
- Dividing customers, markets, territories or countries
- Boycotting certain customers, suppliers or competitors

Always avoid the disclosure of AmTrust's confidential information with competitors. Exercise caution when interacting with competitors at conferences and other similar events. If a competitor, customer, supplier or other business partner attempts to discuss any of the above topics with you, stop the conversation immediately and report the incident to the Legal Department.

Anyone involved in trading and sales activities must understand all the requirements of applicable competition laws and is accountable for careful oversight at their location. Keep in mind that failure to comply with these laws can have serious consequences for

individuals involved and our Company. If you need guidance regarding competition laws, contact the Legal Department.

Competitive Information

It is often important to gather information about our competitors and others to vigorously and successfully compete. However, we must do so lawfully and ethically, which includes respecting another company's right to protect its confidential information. We may not gather information about our competitors using deception, theft, misrepresentation or other illegal or unethical means.

We cannot request information from employees about their former employers. If you have confidential non-public information from your former employment, do not share this information with our Company. Employees should not upload information from their past employer onto the Company's systems. Likewise, should you leave the Company for any reason, you may not download or remove any Company information and take it with you.

Protecting Third-Party Information

We have a duty to protect the confidential information supplied to

the Company by our customers, suppliers, and other business partners. This means we must follow the confidentiality provisions of any contractual agreements or laws governing our activities. Further, we should never misappropriate or misuse confidential non-public information provided by third parties. We may never compromise our customers' trust by disclosing customer confidential non-public information other than to those with a legitimate business purpose. Our obligation to protect third-party information gained through our work with our Company continues even after our employment with AmTrust ends.

Many of the materials we use in our work, such as computer software, journals and other publications, are owned by a third party and protected under copyright laws or licensing agreements. We cannot disclose or copy such materials, or otherwise infringe on the copyrights of others.

For further information regarding protecting third party information, please see the Data Classification Policy.

Meeting Quality and Safety Standards

To achieve top Company performance, we must deliver exceptional value to our customers and business partners

safely and efficiently. To do this, we must adhere to quality and safety standards at all times. This includes applicable laws and regulations, as well as related internal control procedures. In addition, we must follow all contract specifications and meet our customers' expectations at all times.

We must also hold our suppliers accountable for meeting quality and safety standards. For this reason, we only do business with suppliers that assure the quality of the products and services they provide to us.

QUESTION

Sarah, an analyst for AmTrust, recently attended an industry conference. While there, she had lunch with several competitors. Though the conversation started out personal, it quickly turned to a discussion of industry issues. Sarah knew that the discussion was off-limits, but she didn't want to be rude, so she sat quietly as her competitors talked about different pricing strategies. What should she have done differently?

ANSWER

Sarah should have stopped the conversation and removed herself from the conversation, even if it seemed to be rude. We must never discuss pricing with competitors. Even though Sarah didn't contribute to the discussion, she participated simply by being present. Sarah should report the conversation to the Legal Department.

Doing Business with Government Entities

When working with government entities, we must abide by the various laws, regulations and procedures that apply to government contract work. These rules are often more complex than those that govern our business with commercial customers. If your work involves marketing to, selling to, contracting with or working on projects for a government agency, it is your responsibility to understand and follow the rules that apply to the project. You should consult the Legal Department or the Compliance Department if you have any questions or concerns about these rules or their applicability to the work you do. Please note that violations of these rules can result in substantial fines, the loss of future government contracts, and even criminal prosecution for the individuals involved and our Company.

Our Responsibilities to Our Shareholders

Maintaining Accurate Books and Records

We are required to maintain accurate books and records in accordance with the securities and accounting laws of the U.S., the countries in which our subsidiaries are incorporated, as well as the countries in which we operate. These documents form the basis of our earning statements, financial reports and other public disclosures and should be maintained accurately, completely and in a timely and understandable manner. In addition, they guide our Company's business actions and decisions. Each of us is responsible for keeping accurate records of transactions, time reports, expense accounts and other financial records. In addition, we must comply with AmTrust's system of internal controls for financial reporting.

We may never make a false representation in our Company's books or otherwise mischaracterize such information. This means we cannot:

- Intentionally distort or disguise the true nature of a transaction in any accounting entries
- Make a representation, whether in a document or verbally, that is not fully accurate
- Establish any undisclosed or unrecorded funds or assets, such as "slush funds," for any purpose

You must submit any concerns or complaints regarding accounting, internal accounting controls or auditing matters. You can do so anonymously or confidentially via the Hotline, or contact any resource listed in "Seeking Guidance and Reporting Concerns."

If you have any questions about this section of the Code, you should consult the Legal Department.

Records Management

We have a responsibility to understand and follow applicable statutory, regulatory and contractual requirements governing how long we should retain Company documents, as well as how and when to discard them. You therefore must understand and follow the guidelines set forth in the Records Management Retainer Schedule before destroying any Company documents. If you are unsure whether you should maintain or destroy a particular document, you should consult your supervisor.

You may be notified that documents in your control may be relevant to a lawsuit or government investigation. If you receive this type of notice, you must preserve (and never alter, conceal or destroy) any documents identified in the notification that may be relevant.

Questions about such preservation notices should be directed to the individual who issued the notice. If you are unsure of whether a document is relevant, contact the Legal Department.

In addition, never assist or encourage anyone to destroy records in connection with an audit or review.

Responding to Auditors and Government Inquiries

We have a duty of cooperation with external and internal auditors and government examiners and investigators who are reviewing our Company's business activities. Never interfere with or seek to improperly influence any audit or investigation of our Company. For example, do not provide misleading information, offer anything of value or tie incentives to the outcome of the audit or investigation. Provide these individuals with accurate information at all times. Contact the Legal Department in the event you become aware of any actual or threatened litigation, audit, investigation or proceeding.

Please consult the Company's Account Management, Records Management, Anti-Corruption, Expense Management, and Fraud Prevention and Detection Policies for more information regarding

accurately maintaining the Company's books and records.

QUESTION

Upon hearing that a government investigator will be inspecting his department, Scott quickly disposes of some financial statements he knows are inaccurate. Since disclosure of the errors on these statements could harm our Company, he feels that shredding them is his only option. Is he correct?

ANSWER

No. Scott is interfering with a government examination by destroying relevant financial documents, and is therefore violating our Code. Although the statements reflect inaccurate information, Scott must still provide the government investigator access to them pursuant to guidance from the Legal Department. In addition, he may not alter them in any way.

Conflicts of Interest

Avoiding Conflicts of Interest

To create sustainable shareholder value, we must ensure that all of our business actions and decisions are in our Company's best interest. We therefore must be careful to avoid any actual or potential conflict of interest. A "conflict of interest" arises when our personal interests interfere with the interests of our Company. If you feel

you are in a situation that might give rise to an actual or potential conflict of interest with AmTrust, you must disclose the situation immediately to your manager or the Legal Department. Promptly disclosing any personal interest in, or association with, any business decision that might directly or indirectly confer a benefit to us or any immediate family member will help to remedy these potential situations. Remember, while having a conflict of interest is not necessarily a violation of our Code, failing to disclose it is.

Corporate Opportunities

During our employment, we may learn about business opportunities of personal interest to us. We must remember that these opportunities belong first and foremost to AmTrust. We can take advantage of these opportunities only after AmTrust has been informed of the opportunity, has had a chance to evaluate it and has decided not to act on it. Just as we may not personally benefit from such opportunities, we cannot assist anyone else in doing so. Remember, we owe a duty to our Company to advance its business interests and create sustainable shareholder value whenever possible. During your employment, you should not in any way attempt to compete with AmTrust.

Outside Employment and Financial Interests

At no time may we hold any outside employment that interferes with our Company's best interests. This means that we may not:

- Accept outside work that in any way limits our ability to perform our job duties for AmTrust
- Engage in business activities involving firms that compete with, sell to or buy from our Company
- Use AmTrust facilities, equipment or other property in the pursuit of such activities

In addition, we should not own substantial financial interests in companies that do business or compete with our Company. We may own stock in any entity whose securities are regularly traded on a recognized stock exchange, even when a firm is in some way competitive with our Company. However, our investment may not be of such a size that it could influence our judgment on Company matters.

Serving on Outside Boards of Directors

We may be invited to serve as an officer, director, consultant or member of management for another company. If this company is publicly traded or

does business or competes with our Company, accepting this position requires advance approval from the Legal Department.

Having a positive impact on your community by serving on a board of directors for a non-profit, social or civic organization is encouraged and does not require prior approval. AmTrust encourages civic involvement, however, you may only accept a position so long as it does not interfere with your ability to do your job.

Please see the Company's Employee Handbook and Insider Trading and Outside Investment Policy for more information on conflicts of interest.

Preventing Money Laundering

We must all be committed to helping in the global fight against money laundering. "Money laundering" is the process by which persons or groups try to conceal illegal funds or otherwise try to make the sources of their illicit funds appear legitimate. To prevent money laundering, we must perform "know your customer" due diligence on customers, suppliers and other business partners who wish to do business with our Company. Look out for red flags that may signal money

laundering activities. For example, ensure that the parties you are doing business with and their management maintain a physical presence, are engaged in legitimate business and have proper compliance processes in place. If you need more information about how to identify money laundering, you should consult the Legal or Compliance departments.

If you feel you are in a situation that might give rise to an actual or apparent conflict of interest with AmTrust, you must disclose the situation right away.

Complying with Economic Sanctions

Many countries and geo-political organizations, including the United States, the United Nations and the European Union, have economic sanctions programs. These sanction programs may restrict or prohibit dealings with certain countries (or individuals in or from those countries). Activities that may be restricted include transfers of assets, monetary payments, provision of services, exports of sensitive technology and

travel to the covered countries. We must understand and follow applicable restrictions wherever we conduct business. You should consult either the Legal or Compliance departments if you have any questions about sanctions.

Anti-Boycott Laws

United States laws and regulations prohibit us from participating in boycotts not sanctioned by the United States. This may include boycotts of certain countries, companies or individuals. To comply, we must immediately report any suspected request to participate in an illegal boycott to the Legal or Compliance department. Requests may be oral or written and are often hidden in proposals originating out of countries that support the requested boycott. Keep in mind that violations of these anti-boycott laws are serious. Consequences can include civil and criminal penalties for both the Company and the individuals involved.

Complying with Anti-Bribery and Anti-Corruption Laws

We have built trusting relationships with our shareholders and other stakeholders. To preserve this trust and our reputation, we must always do business with integrity and honesty. We

must never make business decisions based on any personal benefit given or offered to us. In particular, we may not engage in corruption or solicit, offer or accept bribes, kickbacks or other improper payments from anyone who does or is seeking to do business with our Company. Keep this principle in mind when offering or receiving any form of gift or entertainment to or from a government official, customer, supplier or other business partner.

Our Company has a zero-tolerance policy for bribery or corruption or any other form of improper payment or kickback.

Every country in which our Company does business has laws that prohibit bribery and corruption. Compliance with these laws is outlined in the Company policy known as the AmTrust Anti-Corruption Policy.

According to these laws and the AmTrust Anti-Corruption Policy, we are prohibited from engaging in any bribery, which is typically defined as the offering, promising, giving, soliciting or receiving anything of value with the intention of influencing the business

judgment or the decisions or actions of any person (whether in a public or private capacity) for the purposes of obtaining or retaining business or a business advantage, or directing business in the direction of a particular person. This prohibition includes the offering, promising, giving, soliciting or receiving anything of value through a consultant, agent, contractor, subcontractor or any other intermediary. Furthermore, personal funds cannot be used to accomplish what is otherwise prohibited.

Violations of anti-corruption and anti-bribery laws can result in significant civil and criminal penalties. In addition, any investigation into any perceived corruption or bribery is disruptive to our business, is costly and is damaging to our reputation.

Therefore, our Company has a zero-tolerance policy for bribery or corruption or any other forms of improper payments or kickbacks. To be clear, a “bribe” can be offering, promising, giving, soliciting or receiving anything of value, including cash, cash equivalents, gifts, paid travel expenses, entertainment, services or loans with the intention of influencing the business judgment or the decisions or actions of a person for the purposes of obtaining or retaining business. A “kickback” is

the return of a sum of money already paid or due to be paid as a reward for making or fostering business arrangements.

This rule applies in all of our operations, regardless of where or with whom we are doing business. Our Company delivers regular anti-corruption and anti-bribery training in each of our locations, and each of us is expected to attend when asked to do so.

For the purposes of this section, “anything of value” or “something of value” includes (but is not limited to) money, gifts, entertainment, goods or services, travel and accommodation expenses, per diems, government secondments, charitable donations and use of equipment or property.

If you have any questions relating to bribery or corruption, any other improper payments or behaviors, or the AmTrust Anti-Corruption Policy, you should seek advice from the Legal Department before acting.

If you become aware of any actual or suspected bribery, corruption, or any other improper payments or behaviors, you are encouraged to speak to your supervisor, a manager or the Legal Department or make a report using the Hotline telephone service or email,

details of which are given above in the section titled “Seeking Guidance and Reporting Concerns.”

Business Gifts and Entertainment – Private Persons

While it is our Company policy to prohibit offering or giving anything of significant value to any person with whom we interact, gifts and entertainment may be exchanged from time to time on cultural or special occasions. Modest gifts and appropriate entertainment can strengthen business relationships. However, we must always use good judgment when offering and accepting such courtesies. Never offer or accept a business gift if doing so may be perceived as a bribe or any other form of improper payment.

A gift or entertainment may only be offered or received if it meets ALL of the following criteria. The gift must be:

- Of token or nominal value not to exceed \$150 USD
- Unsolicited
- Not cash or cash equivalent (such as a gift card or voucher)
- Reasonable, customary, and lawful in the country or region where exchanged

- Not intended to improperly influence a business decision
- Approval has been received from your supervisor

Should you receive a gift or entertainment prior to obtaining approval, you should disclose it promptly to your supervisor. If you have any questions regarding whether a gift or entertainment is acceptable, or if you feel uncomfortable as a result of being offered or given a gift or entertainment, please contact the Legal Department.

Business Gifts, Entertainment or Reimbursement of Expenses - Government Officials

Our Company is listed on the NASDAQ Global Market and is incorporated in the United States. Therefore, the U.S. Foreign Corrupt Practices Act 1977 (the “FCPA”) applies to all of our operations.

The FCPA, along with the laws of other countries that prohibit bribery and corruption, such as the UK Bribery Act 2010, specifically prohibit bribery of government officials. The civil and criminal penalties associated with any violation of the FCPA and similar laws elsewhere are extremely severe. Therefore, we should avoid offering,

giving or receiving anything of value to or from any government officials. This includes travel as well. Many countries in which AmTrust operates limit the value of gifts, entertainment and travel that their officials are able to accept, and you should inquire about the laws of a particular jurisdiction.

QUESTION

Russell frequently works overseas on AmTrust business. Over time, he's become quite friendly with a number of government officials in a few locations. At the New Year, he gives each of them a fine, engraved pen of significant value as a gesture of his thanks. Since Russell has no pending contracts with these officials, he doesn't think this should be a problem. Is he right?

ANSWER

No. Even though Russell has no pending business with these officials currently, it is possible that he will in the future and his gifts may be seen as bribes. Before giving any gift to a government official, Russell is required to obtain prior approval in accordance with our Company Policy.

“Government officials” has a broad meaning under the FCPA and can refer to:

- Public officials and employees at any level of government or royalty

- Officials of and candidates for political parties
- Employees of public international organizations (such as the United Nations)
- Employees of entities that are owned or controlled by the government

Something of value may only be offered to a government official if it is:

- Of token or nominal value and unsolicited in the case of a gift or entertainment
- Not cash or cash equivalent (such as a gift card or voucher)
- In compliance with applicable law
- Made only after prior written approval has been received in accordance with the AmTrust Anti-Corruption Policy

If you become aware of any actual or potential bribery or corruption, you are encouraged to speak to your supervisor or the Legal Department, or you can make a report using the Hotline or email, details of which are given above in the Code section entitled “Seeking Guidance and Reporting Concerns.”

If you have any questions relating to this section concerning government officials, you should seek advice from the Legal Department before acting.

Facilitating Payments

The UK Bribery Act, as well as the anti-bribery and anti-corruption laws in most of the locations in which the Company and its subsidiaries do business, prohibit facilitation or grease payments. Therefore, it is our Company policy that these payments are prohibited. A “facilitation” or “grease” payment is a small payment to a low-level government official to expedite or secure performance of a routine governmental action.

QUESTION

Brittany travels frequently on AmTrust business and always brings her Company laptop with her. The computer contains quite a bit of confidential and proprietary AmTrust information. While attending a business dinner, she stows it under the seat of her rental car. Since the car is locked, she feels the laptop will be safe for the time being. Is this assumption correct?

ANSWER

No. While locking the car and storing the laptop out of sight is a good precaution, someone could break into the car itself. Brittany should either bring the laptop to dinner with her or, if available, store it in the safe in her locked hotel room.

If you have any questions concerning such payments, you should seek the advice of the Legal Department.

Only in exceptional circumstances, such as in the case of protecting the health or safety of a person, may a facilitation payment be made. Any such payment must be noted as a “facilitation” payment in our books and records together with a detailed explanation. You must also immediately notify your supervisor and the General Counsel or the Chief Compliance Officer regarding any facilitation payment.

Protecting AmTrust Assets

We are expected to treat AmTrust’s property—including both tangible and intangible assets—with the same care and respect that we do our own.

Physical Property

We must all protect our Company’s physical assets from theft, damage, alteration, loss or misuse. These assets include real estate, facilities, vehicles, computers, data infrastructure, cell phones, personal digital assistants and other business equipment and supplies. If you suspect any form of fraud or theft, you should report it immediately.

Occasional personal use of certain Company equipment is permitted under certain circumstances. However, we must ensure this use does not interfere with our ability to do our work for AmTrust.

AmTrust Confidential and Proprietary Information

We are entrusted with our Company's confidential and proprietary information. As such, we are expected to protect this information at all times. This generally includes any non-public information that might be of use to competitors or harmful to the Company if made available to the public. Examples include technical, financial, marketing and other business and customer information.

We may only grant access to AmTrust confidential and proprietary information to employees, contractors and third parties who have a reasonable business purpose with AmTrust to access the information. Proper non-disclosure agreements must be executed when necessary.

Information security is critical to the success of our Company. You therefore should never share passwords or other login information with anyone. If your password is lost or stolen, you should contact the AmTrust IT Service Desk

to have it reset. If you become aware of a situation that might compromise information security, contact the SVP, Risk and Audit. For more information, see our Data Classification Policy, Data Security Breach Policy, Physical Security Policy and Password Policy available via the AmTrust Corporate Policy Manager.

In addition, take care not to lose, misplace or leave confidential and proprietary information (or technologies containing such information) unattended. Never discuss this information in places where those who do not have a business need to know it might overhear you. This includes public places such as airport terminals, trains and restaurants. It also includes open areas at AmTrust, such as Company restrooms and break rooms.

Intellectual Property

Our Company's intellectual property includes some of our most valuable assets. We work diligently to protect our Company's intellectual property rights. "Intellectual property" refers to anything we create on Company time, at AmTrust expense or within the scope of our job duties. Examples include equipment and processes, trademarks, copyrights, domain names, patents, trade secrets and logos. Our Company owns the rights to anything we create

through our work on its behalf. This is true regardless of whether this property can be patented or protected by copyright, trade secret or trademark.

Using Company Technologies Appropriately

You are expected to use AmTrust technology in a professional, ethical and lawful manner. Never use AmTrust technologies in a way that would embarrass our Company. For example, this means you may not use Company computers or systems to download, display, send or store material that is fraudulent, harassing, sexually explicit, obscene or otherwise unlawful, inappropriate or offensive. In addition, do not use AmTrust resources to send unauthorized solicitations or to conduct business for another organization during working time. This includes email and voicemail, internet and intranet, computer operating systems and software technologies. We need to follow security measures and have internal controls in place for the technologies to which we have access.

You may use Company technologies for limited personal use, however you must ensure that your use does not interfere with your ability to do your work. In addition, you should not have any expectation of privacy when using the Company's technological

systems. AmTrust reserves the right to monitor our use (as well as transmitted and stored information) and access to hardware as permitted by local law. For more information refer to the Acceptable Use Policy.

Insider Trading

Avoiding Insider Trading

Through our work, we may learn material, non-public information (or "inside" information) about our Company or another company with which we do business. "Material information" is any information that a reasonable investor would consider important in making a decision to trade in a company's securities. Information is material even if it relates to future, speculative or contingent events. It may also be material even if it is only significant when viewed in light of publicly available information. Information is "non-public" unless it has been provided to the public and adequate time has passed for the markets to digest the information.

When we have inside information about a company, we may not trade the securities of that company. This illegal activity is called "insider trading." Through our work, we may acquire inside information about AmTrust, as well as other companies whose

business relates to ours. Insider trading laws govern trades based on all such information.

QUESTION

Kim learns of a potential AmTrust acquisition that will likely cause our stock price to skyrocket. She knows that if she trades based on this information, she could be found guilty of insider trading. However, she doesn't want to waste the opportunity, and urges her father to buy AmTrust stock. Is this okay?

ANSWER

No. Even though Kim is not trading herself based on inside information, she is tipping her father. By providing material, non-public information to her father with the intent to trade on such knowledge, Kim is violating our Company Code and policy. In addition, she and her father may be held liable for insider trading.

Communicating inside information to another person that would help them make a profit or prevent a loss (called "tipping") is also a violation of insider trading laws. Be advised that, in this situation, you expose yourself and the Company to liability for breaking insider trading laws. Penalties for violations of insider trading laws are severe for both the individuals involved and our Company. For questions related to

insider trading, please see the Insider Trading and Outside Investment Policy. If you have any questions about whether you possess inside information or whether you can trade in a company's securities, you should consult the Legal Department before taking any action.

Trading in AmTrust Stock

Our Company encourages us to become long-term investors in AmTrust securities. However, we must never engage in activity that could devalue our Company's stock. Hedging or short-selling AmTrust stock goes against our Code, and in some cases, it may be against the law.

All employees are prohibited from engaging in the following activities:

- "Short Selling" of AmTrust securities
- Any type of hedging transaction with respect to AmTrust securities

Please refer to the Insider Trading and Outside Investment Policy before you take any actions with regard to AmTrust securities. If you have any questions about trading in AmTrust's securities, please contact the Legal Department.

Our Responsibilities to Our Communities

Operating as a Good Corporate Citizen

As a socially responsible corporate citizen, we uphold human rights in all our operations and facilities. We always promote health and safety in all our locations and operations. In addition, we ensure compliance with fair wage and hour laws in all AmTrust operations. We will not knowingly conduct business with—and will terminate business dealings with—any supplier or other business partner who violates these standards. If you suspect a violation of any human rights issues by any person at AmTrust or by any of our customers, suppliers, or other business partners, you should promptly inform your supervisor, a manager or the Legal Department or call the AmTrust Hotline.

Community Investment

We recognize that as a global insurance company, we have the ability improve the quality of life in the communities where we do business. In our various locations, we undertake community-based activities and programs and focus our efforts on making tangible and sustainable improvements in our communities. As we move forward with any corporate-sponsored community investment program, we must ensure that we adhere to all local laws and relevant policies.

Communication with the Public

Our reputation for integrity is an intangible Company asset that ensures our future success. We must protect this asset by making sure the Company's public communications give an honest and consistent picture of our operations. We therefore must properly handle outside inquiries. Only those persons who are authorized to speak on the behalf of AmTrust may make public comments on behalf of the Company. If you receive a request for information from investors, security analysts or the media, do not respond, and instead forward it to Investor Relations or the Legal Department. All calls from the media must be directed to Corporate Communications.

Taking Part in Political Activities

As individuals, we are encouraged to support our communities by participating in the political activities of our choice. AmTrust respects our right to free speech and political participation, however, we may only participate in such activities on our own time and at our own expense. We may never use Company property, facilities, time or funds for political activities without prior approval from the Legal Department. Likewise, we should never expect to be reimbursed (directly or indirectly) for a political

contribution. In addition, we should not pressure our coworkers to engage in a political activity or make a political contribution. If you have any questions, you should seek guidance from the Legal Department.

Corporate Political Activities

Laws in countries where the Company and its subsidiaries do business may make it a criminal offense for any corporation to make contributions in connection with a political campaign or to make any payments to an official's election campaign where a corporation has business dealings with a government. Therefore, it is our Company policy not to make political contributions with corporate funds, whether cash or in kind donations, even if the laws of certain jurisdictions may permit them. "Contributions" is a broad term that includes not only money, but also the use of corporate resources and personnel.

In addition, because lobbying activities are highly regulated, we may not make any contacts with government officials in an attempt to influence legislation, regulation, policy or other governmental actions on AmTrust's behalf. The only exception to this rule is when you have prior permission from the Legal Department.

Social Media and Networking Sites

Social media has changed the way

many of us share information on a daily basis. "Social media" sites include a vast array of websites, including social networking sites (such as Facebook and Twitter), blogs, photo and video sharing sites, forums, chat rooms and many others. If you engage in social media activities, whether on behalf of the Company or personally, this section applies to you. AmTrust respects your right to free speech, but you must be mindful that Company customers, employees and supervisors often have access to your social media postings. This section is intended to encourage clear and consistent communications with our customers and the media, to protect the trade secrets and intellectual property rights of AmTrust, and to promote compliance with federal and state laws, including Federal Trade Regulations and National Labor Relations Board guidance.

You must not create or maintain a social media account that gives the impression that such social media is employed with or endorsed by the Company unless the Company has authorized you to do so. You must only post on Company-related social media accounts with prior approval and for AmTrust business purposes. If you wish to make a comment about AmTrust, you must ensure that your post clearly explains that you are speaking for yourself and not on behalf of the Company. For further information on social media, please review the AmTrust Social Media Policy.

Conclusion

By understanding and following our Code, we ensure that we are complying with the laws and regulations that apply to all of our business activities. This ensures that our business grows by building on the attributes of integrity, honesty and ethical business practices that have enabled us to compete successfully. We must always remember the importance of personal relationships and strive to be the company of choice for our fellow employees, customers, suppliers, business partners, agents, brokers and shareholders. Above all, we must continue to be a company that cares—about its people, its impact, its reputation and always doing the right thing.

Index

Accurate books and records	20	government officials	26
Alcohol use	13	private persons	24
Anonymous reporting	7	Government officials	
Anti-boycott laws	24	bribery of	26
Anti-corruption laws	24	doing business with	17
Antitrust laws	15	inquiries from	21
Audits	21	Guidance	6
Board of Directors		Harassment	10
serving on	22	Health Insurance Portability and Accountability Act (HIPAA)	12
Breaks, employee	13	Hotline	7
Bribery & Corruption	24	Industry meetings	17
Business partners		Insider trading	30
information privacy	15	Intellectual property	
dealing fairly with	15	company	29
gifts	26	third-party	16
insider trading	30	Internet usage	30
Charitable donations	34	Investigations	7
Community investment	34	Investments	22
Competitors		Kickbacks	24
competition laws	15	Material information	30
dealing fairly with	15	Money laundering	23
marketing	15	Non-retaliation	7
Competitive information	16	Non-public information	16, 29
Computers and network systems	17, 30	Outside employment	21
Confidential information		Personally Identifiable Information (PII)	10
competitors	16	Physical assets	27
employees	11	Political activities	33
company	30	Privacy	
third parties	16	expectation of	30
Confidentiality agreement	16	Proprietary information	
Conflicts of interest	21	company	28
Corporate opportunities	22	third-party	16
Customers		Public statements	33
antitrust laws	15	Records retention	21
bribery	24	Reporting concerns	6
Disciplinary action	7	Restricted countries	23
Discrimination	10	Reimbursement of expenses	25
Diversity	10	Safety	12
Drugs		Social media	34
illegal	13	Substance abuse prevention	13
prescription	13	Suppliers	
Email	30	confidential information	15
Employee information	11	Third-party information	16
Entertainment		Timekeeping, employee	13
with government officials	25	Trade secrets	29, 34
Facilitation payments	28	UK Bribery Act	26, 28
Foreign Corrupt Practices Act (FCPA)	26	Violence	13
Gifts			
bribery	24		

AmTrust Code of Business Conduct and Ethics Acknowledgement

This is to confirm that I have read and understand the contents of the AmTrust Code of Conduct. I also acknowledge my responsibility to report any suspected violations of laws and/or principles set forth in this AmTrust Code of Business Conduct and Ethics.

Date: _____

Signature: _____

(SIGNATURE REQUIRED WHEN MAILING)

Name: _____

(PLEASE PRINT)

AmTrust Company: _____

Department: _____

Company address: _____

City: _____

State/
Province: _____

Postal Code: _____

Country: _____

Please mail completed form to the address below:

AmTrust Financial Services, Inc.
Attention: Global Compliance
59 Maiden Lane, 43rd Floor
New York, New York 10038



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