

Reporting of Illegal, Improper or Other Questionable Behavior or Accounting/Auditing Complaints

White Mountains has procedures in place for submitting complaints regarding illegal, improper or other questionable behavior or questionable accounting or auditing matters directly to the Company's Code of Business Conduct Compliance Officer or indirectly through the Company's confidential and anonymous web based or toll free telephone reporting system.

Directly to the Code of Business Conduct Compliance Officer:

Private and Confidential

White Mountains Insurance Group, Ltd.
80 South Main Street
Hanover, NH 03755
Attn: Code of Business Conduct Compliance Officer

Via the Company's anonymous web based reporting system by logging onto:

www.ethicspoint.com

Via the Company's anonymous toll free reporting system:

From outside the U.S.:

Tel: (866) 295-3762

From the U.S.:

Tel: (800) 788-1157

White Mountains anonymous reporting system is maintained and operated by EthicsPoint, Inc., an unaffiliated service provider. All issues or complaints submitted via the anonymous reporting system will be forwarded to the Company's General Counsel for resolution.

For direct access to the Company's Audit Committee, individuals may direct their auditing and accounting related issues or complaints to:

Private and Confidential

Mr. Lowndes A. Smith
Chairman of the Audit Committee
White Mountains Insurance Group, Ltd.
80 South Main Street
Hanover, NH 03755