

	COMPLIANT/ NON-COMPLIANT	ADDITIONAL INFORMATION	EXPLANATION
Disclosure and Transparency			
Principle 8: The company should establish corporate disclosure policies and procedures that are practical and in accordance with best practices and regulatory expectations.			
Recommendation 8.1			
<p>1. Board establishes corporate disclosure policies and procedures to ensure a comprehensive, accurate, reliable and timely report to shareholders and other stakeholders that gives a fair and complete picture of a company's financial condition, results and business operations.</p>	Compliant	<p>Provide information on or link/reference to the company's disclosure policies and procedures including reports distributed/made available to shareholders and other stockholders.</p> <p>Source:</p> <ul style="list-style-type: none"> • Chubb Limited Website https://www.chubb.com/at-en/about-us/chubb-limited.html <p>Reference documents/links:</p> <ul style="list-style-type: none"> • Chubb Policy on Fair Disclosure to Investors <p><Investors (Investor Relations); Corporate Governance; Highlights and Governance Documents (Governance Documents); Chubb Policy on Fair Disclosure> https://s1.q4cdn.com/677769242/files/doc_downloads/Governance%20Documents/2019/Chubb-Policy-on-Fair-Disclosure-to-Investors-March-2019.pdf</p> <ul style="list-style-type: none"> • Chubb Limited Annual Report 2020 <p><Investors (Investor Relations); Shareholder Resources; Shareholder Meeting Materials (Shareholder Resources); 2020 Chubb Annual Report> https://s1.q4cdn.com/677769242/files/doc_financials/2021/Chubb-Limited-Annual-Report-2020.pdf</p>	
Recommendation 8.2			
<p>1. Board fully discloses all relevant and material information on individual board members to evaluate their experience and qualifications, and assess any potential conflicts of interest that might affect their judgment.</p>	Compliant	<p>Provide link or reference to the director's academic qualifications, share ownership in the company, membership in other boards, other executive positions, professional experiences, expertise and relevant trainings attended.</p> <p>Source:</p> <ul style="list-style-type: none"> • Chubb Limited Website https://www.chubb.com/at-en/about-us/chubb-limited.html <p>Reference documents/links:</p> <ul style="list-style-type: none"> • Chubb Limited Annual Report 2020 Chubb Limited Board of Directors, page 38 <p><Investors (Investor Relations); Shareholder Resources; Shareholder Meeting Materials (Shareholder Resources); 2020 Chubb Annual Report> https://s1.q4cdn.com/677769242/files/doc_financials/2021/Chubb-Limited-Annual-Report-2020.pdf</p>	

			<p>• Invitation and Proxy Statement for the 2021 Annual General Meeting of Shareholders Agenda Item 5: Election of the Board of Directors, pages 21-28</p> <p><Investors (Investor Relations); Shareholder Resources; Shareholder Meeting Materials (Shareholder Resources); 2021 Chubb Proxy Statement> https://s1.q4cdn.com/677769242/files/doc_financials/2021/ar/2021-Proxy-Statement.pdf</p>	
2.	Board fully discloses all relevant and material information on key executives to evaluate their experience and qualifications, and assess any potential conflicts of interest that might affect their judgment.	Compliant	<p>Provide link or reference to the key officers' academic qualifications, share ownership in the company, membership in other boards, other executive positions, professional experiences, expertise and relevant trainings attended.</p> <p>Source:</p> <ul style="list-style-type: none"> • Chubb Limited Website https://www.chubb.com/at-en/about-us/chubb-limited.html <p>Reference documents/links:</p> <ul style="list-style-type: none"> • Chubb Limited Annual Report 2020 Officers and Executives, pages 36-37 <p><Investors (Investor Relations); Shareholder Resources; Shareholder Meeting Materials (Shareholder Resources); 2020 Chubb Annual Report> https://s1.q4cdn.com/677769242/files/doc_financials/2021/Chubb-Limited-Annual-Report-2020.pdf</p> <ul style="list-style-type: none"> • Chubb Group Executives <p><Investors (Investor Relations); Corporate Governance; Group Executives> https://www.chubb.com/us-en/about-chubb/chubb-group-executives.html</p>	
Recommendation 8.3				
1.	Company provides a clear disclosure of its policies and procedure for setting Board remuneration, including the level and mix of the same in the Annual Corporate Governance Report consistent with ASEAN Corporate Governance Scorecard (ACGS) and the Revised Corporation Code.	Compliant	<p>Disclose or provide link/reference to the company policy and practice for setting board remuneration.</p> <p>Source:</p> <ul style="list-style-type: none"> • Chubb Limited Website https://www.chubb.com/at-en/about-us/chubb-limited.html <p>Reference document/link:</p> <ul style="list-style-type: none"> • Articles of Association of Chubb Limited IV. Compensation and Related Provisions, Articles 23-25, pages 22-28 <p><Investors (Investor Relations); Corporate Governance; Highlights and Governance Documents (Governance Documents); Articles of Association of Chubb Limited> https://s1.q4cdn.com/677769242/files/doc_downloads/2020/08/Articles-of-Association-520020-(August-2020).pdf</p>	

2.	Company provides a clear disclosure of its policies and procedure for setting Executive remuneration, including the level and mix of the same in the Annual Corporate Governance Report consistent with ASEAN Corporate Governance Scorecard (ACGS) and the Revised Corporation Code.	Compliant	<p>Disclose or provide link/reference to the company policy and practice for determining executive remuneration.</p> <p>Source: <ul style="list-style-type: none"> • Chubb Limited Website https://www.chubb.com/at-en/about-us/chubb-limited.html </p> <p>Reference document/link: <ul style="list-style-type: none"> • Articles of Association of Chubb Limited IV. Compensation and Related Provisions, Articles 23-25, pages 22-28 </p> <p><Investors (Investor Relations); Corporate Governance; Highlights and Governance Documents (Governance Documents); Articles of Association of Chubb Limited> https://s1.q4cdn.com/677769242/files/doc_downloads/2020/08/Articles-of-Association-520020-(August-2020).pdf</p>	
3.	Company discloses the remuneration on an individual basis, including termination and retirement provisions.	Compliant	<p>Provide breakdown of director remuneration and executive compensation, particularly the remuneration of the CEO.</p> <p>Source: <ul style="list-style-type: none"> • Chubb Limited Website https://www.chubb.com/at-en/about-us/chubb-limited.html </p> <p>Reference documents/links: <ul style="list-style-type: none"> • Chubb Limited Annual Report 2020 CHUBB LIMITED SWISS STATUTORY COMPENSATION REPORT December 31, 2020, B. Compensation of the Board of Directors and Executive Management, pages SC-2 to SC-5 </p> <p><Investors (Investor Relations); Shareholder Resources; Shareholder Meeting Materials (Shareholder Resources); 2020 Chubb Annual Report> https://s1.q4cdn.com/677769242/files/doc_financials/2021/Chubb-Limited-Annual-Report-2020.pdf</p> <ul style="list-style-type: none"> • Articles of Association of Chubb Limited IV. Compensation and Related Provisions (a) Article 27: Agreements with Executive Management and the Board of Directors, pages 29-30 (b) Article 28: Retirement Benefits, pages 30-31 <p><Investors (Investor Relations); Corporate Governance; Highlights and Governance Documents (Governance Documents); Articles of Association of Chubb Limited> https://s1.q4cdn.com/677769242/files/doc_downloads/2020/08/Articles-of-Association-520020-(August-2020).pdf</p>	

Recommendation 8.4

1.	Company discloses its policies governing Related Party Transactions (RPTs) and other unusual or infrequently occurring transactions.	Compliant	<p>Disclose or provide reference/link to company's RPT policies.</p> <p>Indicate if the director with conflict of interest abstained from the board discussion on that particular transaction.</p> <p>Source: <ul style="list-style-type: none"> • Chubb Limited Website https://www.chubb.com/at-en/about-us/chubb-limited.html </p> <p>Reference document/link: <ul style="list-style-type: none"> • Invitation and Proxy Statement for the 2021 Annual General Meeting of Shareholders What Is Our Related Party Transactions Approval Policy And What Procedures Do We Use To Implement It?, pages 66-67 </p> <p><Investors (Investor Relations); Shareholder Resources; Shareholder Meeting Materials (Shareholder Resources); 2021 Chubb Proxy Statement> https://s1.q4cdn.com/677769242/files/doc_financials/2021/ar/2021-Proxy-Statement.pdf</p>	
2.	Company discloses material or significant RPT in its Annual Company Report or Annual Corporate Governance Report, reviewed and approved by the Board, and submitted for confirmation by majority vote of the stockholders in the annual stockholders' meeting during the year.	Compliant	<p>Provide information on all RPTs for the previous year or reference to a document containing the following information on all RPTs:</p> <ol style="list-style-type: none"> 1. Name of the related counterparty; 2. Relationship with the party; 3. Transaction date; 4. Type/nature of transaction; 5. Amount or contract price; 6. Terms of the transaction; 7. Rationale for entering into the transaction; 8. The required approval (i.e., names of the board of directors approving, names and percentage of shareholders who approved) based on the company's policy; and 9. Other terms and conditions. <p>Source: <ul style="list-style-type: none"> • Chubb Limited Website https://www.chubb.com/at-en/about-us/chubb-limited.html </p> <p>Reference documents/links: <ul style="list-style-type: none"> • Chubb Limited Annual Report 2020 CHUBB LIMITED AND SUBSIDIARIES CONSOLIDATED FINANCIAL STATEMENTS December 31, 2020, Notes to Consolidated Financial Statements, Note 17. Related party transactions, pages F-94 to F-95 </p> <p><Investors (Investor Relations); Shareholder Resources; Shareholder Meeting Materials (Shareholder Resources); 2020 Chubb Annual Report> https://s1.q4cdn.com/677769242/files/doc_financials/2021/Chubb-Limited-Annual-Report-2020.pdf</p>	

			<ul style="list-style-type: none"> • Invitation and Proxy Statement for the 2021 Annual General Meeting of Shareholders What Related Party Transactions Do We Have?, pages 67-68 <p><Investors (Investor Relations); Shareholder Resources; Shareholder Meeting Materials (Shareholder Resources); 2021 Chubb Proxy Statement> https://s1.q4cdn.com/677769242/files/doc_financials/2021/ar/2021-Proxy-Statement.pdf</p>	
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Recommendation 8.5

1.	Company's corporate governance policies, programs and procedures are contained in its Manual on Corporate Governance (MCG).	Compliant	<p>Provide link to the company's website where the Manual on Corporate Governance is posted.</p> <p>Source:</p> <ul style="list-style-type: none"> • Chubb Limited Website https://www.chubb.com/at-en/about-us/chubb-limited.html 	
2.	Company's MCG is posted on its company website.	Compliant	<p>Reference document/link:</p> <ul style="list-style-type: none"> • CHUBB LIMITED CORPORATE GOVERNANCE GUIDELINES <p><Investors (Investor Relations); Corporate Governance; Highlights and Governance Documents (Governance Documents); Corporate Governance Guidelines> https://s1.q4cdn.com/677769242/files/doc_downloads/Governance%20Documents/2020/11/Corporate-Governance-Guidelines-(Nov.-2020).pdf</p>	

Principle 9: The company should establish standards for the appropriate selection of an external auditor, and exercise effective oversight of the same to strengthen the external auditor's independence and enhance audit quality.

Recommendation 9.1

1.	Audit Committee has a robust process for approving and recommending the appointment, reappointment, removal, and fees of the external auditors.	Compliant	<p>Provide information or link/reference to a document containing information on the process for approving and recommending the appointment, reappointment, removal and fees of the company's external auditor.</p> <p>Source:</p> <ul style="list-style-type: none"> • Chubb Limited Website https://www.chubb.com/at-en/about-us/chubb-limited.html <p>Reference documents/links:</p> <ul style="list-style-type: none"> • CHUBB LIMITED AUDIT COMMITTEE CHARTER 2. AUTHORITY OF THE AUDIT COMMITTEE, (a) and (b), page 1 <p><Investors (Investor Relations); Corporate Governance; Directors, Committee Composition & Charters; Audit Committee Charter> https://s1.q4cdn.com/677769242/files/doc_downloads/2020/08/Audit-Committee-Charter-August-2020.pdf</p>	
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			<p>• Invitation and Proxy Statement for the 2021 Annual General Meeting of Shareholders Board Oversight of Our Independent Advisors, Independent Auditors, page 64</p> <p><Investors (Investor Relations); Shareholder Resources; Shareholder Meeting Materials (Shareholder Resources); 2021 Chubb Proxy Statement> https://s1.q4cdn.com/677769242/files/doc_financials/2021/ar/2021-Proxy-Statement.pdf</p>	
2.	The appointment, reappointment, removal, and fees of the external auditor is recommended by the Audit Committee, approved by the Board and ratified by the shareholders.	Compliant	<p>Indicate the percentage of shareholders that ratified the appointment, reappointment, removal and fees of the external auditor.</p> <p>Source: • Chubb Limited Website https://www.chubb.com/at-en/about-us/chubb-limited.html</p> <p>Reference documents/links: • CHUBB LIMITED AUDIT COMMITTEE CHARTER 4. DUTIES AND RESPONSIBILITIES OF THE AUDIT COMMITTEE, d. Independent Audit and Independent Auditors, (i), page 3</p> <p><Investors (Investor Relations); Corporate Governance; Directors, Committee Composition & Charters; Audit Committee Charter> https://s1.q4cdn.com/677769242/files/doc_downloads/2020/08/Audit-Committee-Charter-August-2020.pdf</p> <p>• Invitation and Proxy Statement for the 2021 Annual General Meeting of Shareholders Agenda Item 4: Election of Auditors, pages 18-20</p> <p><Investors (Investor Relations); Shareholder Resources; Shareholder Meeting Materials (Shareholder Resources); 2021 Chubb Proxy Statement> https://s1.q4cdn.com/677769242/files/doc_financials/2021/ar/2021-Proxy-Statement.pdf</p>	
3.	For removal of the external auditor, the reasons for removal or change are disclosed to the regulators and the public through the company website and required disclosures.	Compliant	<p>Provide information on or link/reference to a document containing the company's reason for removal or change of external auditor.</p> <p>Source: • Chubb Limited Website https://www.chubb.com/at-en/about-us/chubb-limited.html</p> <p>Reference document/link: • Invitation and Proxy Statement for the 2021 Annual General Meeting of Shareholders Board Oversight of Our Independent Advisors, Independent Auditors, page 64 (Need to satisfy the 5 factors enumerated)</p> <p><Investors (Investor Relations); Shareholder Resources; Shareholder Meeting Materials (Shareholder Resources); 2021 Chubb Proxy Statement> https://s1.q4cdn.com/677769242/files/doc_financials/2021/ar/2021-Proxy-Statement.pdf</p>	

Recommendation 9.2				
1.	<p>Audit Committee Charter includes the Audit Committee's responsibility on:</p> <p>i. assessing the integrity and independence of external auditors;</p> <p>ii. exercising effective oversight to review and monitor the external auditor's independence and objectivity; and</p> <p>iii. exercising effective oversight to review and monitor the effectiveness of the audit process, taking into consideration relevant Philippine professional and regulatory requirements.</p>	Compliant	<p>Provide link/reference to the company's Audit Committee Charter.</p> <p>Source: <ul style="list-style-type: none"> • Chubb Limited Website https://www.chubb.com/at-en/about-us/chubb-limited.html </p> <p>Reference document/link: <ul style="list-style-type: none"> • CHUBB LIMITED AUDIT COMMITTEE CHARTER <p><Investors (Investor Relations); Corporate Governance; Directors, Committee Composition & Charters; Audit Committee Charter> https://s1.q4cdn.com/677769242/files/doc_downloads/2020/08/Audit-Committee-Charter-August-2020.pdf</p> </p>	
2.	<p>Audit Committee Charter contains the Committee's responsibility on reviewing and monitoring the external auditor's suitability and effectiveness on an annual basis.</p>	Compliant	<p>Provide link/reference to the company's Audit Committee Charter.</p> <p>Source: <ul style="list-style-type: none"> • Chubb Limited Website https://www.chubb.com/at-en/about-us/chubb-limited.html </p> <p>Reference document/link: <ul style="list-style-type: none"> • CHUBB LIMITED AUDIT COMMITTEE CHARTER <p><Investors (Investor Relations); Corporate Governance; Directors, Committee Composition & Charters; Audit Committee Charter> https://s1.q4cdn.com/677769242/files/doc_downloads/2020/08/Audit-Committee-Charter-August-2020.pdf</p> </p>	
Recommendation 9.3				
1.	<p>Company discloses the nature of non-audit services performed by its external auditor in the Annual Report to deal with the potential conflict of interest.</p>	Compliant	<p>Disclose the nature of non-audit services performed by the external auditor, if any.</p> <p>Source: <ul style="list-style-type: none"> • Chubb Limited Website https://www.chubb.com/at-en/about-us/chubb-limited.html </p> <p>Reference document/link: <ul style="list-style-type: none"> • Invitation and Proxy Statement for the 2021 Annual General Meeting of Shareholders Agenda Item 4: Election of Auditors, Independent Auditor Fee Information, page 19 <p><Investors (Investor Relations); Shareholder Resources; Shareholder Meeting Materials (Shareholder Resources); 2021 Chubb Proxy Statement> https://s1.q4cdn.com/677769242/files/doc_financials/2021/ar/2021-Proxy-Statement.pdf</p> </p>	

2.	Audit Committee stays alert for any potential conflict of interest situations, given the guidelines or policies on non-audit services, which could be viewed as impairing the external auditor's objectivity.	Compliant	<p>Provide link or reference to guidelines or policies on non-audit services.</p> <p>Source: <ul style="list-style-type: none"> • Chubb Limited Website https://www.chubb.com/at-en/about-us/chubb-limited.html </p> <p>Reference document/link: <ul style="list-style-type: none"> • Invitation and Proxy Statement for the 2021 Annual General Meeting of Shareholders Agenda Item 4: Election of Auditors, Pre-Approval Policy of Audit and Non-Audit Services, page 19 </p> <p><Investors (Investor Relations); Shareholder Resources; Shareholder Meeting Materials (Shareholder Resources); 2021 Chubb Proxy Statement></p> <p>https://s1.q4cdn.com/677769242/files/doc_financials/2021/ar/2021-Proxy-Statement.pdf</p>	
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Principle 10: The company should ensure that the material and reportable non-financial and sustainability issues are disclosed.

Recommendation 10.1

1.	Board has a clear and focused policy on the disclosure of non-financial information, with emphasis on the management of economic, environmental, social and governance (EESG) issues of its business, which underpin sustainability.	Compliant	<p>Disclose or provide link on the company's policies and practices on the disclosure of non-financial information, including EESG issues.</p> <p>Source: <ul style="list-style-type: none"> • Chubb Limited Website https://www.chubb.com/at-en/about-us/chubb-limited.html </p> <p>Reference document/link: <ul style="list-style-type: none"> • Invitation and Proxy Statement for the 2021 Annual General Meeting of Shareholders Governance Practices and Policies that Guide Our Actions, Shareholder Outreach Program, page 54 </p> <p><Investors (Investor Relations); Shareholder Resources; Shareholder Meeting Materials (Shareholder Resources); 2021 Chubb Proxy Statement></p> <p>https://s1.q4cdn.com/677769242/files/doc_financials/2021/ar/2021-Proxy-Statement.pdf</p>	
2.	Company adopts a globally recognized standard/framework in reporting sustainability and non-financial issues.	Compliant	<p>Provide link to Sustainability Report, if any. Disclose the standards used.</p> <p>Source: <ul style="list-style-type: none"> • Chubb Limited Website https://www.chubb.com/at-en/about-us/chubb-limited.html </p> <p>Reference document/link: <ul style="list-style-type: none"> • Chubb Limited Annual Report 2020 ENVIRONMENTAL STATEMENT, pages E1 to E2 </p> <p><Investors (Investor Relations); Shareholder Resources; Shareholder Meeting Materials (Shareholder Resources); 2020 Chubb Annual Report></p> <p>https://s1.q4cdn.com/677769242/files/doc_financials/2021/Chubb-Limited-Annual-Report-2020.pdf</p>	

Principle 11: The company should maintain a comprehensive and cost-efficient communication channel for disseminating relevant information. The channel is crucial for informed decision-making by investors, stakeholders and other interested users.

Recommendation 11.1

1.	The company should have a website to ensure a comprehensive, cost-efficient, transparent, and timely manner of disseminating relevant information to the public.	Compliant	<p>Disclose and identify the communication channels used by the company (i.e., website, Analyst's briefing, Media briefings/press conferences, Quarterly reporting, Current reporting, etc.). Provide links, if any.</p> <ul style="list-style-type: none">• Chubb Limited Website https://www.chubb.com/at-en/about-us/chubb-limited.html • Chubb PH Website https://www.chubb.com/ph-en/ • Sell-Side Analysts https://investors.chubb.com/investor-relations/shareholder-resources/sell-side-analysts/default.aspx • Media Center / Press Releases https://investors.chubb.com/investor-relations/media-center/press-releases/default.aspx • Quarterly Reports https://investors.chubb.com/investor-relations/financials/quarterly-reports/default.aspx	
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