



# Code of Conduct

CHUBB®

Our Promise of Integrity



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## A Message from Evan Greenberg



Dear Colleagues:

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Chubb is defined by superior underwriting, service and execution - attributes we are proud of and hold dear. Taken together, what these attributes say to us is superior craftsmanship. It's the bedrock of our culture.

As Chubb employees, we have an obligation to practice our craft with integrity, and to uphold the Company's reputation for ethical conduct. We are ultimately defined by the choices we make and the actions we take, and our customers, shareholders, business partners and co-workers expect honest and ethical conduct from us each and every day.

All of us are accountable for our actions, and we must hold ourselves to exacting standards. The Chubb Code of Conduct reaffirms our shared commitment to ethical behavior throughout the organization. It will guide you in your day-to-day activities as Chubb employees by clearly defining the organization's expectations for ethical conduct.

We live in a complex world. Acting in a manner that is consistent with these guidelines will help strengthen our Company and ensure that we live up to the Chubb name. Please take the time to read the Code of Conduct completely. Should you have any questions, please contact the [Chubb Ethics Helpline](#) or contact the Compliance Officer assigned to your business.

A handwritten signature in black ink that reads "Evan Greenberg". The signature is written in a cursive style with a long, sweeping underline.



# Guided by Our Values – Chubb Culture



Together all of us share a responsibility to do our part to build and sustain a culture at Chubb that sets us apart and defines who we are as an organization. Our culture is made up of the written and unwritten standards of behavior that describe how work gets done, how we make decisions, and how we collaborate with one another.

Our culture helps define *Who We Are*, *Behaviors We Expect* and *What We Recognize and Reward*.

Our culture is continually renewed by the choices and actions each of us makes every day. To provide additional guidance to help us make the best decisions which reflect our values, we have created our *Code of Conduct* (“Code”). This Code, along with our more detailed policies, is intended to guide us when we are faced with ethics or compliance questions.

## How to Use This Code

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Use this Code as a resource. It is intended to help you apply our values and standards and to serve as a first source of information. In some instances you may need additional information and guidance from your manager, the

Compliance Officer assigned to your business, or others. You can also find additional information on specific topics in our policies which are referenced with links throughout the Code.

Insurance is a highly regulated industry. As a good corporate citizen, Chubb - through all of us - must be committed to making sure our actions are within all laws that apply everywhere we do business. Where a local law or internal standards are more stringent than this Code, we must follow the local law or standards.

## Who Must Follow Our Code

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We are responsible for following the Code and related policies and procedures. All employees, officers and directors alike, are expected to acknowledge acceptance of this Code, confirming we know and understand the standards expected of us.

We also expect anyone acting on our behalf to share our values and conduct themselves in a manner consistent with our Code. This includes our business partners such as consultants, agents, third party representatives as well as our service providers. Appropriate measures may be taken if a business partner fails to meet our standards or their contractual obligations.

## Our Responsibilities

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There are times when we may face difficult situations that test our values and our judgment. While such situations may be rare, even day-to-day decisions can have an impact on Chubb’s reputation.





*Have the courage to be frank and self-critical.*

That is why each of us must be clear about our responsibilities and keep the following in mind:

- Always act in a professional and ethical manner. Be aware that your behavior reflects on our Company.
- Be familiar with the information contained in this Code and related Chubb policies. Pay particular attention to the policies that pertain to your job responsibilities.
- If in doubt about your best course of action, reach out to your manager, the Compliance Officer assigned to your business, or any of the resources listed in this Code.
- Promptly report any suspected illegal or unethical behavior.
- Remember, pressures or demands due to business conditions are never an excuse for violating the law, our Code or any Chubb policy.

### Additional Responsibilities of Chubb's Leaders and Managers

Leaders and managers have additional responsibilities to ensure that we meet high standards of ethics and compliance:

- Lead by example and be a role model for ethical behavior.
- Take initiative, particularly in tough situations.
- Be a resource for others. Communicate to employees and business partners how the Code and policies apply to their daily work.
- Create an environment where candor, honesty and integrity are valued and where everyone feels comfortable asking questions and reporting potential violations of the Code and policies.
- Listen and respond to concerns when they are raised.
- Make sure that no one who speaks up suffers retaliation.
- Never ask or pressure anyone to do something that you would be prohibited from doing yourself.
- If you supervise our agents or business partners, ensure that they understand their ethics and compliance obligations.
- Be consistent when enforcing our standards and holding people accountable for their behavior at work.
- Report any action or inaction that you witness or otherwise learn about which you believe violates the law, this Code or any Company policy.

### Cooperating with Investigations

All employees have a responsibility to fully cooperate with all internal investigations and audits, as well as those initiated by government authorities. More harm can be done to Chubb's and to your reputation if you mislead investigators or fail to disclose what you know than if you present the facts fully and honestly.

Immediately contact the Legal department or the Compliance Officer assigned to your business for additional guidance if you are contacted by a government official conducting any kind of investigation.



*Ask the right questions;  
Always tell the truth.*

### Ask the Right Questions - Make Good Decisions

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Making the right decision is not always easy. There will be times when you may be under pressure or unsure of what to do. Always remember that resources are available to help, including those listed in this Code.

When faced with a difficult decision, it may help to ask yourself these questions:

- Is it consistent with our culture, policies, and this Code?
- Have I considered all of the possible options?
- Have I thought through the consequences and the risks involved?

If the answer to any of these questions is “No,” or if you are uncertain, stop and ask for guidance.

### Open Communications

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Each of us has a responsibility to help protect the reputation and integrity of Chubb. If you see or suspect illegal or unethical behavior, including possible violations of this Code, or if you have a question or need help making an ethics or compliance decision, you have several options.

- Talk it through with your manager or with the Compliance Officer assigned to your business.
- Discuss the matter with any other senior leader or manager whom you feel comfortable talking to.
- Contact Human Resources.
- Contact the [Chubb Ethics Helpline](#).

*Communicate with  
candor and transparency.*

### Closing the loop

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Ethics and compliance at Chubb must continually evolve to stay current with new and emerging risks and regulations. Once you’ve made a decision, ask yourself the following additional question:

Do you believe there are sufficient standards, policies and resources in place to address the issue you faced - or should more be done? If you believe more should be done, contact the Compliance Officer assigned to your business. Your suggestions will help us improve our ethics and compliance program.

We are committed to investigating potential violations and will deal with each report fairly and reasonably.

### How the Ethics Helpline Works

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Our Ethics Helpline is a confidential way to report possible violations of the Code or any laws, rules, or regulations. You may contact the Ethics Helpline 24 hours a day, 7 days a week, online or by phone. The Ethics Helpline call center is staffed by third-party ethics and compliance specialists. Translation services are available. For more information, see the [Ethics Helpline](#) page on the Village.



*Constantly seek ways to improve how we do things.*

*Take personal accountability for decisions and actions, including failures.*

In some jurisdictions anonymous reporting is not allowed and in others, the Ethics Helpline may only be used for certain types of issues and not others. If you have any questions about what is allowed in your jurisdiction, the Ethics Helpline compliance specialist will be able to assist you.

When you contact the Ethics Helpline by phone, the operator will listen, ask clarifying questions if necessary, and then write a summary report of the call. When you make a report online you will be asked to fill out a form with information about your concern/question. The report will then be provided to Chubb for assessment and further action.

It is important to provide as many details as possible (e.g., who, what, when, where). Because the investigator may need additional information during the review, you will be assigned a report number. You should login or call back at a later date to answer any follow-up questions.

Any information provided to the Ethics Helpline will be treated as confidential to the extent allowed by law. In some instances during the course of investigations, information may be shared on a need to know basis. Under some circumstances, Chubb may be required by law to report certain types of activities.

When an investigation is completed, Chubb will determine if corrective or disciplinary action is necessary. While you may be informed when an investigation has come to a conclusion, it is not always permissible to share details of findings and results.

## Never Tolerate Retaliation

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It is important that all employees feel confident that they can report conduct that may be contrary to our Code. We are committed to protecting those who, in good faith, make a report or participate in Code or other policy violation investigations. Retaliation, harassment and reprisals of any kind will not be tolerated.

Reporting “in good faith” means that you had reason to believe a violation of the Code existed and are sincere in your attempt to provide honest and accurate information, even if the investigation determines there was no violation.

## Accountability and Discipline

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When a violation of this Code, policies or the law occurs, appropriate disciplinary action will be taken, up to and including termination of employment. Certain actions may also result in legal proceedings, penalties or criminal prosecution.



## Collaboration and Respect



### Always Keep in Mind:

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- Treat others and their ideas with respect. When you see a business issue differently, express your differences politely and professionally.
- Remember that our commitment to diversity enables us to attract and retain talented individuals who contribute to our success.
- Never discriminate on the basis of race, color, religion, age, gender, gender identity and expression, sexual orientation, national or ethnic origin, disability, veteran status, marital status or any other characteristic protected by law.
- Help create an environment where others feel comfortable speaking up and contributing.
- If you encounter an issue, don't suffer in silence.

### Help Create a Work Environment Free of Harassment

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All Chubb employees deserve the freedom to do their jobs in a respectful environment, free from behavior that creates hostile or offensive working conditions.

### Always Keep in Mind:

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- Inappropriate comments and objectively offensive behavior will not be tolerated.
- Harassment is not tolerated in any business interactions regardless of the setting or parties involved.
- Contact Human Resources if you have experienced or witnessed harassing behaviors.

### Build Teamwork through Diversity and Inclusion

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We value the unique contribution that each person brings to Chubb. Teamwork and respect are central to how we work and we believe the best solutions are those that draw on diverse ideas and perspectives. That is why we value each and every employee as an important contributor to our success and aim to create a supportive, accepting and rewarding working environment where everyone has the opportunity to contribute.

Chubb is committed to complying with equal employment opportunity laws and other applicable civil rights, human rights and labor laws. We make reasonable accommodations to meet our obligations under laws protecting the rights of people with disabilities.

*Leverage difference for a better business result.*

*If you encounter an issue, don't suffer in silence.*





*Take ownership and step up when leadership is required; there are no passengers.*

## Look Out for One Another's Safety, Health and Security

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Each of us has the responsibility to work in a way that helps ensure the safety, health and security of our co-workers, business partners and guests. Be proactive and do your part to address possible risks.

### Always Keep in Mind:

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- If you become aware of any threat to safety, report it immediately to your manager, Human Resources or Global Security.
- Intimidation and violence towards anyone at work, including co-workers, business partners and visitors to our facilities are never tolerated. If you become aware of a workplace violence incident or a threat of violence, immediately report your concerns. If someone is in immediate danger, do not hesitate to contact local authorities first.
- Firearms, knives or other dangerous weapons should never be brought onto Company property.

## Use of Drugs & Alcohol

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Abuse of alcohol or drugs can be a serious problem in the workplace. It can pose a threat to our own health and safety as well as the productivity of our organization and the wellbeing of others.

Employees, business partners and our guests must not use or possess alcohol, illegal drugs or other controlled substances in the workplace, except for prescription medication used as prescribed for medical treatment.

Management may approve the serving of alcoholic beverages at Company-sponsored events. In these cases, we must follow all appropriate liquor laws and Company policies and avoid excessive drinking at any work-related events.



## Trust and Reliability



something unlawful or contrary to this Code.

- Help our business partners understand our expectations and all policies that apply to them.
- Respect all intellectual property, patents, trademarks, copyrights, proprietary information and trade secrets of anyone with whom we do business.
- Report any concerns that a business partner may not be meeting our standards or their contractual obligations.
- Never provide others with information that you are not authorized to share.
- Promise only what you can deliver and deliver on what you promise.

### Treat Our Customers, Agents and Business Partners Fairly

*Anticipate customer needs, going above and beyond to surpass customer expectations,*

We deal honestly and fairly with each other and with our customers, business partners and competitors. We are committed to fulfilling all contractual obligations, and we take pride in ensuring that our products and services always meet our high standards for quality.

*Provide exceptional quality and range of services to customers,*

Our business partners must share our commitments to honesty, fairness and delivering on our promises to our customers.

*Build, grow and maintain profitable and long-lasting relationships.*

### Always Keep in Mind:

- Treat others fairly and honestly. Never manipulate or conceal important information, or use confidential information for improper advantage.
- Be responsive to requests from customers and business partners, but never follow a request to do

### Doing Business with Government Officials

From time to time, Chubb may do work for a government entity or government officials and their immediate family members. In cases where Chubb works with governments or government officials, the rules guiding such relationships are more strict than those that apply to other commercial relationships. The rules are designed to avoid actual or perceived improper influence and bribery risk.

When working with government contracts or subcontracts, it is critical that we familiarize ourselves with and follow all of the policies, laws and regulations that apply to our work. For more information, see the Chubb policy [Avoiding Bribery & Corruption](#).



## Gathering Competitive Information

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- When collecting business intelligence, employees and others who are working on our behalf must never engage in fraud, misrepresentation or deception to obtain information or use invasive technology to ‘spy’ on others.
- Be careful when accepting information from third parties: know and trust their sources and be sure that the knowledge they provide is not protected by trade secret laws, or by non-disclosure or confidentiality agreements.
- When we hire employees of competitors, we must respect valid legal obligations of those employees and not encourage them to disclose protected information of their former employers.

## Protect the Privacy of Others- Keep Confidential Information Safe and Secure

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Good privacy and data security practices are vitally important to Chubb. In the course of our work, many of us have access to personal, confidential or proprietary information about Chubb, our employees, our customers, or other third parties. We must keep confidential information secure by applying proper security controls, limiting access only to those who have a ‘need to know,’ and using the information only for permitted purposes. The obligation to preserve confidential information is ongoing, even after employment ends.

You should review the [Global Information Security and Privacy Policy and Guidelines](#) to understand the company’s approach to security and privacy and your responsibility to safe guard our corporate information. More information on Chubb’s privacy and data security practices can be found [here](#).

## Always Keep in Mind:

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- Avoid sharing confidential information with anyone—even a co-worker—who does not have a legitimate “need to know.”
- Use care and ensure appropriate authority is obtained when you provide personal data about employees to anyone outside of Chubb and limit access to authorized individuals.
- Never discuss confidential information in public areas or at work in the presence of employees not authorized to have access to the information.
- Immediately report the loss of any misplaced information that should be protected.



## Confidential information can be any information that is not publicly available. For example:

- Written and verbal agreements between Chubb and employees, agents, strategic partners or other third parties.
- Non-public financial information about Chubb.
- Information about potential acquisitions, Company investments or investment practices.
- Producer compensation arrangements.
- Personnel or employee information.
- Non-public personal financial and medical information of customers, prospective customers or policyholders.
- Information received from third parties under obligations of confidentiality.
- Customer lists and agreements, market share data, producer agreements and other files.

## Insider Trading

Many countries where we do business have securities laws that regulate the purchase and sale of securities. These laws are based in part on the belief that all persons trading in a company's securities should have equal access to all "material" information about that company.

In the course of your business activities, or by other means, you may become aware of material non-public information about Chubb or other publicly traded companies. Using this information for personal gain, sharing it with others, or spreading false rumors, is illegal.

## Key Definitions

Information is **material** if it is likely that an investor would want to know or benefit from having that information ahead of making an investment decision, or if disclosed, it would have an impact on the pricing of a security.

Information is **non-public** if it has not been released broadly to the market, for example, through widely disseminated company communications or press releases.

If you are ever in doubt over whether a piece of information is material or non-public, consult your manager or legal counsel or the Compliance Officer assigned to your business.

For more information, see [Restrictions on Insider Trading and Trading Chubb Securities](#).



## Use Our Assets Wisely

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Each of us is responsible for protecting Chubb property and assets. This includes our facilities, equipment, computers and information systems, confidential information, inventory, supplies, and funds.

Our success at Chubb depends on the development of confidential business information and intellectual property that helps distinguish Chubb from our competitors in all that we do to serve our clients. To help ensure that Chubb's confidential and proprietary material is adequately protected, Chubb has adopted a [Global Intellectual Property Policy](#). The Policy applies to all Chubb employees. As the Policy makes clear, the unauthorized disclosure or other misuse of the Company's confidential and proprietary information and property violates Chubb policy and may give rise to serious legal consequences. Please make sure that you take the time to review the [Policy](#) in its entirety.

## Always Keep in Mind:

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- Occasional personal use of assets such as our network, Wi-Fi, computers, telephones and supplies is permitted, but:
  - The use must not be harmful to the business, the reputation of the Company, or any individual associated with the Company.
  - It should not involve accessing, downloading, creating, storing or sending content that others might find offensive.
  - Company assets must never be used for any outside business interests or for personal gain.

- Protect your user IDs, passwords, and PINs. Do not share them with anyone, including other employees. Whether in the office or traveling always keep your Company-owned laptop, mobile devices, and digital storage media safe and secure.
- Always comply with computer software copyrights and with the terms and conditions of all software licenses.

For more information, see our policy on [Electronic Communications and Data Security](#).

## To make sure our electronic messages are respectful, professional and secure:

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- Re-read before sending, not just to catch errors but also to ensure that the message is simple, clear and direct.
- Think twice about using “Reply to All”. Send the message only to those who truly need it.
- When forwarding email, delete attachments unless they are absolutely necessary.
- Limit using our email system for personal communications and remember that anything we put on the Chubb systems may be subject to monitoring by the Company, subject to local law.



# Integrity



- Is my personal activity or interest something my customer or business partner would reasonably expect to be disclosed?
- Is there a policy or procedure that covers this type of situation?

All employees, officers and directors are required to report any real or perceived conflicts of interest as they arise and as part of the Code of Conduct Annual Certification.

When in doubt, discuss the matter with your manager or the Compliance Officer assigned to your business and follow local reporting policies. Additional rules and procedures are applicable to our directors and executive officers.

## Always Keep in Mind:

The following are examples of potential conflicts of interest:

- Conducting Chubb business with family or personal friends—such as awarding a contract to a relative.
- Ownership in or serving in a key role for outside companies that do or seek to do business with Chubb, or that compete with Chubb.
- Taking advantage of personal investment opportunities afforded to you by virtue of your position with Chubb.
- Engaging in work outside the Company that otherwise interferes with your work at Chubb.

## Avoid Conflicts of Interest

We must avoid conflicts of interest in our personal and business activities.

A conflict of interest may occur when our personal interests or activities affect our ability to make objective decisions on behalf of Chubb. We must avoid situations that give rise to actual conflicts, and situations that create the appearance of a conflict.

Conflicts are not always easily identifiable. If you are presented with a situation that might involve a conflict or the appearance of a conflict, ask these questions:

- To an impartial observer, would it appear to be a conflict?
- Could my judgment be impacted by concerns for my personal activity or interests?

*Individual accountability*

*Maturity in judgment*

*Consistent excellence  
in execution*



## Exchange Gifts and Entertainment

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Chubb generally permits giving and receiving business gifts that are reasonable, not excessive in frequency, and are consistent with local laws. It is important, however, to handle gifts and entertainment carefully and in full compliance with Chubb policy.

### Always Keep in Mind:

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- For both giving and receiving gifts, the annual limit to or from any one entity or individual is US \$250 (or local equivalent).
- Before giving a gift or providing entertainment, make sure it is consistent with the customs and policies of the recipient as well as any applicable law.
- Obtain pre-approval before offering a gift or entertainment to a government official. For more information, see our [Avoiding Bribery and Corruption](#) policy.
- Gifts and entertainment are prohibited if they:
  - Are intended to improperly influence a business decision, or to gain another form of business advantage,
  - Involve a party engaged in a competitive bidding process with Chubb,
  - Are in the form of cash or cash equivalents (including gift cards), or
  - Are indecent or otherwise do not comply with our values.

## Travel and lodging

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Hosting and attending conferences, presentations or recreational events for the purpose of general business discussions and brand-building are accepted practices in our industry. Since travel is often involved, it is common for the host to provide lodging and/or transportation for attendees.

We may offer and accept travel and lodging for such events, so long as it is reasonable under the circumstances.

Additional local procedures may apply, such as written pre-approvals from a senior Chubb officer, so be certain to check local requirements.

## Meals and entertainment

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We may accept and offer meals and entertainment from current or prospective business partners as long as they accompany us. Business partners include producers, insureds and anyone who provides goods or services to Chubb.

We may accept meals or tickets to sporting events, the theater and other recreational events provided that the purpose is for us to discuss business matters with non-Chubb business partners. We generally do not accept invitations to such events if a non-Chubb associate will not be present.

For more information, see our [Business Gifts and Entertainment](#) policy.



## Honesty and Transparency



### Records Retention and Legal Holds

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Many countries where we do business have laws governing the retention and destruction of Company records. We also have contractual obligations regarding record retention. For these reasons, our document retention and destruction actions must always be consistent with the law, contractual obligations, and Company policies.

It is also critical that we comply with any “legal holds” that require records to be maintained beyond typical retention schedules when there is current or anticipated litigation. Never destroy, alter or try to conceal any documents that may be necessary for litigation or an investigation. Our Office of General Counsel is responsible for advising when legal holds are instituted.

### Always Keep in Mind:

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- Chubb’s books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect our transactions, and must conform to applicable legal requirements and to our internal controls.
- Never make false, misleading, incomplete or dishonest entries about our business performance.
- If you receive requests from governmental agencies for information or documents relating to Chubb business, immediately consult with the Legal representative for your business.

### Maintain Accurate and Complete Records

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Business partners, government officials and others rely on us to comply with financial reporting and accounting regulations and ensure accounting and financial information is accurately reported.

It is crucial to our reputation that we immediately report any fraudulent activity. Those who do engage in fraudulent activity and those who have knowledge of fraud but fail to report it will be subject to strict disciplinary action. Depending on circumstances, discipline may include termination, civil penalties, and in significant fraud matters may include criminal actions.

*Consistently ask  
“Is this work worthy of  
Chubb’s signature?”*





## Preventing Fraud

Fraud is an intentional misrepresentation of fact that deceives or is intended to deceive others. The nature of our business presents a variety of opportunities for individuals within or outside Chubb to commit fraud. We must all be aware of this potential and report any suspicions of fraud using any of the channels included in this Code.

## Be Clear and Transparent in Our Public Communications

When we share information with the public, it is important that we do so carefully and that we are consistent.

### Always Keep in Mind:

- If you are involved in preparing documents for official disclosures, public communications or filings with government agencies, always be fair and accurate.
- All outside requests for information related to Chubb's activities, performance, plans or position on issues must be referred to your regional communications department.

## Social Media

Social media is an important way for us to conduct work-related communications and share information with others. When using social media on behalf of Chubb, follow the same standard of professionalism used in traditional forms of written communication, such as letters and memos.

If you read an online comment about Chubb that you believe is wrong or harmful to our reputation, do not respond. Instead, bring it to the attention of the Legal, Compliance or Communications department representatives assigned to your business.

## Public Statements

Chubb Global Communications has exclusive responsibility for Chubb public statements. This includes all written and oral comments provided to the media, analysts, government officials, shareholders or audiences at conferences and seminars, or posted on the Internet.

Global Communications works together with their colleagues in regional and country Communications units, as well as with Investor Relations and Government Affairs.

In limited circumstances, select individuals may be authorized to provide public statements on behalf of Chubb with pre-approval from Global Communications.

Leaders of our business units are responsible for working with the Communications team to review opportunities for publicity, assess their risks and approve public statements.

Certain restrictions apply to all Chubb public statements, including:

- No speculation on changes or projections on Chubb's stock price, future revenue, earnings or financial position.
- No comments on rumors concerning a merger, acquisition, management changes or other significant business events.
- No disclosure of proprietary information regarding new products, policies or strategies.
- No discussion or reference to specific competitors.
- No reference to any financial information that has not been publicly disclosed.



# The Greater Good



## Respect Human Rights and the Rule of Law

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We conduct our business in a manner that respects the human rights and dignity of all, and we support international efforts to promote and protect human rights. The use of slavery and human trafficking represents some of the gravest forms of human rights abuse in any society. We all have a responsibility to be alert to the risks of slavery and human trafficking, however small, and to report concerns and act upon them. Chubb does not tolerate abuse of human rights in a Chubb workplace or in the course of Chubb business.

### Always Keep in Mind:

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Each of us can help support efforts to eliminate abuses such as child labor, slavery, human trafficking, and forced labor:

- Report any suspicion or evidence of human rights abuses in our operations or in the operations of our business partners.
- Remember that respect for human dignity begins with our daily interactions with one another and with our customers, and includes promoting diversity, accommodating disabilities, and doing our part to protect the rights and dignity of everyone with whom we do business.

*Think globally, act locally. Be mindful of being parochial.*

*Move beyond traditional ways of doing things by pushing past the status quo to achieve results.*

## Protect the Environment

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The environment is a top priority for Chubb. As one of the world's largest property and casualty insurers, Chubb believes that the well-being of our society depends on a healthy environment and that a proper ethic strives for a sustainable balance between development and preservation. We recognize our responsibility to provide solutions that help clients manage environmental risks, to reduce our own environmental impact and to make meaningful contributions to environmental causes.

We further recognize that global climate change affects everyone - our customers, employees, shareholders, business partners and the people who live and work in the communities we serve. Chubb reports on an annual basis by disclosing climate change risks and opportunities as well as emissions performance. In addition, a third-party certified Environmental Statement on the Company's GHG emissions program is included in the Company's annual report.



## Participate in Political and Charitable Activities

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You are encouraged to voluntarily participate in political and charitable activities including volunteering your time. However, always make it clear that your personal views and actions are not those of the Company. In addition, except in the case of Chubb-organized activities, when you are involved in a political or charitable cause, do so on your own time using your own personal resources. For certain Chubb senior managers, select political contributions may need to be reviewed by or reported to counsel, as some jurisdictions deem these to be made on behalf of Chubb.

Chubb exercises its right and responsibility to make its position known on relevant public issues and legislation. When lobbying and participating in the political process, we always comply with applicable laws regulating participation in political affairs—including those regulating contributions to political parties, national political committees and individual candidates.

## Always Keep in Mind:

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- Obtain all necessary approvals before using any Company resources to support political activities.
- Ensure that your personal political views and activities are not viewed as those of the Company.
- Do not use Company time, resources or funds to support your political or charitable activities, including supporting any employee who runs for office.
- Never give the impression that Chubb supports any candidate, campaign or issue in which you are personally involved.
- If you volunteer to help local civic organizations, be sure that your participation does not interfere with your work.
- Soliciting or pressuring customers, business partners, or co-workers to support your favorite charities or causes is not allowed.

Remember: laws governing lobbying and contacts with government representatives are complex. Always follow our policies and if you have any doubt, contact the Government Affairs department before acting.



## Prevent Corruption and Bribery

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Corruption and bribery in all of their forms are completely contrary to our business standards. We comply with all applicable international laws, treaties and regulations that forbid bribery both of public officials and within the private sector. Bribery is defined as the making, providing, offering or authorizing any payment, gift of any kind or anything of value to a government official or to an employee of another organization where the purpose of the payment or gift is to obtain an improper advantage, by inducing a person to perform a function or activity improperly or to reward them for doing so.

There can be severe consequences if we or a business partner acting on our behalf violates anti-bribery laws. Even the perception by others that we may have acted illegally can be damaging. For this reason, always be aware of how our actions might be viewed by others and err on the side of caution.

### Always Keep in Mind:

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- Do not give or accept bribes or kickbacks, offer facilitation or 'grease' payments, or accept or provide any other kind of improper payment.
- Keep accurate books and records so that payments can be honestly described and documented.
- Be aware of our anti-corruption and bribery standards when selecting third parties that provide services on our behalf. Be vigilant and monitor their behavior. Never 'look the other way.'
- Be aware that not reporting a bribe or other illegal activity may in itself be an offense.

For more information see our [Avoiding Bribery and Corruption](#) policy.

## Compete Fairly

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Fair competition ensures that our customers get the best possible service at the best possible price. Competition and antitrust laws are designed to preserve the competitive process and the free market. Violations of these laws can result in severe penalties for Chubb and for the individuals involved.

### Always Keep in Mind:

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- Antitrust laws are complex and compliance requirements can vary depending on the circumstance. If you have any questions or if you see a potential violation of antitrust policies, contact the Legal department.
- Those of us working in underwriting, sales and management—and those of us who participate in trade associations, industry standard-setting groups or other meetings involving competitors—must be especially vigilant about the requirements of competition laws and regulations.

**Note:** [Chubb Guidelines on Business Relationships with Competitors and Producers](#) provide additional guidance on what we can and cannot do when dealing with brokers, other intermediaries and our competitors.

These guidelines and other relevant policies are available on the Village.



## Meetings Involving Competitors

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When preparing for and attending any meeting involving competitors:

- Review the agenda in advance of every meeting with sensitivity toward topics with anti-competitive implications such as “marketing practices” or “pricing.”
- Encourage the organization to undertake only the business on the agenda, and to avoid discussions of sensitive topics not on the agenda.
- Review the minutes after the meeting to ensure that they accurately report the actions taken at the meeting.
- Consider anti-competitive risks in attending informal meetings at or around the time of the regular meeting.
- Limit, as a general rule, discussions to insurance industry matters, and avoid discussing Company-specific matters.
- If you are at a meeting where sensitive competitive issues are being discussed, ask the group to stop discussing those matters. If the discussion continues, leave the meeting after requesting that your objection to the discussion and your departure are noted in the meeting records.

For more information see our [Antitrust Compliance Guidelines](#).

## Comply with Regulations Governing Business across Borders

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We are committed to following all applicable trade laws, regulations, and sanctions programs in the countries in which we do business.

### Boycotts and Embargos

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U.S. law and our policies prohibit team members from cooperating with unsanctioned boycotts of countries that are friendly to the United States.

We also have policies, procedures, and controls to comply with U.S., European Union, U.K., and United Nations rules pertaining to transactions and investments that involve certain countries, groups, or individuals, including those associated with terrorism, narcotics trafficking, or nuclear weapons proliferation.

For more information see our [Restrictions on Trading with Certain Countries and Individuals](#) policy.



## Money-laundering

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Money-laundering is the process of hiding criminal proceeds or making them look as though they are legitimate. Knowing our clients and understanding their businesses is critical to identifying and preventing money-laundering schemes.

### Always Keep in Mind:

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- Seek guidance from the Legal department or the Compliance Officer assigned to your business, to ensure that transfers of information, technology, products, or software across international borders comply with laws governing imports and exports.
- Trade restrictions and sanctions often change. If you are involved in cross-border transactions, make sure you are up-to-date on the relevant rules.
- If you have suspicions that money-laundering has occurred, immediately report the matter to our Anti money-laundering (AML) officer or the Compliance Officer assigned to your business.

### To help guard against money-laundering, look for these red flags:

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- Any transaction in which the nature, size or frequency appears unusual;
- Overpayment of premium with a request to refund the excess to a third party or to a different country;
- Early cancellation of policies with return of premium, particularly where:
  - A number of policies entered into by the same insured or intermediary for small amounts and then cancelled at the same time;
  - Return premium being credited to an account different from the original account, or requests for return premiums in currencies different from the original premium; and
  - Regular purchase and cancellation of policies.