

		COMPLIANT/ NON-COMPLIANT	ADDITIONAL INFORMATION	EXPLANATION
Internal Control System and Risk Management Framework				
Principle 12: To ensure the integrity, transparency and proper governance in the conduct of its affairs, the company should have a strong and effective internal control system and enterprise risk management framework.				
Recommendation 12.1				
1.	Company has an adequate and effective internal control system in the conduct of its business.	Compliant	<p>List quality service programs for the internal audit functions.</p> <p>Indicate frequency of review of the internal control system.</p> <p>Source:</p> <ul style="list-style-type: none"> • Chubb Limited Website https://www.chubb.com/us-en/ <p>Reference documents/links:</p> <ul style="list-style-type: none"> • CHUBB LIMITED AUDIT COMMITTEE CHARTER 4. DUTIES AND RESPONSIBILITIES OF THE AUDIT COMMITTEE, c. Internal Controls and Internal Audit, page 3 <p><About (ABOUT CHUBB); Investors (Investor Relations); Governance; Board of Directors and Committees; Committees, members and charters; Audit; Audit Committee Charter> https://about.chubb.com/content/dam/chubb-sites/chubb/about-chubb/governance/pdfs/audit-committee-charter_august-2024.pdf</p> <ul style="list-style-type: none"> • UNITED STATES SECURITIES AND EXCHANGE COMMISSION, FORM 10-K, CHUBB LIMITED REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM, Critical Audit Matters, page F-5 <p><About (ABOUT CHUBB); Investors (Investor Relations); Financials; SEC Filings; Annual Filings; Filing Type 10-K> https://d18rn0p25nwr6d.cloudfront.net/CIK-0000896159/381ec7fd-8fb8-4fd6-b467-17eae6e6c51c.pdf</p> <ul style="list-style-type: none"> • Organizational Regulations of Chubb Limited 8. GROUP INTERNAL AUDIT, 8.1 Responsibilities, page 16 <p><About (ABOUT CHUBB); Investors (Investor Relations); Governance; Governance Documents; Organizational Regulations of Chubb Limited> https://s201.q4cdn.com/471466897/files/doc_downloads/govdocs/current/Organizational-Regulations-of-Chubb-Limited.pdf</p>	Our auditors also disclose their assessments of our company's "Critical Audit Matters". It's a sort of short run down on whatever they think are the most critical or contingent things they had to consider in giving us our clean bill of health, and could be considered an extra layer of audit oversight and controls disclosure.

2.	Company has an adequate and effective enterprise risk management framework in the conduct of its business.	Compliant	<p>Identify international framework used for Enterprise Risk Management.</p> <p>Provide information or reference to a document containing information on:</p> <ol style="list-style-type: none"> 1. Company's risk management procedures and processes. 2. Key risks the company is currently facing. 3. How the company manages the key risks. <p>Indicate frequency of review of the enterprise risk management framework.</p> <p>Source:</p> <ul style="list-style-type: none"> • Chubb Limited Website <p>https://www.chubb.com/us-en/</p> <p>Reference documents/links:</p> <ul style="list-style-type: none"> • CHUBB LIMITED RISK & FINANCE COMMITTEE CHARTER <p>4. DUTIES AND RESPONSIBILITIES OF THE RISK & FINANCE COMMITTEE, b. Enterprise Risk Management, pages 2-3</p> <p><About (ABOUT CHUBB); Investors (Investor Relations); Governance; Board of Directors and Committees; Committees, members and charters; Risk & Finance; Risk & Finance Committee Charter></p> <p>https://about.chubb.com/content/dam/chubb-sites/chubb/about-chubb/governance/pdfs/risk-finance-committee-charter_august-2024.pdf</p> <ul style="list-style-type: none"> • Chubb Limited Annual Report 2024 <p>CHUBB LIMITED INDEX TO FORM 10-K, PART I, ITEM 1. Business, Enterprise Risk Management, pages 18-19</p> <p><About (ABOUT CHUBB); Investors (Investor Relations); Governance; General Meeting of Shareholders; ANNUAL MEETING MATERIALS; 2024 Chubb Annual Report></p> <p>https://about.chubb.com/content/dam/chubb-sites/chubb/about-chubb/governance/pdfs/risk-finance-committee-charter_august-2024.pdf</p>	
Recommendation 12.2				
1.	Company has in place an independent internal audit function that provides an independent and objective assurance, and consulting services designed to add value and improve the company's operations.	Compliant	<p>Disclose if the internal audit is in-house or outsourced. If outsourced, identify external firm.</p> <p>Source:</p> <ul style="list-style-type: none"> • Chubb Limited Website <p>https://www.chubb.com/us-en/</p> <p>Reference document/link:</p> <ul style="list-style-type: none"> • Organizational Regulations of Chubb Limited <p>8. GROUP INTERNAL AUDIT, pages 16-17</p> <p><About (ABOUT CHUBB); Investors (Investor Relations); Governance; Governance Documents; Organizational Regulations of Chubb Limited></p> <p>https://s201.q4cdn.com/471466897/files/doc_downloads/govdocs/current/Organizational-Regulations-of-Chubb-Limited.pdf</p>	

Recommendation 12.3

1.	The company has a qualified Chief Audit Executive (CAE) appointed by the Board.	Compliant	Identify the company's Chief Audit Executive (CAE) and provide information on or reference to a document containing his/her responsibilities. Source: • Chubb Limited Website https://www.chubb.com/us-en/	
2.	CAE oversees and is responsible for the internal audit activity of the organization, including that portion that is outsourced to a third party service provider.	Compliant	Reference document/link: • Chubb Limited Annual Report 2024 Officers and Executives, Other Executives, page 37 Mong-Diep “Dee” Le Chief Auditor <About (ABOUT CHUBB); Investors (Investor Relations); Governance; General Meeting of Shareholders; ANNUAL MEETING MATERIALS; 2024 Chubb Annual Report> https://s201.q4cdn.com/471466897/files/doc_financials/2024/ar/2024-Chubb-Limited-Annual-Report-Final.pdf	
3.	In case of a fully outsourced internal audit activity, a qualified independent executive or senior management personnel is assigned the responsibility for managing the fully outsourced internal audit activity.	Compliant	Identify qualified independent executive or senior management personnel, if applicable. (N/A) Source: • Chubb Limited Website https://www.chubb.com/us-en/ Reference document/link: • UNITED STATES SECURITIES AND EXCHANGE COMMISSION, FORM 10-K, CHUBB LIMITED MANAGEMENT'S RESPONSIBILITY FOR FINANCIAL STATEMENTS AND INTERNAL CONTROL OVER FINANCIAL REPORTING, page F-3 <About (ABOUT CHUBB); Investors (Investor Relations); Financials; SEC Filings; Annual Filings; Filing Type 10-K> https://d18rn0p25nwr6d.cloudfront.net/CIK-0000896159/381ec7fd-8fb8-4fd6-b467-17eae6e6c51c.pdf	

Recommendation 12.4				
1.	The company has a separate risk management function to identify, assess and monitor key risk exposures.	Compliant	<p>Provide information on company's risk management function.</p> <p>Source:</p> <ul style="list-style-type: none"> • Chubb Limited Website https://www.chubb.com/us-en/ <p>Reference document/link:</p> <ul style="list-style-type: none"> • CHUBB LIMITED RISK & FINANCE COMMITTEE CHARTER 4. DUTIES AND RESPONSIBILITIES OF THE RISK & FINANCE COMMITTEE, b. Enterprise Risk Management, pages 2-3 <p><About (ABOUT CHUBB); Investors (Investor Relations); Governance; Board of Directors and Committees; Committees, members and charters; Risk & Finance; Risk & Finance Committee Charter></p> <p>https://about.chubb.com/content/dam/chubb-sites/chubb/about-chubb/governance/pdfs/risk-finance-committee-charter_august-2024.pdf</p>	
Recommendation 12.5				
1.	In managing the company's Risk Management System, the company has a Chief Risk Officer (CRO), who is the ultimate champion of Enterprise Risk Management (ERM).	Compliant	<p>Identify the company's Chief Risk Officer (CRO) and provide information on or reference to a document containing his/her responsibilities and qualifications/background.</p> <p>Source:</p> <ul style="list-style-type: none"> • Chubb Limited Website https://www.chubb.com/us-en/ 	
2.	CAE oversees and is responsible for the internal audit activity of the organization, including that portion that is outsourced to a third party service provider.	Compliant	<p>Reference documents/links:</p> <ul style="list-style-type: none"> • Chubb Group Executives Frances D. O'Brien, Executive Vice President, Chubb Group Chief Risk Officer <p><About (ABOUT CHUBB); Investors (Investor Relations); Governance; Group Executives, Chubb Group Executives; Frances D. O'Brien></p> <p>https://about.chubb.com/who-we-are/leadership/frances-d-obrien.html</p>	
3.	CRO has adequate authority, stature, resources and support to fulfill his/her responsibilities.	Compliant	<p>Source:</p> <ul style="list-style-type: none"> • Chubb Limited Website https://www.chubb.com/us-en/ <p>Reference document/link:</p> <ul style="list-style-type: none"> • Chubb Limited Annual Report 2024 CHUBB LIMITED INDEX TO FORM 10-K, PART I, ITEM 1. Business, Enterprise Risk Management, pages 17-19 <p><About (ABOUT CHUBB); Investors (Investor Relations); Governance; General Meeting of Shareholders; ANNUAL MEETING MATERIALS; 2024 Chubb Annual Report></p> <p>https://s201.q4cdn.com/471466897/files/doc_financials/2024/ar/2024-Chubb-Limited-Annual-Report-Final.pdf</p>	