

	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.	<p>Compliant</p> <p><i>[List quality service programs for the internal audit functions.</i></p> <p><i>Indicate frequency of review of the internal control system.]</i></p> <p>Source:</p> <ul style="list-style-type: none"> • Chubb Limited Website https://about.chubb.com/ <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, pages 3-4 <p><Investors (Investor Relations); Governance; Board of Directors and Committees; Committees, members and charters; Audit; Audit Committee Charter></p> <p>https://about.chubb.com/content/dam/chubb-sites/chubb/about-chubb/governance/pdfs/audit-committee-charter_august-2025.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><Investors (Investor Relations); Financials; SEC Filings; Annual Filings; Filing Type 10-K></p> <p>https://d18rn0p25nwr6d.cloudfront.net/CIK-0000896159/3b3e19f6-b9f8-436d-b0c0-4825fcc72b46.pdf</p> <ul style="list-style-type: none"> • Organizational Regulations of Chubb Limited 8. GROUP INTERNAL AUDIT, 8.1 Responsibilities, page 16 <p><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>	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><i>[Identify international framework used for Enterprise Risk Management.</i></p> <p><i>Provide information or reference to a document containing information on:</i></p> <ol style="list-style-type: none"> 1. <i>Company's risk management procedures and processes.</i> 2. <i>Key risks the company is currently facing.</i> 3. <i>How the company manages the key risks.</i> <p><i>Indicate frequency of review of the enterprise risk management framework.]</i></p> <p>Source:</p> <ul style="list-style-type: none"> • Chubb Limited Website <p>https://about.chubb.com/</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><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-2025.pdf</p> <ul style="list-style-type: none"> • Chubb Limited Annual Report 2025 <p>CHUBB LIMITED INDEX TO FORM 10-K, PART I, ITEM 1. Business, Enterprise Risk Management, pages 15-17</p> <p><Investors (Investor Relations); Governance; General Meeting of Shareholders; ANNUAL MEETING MATERIALS; 2025 Chubb Annual Report></p> <p>https://s201.q4cdn.com/471466897/files/doc_financials/2025/ar/2025-Chubb-Limited-Annual-Report.pdf</p>	Insurance Company of North America (a Chubb Company), as a branch office, maintains an enterprise risk management framework, with procedures for identifying, assessing, and managing key risks. The framework is reviewed annually by the Risk Management Committee and reported to senior management.
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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><i>[Disclose if the internal audit is in-house or outsourced. If outsourced, identify external firm.]</i></p> <p>Source:</p> <ul style="list-style-type: none"> • Chubb Limited Website <p>https://about.chubb.com/</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><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>	
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Recommendation 12.3

1.	The company has a qualified Chief Audit Executive (CAE) appointed by the Board.	Compliant	<i>[Identify the company's Chief Audit Executive (CAE) and provide information on or reference to a document containing his/her responsibilities.]</i> Source: • Chubb Limited Website https://about.chubb.com/	
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 2025 Officers and Executives, Other Executives, page 37 Mong-Diep “Dee” Le Chief Auditor <Investors (Investor Relations); Governance; General Meeting of Shareholders; ANNUAL MEETING MATERIALS; 2025 Chubb Annual Report> https://s201.q4cdn.com/471466897/files/doc_financials/2025/ar/2025-Chubb-Limited-Annual-Report.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	<i>[Identify qualified independent executive or senior management personnel, if applicable. (N/A)]</i> Source: • Chubb Limited Website https://about.chubb.com/ 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 <Investors (Investor Relations); Financials; SEC Filings; Annual Filings; Filing Type 10-K> https://d18rn0p25nwr6d.cloudfront.net/CIK-0000896159/3b3e19f6-b9f8-436d-b0c0-4825fcc72b46.pdf	

Recommendation 12.4				
1.	The company has a separate risk management function to identify, assess and monitor key risk exposures.	Compliant	<p><i>[Provide information on company's risk management function.]</i></p> <p>Source:</p> <ul style="list-style-type: none"> • Chubb Limited Website https://about.chubb.com/ <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><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-2025.pdf</p>	Insurance Company of North America (a Chubb Company), as a branch office, has a separate risk management function to identify, assess, and monitor key risk exposures; these local practices are aligned with the risk management framework and oversight structures established by Chubb Limited as set out in the Risk & Finance Committee Charter. For further details, please refer to the Chubb Limited Risk & Finance Committee Charter at the link provided in the preceding column.
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><i>[Identify the company's Chief Risk Officer (CRO) and provide information on or reference to a document containing his/her responsibilities and qualifications/background.]</i></p> <p>Source:</p> <ul style="list-style-type: none"> • Chubb Limited Website https://about.chubb.com/ 	
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><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://about.chubb.com/ <p>Reference document/link:</p> <ul style="list-style-type: none"> • Chubb Limited Annual Report 2025 CHUBB LIMITED INDEX TO FORM 10-K, PART I, ITEM 1. Business, Enterprise Risk Management, pages 15-17 <p><Investors (Investor Relations); Governance; General Meeting of Shareholders; ANNUAL MEETING MATERIALS; 2025 Chubb Annual Report></p> <p>https://s201.q4cdn.com/471466897/files/doc_financials/2025/ar/2025-Chubb-Limited-Annual-Report.pdf</p>	