

	COMPLIANT/ NON-COMPLIANT	ADDITIONAL INFORMATION	EXPLANATION
Duties to Stakeholders			
<p>Principle 14: The rights of stakeholders established by law, by contractual relations and through voluntary commitments must be respected. Where stakeholders' rights and/or interests are at stake, stakeholders should have the opportunity to obtain prompt effective redress for the violation of their rights.</p>			
<p>Recommendation 14.1</p>			
<p>1.</p>	<p>Board identifies the company's various stakeholders and promotes cooperation between them and the company in creating wealth, growth and sustainability.</p>	<p>Compliant</p> <p><i>[Identify the company's shareholder and provide information or reference to a document containing information on the company's policies and programs for its stakeholders.]</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"> • The Chubb Way, Code of Conduct Getting to Know the Code, Who must follow the Code?, page 8 <p><Investors (Investor Relations); Governance; Governance Documents; Corporate Governance Documents; The Chubb Code of Conduct></p> <p>https://s201.q4cdn.com/471466897/files/doc_downloads/govdocs/current/Code-of-Conduct.pdf</p> <ul style="list-style-type: none"> • Chubb 2025 Sustainability Report <p><Investors (Investor Relations); Citizenship; Citizenship Reports; Accountability and transparency, Chubb 2025 Sustainability Report, Download></p> <p>https://s201.q4cdn.com/471466897/files/doc_financials/2025/ar/2025-Chubb-Sustainability-Report.pdf</p>	
<p>Recommendation 14.2</p>			
<p>1.</p>	<p>Board establishes clear policies and programs to provide a mechanism on the fair treatment and protection of stakeholders.</p>	<p>Compliant</p> <p><i>[Identify policies and programs for the protection and fair treatment of company's stakeholders.]</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"> • The Chubb Way, Code of Conduct Promoting Diversity, Equity and Inclusion, pages 14-15 <p><Investors (Investor Relations); Governance; Governance Documents; Corporate Governance Documents; The Chubb Code of Conduct></p> <p>https://s201.q4cdn.com/471466897/files/doc_downloads/govdocs/current/Code-of-Conduct.pdf</p>	

			<p>• Chubb 2025 Sustainability Report</p> <p><Investors (Investor Relations); Citizenship; Citizenship Reports; Accountability and transparency, Chubb 2025 Sustainability Report, Download></p> <p>https://s201.q4cdn.com/471466897/files/doc_financials/2025/ar/2025-Chubb-Sustainability-Report.pdf</p>	
Recommendation 14.3				
1.	Board adopts a transparent framework and process that allow stakeholders to communicate with the company and to obtain redress for the violation of their rights.	Compliant	<p><i>[Provide the contact details (i.e., name of contact person, dedicated phone number or e-mail address, etc.) which stakeholders can use to voice their concerns and/or complaints for possible violation of their rights.</i></p> <p><i>Provide information on whistleblowing policy, practices and procedures for stakeholders.]</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"> • The Chubb Way, Code of Conduct <p>Getting Help, page 50</p> <p><Investors (Investor Relations); Governance; Governance Documents; Corporate Governance Documents; The Chubb Code of Conduct></p> <p>https://s201.q4cdn.com/471466897/files/doc_downloads/govdocs/current/Code-of-Conduct.pdf</p> <ul style="list-style-type: none"> • The Chubb Ethics Helpline – Reporting a Violation <p><Investors (Investor Relations); Governance; Chubb Ethics Helpline></p> <p>https://investors.chubb.com/governance/chubb-ethics-helpline/default.aspx</p>	

Principle 15: A mechanism for employee participation should be developed to create a symbiotic environment, realize the company's goals and participate in its corporate governance processes.

Recommendation 15.1

1.	Board establishes policies, programs and procedures that encourage employees to actively participate in the realization of the company's goals and in its governance.	Compliant	<p><i>[Provide information on or link/reference to company policies, programs and procedures that encourage employee participation.]</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"> • The Chubb Way, Code of Conduct Understanding Your Responsibilities, page 9 <p><Investors (Investor Relations); Governance; Governance Documents; Corporate Governance Documents; The Chubb Code of Conduct> https://s201.q4cdn.com/471466897/files/doc_downloads/govdocs/current/Code-of-Conduct.pdf</p> <ul style="list-style-type: none"> • Investing in Our People <p><Our Culture; Learn More; Our Culture; INVESTING IN OUR PEOPLE; Our commitment to our employees; Investing in Our People> https://about.chubb.com/culture/investing-people.html</p> <ul style="list-style-type: none"> • Philanthropy & Volunteerism <p><Our Culture; Learn More; Our Culture; PHILANTHROPY AND VOLUNTEERISM; Our commitment to philanthropy and volunteerism; Philanthropy & Volunteerism> https://about.chubb.com/citizenship/philanthropy.html</p>	Insurance Company of North America (a Chubb Company), as a branch office, implements the policies, programs, and procedures established by Chubb Limited, including those that encourage employee participation in governance and goal achievement, as set out in the Chubb Code of Conduct and related group-wide initiatives.
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Recommendation 15.2

1.	Board sets the tone and makes a stand against corrupt practices by adopting an anti-corruption policy and program in its Code of Conduct.	Compliant	<p><i>[Identify or provide link/reference to the company's policies, programs and practices on anti-corruption.]</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"> • The Chubb Way, Code of Conduct Preventing Bribery and Corruption, pages 33-34 <p><Investors (Investor Relations); Governance; Governance Documents; Corporate Governance Documents; The Chubb Code of Conduct> https://s201.q4cdn.com/471466897/files/doc_downloads/govdocs/current/Code-of-Conduct.pdf</p>	Insurance Company of North America (a Chubb Company), as a branch office, adopts and disseminates Chubb Limited's anti-corruption policy and program through regular trainings and communications, embedding these standards in local operations pursuant to the Chubb Code of Conduct.
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2.	Board disseminates the policy and program to employees across the organization through trainings to embed them in the company's culture.	Compliant	<p><i>[Identify how the board disseminated the policy and program to employees across the organization.]</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"> • The Chubb Way, Code of Conduct <p>Preventing Bribery and Corruption, pages 33-34</p> <p><Investors (Investor Relations); Governance; Governance Documents; Corporate Governance Documents; The Chubb Code of Conduct></p> <p>https://s201.q4cdn.com/471466897/files/doc_downloads/govdocs/current/Code-of-Conduct.pdf</p>	Insurance Company of North America (a Chubb Company), as a branch office, adopts and disseminates Chubb Limited's anti-corruption policy and program through regular trainings and communications, embedding these standards in local operations pursuant to the Chubb Code of Conduct.
Recommendation 15.3				
1.	Board establishes a suitable framework for whistleblowing that allows employees to freely communicate their concerns about illegal or unethical practices, without fear of retaliation.	Compliant	<p><i>[Disclose or provide link/reference to the company's whistleblowing policy and procedure for employees.</i></p> <p><i>Indicate if the framework includes procedures to protect the employees from retaliation.</i></p> <p><i>Provide contact details to report any illegal or unethical behavior.]</i></p> <p>Source:</p> <ul style="list-style-type: none"> • Chubb Limited Website <p>https://about.chubb.com/</p>	Insurance Company of North America (a Chubb Company), as a branch office, adopts the whistleblowing framework established by Chubb Limited, which enables employees to report illegal or unethical practices without fear of retaliation, including direct access to independent channels such as the Chubb Ethics Helpline.
2.	Board establishes a suitable framework for whistleblowing that allows employees to have direct access to an independent member of the Board or a unit created to handle whistleblowing concerns.	Compliant	<p>Reference document/link:</p> <ul style="list-style-type: none"> • The Chubb Way, Code of Conduct <p>Reporting Concerns, pages 11-12</p> <p><Investors (Investor Relations); Governance; Governance Documents; Corporate Governance Documents; The Chubb Code of Conduct></p> <p>https://s201.q4cdn.com/471466897/files/doc_downloads/govdocs/current/Code-of-Conduct.pdf</p> <ul style="list-style-type: none"> • The Chubb Ethics Helpline – Reporting a Violation <p><Investors (Investor Relations); Governance; Chubb Ethics Helpline></p> <p>https://investors.chubb.com/governance/chubb-ethics-helpline/default.aspx</p>	Insurance Company of North America (a Chubb Company), as a branch office, adopts the whistleblowing framework of Chubb Limited, which provides employees with direct access to the Chubb Ethics Helpline ensuring that all reports are handled impartially and with confidentiality and protection from retaliation as set out in the Chubb Code of Conduct and Ethics Helpline.

3.	Board supervises and ensures the enforcement of the whistleblowing framework.	Compliant	<p><i>[Provide information on how the board supervised and ensured enforcement of the whistleblowing framework, including any incident of whistleblowing.]</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"> • The Chubb Way, Code of Conduct Reporting Concerns, pages 11-12 <p><Investors (Investor Relations); Governance; Governance Documents; Corporate Governance Documents; The Chubb Code of Conduct></p> <p>https://s201.q4cdn.com/471466897/files/doc_downloads/govdocs/current/Code-of-Conduct.pdf</p>	Insurance Company of North America (a Chubb Company), as a branch office, ensures the whistleblowing framework is actively enforced by local management and regular review by Chubb Limited’s Global Compliance team, with concerns addressed according to established group protocols.
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Principle 16: The company should be socially responsible in all its dealings with the communities where it operates. It should ensure that its interactions serve its environment and stakeholders in a positive and progressive manner that is fully supportive of its comprehensive and balanced development.

Recommendation 16.1

1.	Company recognizes and places importance on the interdependence between business and society, and promotes a mutually beneficial relationship that allows the company to grow its business, while contributing to the advancement of the society where it operates.	Compliant	<p><i>[Provide information or reference to a document containing information on the company's community involvement and environment-related programs.]</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"> • Environment & Climate Change <p><Investors (Investor Relations); Citizenship; Environment and Climate Change></p> <p>https://about.chubb.com/citizenship/environment.html</p> <ul style="list-style-type: none"> • Chubb and climate change <p><Investors (Investor Relations); Citizenship; Environment and Climate Change; Chubb and climate change></p> <p>https://about.chubb.com/citizenship/environment.html</p> <ul style="list-style-type: none"> • Corporate Environmental Program goals <p><Investors (Investor Relations); Citizenship; Environment and Climate Change; Corporate Environmental Program goals></p> <p>https://about.chubb.com/citizenship/environment.html</p>	
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- **Environmental philanthropy**

<Investors (Investor Relations); Citizenship; Environment and Climate Change; Environmental philanthropy; Learn more about Chubb's environmental philanthropy>

<https://about.chubb.com/citizenship/philanthropy/environmental-philanthropy.html>

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