		Source Document/ Location of Information	Yes / No	Point	REMARKS
A	Rights of Shareholders				
A.1	Basic Shareholder Rights				
A.1.1	Does the company pay (interim and final/annual) dividends in an equitable and timely manner; that is, all shareholders are treated equally and paid within 30 days after being (i) declared for interim dividends and (ii) approved by annual general meeting (AGM) for final dividends?	Dividends announcement.  Dividends are paid in an equitable manner. Timing is complicated under Swiss law payment can be more than 30 days. AGM approves the dividends for the full year. Dividends are paid, on schedule, quarterly.  Source: <a href="http://investors.acegroup.com/phoenix.zhtml?c=100907&amp;p=irol-dividends#STS=g76fxz5y.hcl">http://investors.acegroup.com/phoenix.zhtml?c=100907&amp;p=irol-dividends#STS=g76fxz5y.hcl</a>	Υ	1	
A.2	Right to participate in decisions concerning fundamental corporate changes.				
	Do shareholders have the right to participate in:				
A.2.1	Amendments to the company's constitution?	Annual Report/Company website/Articles of Association.  A.2.1  Source: Articles of Association of ACE Limited, page 8  Part III. Organisation  Article 9. Authorities <a href="http://investors.acegroup.com/phoenix.zhtml?c=100907&amp;p=irol-govhighlights">http://investors.acegroup.com/phoenix.zhtml?c=100907&amp;p=irol-govhighlights</a>	Y	1	
A.2.2	The authorisation of additional shares?	A.2.2 Source: Articles of Association of ACE Limited, page 19 Part IV. Liquidation Article 21. Dissolution and Liquidation <a href="http://investors.acegroup.com/phoenix.zhtml?c=100907&amp;p=irol-govhighlights">http://investors.acegroup.com/phoenix.zhtml?c=100907&amp;p=irol-govhighlights</a>	Y	1	
A.2.3	The transfer of all or substantially all assets, which in effect results in the sale of the company?	A.2.3 Source: Articles of Association of ACE Limited, page 19 Part IV. Liquidation Article 21. Dissolution and Liquidation <a href="http://investors.acegroup.com/phoenix.zhtml?c=100907&amp;p=irol-govhighlights">http://investors.acegroup.com/phoenix.zhtml?c=100907&amp;p=irol-govhighlights</a>	Υ	1	

		Source Document/ Location of Information	res / No	Point	REIVIARKS
A	Rights of Shareholders				
A.3	Right to participate effectively in and vote in general shareholder meetings and should be informed of the rules, including voting procedures, that govern general shareholder meetings.				
A.3.1	Do shareholders have the opportunity, evidenced by an agenda item, to approve remuneration (fees, allowances, benefit-in-kind and other emoluments) or any increases in remuneration for the <a href="mailto:non-executive">non-executive</a> <a href="mailto:directors/commissioners?">directors/commissioners?</a>	Announcement of AGM/Articles of Association/Annual Report/Company website.  The Board Compensation Committee determines director fees.	N/A	0	
A.3.2	Does the company provide non-controlling shareholders a right to nominate candidates for board of directors/commissioners?	Annual Report/Company website/Articles of Association.  Source: Corporate Governance Highlights; Nominating and Governance Committee Charter, 4.a.1, page 2 <a href="http://investors.acegroup.com/phoenix.zhtml?c=100907&amp;p=irol-govhighlights">http://investors.acegroup.com/phoenix.zhtml?c=100907&amp;p=irol-govhighlights</a>	Υ	1	
A.3.3	Does the company allow shareholders to elect directors/commissioners individually?	Minutes of AGM/Result announcement of AGM/Articles of Association/Annual Report/website.  Source: 2013 ACE Proxy Statement, Item 1, page 18  http://proxy.acegroup.com/phoenix.zhtml?c=100907&p=proxy	Υ	1	
A.3.4	Does the company disclose the voting and vote tabulation procedures used, declaring both before the meeting proceeds?	AGM Minutes/Articles of Association/Company website.  Source: Source: 2013 ACE Proxy Statement, page 1  http://proxy.acegroup.com/phoenix.zhtml?c=100907&p=proxy	Υ	1	
A.3.5	Do the minutes of the most recent AGM record that there was an opportunity allowing for shareholders to ask questions or raise issues?	AGM Minutes/Summary of Minutes.  Yes, but they are not public.	Y	1	
A.3.6	Do the minutes of the most recent AGM record questions and answers?	There weren't any.	N	0	
A.3.7	Does the disclosure of the outcome of the most recent AGM include resolution(s)?	Source: Investor Information; Annual Meeting Materials - 2013 ACE AGM Voting Results - 2013 ACE Proxy Statement http://proxy.acegroup.com/phoenix.zhtml?c=100907&p=proxy	Υ	1	

Source Document/ Location of Information

Yes / No

Point

REMARKS

		Source Document/ Location of Information	Yes / No	Point	REMARKS
Α	Rights of Shareholders				
A.3.8	Does the company disclose the voting results including approving, dissenting, and abstaining votes for each agenda item for the most recent AGM?	Source: Investor Information; Annual Meeting Materials - 2013 ACE AGM Voting Results <a href="http://proxy.acegroup.com/phoenix.zhtml?c=100907&amp;p=proxy">http://proxy.acegroup.com/phoenix.zhtml?c=100907&amp;p=proxy</a>	Υ	1	
A.3.9	Does the company disclose the list of board members who attended the most recent AGM?	Source: Investor Information; Annual Meeting Materials - 2013 ACE Proxy Statement, page 7 "Do the Directors Attend the Annual General Meeting?" http://proxy.acegroup.com/phoenix.zhtml?c=100907&p=proxy	Y	1	
A.3.10	Did the chairman of the board of directors/commissioners attend the most recent AGM?	Source: Investor Information; Annual Meeting Materials - 2013 ACE Proxy Statement, page 7 "Do the Directors Attend the Annual General Meeting?" http://proxy.acegroup.com/phoenix.zhtml?c=100907&p=proxy	Y	1	
A.3.11	Did the CEO/Managing Director/President attend the most recent AGM?	Source: Investor Information; Annual Meeting Materials - 2013 ACE Proxy Statement, page 7 "Do the Directors Attend the Annual General Meeting?" http://proxy.acegroup.com/phoenix.zhtml?c=100907&p=proxy	Υ	1	
A.3.12	Did the chairman of the Audit Committee attend the most recent AGM?	Source: Investor Information; Annual Meeting Materials - 2013 ACE Proxy Statement, page 7 "Do the Directors Attend the Annual General Meeting?" http://proxy.acegroup.com/phoenix.zhtml?c=100907&p=proxy	Υ	1	
A.3.13	Did the company organise their most recent AGM in an easy to reach location?	Notice of AGM/Company website.  The Annual General Meeting of ACE Limited was held on Thursday, May 16, 2013, 2:45 p.m. Central European time (doors open at 1:45 p.m. Central European time) at the offices of ACE Limited, Bärengasse 32, 8001 Zurich, Switzerland  Source: 2013 ACE AGM Swiss Invitation <a href="http://proxy.acegroup.com/phoenix.zhtml?c=100907&amp;p=proxy">http://proxy.acegroup.com/phoenix.zhtml?c=100907&amp;p=proxy</a>	Υ	1	
A.3.14	Does the company allow for voting in absentia?	AGM Announcement/AGM Minutes/Articles of Association  Source: 2013 ACE Proxy Statement  http://proxy.acegroup.com/phoenix.zhtml?c=100907&p=proxy	Υ	1	

			Source Document/ Location of Information	Yes / No	Point	REMARKS
1	4	Rights of Shareholders				
Å	1 3 1 5	Did the company vote by poll (as opposed to by show of hands) for all resolutions at the most recent AGM?	AGM Minutes.  Show of hands at AGM and also electronic poll because all votes were by proxy.	Y	1	
Å	A.3.16	Does the company disclose that it has appointed an independent party (scrutineers/inspectors) to count and/or validate the votes at the AGM?	Source:  2013 ACE Proxy Statement , page 4 "How Do I appoint and Vote via an Independent Proxy if I am a Record Holder?" <a href="http://proxy.acegroup.com/phoenix.zhtml?c=100907&amp;p=proxy">http://proxy.acegroup.com/phoenix.zhtml?c=100907&amp;p=proxy</a>	Y	1	
Å	A.3.17	Does the company make publicly available by the next working day the result of the votes taken during the most recent AGM for all resolutions?	Company announcement/Company website.  It takes longer than one working day.  Source:  2013 ACE AGM Voting Results <a href="http://proxy.acegroup.com/phoenix.zhtml?c=100907&amp;p=proxy">http://proxy.acegroup.com/phoenix.zhtml?c=100907&amp;p=proxy</a>	N	0	

		Source Document/ Location of Information	Yes / No	Point	REMARKS
Α	Rights of Shareholders				
A.3.18	Do companies provide at least 21 days notice for all resolutions?	Company announcements/Articles of Association/Annual Report/Company website.  Source: Articles of Association of ACE Limited, page 13 Part III. Organization Section A. The General Meeting Article 15. Resolutions  While Article 11 of the Articles of Association only requires 20 days notice, in effect, more than 21 days has always been given (see all AGM and EGM Proxies under Investor Information; SEC - Section 16 Filings, All Form 14As).  http://investors.acegroup.com/phoenix.zhtml?c=100907&p=irol-govhighlights	Y	1	
A.3.19	Does the company provide the rationale and explanation for each agenda item which require shareholders' approval in the notice of AGM/circulars and/or the accompanying statement?	Company announcements/Articles of Association/Annual Report/Company website.  Source: 2013 ACE Proxy Statement 2013 ACE AGM Swiss Invitation  http://proxy.acegroup.com/phoenix.zhtml?c=100907&p=proxy	Y	1	
A.4	Markets for corporate control should be allowed to function in an efficient and transparent manner.				
A.4.1	In cases of mergers, acquisitions and/or takeovers, does the board of directors/commissioners of the offeree company appoint an independent party to evaluate the fairness of the transaction price?	Merger announcement/Company Report on the merger.  Not always. Source: Articles of Association of ACE Limited, page 18 Part III. Organization Section C. Auditors and Special Auditor Article 20. Term, Powers and Duties  http://investors.acegroup.com/phoenix.zhtml?c=100907&p=irol-govhighlights	N	0	

		Source Document/ Location of Information	Yes / No	Point	REMARKS
Α	Rights of Shareholders				
A.5	The exercise of ownership rights by all shareholders, including institutional investors, should be facilitated.				
A.5.1	Does the company publicly disclose policies to encourage shareholders including institutional shareholders to attend the AGM?	Annual Report/Company website.  Source: Invitation and Proxy Statement for the 2013 Annual General Meeting of Shareholders, Front Page  http://proxy.acegroup.com/phoenix.zhtml?c=100907&p=proxy	Y	1	
A.5.2	Is the share ownership by institutional investors, other than controlling shareholders, greater than 5%?	Annual Report/Company website.  Source: Investor Information; SEC - Section 16 Filings; All Forms 13G, 13G/A and 13D <a href="http://proxy.acegroup.com/phoenix.zhtml?c=100907&amp;p=irol-sec">http://proxy.acegroup.com/phoenix.zhtml?c=100907&amp;p=irol-sec</a>	Υ	1	