

CHUBB®

# The Chubb Way

Code of Conduct



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# A Message from Evan Greenberg

**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.

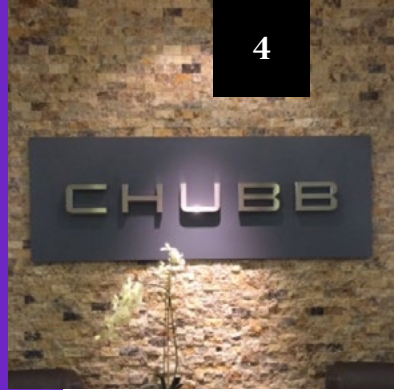
Evan Greenberg

*Chairman and Chief Executive Officer*



# Our Code at a Glance – Key Takeaways

Chubb's Code of Conduct represents our values and beliefs and guides our conduct and business activities as representatives of Chubb. The Code expresses Chubb's expectations of how we treat each other, our customers and our business partners. These are the main points we ask you to keep front-of-mind with respect to our Code. Click the Key Takeaways below for further information. And remember, the Code's general guidelines are supplemented by policies and rules regarding specific activity; you are responsible for knowing and adhering to the policies and rules that apply to your work at Chubb.



## Integrity

We trust you to know your responsibility and use sound judgment in your decision making – ask for help if you are ever unsure.

We do not tolerate retaliation against anyone who speaks up in good faith – raise concerns so we can resolve them fairly and quickly.

## Respect

We expect you to treat coworkers, customers and business partners fairly and with respect.

Promote inclusion, diversity and equity – report potential discrimination, retaliation or harassment.

## Dependability

Protect data and handle information in line with Chubb's information security and privacy requirements.

Embrace innovation and join Chubb's commitment to exploring new technology and ways of doing business ethically and with due care.

Avoid conflicts of interest. Contact the Legal and Compliance department if you think you may have a conflict.

## Responsibility

Conduct due diligence when selecting business partners and carefully manage relationships.

Compete fairly and act honestly – follow anti-trust laws, do not engage in insider trading, never accept or offer a bribe and only exchange gifts that are reasonable and customary.

Follow sanctions regulations. Watch for possible financial crimes, such as money laundering or fraud and report suspicious activity.

## Stewardship and Our Commitment for the Future

We are not only Chubb employees, but members of the communities where we live and work. Chubb contributes to the protection of human rights, invests in the wellbeing of local communities and strives to run an environmentally sustainable and responsible business.



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# Living Our Culture

Our culture is the heart of **The Chubb Way**. It defines how we work, how we make decisions and how we treat others. We become our best selves and do our best work when we allow our culture to take root within us and shape our every action.



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# Integrity

We view our work through the prism of our culture, values and beliefs. Our Code of Conduct helps us turn the things we believe into the things we do every day - for Chubb and everyone we serve.

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# Getting to Know the Code

Since our founding, Chubb employees have supported our customers with speed, energy and integrity. We have made a positive and lasting mark on our industry and our world, measuring our success by the relationships we build, the trust we earn and our results in the marketplace.

We are a diverse team, serving diverse customers, markets and distribution channels, and we are united in our commitment to the highest ethical standards. You are an integral part of our team, making daily decisions that impact both our present and our future. We trust you to use good judgment, but we realize the right course of action may not always be clear. That is why we have our Code of Conduct (“Code”).

**Our Ideals**  
Click to play video

## How can the Code help?

We work in a highly regulated industry, governed by evolving laws and regulations. The Code is your guide to navigating the rules that apply to us and the ethical situations you might encounter through work. It helps you make decisions that align with our policies and culture or find Chubb resources who can help. The Code is not designed to cover every possible situation. Think of it instead as the umbrella under which all of our policies lie. The Code provides guidance and leads you in the right direction.



### The Code gives you ...

- High-level reviews of important ethical topics
- Links to our policies and other resources
- Tools to make good decisions and model our culture
- Definitions of key terms
- Answers to frequently asked questions
- Additional resources for more information

When you have questions, start with the Code. If you cannot find the answers you need in the Code, talk to your manager or one of the other resources listed.

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## Who must follow the Code?

If you represent Chubb, the Code applies to you. That includes every employee at every level and in every Chubb location, no matter where in the world you work. Each of us is expected to affirm our receipt and understanding of the Code and follow it each day. That includes our leaders, Board of Directors and all full- and part-time employees and contractors.

## What if the Code is violated?

Our Code is the written expression of the commitments we all share. We take our Code seriously and do not tolerate any conduct that violates it. If a violation of our Code or policies does occur, it can lead to disciplinary action, up to and including termination of employment. If a law is also violated, further civil or criminal penalties may also apply to those involved.

## Modeling Our Culture

We also expect anyone acting on our Company's behalf to uphold the spirit of our Code and work **The Chubb Way**. That includes:

- Business partners
- Consultants
- Agents
- Third-party representatives
- Service providers



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# Understanding Your Responsibilities

The generations of Chubb employees who came before us built our Company's reputation, one day and one decision at a time. We preserve our reputation by understanding and fulfilling our shared responsibilities.



## Employee responsibilities:

- ✓ **Model our culture** - Bring our culture and values to life in everything you do.
- ✓ **Uphold the Code** - Take all required training and know the Code well. Refer to it often and apply it to your daily work.
- ✓ **Follow the rules** - Get to know our policies and the laws that apply to our business, such as the:
  - Global Information Security and Privacy Policy
  - Global Avoiding Bribery and Corruption Policy
  - Global Antitrust Compliance Guidelines
  - Other policies referenced throughout the Code

It is your responsibility to know and follow all of our rules and policies. Know how they impact your work and ask questions if something is unclear.
- ✓ **Speak up** - If you see or suspect conduct that could violate our Code, policies or the law, or if you have suggestions on how we can do better, [speak up](#) immediately.
- ✓ **Cooperate** - If you are asked to assist in an investigation or audit, whether by internal or government authorities, provide honest and complete information.



## Added manager responsibilities:

- ✓ **Set the right example** - Show your team what it means to work **The Chubb Way**. Promote our culture and our Code by observing high standards each day.
- ✓ **Be a resource** - Be knowledgeable about our Code and policies and be able to answer your team's questions.
- ✓ **Ensure open communication** - Make sure employees feel comfortable coming to you with questions or concerns. Listen, without judgment or threats of retaliation.
- ✓ **Be proactive** - If you become aware of misconduct, take immediate action to stop the bad behavior and report your concerns to the proper resources so that an investigation can take place in accordance with Chubb's Internal Investigation Policy and Guidelines.

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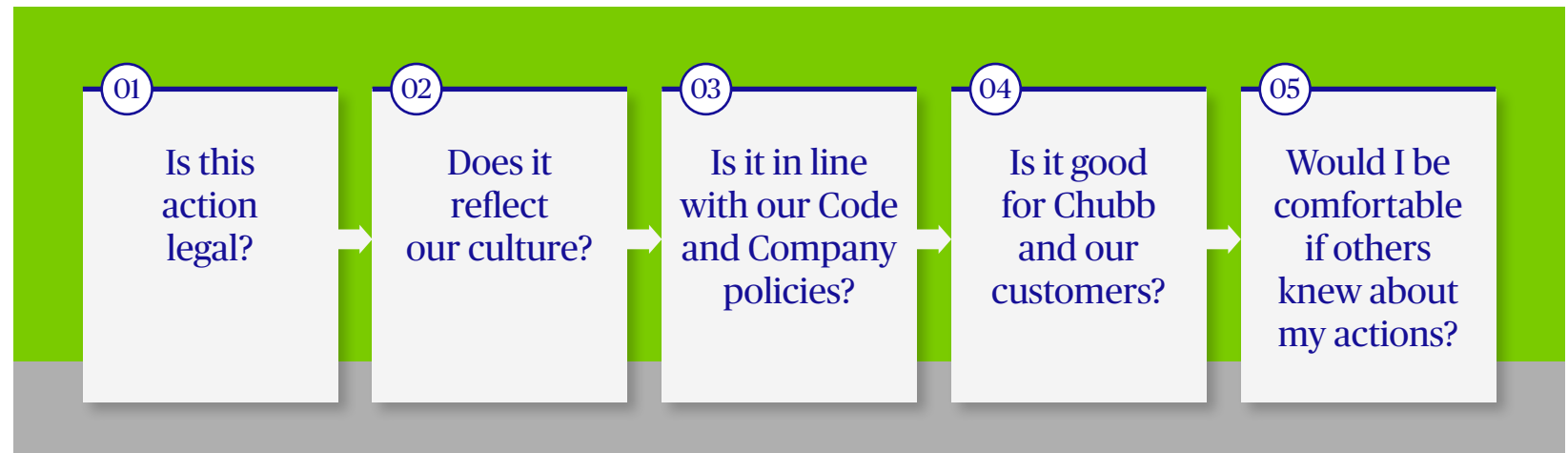
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# Making Good Decisions

Every day we make decisions, both big and small, that impact Chubb. Can you be sure that your choices are the right ones? When you are uncertain, check the Code and our policies.

**Also try asking yourself:**



Did you answer **“yes”** to every question? If not, or if you hesitate to answer any of them, stop and [ask for guidance](#) before proceeding.

**We Recognize  
and Reward**  
Future-focused,  
mature judgment

# Reporting Concerns

One of the most important things you can do to work **The Chubb Way** is speak up when you have a question or suspect anything that might violate our Code, policies or the law. When you do, you protect both our reputation and our legacy. We understand speaking up is not always easy to do – it takes courage and commitment. It is also our responsibility as Chubb employees.

## How to speak up

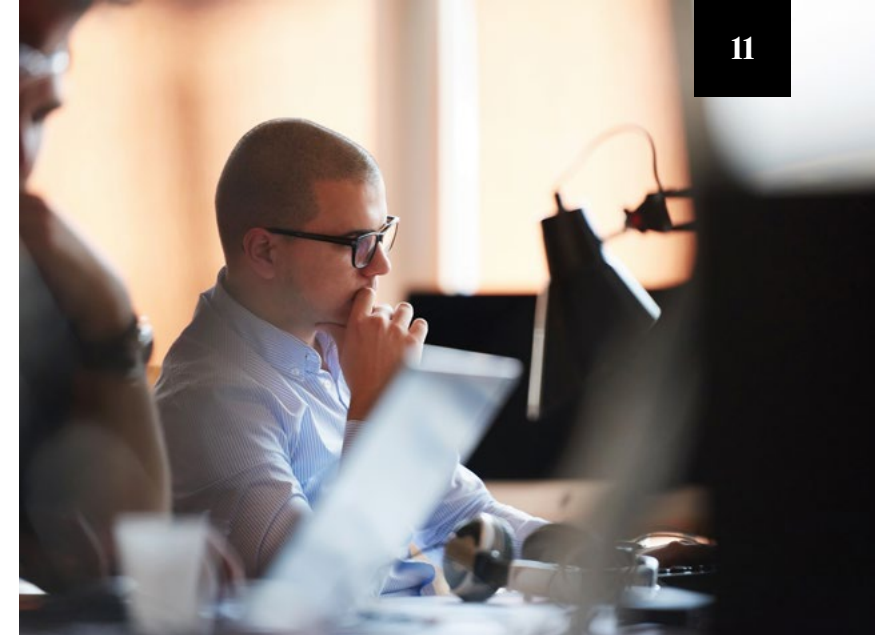
Ignoring possible misconduct is not an option. To make sure you share concerns, and you feel confident and comfortable doing so, we offer these options for speaking up:

- Your manager or the [Compliance Officer assigned to your business](#)
- Any other senior leader
- Your local Human Resources representative

Or, if you prefer, you also may contact:

## The Ethics Helpline

This service gives you a way to report a concern either online or by phone. Operated by an independent third-party provider, the Ethics Helpline is available 24 hours a day, seven days a week. While we encourage you to identify yourself when reporting, you do have the option to report anonymously. Be aware that local laws may prohibit anonymous reporting or limit the types of issues you may report.



## To access the Ethics Helpline:

Visit the [Ethics Helpline](#) page. There you will find a link for online reporting and the telephone number to access the Helpline from your country.



## What happens next

- Your report will be taken seriously.
- When appropriate, we will conduct a prompt and thorough investigation, protecting the rights of those reporting and those being investigated and keeping information as confidential as possible, as required by law.
- We require you to cooperate fully and honestly in any internal or external investigation.
- If an investigation reveals a violation of the Code, policy or law has occurred, we will take appropriate disciplinary action.

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## No retaliation

At Chubb, speaking up is both your right and your responsibility. We can never be our best unless we uncover misconduct and stand up for what is right – even when doing so is difficult. We do not tolerate retaliation against anyone who reports concerns in good faith or participates in an investigation.

Retaliation runs counter to Chubb’s culture and is a serious violation of our Code.

Stay alert for the many forms of retaliation, including:

- Demotion or reduced responsibility
- Reduced pay
- Exclusion from opportunities or activities
- Dismissal or the threat of dismissal

If you have experienced or suspect retaliation of any kind, [speak up](#) immediately.

## We Expect

Passion and energy for  
constant improvement

## Modeling Our Culture

Reporting in “good faith” means:

You sincerely believe your concern to be true. You have not knowingly made a false or malicious report.

## Consider This

**There is an issue I would like to report, but it involves my manager. Not only am I afraid of retaliation if I report it, I am also concerned about how my colleagues would react if they knew I reported this. Should I just wait and see if the situation improves?**

No, you should not. We understand it may be especially difficult to report something when a colleague or a manager is involved. Above all, remember your responsibility to report possible misconduct, no matter who is involved. We will not tolerate retaliation of any kind, by anyone, against you. Remember you can always report through the Ethics Helpline where you can remain anonymous if you choose.



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# Respect

We are committed to maintaining a positive and welcoming workplace, where each individual is supported, their contributions are valued and their well-being is respected.

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# Promoting Diversity, Equity and Inclusion

Chubb is powered by people – a talented and dedicated team with diverse skills, backgrounds and experiences. We value the unique contributions and perspectives of each individual and empower them to reach their full potential.



## The Chubb Way

### Focusing on inclusion

No matter who you are at Chubb, we believe you deserve an equal chance to participate. If your work involves employment decisions for Chubb, promote fairness by following all equal employment laws to ensure equity throughout our business. Also help us ensure that every applicant, candidate and employee feels welcomed and valued and have access to the same resources to succeed. If you have questions about our policies or the law, contact Chubb's Culture Office or your local Human Resources representative for guidance.

**We Recognize  
and Reward  
Leveraging diversity  
as a strength**

### Overcoming bias

Hearing new perspectives and voices helps us innovate and better serve our customers, but personal biases (both conscious and unconscious) can make it hard to listen. In your interactions and decision-making, strive to recognize and see past potential biases. Help us maintain a culture that values diversity, equity and inclusion by welcoming input from everyone and never excluding anyone or dismissing their contributions.

### Modeling Our Culture

Bias and discrimination can happen at any time but most often occur in decisions involving:

- Interviewing/screening
- Hiring
- Assignments
- Promotions
- Discipline

Base all employment decisions on actual business requirements and each individual's skills and qualifications.

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## Preventing discrimination

We believe in treating everyone fairly and respectfully. Never discriminate or favor anyone based on their background, beliefs or any characteristic protected by law. Protected characteristics vary around the world, but they usually include factors like:

- Age
- Disability
- Gender expression or identity
- Marital status
- Pregnancy and maternity
- Race, ancestry, color and place of origin
- Religion
- Sex or sexual orientation

Do you suspect discrimination or unfair treatment somewhere in our business? [Speak up](#) immediately.

**We Expect**  
An inclusive mindset

## Consider This

**I overheard colleagues repeatedly joking about a certain religion. They did not seem to be directing this at anyone, but I feel like this does not fit the Chubb culture. Am I overreacting?**

No, you are not. Jokes among co-workers must never be made at someone else's expense – even unintentionally. Express your concerns to your colleague if you can. If not, or if it keeps happening, report your concerns.

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# Maintaining a Respectful Workplace

We believe our workplace should be a place where every individual can thrive, knowing that they are respected and protected from harassment, bullying and other abusive conduct.

## The Chubb Way

### Interacting with care

Respectful relationships are essential to Chubb's culture. No matter who you interact with, whether it is our customers, business partners, colleagues or the public, act professionally and practice respect. Never allow harassment, intimidation, bullying or other negative treatment to enter our workplace or affect another person's ability to do their job.

**We Expect**  
An inclusive mindset

### Recognizing harassment

Working **The Chubb Way** means working to ensure a positive workplace. Each of us can help prevent negative treatment by learning to recognize it. While harassment can take different forms, it creates a hostile or intimidating work environment and is often **physical, verbal** or **sexual** in nature.

Sexual harassment is a type of harassment involving:

- Unwanted or repeated sexual advances
- Unwelcome physical contact
- Sharing of sexual materials
- Sexual requests – sometimes made as a condition of employment or in exchange for favorable treatment

Harassment does not have to be intentional to be harmful. What matters is perception – how someone else might interpret your words or actions. Be aware and be considerate.

### Speaking up

Watch for signs of possible harassment. If you see or experience it anywhere in our operations, [speak up](#) immediately. We will not tolerate retaliation against you.

### Integrity in Action

Warning signs of possible harassment include:

**Unwanted or unwelcome behavior**

**Unwelcome physical contact or gestures**

**Intimidating or degrading words or names**

**Something verbally or visually offensive**

**Behavior that a reasonable person would find offensive**

**Behavior that negatively impacts another's ability to work**



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# Ensuring a Safe and Healthy Workplace

A safe workplace is about more than preventing accidents and illness. At Chubb, it means protecting the whole person. Each of us must do our part to protect one another and maintain a safe and healthy work environment.

## The Chubb Way

### Prioritizing safety

Chubb prioritizes safety and well-being, and we expect you to do the same. Follow all safety rules and procedures that apply to us, whether they concern accident or disease prevention. These rules may vary by location, but they are all equally important. Use our equipment properly, know what to do in an emergency and immediately [report](#) any potential safety hazards.

### Preventing substance abuse

No matter where we are working – remotely or in a Chubb office – we must always be fit for work and not under the influence of alcohol or drugs, which can impair our productivity and put those around us at risk. You may not use, possess or distribute alcohol or drugs (whether illegal drugs or legal controlled substances, unless used as prescribed by your physician) while conducting Chubb business, using our property or vehicles or on Company property. Chubb may make exceptions for alcohol served at approved Company events where we carefully follow relevant laws and policies.

### Keeping violence out

Everyone in our facilities should feel safe at all times – whether they are employees, business partners, customers or visitors. We do not tolerate threats of violence or weapons in our workplace or on Chubb property. Watch for signs of potentially threatening behavior, and if you see it, report your concerns immediately.

### Modeling Our Culture

Protect yourself and others by reporting concerns like:

- Unsafe work conditions
- Broken equipment
- Verbal or physical threats
- Possible weapons
- Substance abuse
- Violations of safety rules or laws

### Consider This

**A colleague keeps threatening to damage my reputation if I keep outperforming others on my team. The colleague then laughs it off as a joke afterwards. This has happened on multiple occasions, and it is making me feel nervous. What should I do?**

Even though this colleague claims to be joking, this behavior can be perceived as threatening, hostile and inappropriate. It also goes against our culture at Chubb. Ask for help about this right away from your manager or your local Human Resources representative.

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# Dependability

We pride ourselves on being reliable and dependable - producing consistently good results without sacrificing integrity. That is how we preserve our relationships and our reputation.

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# Ensuring Data Privacy and Protection

Strong information security and privacy practices are critical to protecting Chubb and the trust that others place in our name. We handle information with care, following the laws and policies designed to secure it.

## The Chubb Way

### Knowing what to protect

We are a data-driven business, handling a great deal of sensitive personal and business information. The way we gather, handle and store that information reflects directly on Chubb. Chubb classifies information as **Red**, **Yellow** or **Green**, according to its level of sensitivity.

These categories are described in our Global Information Security and Privacy Policy and Guidelines.

<b>Red</b>	<p><b>Sensitive Personal Information (SPI)</b> Highly sensitive elements about customers, applicants, claimants, business partners, employees, former employees, dependents and beneficiaries.</p>	<p><b>Sensitive Business Information (SBI)</b> Very sensitive proprietary business information.</p>
<b>Yellow</b>	<p><b>Personal Information</b> Personal information about customers, applicants, claimants, business partners, employees, former employees, dependents and beneficiaries that is not as sensitive as SPI and does not contain any of the highly sensitive elements that make up SPI.</p>	<p><b>Business Information</b> This classification includes proprietary business information that is not as sensitive as SBI. This will include the majority of information that most employees handle on a daily basis.</p>
<b>Green</b>	<p><b>Public</b> Information that has been approved by management to be shared with the public.</p>	

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## Modeling Our Culture

Secure **Red** and **Yellow** information by adopting these policies:

- Only use information for legitimate business purposes
- Access and use only the information needed for your job
- Only share information with individuals authorized to access it
- Protect it from public exposure and encrypt Red information if you send it outside Chubb
- Protect and do not share user IDs, passwords and PINs with anyone including other employees
- Do not send or store it in third-party applications, systems or on devices that Chubb has not approved for storage

## Handling data with care

Each of us has a responsibility to protect Chubb information and the systems that hold it from inappropriate disclosure, unauthorized access, loss and misuse. A variety of data privacy and security rules and laws apply to Chubb's business around the world. If your job involves handling Red or Yellow information, be sure to know and follow our privacy and cybersecurity policies and the data privacy and cybersecurity laws that apply. If you have questions about how a law applies to you, ask the Global Privacy Office for guidance.

Immediately contact the Global Privacy Office or Global Information Security for any situation where you know or reasonably suspect there has been unauthorized access to, or unauthorized acquisition of corporate information.

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# Using Company Assets and Technology Responsibly

Running our business requires investment in the right resources to keep us competitive and equipped to serve our customers. Chubb entrusts these assets to us and expects us to use them responsibly and securely.

## The Chubb Way

### Handling physical assets

No matter where in the world you work, you use Chubb's resources each day – from our offices and furniture to our funds and supplies.

You have a responsibility to protect all of these assets from theft, loss or damage. Keep devices maintained and updated.

Never borrow, lend, sell or dispose of our assets without authorization. And if you leave Chubb, you must return all physical assets, such as phones or laptops, immediately.

**We Are  
Disciplined in our  
approach to our business**

### Securing data assets

Chubb relies heavily on data and technology to run our business. When you use or access our computer systems, technologies or data, do so with care. Good cybersecurity habits can help protect Chubb's systems and data from malware, security incidents and other

malicious acts. You should understand and follow the Global Information Security and Privacy Policy and Guidelines along with other cybersecurity policies which are your roadmap to protecting data and systems at Chubb.

### Securing intellectual property

We are an innovative team, generating information and ideas that are unique to Chubb. This is our intellectual property – a valuable asset that we must protect. Things that you design or create for Chubb are Chubb's property, and you cannot take or use that property when you leave Chubb. We also honor the intellectual property and proprietary information of others. To secure intellectual property, follow Chubb's policies carefully, along with any intellectual property laws that apply. You must also obtain permission before using anyone else's intellectual property. If you are unsure about what to protect (or how to protect it), contact the [Legal and Compliance department](#).

### Modeling Our Culture

Limited personal use of Chubb assets is permitted, but make sure your use does NOT:

- Violate our policies or the law
- Harm Chubb or our reputation
- Harm anyone associated with us
- Involve offensive materials or content
- Disclose [sensitive information or intellectual property](#)

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## Innovating ethically

Digital technologies are reshaping our industry, empowering us to innovate, streamline our business and better serve our customers. We welcome new technologies, such as Artificial Intelligence (AI) to help us develop solutions that give our customers a more personalized experience. Because AI learns and operates in a human-like fashion, we must make sure the tools Chubb develops are built with integrity, transparency and fairness from the start. If your work involves creating AI, data analytics or other digital technologies, consult with the Legal and Compliance department to ensure that you are following all applicable laws and regulations in the design and development of new technology.

### Consider This

**During a job interview, a candidate shared some information about their current employer with me that I believe must be confidential. Since I did not request this information, is it OK to share it with my team?**

No, it is not. Just as we expect you to keep Chubb's information confidential, we expect job applicants and new employees to protect the information of their previous employers. Even though you did not request this information, you must keep it confidential. Do not use it or share it with anyone else.



## Learn More

Global Information Security and Privacy Policy  
Global Information Security and Privacy Guidelines  
Global Intellectual Property Policy  
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# Working Responsibly

More of us are working remotely than ever before, but despite our changing work environments, our responsibilities to Chubb remain the same. That is why – no matter where we work – we are mindful of upholding Chubb’s policies and high standards.

## The Chubb Way

### Doing what is expected

It is important that we fulfill our duties and reflect our values wherever we work. If you ever work remotely for Chubb, follow the same practices and offer the same level of effort you would in an office setting.

**We Expect  
Excellence in  
execution**

### Protecting our assets

When you work remotely, our hardware, technology and data are in your care. Treat them responsibly and in line with our policies. Keep devices maintained and updated. Never leave them unattended in a public setting or access or share our [sensitive information](#) over an unsecured network.

Contact Global Information Security if you have questions about how to safeguard our data or electronic assets or if you become aware of a cybersecurity issue.

## Modeling Our Culture

When working remotely:

- Choose an environment conducive to work
- Put in the expected number of hours
- Be available to colleagues during regular work hours
- Be on time for meetings
- Maintain a professional appearance on video calls – both you and your workspace
- Do what is right and what is required, even without direct supervision



[Learn More](#)

Security Event Response

- Ensuring Data Privacy and Protection
- Using Company Assets and Technology Responsibly
- Working Responsibly
- **Managing Chubb Information**
- Avoiding Conflicts of Interest
- Communicating Responsibly

# Managing Chubb Information

We maintain a variety of information in various formats and media types that helps Chubb meet our obligations and tell our story. Since we all contribute to Chubb’s story in some way, we all share the responsibility to keep this information accurate, secure, up-to-date and complete.

## The Chubb Way

### Following the law and our standards

Information we keep matters to Chubb, our customers, shareholders, the government and other third parties. Our records must always give an accurate reflection of our business. We rely on you, particularly if your job involves core Chubb business and operations, to be fair and transparent in our recording and reporting information. Carefully follow the law and local guidance and be accurate, transparent and timely when you document information.

### Modeling Our Culture

To promote integrity in our records:

- Never pressure anyone or submit to pressure to alter a Chubb record
- Keep our records well-organized and secure
- Cooperate fully with internal or external audits or investigations
- Notify the Legal and Compliance department of any government requests for information
- Be ready to provide supporting documentation when required



### Preventing fraud

If our records are altered or falsified, it can seriously damage Chubb’s reputation. Each of us must help prevent fraud by watching for and never making false, misleading or incomplete entries. Acts of fraud can lead to serious legal, civil or even criminal penalties for anyone involved, so insist on accuracy – from yourself and others – in every record. If you are aware of suspicious activity involving our records, [speak up](#) immediately. Examples of our records include:

- Expense reports
- Invoices
- Timesheets
- Performance reviews
- Contracts
- Bids and proposals
- Underwriting documents
- Claims files
- Policies
- Emails and other correspondence



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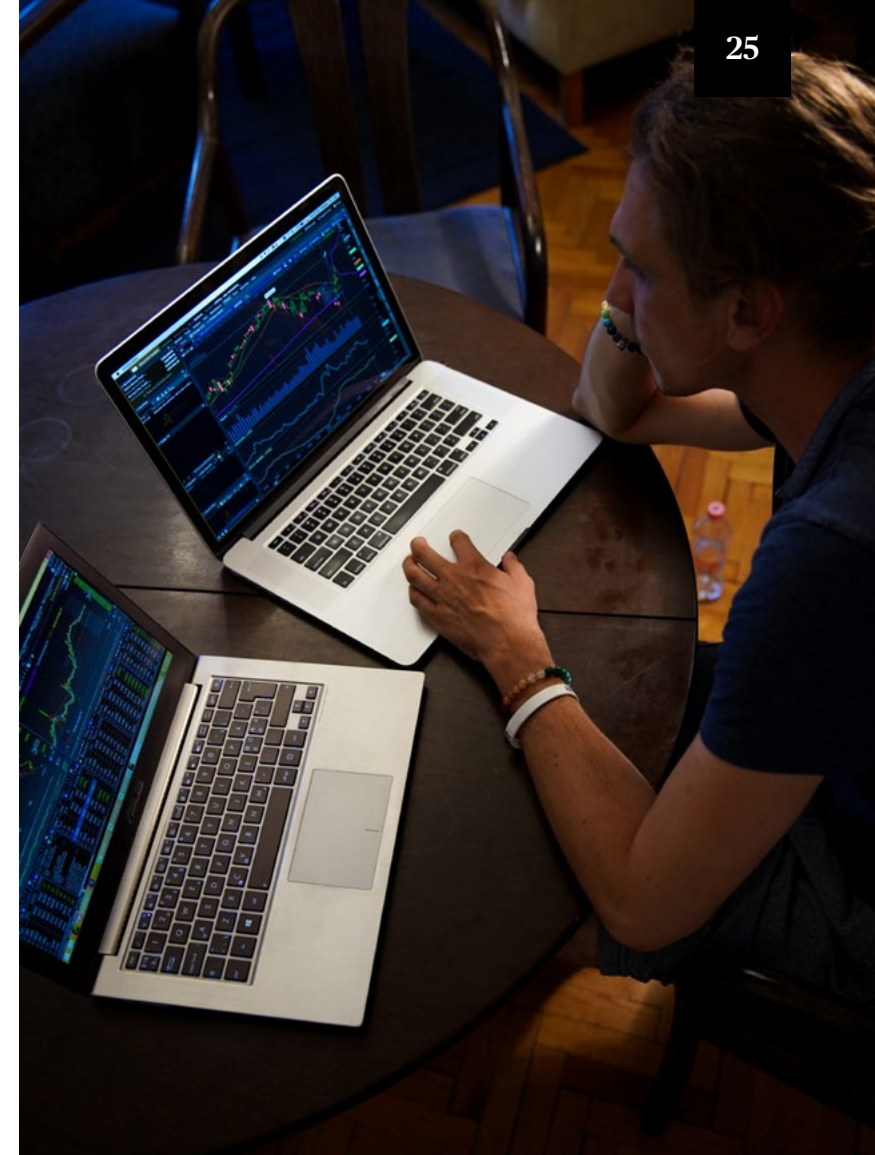
**Carefully managing our information**

When information is well-maintained, we are better able to locate and rely on it. To help maintain Chubb's information, follow our policies, contracts and the different laws that may apply around the world regarding records management, handling, storage and destruction. Remember that all information created, received or maintained by you in the course of your work at Chubb is Company property and must be retained and disposed of in accordance with Chubb's retention schedules and the guidelines in the Global Information Security and Privacy Policy and the Global Payment Card Industry (PCI) Compliance and Delivery Policy. If you receive notice of a legal hold on any information or know it may be needed for a lawsuit or investigation, do not destroy, alter or conceal that information. Contact the [Legal and Compliance department](#) with any questions.

**Consider This**

**I feel like the period listed to keep some records is too short. May I keep them longer, just in case?**

No, you should not. Our records retention schedule is determined by an internal team at Chubb to make sure we meet our legal and operational obligations and manage risk. If you believe a retention period should be shorter or longer, contact the Legal and Compliance department to have it reviewed.



**Learn More**

**Global PCI Compliance and Delivery  
Global Information Security and Privacy Policy  
and Guidelines**

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# Avoiding Conflicts of Interest

At Chubb, ethical business relationships are paramount. To preserve them and the trust on which they are built, we must not allow our own interests to influence the way we do our jobs or the decisions we make.

## The Chubb Way

### Recognizing and avoiding conflicts

A conflict of interest happens when your personal interests clash with Chubb’s best interests and your responsibilities here. Even the suggestion or the appearance of a conflict can cause others to question your actions. That is why it is important for you to recognize possible conflicts of interest and avoid them.

**We Recognize and Reward Maturity in judgment**

### Integrity in Action

If you are unsure if a situation is a conflict of interest, **ask yourself:**

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Conflicts of interest may involve our customers, third parties, competitors or anyone hoping to do business with us. Conflicts come in many forms but might include:

- Accepting a second job with a competitor or customer
- Serving on the board of directors for a company that competes or does business with Chubb
- Supervising a friend or family member
- Investing in a vendor, customer or other third party
- Taking a business opportunity for yourself that belongs to Chubb
- Awarding a contract to a family member or friend
- Doing contract work for a Chubb third party, such as one of our vendors, in your free time
- Soliciting or accepting improper gifts or entertainment. See [Exchanging Appropriate Gifts](#) to learn more

### Disclosing possible conflicts

If you believe you may be facing (or already involved in) a possible conflict of interest, disclose it immediately. Do not hide it or wait any longer. Talk to your manager or the [Compliance Officer assigned to your business](#). Then work with Chubb to mitigate the conflict or avoid it altogether.

#### Consider This

**My spouse works for one of Chubb's competitors. Since I am not the one doing the work, is this a conflict of interest?**

Not necessarily. But you should still disclose this situation to your manager and make sure you are not given assignments that would create a conflict of interest. Also make sure you never share confidential Chubb information with your spouse.

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# Communicating Responsibly

We understand our words have the power to build or break down our business and our relationships. Any time we communicate about Chubb, we ensure careful, consistent and honest messaging.

## The Chubb Way

### Ensuring clear and transparent public communication

When we share information with the public, it is important we do so carefully and that we are consistent. 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 or social media. Global Communications works together with their colleagues in regional and country Communications units, as well as with Investor Relations and Government Affairs.

Irresponsible communications could lead to:

- Inaccurate or misleading statements about Chubb
- Promises we may not be able to keep
- Violations of law and industry standards
- Breach of [sensitive or proprietary information or intellectual property](#) (whether it belongs to Chubb or someone else)
- [Anti-competitive conversations](#)
- [Leaks of inside information](#)
- Statements that conflict with our values, policies or culture

All outside requests for information related to Chubb's activities, performance, plans or position on issues must be referred to your regional communications department.

### Modeling Our Culture

How you can help:

- In terms of your own use of social platforms, remember, the things you say on social media can be read by anyone, anywhere and last for a very long time
- While we welcome employees sharing approved Chubb social media content, please do not speak on behalf of Chubb over social channels
- However you participate be careful not to post anything:
  - Confidential
  - Offensive, harassing, discriminatory or illegal
- Refer outside requests for information or comments to your regional communications department
- Follow our process for referring and processing customer complaints
- Submit a Speaking Engagement Request before any external speaking engagements



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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

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

**Using social media with care**

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 and Compliance or Communications department representatives assigned to your business.



[Learn More](#)

**Chubb Communications Policy on Public Statements**

**Chubb Consumer Complaint Handling Standard Policy**

**Chubb Social Media Guidelines for Employees Speaking Engagement Request**

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# Responsibility

At Chubb, we are passionate about our business and our work. Nothing is more important than doing that work with integrity, choosing what is right over what is easy in all we do.

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# Building Relationships With Third Parties

Chubb’s relationships form the foundation of our business. When we base our relationships on mutual trust and a commitment to integrity and respect, we build a stronger Company and connections that last.

## The Chubb Way

### Appointing qualified business partners

We Are Relationship-focused

Anyone who partners with Chubb acts as an extension of our business. Our third parties’ decisions and actions (whether helpful or harmful) reflect on us and our reputation. For that reason, we select partners who share our commitment to excellence and integrity. Engaging third parties increases the risk to Chubb. Therefore, if you choose third parties on Chubb’s behalf, do your homework. Follow the standards defined in our Third Party Provider (TPP) Policy and operationalized in the Third Party Risk Management (TPRM) Program to ensure that we identify, measure and mitigate any risks represented by third parties before they start providing services to Chubb. Also remember we do not do business with restricted entities, individuals or countries.

### Integrity in Action

Red flags that indicate a third party does not mirror our values and principles include:



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## Conducting due diligence

We select and appoint our third parties based on merit and perform appropriate due diligence to understand a range of factors including:

- Competencies and experience
- Fee structure and pricing
- Compliance with law and regulation
- Management of its supply chain to minimize risk of [modern slavery and human trafficking](#)
- Fair treatment of workers
- Effectiveness of internal controls
- Information and data security capabilities
- Operational resilience
- Financial condition
- Potential conflicts of interest

We never base our decisions on personal biases or other [unfair or discriminatory criteria](#).

In consultation with your applicable [Legal and Compliance department](#), third-party engagements must be formalized in approved and signed written contracts. These agreements must define the terms of the services being provided to Chubb and include clauses that allow us to mitigate risks identified through due diligence.

## Managing third-party relationships

Once we have selected, contracted with and onboarded our third-party partners, our job isn't finished. We must continue to manage the relationship for as long as the third party is engaged by Chubb. That includes continually monitoring their performance against contracted terms and periodically undertaking due diligence or reassessments to identify risks that need to be addressed. If you work regularly with third parties, communicate our expectations, including our Third Party Provider Code of Conduct. Watch our partners' work and hold them accountable by [speaking up](#) if you see any possible violations of our Code, policies or the law.

## Dealing fairly

For a business partnership to thrive, both parties must be held to the same high standards. That is why we must deal fairly with anyone with whom we interact, including our third parties, customers and competitors. We model our culture in every interaction and do not engage in any illegal, unethical or unfair practices that would give Chubb an advantage. Such activity could negatively impact our reputation or result in regulatory fines and penalties.

## Learn More

[Third Party Provider \(TPP\) Policy](#)

[Third Party Risk Management \(TPRM\) Program](#)

[Third Party Provider Code of Conduct](#)



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# Preventing Bribery and Corruption

At Chubb, we appreciate the rewards of a job well done – winning because we work hard. We do not cheat. We are committed to preventing bribery and corruption and keeping it out of our business.

## The Chubb Way

### Identifying bribes

Bribery is not **The Chubb Way**. It harms companies and communities and undermines trust and relationships. Even if bribes are customary in the local culture where you are working, remember, we do not offer or accept them, including:

**Kickbacks** – payments made to facilitate a transaction.

**Facilitation or “grease” payments** – payments made to speed up routine government processes.

### Avoiding the appearance of a bribe

Even if you did not intend to offer or accept a bribe, certain situations can give the appearance of one. Avoid situations that might look to someone else like your judgment has been compromised. Hold everyone you work with to the same standards and [speak up](#) if you see or suspect a bribe, or are concerned about payments being made as part of a business practice.

## Integrity in Action

Is an offer appropriate? **Ask yourself:**



## Following the law

Bribery can lead to harsh legal penalties for companies and employees alike. That is why each of us, and our third parties, must follow Chubb's policies carefully, along with the anti-bribery laws, treaties and regulations that apply to us around the world. Remember, the rules for [exchanging gifts](#) can be tricky – particularly when government officials are involved. If you have questions about how laws may apply to you, contact [Global Compliance](#).

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## Bribes are ...

Anything of value offered with the goal of **influencing someone's business decision, gaining some advantage or winning or retaining business.**

## Bribes may look like ...

- Cash or a cash equivalent
- Lavish gifts or entertainment
- Loans
- Stocks
- Job offers
- Special discounts not available to the public
- Charitable or political contributions

## Being accountable

Good records are essential to uncover acts of bribery. Follow our policies carefully to [keep accurate records](#). Document every transaction with care, no matter the size of the transaction or who is involved, including customers and third parties. Never falsify or allow anyone else to hide or mischaracterize a transaction.

### Consider This

**I have worked with a supplier for many years. This year, the supplier offered me a commission if I sign a multi-year contract with their company. Is this acceptable?**

No, it is not. In this situation, a “commission” in exchange for a signed contract is another word for a kickback or a bribe, both of which are improper and potentially illegal. Report this immediately to your manager or the Compliance Officer assigned to your business.

[Learn More](#)

Global Avoiding Bribery and Corruption Policy

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# Exchanging Appropriate Gifts

At Chubb, our business relationships are built on honesty and trust. We should never allow improper offers to damage those relationships or influence our judgment.

## The Chubb Way

### Proceeding with caution

Gifts, entertainment and other courtesies can build goodwill in business, but the line between customary offers and corruption can be hard to see. While some small offers between our employees, clients and third parties (producers, insureds and other suppliers) may be appropriate, you must avoid any offers that appear to create an obligation or affect someone's decisions.

### Acting ethically with government officials

When a government official is involved, the rules are especially strict, so take special care in your government interactions. Get approval in advance for **any** offer of **any** value involving a government official. See [Preventing Bribery and Corruption](#) to learn more.

## Integrity in Action

Before making or accepting any offer, **ask yourself:**

**Have I followed the laws and customs that apply?**

**Does this comply with both Chubb's policies and the other party's policies?**

**Have I documented the offer accurately?**

**Did I get approval in advance if required?**

Can you say "yes" to each question? If not, check local requirements and ask the [Compliance Officer assigned to your business](#) for help.

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Acceptable offers ...	Unacceptable offers ...
<ul style="list-style-type: none"> <li>✓ Are appropriate, customary and reasonable</li> <li>✓ Are offered for a legitimate business reason</li> <li>✓ Fall below Chubb’s annual limit of US \$250 (or local equivalent)</li> <li>✓ Include reasonable meals or entertainment when:                             <ul style="list-style-type: none"> <li>- The third party attends with you</li> <li>- Business is discussed</li> </ul> </li> <li>✓ Include reasonable travel and lodging to host or attend conferences, presentations or events</li> </ul>	<ul style="list-style-type: none"> <li>✗ Are illegal or solicited</li> <li>✗ Are lavish or inappropriate</li> <li>✗ Are offered frequently</li> <li>✗ Are intended to influence a business decision, win business or gain an advantage</li> <li>✗ Appear to create an obligation in return</li> <li>✗ Involve a competitor</li> <li>✗ May involve a government official, elected official, or candidate for office, and their staff</li> <li>✗ Take the form of cash or a cash equivalent (like gift cards, bonuses or investment securities)</li> </ul>

**Consider This**

**I received a holiday gift basket from a supplier that contains a variety of costly items that I suspect may violate our policy. We have had a good relationship for a long time, and I am afraid I will insult them if I refuse it. What should I do?**

It depends. First, you should talk to your manager to determine the right course of action. If the gift is something that can be shared with your team, like food, it may be OK. If you feel you cannot refuse it, the Compliance Officer assigned to your business can help you do the right thing (like distributing the gift or donating it to charity).



[Learn More](#)

- Global Business Gifts and Entertainment Policy
- Global Avoiding Bribery and Corruption Policy

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# Competing Fairly

We welcome healthy competition. It drives us to dig deeper and give our clients and our Company our best. But Chubb's success must be won fairly – without breaking the law or keeping anyone else from competing.

## The Chubb Way

### Following the law

Competition can only be fair when everyone complies with the antitrust and competition laws that apply to our business around the world. By knowing and following these laws, you help to foster an open environment where everyone has the same chance to succeed. Antitrust requirements can be complicated and violations can be severe, so review the Global Antitrust Compliance Guidelines and reach out to your local legal counsel if the right course of action is ever unclear.

Pay special attention to the law if your work involves:

- Underwriting
- Sales
- Pricing
- Management
- Trade associates
- Industry standards
- Meetings with competitors

**We Expect**  
Open, transparent  
communication



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## Acting honestly

Fair competition is based on honest interactions. You are expected to use good judgment in every interaction with competitors, clients and third parties. In your conversations, avoid anything that could refer to an agreement to limit competition. If a conversation takes an anti-competitive turn, let those involved know that it is inappropriate, excuse yourself and notify the [Legal and Compliance department](#).

### Modeling Our Culture

Avoid conversations about:

- Raising or holding (“fixing”) prices
- Marketing practices
- Dividing markets or territories
- Influencing or “rigging” the outcome of a competitive bid
- Preventing someone from competing
- Refusing to deal with a certain competitor, vendor or client
- Restricting production or sales

## Gathering competitive insights

To outperform the competition, we learn about them, and we must do so ethically and legally. If you gather intelligence about our competitors, never seek or accept information that is illegally obtained, [confidential or proprietary](#). The same rules apply when gathering information about our clients or third parties.

## Promoting our Company

Chubb’s business is all about building relationships – with clients, stakeholders, third parties and the public. They need to trust the things we say, including in our advertising and promotions. You must never over-promise or over-state anything about Chubb. If you help advertise or promote Chubb, be honest and transparent. Your colleagues on the Legal and Compliance teams can help resolve specific questions as they arise.



## Learn More

Global Antitrust Compliance Guidelines  
Guidelines on Producer and Competitor Relationships

Global Information Security and Privacy Policy and Guidelines

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# Following Insider Trading Laws

We believe in fairness – in our business and in the marketplace. To help ensure that everyone has an equal chance to invest, we protect material, inside information and follow both the letter and spirit of insider trading laws.

## The Chubb Way

### Recognizing and preventing insider trading

Using information that is not publicly available to make investment decisions is insider trading. It happens when someone:

- Uses material, nonpublic information to buy or sell securities
- Shares this information with someone else so that they may buy or sell securities using that information (also known as “tipping”)

Either form of insider trading destabilizes and erodes faith in financial markets. Insider trading is also illegal and can lead to serious penalties for those involved.

### Following the rules

Your work may expose you to material, inside information about companies, including Chubb, our customers or our third parties. If that information is not yet publicly known (like through a press release or a Company report), you may not invest on it or “tip” it to someone else – not even to family members, friends or colleagues. Help protect that information by knowing and following the insider trading laws that apply to you and to Chubb.

## Modeling Our Culture

### Ask yourself:

Is information ...

- Unavailable to the public?
- Potentially useful to an investor?
- Shared with you by an insider?
- Confidential information you learned through your job?
- Possibly giving you an unfair advantage?

If you answer “**yes**” to any of these questions, the information is likely material, nonpublic information. Do not invest based on it, or advise, tip or assist others in investing based on it. Contact the [Legal and Compliance department](#) with questions.

## Material inside information can look like ...

- Merger or acquisition plans
- Business plans
- Stock splits or dividends
- Leadership changes
- Sale of assets
- Projected earnings or losses
- Pending lawsuits or investigations

If you are unsure if your information is material and nonpublic, ask for guidance.

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## Honoring Chubb's trading windows

Chubb requires some of our employees, including executives, and directors to follow additional rules on when they may trade and what type of trades they may make. Before trading, get to know how these rules may apply to you.

### Consider This

I overheard in the break room that Chubb is planning to acquire another company. Since I did not seek out the information, may I buy shares in that company?

No. It does not matter how you received the information. Even though nobody specifically shared it with you, the prohibition against trading on it still applies.

### Learn More

Global Restrictions on Insider Trading and  
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# Doing Business Around the World

Chubb is proud to be a global company serving the needs of a diversified client base in many countries. While doing business internationally is a source of great opportunity, it carries a great responsibility to comply with applicable laws and regulations. We scrupulously follow the laws and regulations in the countries and territories in which we operate.

## The Chubb Way

### Following the law

Chubb follows all applicable laws and regulations of the countries in which we do business, including economic sanctions laws and regulations promulgated by the United States, European Union, United Nations, United Kingdom and all other national authorities in the markets in which we operate. If you find that the laws of multiple countries/territories might apply to a transaction or you're unsure about a law or how to proceed, contact your local [Legal and Compliance department](#).

We Are  
Global with  
local expertise

### Preventing money laundering

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. It's also critical that we keep illegally earned funds from being moved through

our Company. To prevent this activity, work only with reputable organizations and watch for suspicious financial activity.

### Modeling Our Culture

Watch for the warning signs of money laundering, which include:

- 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
  - Regular purchase and cancellation of policies

**If you see these or any other suspicious signs, notify your manager immediately.**

### Learn More

**Global Economic Sanctions Policy**

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# Participating in Political Activities

Each of us has a right to be involved in the political process. Chubb supports political involvement but expects us to participate respectfully, without negatively impacting our Company, its reputation or the reputations of our colleagues. You should feel free to engage in political activities and vote for the candidates and issues you support.

## The Chubb Way

### Participating responsibly

As an employee you are expected to keep your personal political activities separate from your work at Chubb. That means you must:

- Conduct your personal political activities on your own time
- Never use Chubb funds or resources (e.g., Chubb computers or printers) for personal political activities
- Never allow your political activities to interfere with your work
- Never post political signs or share political materials in the workplace
- Never allow political activity to affect your interaction with colleagues
- Respect your colleagues' right to hold their own opinions



- Always make clear that you are advocating for your own opinions; never give the impression that you speak for Chubb unless you are working through Chubb Government Affairs
- Never contribute to a candidate or campaign in Chubb's name
- If you run for political office or are appointed to a government position, be aware of potential conflicts of interest and notify Legal and Compliance

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## Integrity in Action

To make sure your political participation is appropriate,  
**ask yourself:** ...

Am I ...



## Following the law

Chubb is committed to following all laws and rules related to political activities, including those related to political contributions and candidates. A personal financial contribution to a candidate or certain political organizations may trigger legal and compliance issues for Chubb depending on your role in the organization. In addition, if you interact with legislators or government officials through your work, [specific rules and disclosures](#) may apply. Any Chubb-related political activity, as well as lobbying and advocacy on behalf of the Company, must be coordinated and managed through Chubb Government Affairs. Contact the [Government Affairs department](#) if you have questions.

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# Stewardship

We are more than the work we do - we are vital members of our communities. We share our world and the responsibility to make our world a better place, today and for future generations.

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# Promoting Human Rights

Our work at Chubb touches the lives of people around the world. We believe every individual should have a voice and the power to shape their own destinies, so we work to defend human rights in every aspect of our business.

## The Chubb Way

### Preventing abuses

When we do business responsibly, we contribute to the protection of human rights. As a company, we are committed to preventing human rights abuses including modern slavery and human trafficking (MSHT) in its various forms (trafficking, debt bondage/bonded labor, forced labor, child labor) and physical punishment anywhere in our business, including our [supply chains](#). If you suspect human rights abuses anywhere in our operations or in those of our third parties, [speak up](#) immediately.

### Being alert

MSHT can be part of complex money laundering schemes, so watch for [money laundering warning signs](#) and report any suspicious financial activity.



### Modeling Our Culture

We protect human rights by making sure that we (and our third parties) give employees:

- Safe working conditions
- Fair pay
- Reasonable and legal work hours
- The right to choose whether or not to work

### Upholding the law

Making the world a better place is a vital part of Chubb's mission, so we are careful to follow all human rights laws that apply to us wherever in the world we do business. If your work involves supply chain management or employment issues, you must be particularly vigilant of the MSHT risks, work to preserve human dignity and expect the same commitment from our third parties. We need to work closely with our suppliers and business partners so that ethical employment standards genuinely trickle down through the entirety of our supply chains. Promote diversity, equity and inclusion and never tolerate unfair business practices or anything that may limit or suppress human rights.

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# Supporting Our Communities

At Chubb, looking for ways to do more doesn't stop with our clients. It means looking for ways to do more for the community, too. We have a rich history of fostering philanthropic engagement in the places where our employees live and work. We are proud to invest in the well-being of our local communities through volunteerism, grants, sponsorships, matching gifts and scholarship programs.

## The Chubb Way

### Engaging as a Company

We believe that meaningful contributions that support our communities globally provide lasting benefits to society, to Chubb and to Chubb employees. Through our Chubb Charitable Foundation, we utilize global partnership and volunteerism to contribute to projects that support communities where we live and work. While we do not require you to get involved, we encourage you to participate in our initiatives in whatever way you choose. We also expect you to be mindful of how our business may affect people or communities and help Chubb ensure that Chubb always makes a positive impact. You may also view updates on [Chubb's citizenship and sustainability initiatives](#).

### Modeling Our Culture

Discover the many ways Chubb supports communities and how you might get involved. To name just a few:

The Chubb Charitable Foundation which highlights:

- Education
- Environment
- Poverty and health

The Chubb Rule of Law Fund which strengthens legal institutions and focuses on areas such as:

- Equal enforcement and impartial adjudication of laws
- Equal access to justice and full government accountability
- Protection of fundamental rights

[Volunteerism](#) which includes a variety of initiatives, such as:

- Building houses
- Supporting public schools
- Food donations and more
- Matching gift campaigns



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## Engaging as individuals

While Chubb offers ample opportunities to support our world and our communities, we understand that our employees carry that sense of service home with them. We encourage you to offer your support as an individual through your own charitable and civic activities. When you do participate on your own, do so independently. Make it clear that you do not speak for Chubb. Do not use Company time, funds, property or the Chubb name without proper authorization.

### Consider This

**I enjoy participating in charitable events in my community. I am also a manager, and several of my team members have offered to join me at a charitable walk this weekend. Should I invite everyone else on my team? And if we all go, can we walk with a Chubb banner or t-shirts?**

First, be careful about inviting everyone on your team. Because you are a manager, some individuals may feel pressured to participate – even if it is not required. Secondly, because this is not a Chubb-sponsored activity, you should not walk in Chubb's name without permission. Consult with your local leadership or contact your local Human Resources representative.

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# Being Good Environmental Stewards

We recognize that we are citizens of our world, with the shared responsibility to make our world a better place. As a Company, we do our part to reduce Chubb's environmental footprint, strengthen the resiliency of communities and support the transition to a net-zero economy.

## The Chubb Way

### Living our commitment

Through our global [Corporate Environmental Program](#), we strive to run an environmentally sustainable and responsible business. That means we focus on:

- Being good stewards
- Using resources responsibly (reducing, reusing and recycling)
- Reducing greenhouse gas emissions
- Minimizing our environmental footprint
- Developing products and services to assist in a transition to a net-zero economy and improve insureds' resilience to climate change
- Supporting environmental philanthropy in the communities in which we operate

We encourage you to help Chubb in our efforts to advance the orderly and equitable transition to a net-zero carbon economy. Be mindful of the ways you can improve sustainability as an employee and a citizen of the world.

**We Expect**  
A belief that we can  
always be better

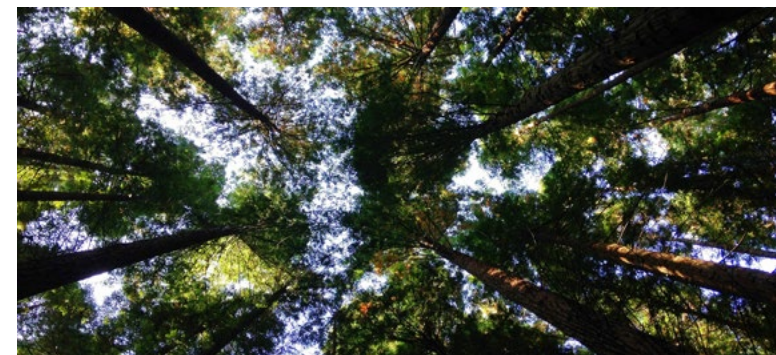
## Modeling Our Culture

To help Chubb live our commitment to stewardship, adopt these good habits:

- Reduce, reuse and recycle whenever possible
- Conserve resources like water, energy and paper
- Look for ways to reduce greenhouse gas emissions
- Dispose of waste properly
- Report any environmental risks
- Watch for and participate in local environmental projects (whether Chubb-sponsored or not) in your community

## Following the law

Chubb follows all environmental laws that apply to us. However, our environmental stewardship goes beyond simply what is required; we are taking significant actions to address climate change through a holistic effort across our business. Help our Company comply with all laws that apply to us and watch for and [speak up](#) about any harmful activity – whether at Chubb or in our third parties' operations.





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## Our Commitment for the Future

Thank you for taking the time to read Chubb's Code of Conduct.

We realize this is a great deal of information to take in. But rest assured, the time it takes to read this Code is time well spent. Being knowledgeable about the risks we face and willing to follow its guidance is of vital importance to Chubb and our mission.

You are so much more than a Chubb employee – you are an ambassador, representing the Chubb name around the world. When you work with the Code as your daily guide, you show the world ...

- What it means to live and work **The Chubb Way**
- Who we are as a Company
- The behaviors we expect
- What we recognize and reward
- The things we believe and the lines we will not cross

Remember, your voice also matters at Chubb. We want to hear from you if you have questions about the Code or our policies, or if you cannot find the answers you need. Never hesitate to ask questions, express your concerns or make suggestions. That is how we model our culture and make the world a better place.



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When you have questions or need guidance, Chubb has resources to help:

Issues or Concerns	Contact
<b>To ask questions or report potential misconduct or other ethical concerns</b>	<ul style="list-style-type: none"> <li>Your manager or the Compliance Officer assigned to your business</li> <li>Any other senior leader</li> <li>Human Resources</li> </ul> <p>Or, if you prefer, you also may contact:</p> <p><b>The Ethics Helpline</b> The <a href="#">Chubb Ethics Helpline</a> is available 24 hours a day, seven days a week in your own language via telephone or online.</p> 
<b>For compliance questions</b>	<ul style="list-style-type: none"> <li>Global Compliance</li> <li>Chubb Life Compliance</li> <li>Asia Pacific Compliance</li> <li>Europe Compliance</li> <li>Latin America Compliance</li> <li>North America Compliance</li> <li>Eurasia and Africa Compliance</li> <li>Far East Compliance</li> <li>Australia and New Zealand Compliance</li> </ul>

Issues or Concerns	Contact
<b>For legal questions</b>	<ul style="list-style-type: none"> <li>Global Legal</li> <li>COG Legal</li> <li>North America Legal Group</li> <li>Latin America Legal Group</li> <li>EMEA Legal Group</li> <li>Asia Pacific and Japan Legal Group</li> <li>Australia and New Zealand Legal Group</li> <li>Global Life Legal Group</li> <li>Global Reinsurance Legal Group</li> </ul>
<b>For legislative questions</b>	Chubb Government Affairs
<b>For financial questions</b>	Global Treasury
<b>For analyst, investor or media requests</b>	Global Communications
<b>For concerns of data breaches</b>	Security Event Response Team
<b>For questions about diversity, equity and inclusion</b>	Chubb's Culture Office
<b>For questions about protecting our data or electronic assets</b>	Global Information Security
<b>For data privacy questions</b>	Global Privacy Office

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Chubb reserves the right to modify this Code at any time, as necessary, along with our policies, procedures and conditions of employment. The Code is not intended as a contract or guarantee of employment.

No waiver of this Code may be made for a member of our Board of Directors or an executive officer without the written consent of our Board of Directors. Any such waiver must then be disclosed to the Company's stockholders, along with the reasons for granting the waiver.

Chubb also supports our employees' right to speak out publicly about matters of public concern and to participate in concerted activities and communications related to terms and conditions of employment. Nothing in any section of our Code or in any of our policies is intended to limit or interfere with that right. That includes activities protected under applicable labor and employment laws, such as Section 7 of the U.S. National Labor Relations Act, such as discussions related to wages, hours, working conditions, health hazards and safety issues.

