D.1	Transparent ownership structure		Y/ N	Reference/ Source document
D.1.1	identity of beneficial owners, holding 5% shareholding or more?	OECD Principle V: Disclosure and Transparency (A) Disclosure should include, but not limited to, material information on: (3) Major share ownership and voting rights, including group structures, intra-group relations, ownership data, and beneficial ownership. ICGN 7.6 Disclosure of ownership the disclosure should include a description of the relationship of the company to other companies in the corporate group, data on	Y	Source: www.chubb.com Investors; Shareholder Resources; Shareholder Meeting Materials; 2019 Chubb Annual Report, page S-11, Item No. 7 Significant Shareholders https://s1.q4cdn.com/677769242/files/doc_downloads/2020/04/update/2019-Chubb-Limited-Annual-Report.pdf
D.1.2	(deemed) shareholdings of major and/or substantial	major shareholders and any other information necessary for a proper understanding of the company's relationship with its public shareholders.	Y	Source: www.chubb.com Investors; Shareholder Resources; Shareholder Meeting Materials; 2019 Chubb Annual Report, page S-11, Item No. 7 Significant Shareholders https://s1.q4cdn.com/677769242/files/doc_downloads/2020/04/update/2019-Chubb-Limited-Annual-Report.pdf
D.1.3	Does the company disclose the direct and indirect (deemed) shareholdings of directors (commissioners)?		Y	Source: www.chubb.com Investors; Shareholder Resources; Shareholder Meeting Materials; 2019 Chubb Annual Report, page S-7, Item No. 5 Common Share ownership of the Board of Directors and Group Executives
D.1.4	Does the company disclose the direct and indirect (deemed) shareholdings of senior management?			https://s1.q4cdn.com/677769242/files/doc_downloads/2020/04/update/2019-Chubb-Limited-Annual-Report.pdf Source: www.chubb.com Investors; Shareholder Resources; Shareholder Meeting Materials; 2019 Chubb Annual Report, page S-7, Item No. 5 Common Share ownership of the Board of Directors and Group Executives
			Y	https://s1.q4cdn.com/677769242/files/doc_downloads/2020/04/u_pdate/2019-Chubb-Limited-Annual-Report.pdf
D.1.5	Does the company disclose details of the parent/holding company, subsidiaries, associates, joint ventures and special purpose enterprises/ vehicles (SPEs)/ (SPVs)?		Y	Source: www.chubb.com Investors; Shareholder Resources; Shareholder Meeting Materials; 2019 Chubb Annual Report, pages 3-9, Segment Information https://s1.q4cdn.com/677769242/files/doc_downloads/2020/04/update/2019-Chubb-Limited-Annual-Report.pdf

D.2	Quality of Annual Report			
	Does the company's annual report disclose the	following items:		
D.2.1	Key risks	"OECD Principle V (A): (1) The financial and operating results of the company; (2) Company objectives, including ethics, environment, and other public policy commitments; (3) Major share ownership and voting rights, including group structures, intra-group relations, ownership data, beneficial ownership; (4) Remuneration policy for members of the board and key executives, including their qualifications, the selection process, other company directorships and whether they are regarded as	Y	Source: www.chubb.com Investors; Shareholder Resources; Shareholder Meeting Materials; 2019 Chubb Annual Report, pages 15-31, Enterprise Risk Management: ITEM 1A. Risk Factors https://s1.q4cdn.com/677769242/files/doc_downloads/2020/04/u pdate/2019-Chubb-Limited-Annual-Report.pdf
D.2.2	Corporate objectives	independent by the board; (6) Foreseeable risk factors, including risk management system; (7) Issues regarding employees and other stakeholders; (8) Governance structure and policies, in particular, the content of any corporate governance code or policy and the process by which it is implemented. OECD Principle V (E): Channels for disseminating information should provide for equal, timely and cost-efficient access to relevant information by users.	Y	Source: www.chubb.com Investors; Shareholder Resources; Shareholder Meeting Materials; 2019 Chubb Annual Report, pages 3-19, "To My Fellow Shareholders" (Evan G. Greenberg, Chairman and Chief Executive Officer) https://s1.q4cdn.com/677769242/files/doc_downloads/2020/04/u pdate/2019-Chubb-Limited-Annual-Report.pdf
D.2.3	Financial performance indicators	ICGN 2.4 Composition and structure of the board ICGN 2.4.1 Skills and experience ICGN 2.4.3 Independence ICGN 5.0 Remuneration ICGN 5.4 Transparency UK Corporate Governance Code (2010) A.1.2 - the number of meetings of the board and those committees and individual attendance by directors. CLSA-ACGA (2010) CG Watch 2010 - Appendix 2	Y	Source: www.chubb.com Investors; Shareholder Resources; Shareholder Meeting Materials; 2019 Chubb Annual Report - page 1, Financial Summary - pages 38-39, Financial Highlights for the Year Ended December 31, 2019 https://s1.q4cdn.com/677769242/files/doc_downloads/2020/04/u pdate/2019-Chubb-Limited-Annual-Report.pdf
D.2.4	Non-financial performance indicators	(I) CG rules and practices (19) Disclose the exact remuneration of individual directors.	Y	Source: www.chubb.com Investors; Shareholder Resources; Shareholder Meeting Materials; 2019 Chubb Annual Report - pages 3-19, "To My Fellow Shareholders" (Evan G. Greenberg, Chairman and Chief Executive Officer) - pages 3-9, Segment Information https://s1.q4cdn.com/677769242/files/doc_downloads/2020/04/u pdate/2019-Chubb-Limited-Annual-Report.pdf

D 2 F	Dividend as line		
D.2.5	Dividend policy	Υ	Source: www.chubb.com Investors; Shareholder Resources; Shareholder Meeting Materials; 2019 Chubb Annual Report, page F-80, Dividend approval and Dividend distributions https://s1.q4cdn.com/677769242/files/doc_downloads/2020/04/update/2019-Chubb-Limited-Annual-Report.pdf
D.2.6	Details of whistle-blowing policy	Y	Source: www.chubb.com Investors; Corporate Governance; Highlights and Governance Documents; The Chubb Code of Conduct, page 6, "How the Ethics Helpline Works" https://s1.q4cdn.com/677769242/files/doc_downloads/Governance%20Documents/2016/The-Chubb-Code-of-Conduct-November-2016.pdf Source: www.chubb.com Investors; Corporate Governance; Chubb Ethics Helpline https://investors.chubb.com/investor-relations/corporate-governance/chubb-ethics-help-line/default.aspx
D.2.7	Biographical details (at least age, qualifications, date of first appointment, relevant experience, and any other directorships of listed companies) of directors/commissioners	Y	Source: www.chubb.com Investors; Shareholder Resources; Shareholder Meeting Materials; 2020 Chubb Proxy Statement, pages 22-28, Our Director Nominees https://s1.q4cdn.com/677769242/files/doc_financials/2020/ar/Chubb-Limited-2020-Proxy-Statement.pdf Source: www.chubb.com Investors; Shareholder Resources; Shareholder Meeting Materials; 2019 Chubb Annual Report, page 48, Chubb Limited Board of Directors https://s1.q4cdn.com/677769242/files/doc_downloads/2020/04/update/2019-Chubb-Limited-Annual-Report.pdf
D.2.8	Training and/or continuing education programme attended by each director/commissioner	N	

D.2.9	Number of board of directors/commissioners			Source:
5.2.3	meetings held during the year	1		www.chubb.com
	, , , , , , , , , , , , , , , , , , , ,	1		Investors; Shareholder Resources; Shareholder Meeting Materials;
	·	1		2020 Chubb Proxy Statement, page 49, Board Meetings
	·	1	,	2020 Chubb Ploxy Statement, page 43, board wicetings
	·	1	Y	
	,	1		
	,	1		https://s1.q4cdn.com/677769242/files/doc_financials/2020/ar/Chu
	,	1		bb-Limited-2020-Proxy-Statement.pdf
	,	1		ov Entitled 2020 Front State Control of the Control
D.2.10	Attendance details of each director/commissioner in	1		Source:
7.	respect of meetings held	1	1	www.chubb.com
	respect of freetings field	1 J	1	Investors; Shareholder Resources; Shareholder Meeting Materials;
]	1 J	1	_
		1		2020 Chubb Proxy Statement, page 117, "Do directors attend the
	,	1	Y	Annual General Meeting?"
	·	1		
	·	1		https://s1.g4cdn.com/677769242/files/doc_financials/2020/ar/Chu
		1		bb-Limited-2020-Proxy-Statement.pdf
	·	1		DD-LIMILEU-2020-PT0XY-Statement.pui
D.2.11	Details of remuneration of each member of the board	1		Source:
J.2.11		1		
	of directors/commissioners	1		www.chubb.com
		1		Investors; Shareholder Resources; Shareholder Meeting Materials;
	·	1		2020 Chubb Proxy Statement, pages 62-64, Director Compensation
	·	1] ,	
	,	1	Y	
	·	1		
	,	1		
		1		https://s1.q4cdn.com/677769242/files/doc_financials/2020/ar/Chu
		1		<u>bb-Limited-2020-Proxy-Statement.pdf</u>
	Corporate Governance Confirmation Statement	<u></u>	<u> </u>	
D 2 42		OFCO ODINCIDIE V/AV/OV	T	Te
D.2.12		OECD PRINCIPLE V (A) (8)		Source:
	confirming the company's full compliance with the	1		www.chubb.com
	code of corporate governance and where there is non-			Investors; Shareholder Resources; Shareholder Meeting Materials;
	compliance, identify and explain reasons for each such	9.8.6 R (for UK incorporated companies) and 9.8.7 R (for overseas		2019 Chubb Annual Report, page 96, Item 10. Directors, Executive
	issue?	incorporated companies) state that in the case of a company that		Officers and Corporate Governance
		has a Premium listing of equity shares, the following items must be		
	I	included in its Annual Report and accounts: a statement of how the		
		I ·		
	I	listed company has applied the Main Principles set out in the UK CG		
		Code, in a manner that would enable shareholders to evaluate how		
	I	the principles have been applied; a statement as to whether the		
		listed company has complied throughout the accounting period with		
		all relevant provisions set out in the UK CG Code; or not complied		
	I	throughout the accounting period with all relevant provisions set		
		out in the UK CG Code, and if so, setting out:		
		dut in the ok es code, and it so, setting out.		
		1		
	•	•	1	_

		(i) those provisions, if any, it has not complied with; (ii) in the case of provisions whose requirements are of a continuing nature, the period within which, if any, it did not comply with some or all of those provisions; and (iii) the company's reasons for non-compliance. ASX CODE: Under ASX Listing Rule 4.10.3, companies are required to provide a statement in their Annual Report disclosing the extent to which they have followed the Recommendations in the reporting period. Where companies have not followed all the Recommendations, they must identify the Recommendations that have not been followed and give reasons for not following them. Annual Reporting does not diminish the company's obligation to provide disclosure under ASX Listing Rule 3.1.		https://s1.q4cdn.com/677769242/files/doc_downloads/2020/04/update/2019-Chubb-Limited-Annual-Report.pdf
D.3.	Disclosure of related party transactions (RPT)	1	1	1
D.3.1	Does the company disclose its policy covering the review and approval of material/significant RPTs?	OECD Principle V: Disclosure and Transparency (A) Disclosure should include, but not limited to, material information on: (5) Related party transactions ICGN 2.11.1 Related party transactions The company should disclose details of all material related party transactions in its Annual Report.	Y	Source: www.chubb.com Investors; Shareholder Resources; Shareholder Meeting Materials; 2020 Chubb Proxy Statement, pages 56-57, "What Is Our Related Party Transactions Approval Policy And What Procedures Do We Use To Implement It?" https://s1.q4cdn.com/677769242/files/doc_financials/2020/ar/Chubb-Limited-2020-Proxy-Statement.pdf
D.3.2	Does the company disclose the name of the related party and relationship for each material/significant RPT?		Y	Source: www.chubb.com Investors; Shareholder Resources; Shareholder Meeting Materials; 2020 Chubb Proxy Statement, pages 56-57, "What Is Our Related Party Transactions Approval Policy And What Procedures Do We Use To Implement It?" https://s1.q4cdn.com/677769242/files/doc_financials/2020/ar/Chubb-Limited-2020-Proxy-Statement.pdf
D.3.3	Does the company disclose the nature and value for each material/significant RPT?		Y	Source: www.chubb.com Investors; Shareholder Resources; Shareholder Meeting Materials; 2020 Chubb Proxy Statement, pages 56-57, "What Is Our Related Party Transactions Approval Policy And What Procedures Do We Use To Implement It?" https://s1.q4cdn.com/677769242/files/doc_financials/2020/ar/Chubb-Limited-2020-Proxy-Statement.pdf

D.4	Directors and commissioners dealings in shares of the	e company		
D.4.1	Does the company disclose trading in the company's shares by insiders?	OECD Principle V (A): (3) Major share ownership and voting rights ICGN 3.5 Employee share dealing Companies should have clear rules regarding any trading by directors and employees in the company's own securities. ICGN 5.5 Share ownership Every company should have and disclose a policy concerning ownership of shares of the company by senior managers and executive directors with the objective of aligning the interests of these key executives with those of shareholders.	Y	Source: www.chubb.com Investors; Financials; SEC Filings; Section 16 Filings https://investors.chubb.com/investor-relations/financials/sec-filings/default.aspx
D.5	External auditor and Auditor Report			
D.5.1	Are audit fees disclosed?	OECD Principle V (C): An annual audit should be conducted by an independent, competent and qualified, auditor in order to provide an external and objective assurance to the board and shareholders that the financial statements fairly represent the financial position and performance of the company in all material respects. OECD Principle V (D): External auditors should be accountable to the shareholders and	Y	Source: www.chubb.com Investors; Shareholder Resources; Shareholder Meeting Materials; 2020 Chubb Proxy Statement, page 19, Independent Auditor Fee Information https://s1.q4cdn.com/677769242/files/doc_financials/2020/ar/Chu bb-Limited-2020-Proxy-Statement.pdf
Where the same o	audit firm is engaged for both audit and non-audit services	owe a duty to the company to exercise due professional care in the conduct of the audit. ICGN 6.5 Ethical standards (Audit)		
D.5.2	Are the non-audit fees disclosed?	The auditors should observe high-quality auditing and ethical standards. To limit the possible risk of possible conflicts of interest, non-audit services and fees paid to auditors for non-audit services should be both approved in advance by the audit committee and disclosed in the Annual Report.	Y	Source: www.chubb.com Investors; Shareholder Resources; Shareholder Meeting Materials; 2020 Chubb Proxy Statement, page 19, Independent Auditor Fee Information
				https://s1.q4cdn.com/677769242/files/doc_financials/2020/ar/Chu bb-Limited-2020-Proxy-Statement.pdf
D.5.3	Does the non-audit fee exceed the audit fees?		Y	Source: www.chubb.com Investors; Shareholder Resources; Shareholder Meeting Materials; 2020 Chubb Proxy Statement, page 19, Independent Auditor Fee Information https://s1.q4cdn.com/677769242/files/doc_financials/2020/ar/Chu

D.6	Medium of communications			
	Does the company use the following modes of commu	nication?		
D.6.1	Quarterly reporting	OECD Principle V (E): Channels for disseminating information should provide for equal, timely and cost-efficient access to relevant information by users. ICGN 7.1 Transparent and open communication Every company should aspire to transparent and open communication about its aims, its challenges, its achievements and	Y	Source: www.chubb.com Investors; Financials; Quarterly Reports https://investors.chubb.com/investor- relations/financials/quarterly-reports/default.aspx
D.6.2	Company website	its failures. ICGN 7.2 Timely disclosure Companies should disclose relevant and material information concerning themselves on a timely basis, in particular meeting	Y	https://www.chubb.com/us-en/ https://www.chubb.com/ph-en/
D.6.3	Analyst's briefing	market guidelines where they exist, so as to allow investors to make informed decisions about the acquisition, ownership obligations and rights, and sales of shares.	Υ	Source: www.chubb.com Investors; Shareholder Resources; Sell-Side Analysts https://investors.chubb.com/investor-relations/shareholder- resources/sell-side-analysts/default.aspx
D.6.4	Media briefings /press conferences		Υ	Source: www.chubb.com News; Corporate News https://news.chubb.com/
D.7	Timely filing/release of annual/financial reports			
D.7.1	Are the audited annual financial report / statement released within 120 days from the financial year end?	OECD Principle V (C) OECD Principle V (E) OECD Principle V-(A). ICGN 7.2 Timely disclosure ICGN 7.3 Affirmation of financial statements The board of directors and the corporate officers of the company	Y	Source: www.chubb.com Investors; Financials; SEC Filings; Annual Filings; Filing Type 10-K, Date: 02.27 2020 (see Exhibits 32.1 and 32.2) http://d18rn0p25nwr6d.cloudfront.net/CIK-0000896159/c7314d77-07e4-487d-a3d5-6f569e08029d.pdf
D.7.2	Is the annual report released within 120 days from the financial year end?	should affirm at least annually the accuracy of the company's financial statements or financial accounts.	у	Source: www.chubb.com Investors; Financials; SEC Filings; Annual Filings; Filing Type 10-K, Date: 02.27 2020 (see Exhibits 32.1 and 32.2) http://d18rn0p25nwr6d.cloudfront.net/CIK-0000896159/c7314d77- 07e4-487d-a3d5-6f569e08029d.pdf

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D.7.3	Is the true and fairness/fair representation of the annual financial statement/reports affirmed by the			Source: www.chubb.com
	board of directors/commissioners and/or the relevant			Investors; Shareholder Resources; Shareholder Meeting Materials;
	officers of the company?			2019 Chubb Annual Report,
	officers of the company:			- pages 107-108, Signatures
				- page F-3, Management's Responsibility for Financial Statements
			Y	I 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
				and Internal Control over Financial Reporting
				https://s1.q4cdn.com/677769242/files/doc_downloads/2020/04/u
				pdate/2019-Chubb-Limited-Annual-Report.pdf
D.8	Company website			
	Does the company have a website disclosing up-to-dat	te information on the following:		
D.8.1	Business operations	OECD Principle V (A)		Source:
				www.chubb.com
		OECD Principle V (E)	Y	News; Corporate News
		ICGN 7.1 Transparent and open communication		https://news.chubb.com/
D.8.2	Financial statements/reports (current and prior years)	ICGN 7.2 Timely disclosure		
		ican 7.2 Timely disclosure		Source:
				www.chubb.com
				Investors; Shareholder Resources; Shareholder Meeting Materials;
			v	2019 Chubb Annual Report, pages S-1 to S-3, Swiss Statutory
			Y	Financial Statements
				https://s1.q4cdn.com/677769242/files/doc_downloads/2020/04/u
				pdate/2019-Chubb-Limited-Annual-Report.pdf
D.8.3	Materials provided in briefings to analysts and media			
				Source:
				www.chubb.com
				Investors; Shareholder Resources; Shareholder Meeting Materials;
			Υ	2019 Chubb Annual Report, pages S-1 to S-3, Swiss Statutory
			'	Financial Statements
				https://s1.q4cdn.com/677769242/files/doc_downloads/2020/04/u
				pdate/2019-Chubb-Limited-Annual-Report.pdf
D.8.4	Shareholding structure			
1				Source:
				www.chubb.com
				Investors; Shareholder Resources; Shareholder Meeting Materials;
				2019 Chubb Annual Report, pages 49, Shareholder Information
			Y	
				https://s1.q4cdn.com/677769242/files/doc_downloads/2020/04/u
				pdate/2019-Chubb-Limited-Annual-Report.pdf

D.8.5	Group corporate structure		T	
0.8.5	Group corporate structure		Y	Source: www.chubb.com Ahout Us: Ahout Chubb: Who We Are https://www.chubb.com/us-en/about-chubb/who-we-are.aspx
D.8.6	Downloadable annual report		Y	Source: www.chubb.com Investors; Shareholder Resources; Shareholder Meeting Materials; 2019 Chubb Annual Report https://s1.q4cdn.com/677769242/files/doc_downloads/2020/04/update/2019-Chubb-Limited-Annual-Report.pdf
D.8.7	Notice of AGM and/or EGM		Y	Source: www.chubb.com Investors; Shareholder Resources; Shareholder Meeting Materials; Swiss Invitation to the 2020 Chubb AGM https://s1.q4cdn.com/677769242/files/doc_downloads/2020/04/S wiss-Invitation-to-Chubb-Limited-2020-AGM.pdf
D.8.8	Minutes of AGM and/or EGM		N	
D.8.9	Company's constitution (company's by-laws, memorandum and articles of association)		Y	Source: www.chubb.com Investors; Corporate Governance; Highlights and Governance Documents; Articles of Association of Chubb Limited https://s1.q4cdn.com/677769242/files/doc_downloads/Governance%20Documents/2020/Articles-of-Association-5.20.2020-(AuthShare-Capital).pdf
D.9	Investor relations			
D.9.1		ICGN 7.1 Transparent and open communication	Y	Source: www.chubb.com Investors; Shareholder Resources; Contact IR https://investors.chubb.com/investor-relations/shareholder- resources/contact-ir/default.aspx