ZURICH



We care.

Our Group's Code of Conduct

Foreword



Dear colleagues,

As an insurer, we have a crucial responsibility to our customers and society. By behaving ethically and responsibly and by standing up for what is right, we demonstrate to our customers, each other and all our stakeholders that we care about them and that we are worthy of their trust, something that is vital for our long-term success.

Our industry is undergoing a fundamental transformation. In this evolving landscape, Zurich must remain agile to position itself for continued success in order to exceed our customers' and other stakeholders' expectations. While our business is changing, our commitment to ethical behavior remains steadfast.

We are committed to fostering a culture of ownership and accountability at Zurich. Together, we are responsible for embodying our Code of Conduct in everything we do, while holding each other accountable for our actions. While the Code cannot address all situations we may face, together with our purpose and values, it provides us with a north star that guides us in ensuring everything we do is held to the highest ethical, legal and professional standards.

Thank you for your commitment to standing up for what is right and protecting our reputation.

Mario Greco
Group Chief Executive Officer

Watch the video online ›

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We care about doing the right thing



… because living by our values, making ethical decisions, and speaking up when we see something that does not seem right is crucial for us to maintain the trust of each other, our customers, investors, regulators and society.

Watch the video online >

Living by our purpose and values

Our purpose and values guide the actions that we take both individually and as a business. As our world changes at an unprecedented pace, it is increasingly important to maintain a clear view of what we stand for and why we are in business.

We have the ambition to be one of the most responsible and impactful businesses in the world and we can only achieve this ambition by living our purpose and values every day.



Our purpose

Our world needs actions, not just words. We are in business to create a brighter future together with our customers with sustainable products and services.

By driving proactive prevention and protecting our customers, we empower them with a freedom of choice to explore what is next in their lives and their businesses while maintaining the peace of mind that should they need us, we are here.

Our values

- Optimism
- Determination
- Caring
- Togetherness
- Reliability
- Forward-thinking

Our purpose and values clearly set out why we are in business and provide the foundation for our strategy.

The essence of our business is about customer relationships and the success of our strategy lies in being able to delight our customers with experiences that are uniquely Zurich at every touch point.

More information:

- Our strategy
- Our purpose and values
- Our behaviors*

** internal link*

Acting with integrity

We conduct ourselves with honesty, fairness, dignity and integrity in our workplace and whenever we act on Zurich's behalf.

Our rules of conduct give a reference for the decisions we make every day, and our actions and business goals must be consistent with those rules.

We adhere to all laws, rules and regulations of the countries in which Zurich operates, as applicable at our workplace, as well as with our internal policies.

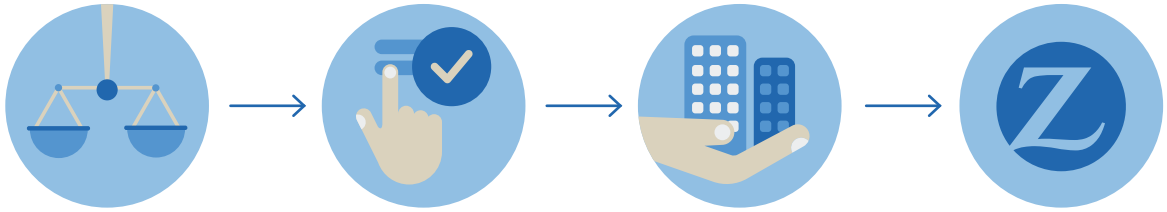
We understand and manage the challenges that may arise in our daily work. If we are uncertain about any of the topics covered in this Code, we consult with our line manager. Our Legal and Compliance functions are here to help and advise on legal and regulatory requirements.

Doing the right thing, however, means not only following the rules, but also using our best judgment. Not all situations have a specific guideline to support our actions, nor can this Code address all decisions and potential dilemmas that we may face.

This is why in all of our decisions, we are guided not only by applicable laws and regulations and internal guidelines, but also by what is the right thing to do.



If unsure what to do when faced with a decision, ask yourself the following questions:



Is it legal?

Consider whether the decision complies with applicable laws and regulation.

Is it the right thing to do?

Consider whether the decision reflects the standards of conduct articulated in this Code and our internal standards and policies, as well as our purpose and values. Ask yourself not only whether you can do something, but whether you should.

Is it in our company's and stakeholders' best interest?

Consider whether the decision honors our commitment to our customers, is respectful of the rights of our colleagues and others we work with, and serves our company's long-term interest. Ask yourself whether the decision places your personal interest in conflict with those of the company or our customers.

Is it reflective of our brand and what Zurich stands for?

Consider whether you would be comfortable if the decision were made public and whether it could hurt our reputation and/or diminish trust in us, or negatively impact others (e.g., customers, shareholders, colleagues, or the public).

If your answer to any of these questions is "No", or if you are in doubt, you should pause, reconsider, and consult with your line manager, Legal or Compliance.



We are all accountable for our own conduct and actions and each of us has a role to play in living up to our values and this Code. Accordingly, if we believe we have been instructed to do something that is illegal, unethical, or violates this Code or any Zurich policy, we raise our concerns. Managers have an added responsibility to lead by example and to set clear expectations around the standards of conduct to which all employees are required to adhere.

Zurich is further committed to forthright, full and prompt disclosure when communicating with regulators, supervisors and governments. This means we are open, honest and cooperative with government investigations or regulatory examinations that involve Zurich, as well as with internal investigations.

Once a government, internal investigation or regulatory examination is underway, we take care to maintain any paper or electronic information relevant to the investigation or examination.



Speaking up and reporting concerns

Doing the right thing and speaking up helps protect Zurich, our integrity and our reputation.

Zurich is committed to a Speak Up culture where we appreciate that everyone has a valuable contribution to make and employees and others feel comfortable sharing their views and raising their concerns.

We are encouraged to constructively express our opinions, contribute ideas, or challenge the status quo to help us create a brighter future together. In particular, we speak up promptly and report conduct that we believe in good faith (i.e., with reasonable grounds to believe the information reported is true at the time of reporting) may violate laws, regulations, internal policies or this Code.

There are multiple channels to raise concerns, including to line managers, Legal, Compliance, or Human Resources. We reach out to our line managers or Human Resources regarding concerns, suggestions or questions about our jobs or working conditions.

The Zurich Ethics Line may also be used to report concerns either via telephone or online via a web form. Reports can also be made anonymously.

Confidentiality and no tolerance for retaliation.

We treat all reported concerns (particularly the identity of any employee or other person who reports a concern), as well as any investigations that may be undertaken, with strict confidentiality, to the extent possible and consistent with Zurich's legal obligations.

Zurich does not tolerate retaliation against any employee or other person who reports a concern in good faith. Protection against retaliation is also extended to those who assist in any investigation of such concerns and, where applicable, to other persons.

More information:

- Our Speak Up culture*
- Zurich Ethics Line
- Group Policy: Reporting of Improper Conduct and Concerns*

** internal link*

Adhering to this Code

This Code sets out our purpose and values and the minimum standards of conduct expected from us.

We are all expected to read, understand and adhere to the provisions set forth in this Code. This Code is supplemented by other internal policies, some of which are referenced throughout this Code.



Applicability

Our Code applies to everyone at Zurich and its subsidiaries worldwide, including board members and employees including management. Regardless of our role, responsibilities or where we are located in the world, we each do our part to consider the Code and related policies as we go about our daily activities and decisions. We endeavor to work with third parties such as consultants, advisers, suppliers and agents who share our values, and we expect our business partners to adhere to the spirit of our Code and embrace high standards of business conduct.

Annual Personal Awareness and Acknowledgment (APAA)

All of us at Zurich are required to acknowledge that we have read our Code, and that we understand and agree to be bound by the provisions contained in our Code and our other internal policies. We are asked to do so upon hire, and annually after that.

Adherence to the Code is important for all of us

Non-compliance with any provision of this Code may constitute grounds for disciplinary action, up to and including termination of employment. A breach of our Code may also constitute a violation of applicable law, and may result in civil or criminal fines or penalties, including imprisonment, for you.



We care about our colleagues

... because we know that we can only be successful if we work as a team, and that mutual respect is vital in order for each and every one of us to live up to our full potential.

Watch the video online >

Treating each other with fairness and understanding

Combining global scale with local service, we help our customers protect the people, places and things that matter most. For something this important we need the best from everyone at Zurich, and this is why our people are Zurich's most important asset.



Our passion, personal integrity and engagement are crucial factors for the shared success of our company and will help us achieve our strategy and deliver on our purpose.

Mutual respect and understanding of each other's views are essential to togetherness, building trust and working together as a team – as we live up and work towards our employee promise of Let's Grow Together. We treat others with openness and fairness and appreciate that everyone has a valuable contribution to make.

Zurich does not tolerate harassment, discrimination or bullying in the workplace, whether based on race, ethnicity, color, age, sex, gender, gender identity or expression, sexual orientation, national origin, religion, disability, pregnancy, veteran status, or any other relevant characteristic protected under applicable law. This applies regardless of an individual's duties or position within the company.

These principles apply to all aspects of the employment relationship, such as recruiting, assignments, training, promotion, compensation, discipline and termination.

Zurich maintains an environment free from all forms of discrimination and harassment. We are encouraged to contact our manager or Human Resources regarding any instances of harassment, discrimination or bullying. We may also use the Zurich Ethics Line to raise any such concerns. Zurich does not tolerate retaliation against any employee who reports a concern in good faith.



What does it mean for me?

We each have a responsibility to create an environment free of discrimination and harassment. You should discourage and speak out against any behavior that is contrary to this.

More information:

- Zurich Ethics Line
- Diversity, Equity, Inclusion and Belonging



Fostering a diverse and inclusive environment

We take pride in the diversity of our workforce, as it contributes to making Zurich an employer of choice, while helping us drive innovation and maintain a competitive edge.

We value and manage diversity through an inclusive and supportive environment, since this is critical in helping to drive innovation and build employee engagement. We aim to create a workplace where we can all thrive and where everyone's voice is heard. We embrace and endeavor to harness our different experiences, skills and perspectives.

We are committed to fair and equal treatment of all employees and all people who seek employment at Zurich, including equal opportunities for development and advancement.

Zurich invests in our growth by fostering a learning culture in which potential is developed, performance is reviewed and feedback from all stakeholders is encouraged and appreciated.

Zurich recognizes the right of its employees to freedom of association and collective bargaining and to freely form and join groups for the promotion and protection of employment interests.

What does it mean for me?

If I ask Human Resources to talk to my boss because he said that the IT position is a 'man's job', will I put my job in jeopardy? **– No. Retaliation for reports made in good faith is not tolerated at Zurich.**

A co-worker makes ethnic jokes on a regular basis and I feel uncomfortable about it. What can I do? **– Ask the co-worker to stop, since Zurich prohibits that type of behavior. If that doesn't work or if you are not comfortable speaking to your co-worker directly, speak with your manager or Human Resources, or call the Zurich Ethics Line.**

More information:

- Diversity, Equity, Inclusion and Belonging

Leading by example

We all aspire to work for managers who truly value our input. This is why whenever we lead others, we treat them with respect and dignity, acknowledge their contributions, actively seek and consider their views, ideas and concerns, and set a good example by demonstrating integrity.

People managers have a special responsibility to uphold and demonstrate our commitment to ethical conduct, and to create an inclusive working environment that inspires empowerment and accountability in all of us.



What does it mean for me?

At Zurich, we value and reward high performance, but above everything else, we are committed to ethical conduct. As a people manager, you need to make it clear to your team members that no business and no short-term gain are ever worth risking Zurich's reputation or our commitment to doing the right thing. Even in the face of ambitious goals or tight deadlines, we must always act with integrity.

All of our people managers are expected to:

Be a role model
As people managers, we lead by example and uphold Zurich's commitment to doing the right thing in everything we say and do. We understand that our decisions and the way we handle ethical situations set the culture for our team.

Communicate expectations
We inform our team members about their responsibilities and make it clear that we expect them to always live by this Code and make ethical decisions.

Promote open and honest dialogue
We actively seek our team members' input and give them the opportunity to provide feedback and speak up. We create an environment where all team members feel comfortable sharing opinions, raising concerns or asking for guidance.

Handle concerns respectfully
We listen carefully when a concern is raised and we take concerns seriously. We ask Human Resources for support on concerns or questions around our team members' jobs or working conditions, and we forward all alleged violations of laws, regulations, policies or this Code to Legal, Compliance, Human Resources or any other appropriate function, and do not conduct investigations on our own. We keep concerns, as well as any investigations that may be undertaken, strictly confidential, to the extent possible and consistent with Zurich's legal obligations. We emphasize Zurich's non-retaliation policy to reassure our team members and others that retaliation will not be tolerated (for more details, please see chapter Speaking up and reporting concerns.)

Ask for advice
If we are ever in doubt of the right course of action when faced with an ethical question or dilemma, we seek advice from our Legal or Compliance teams.

Providing a healthy and safe workplace

We endeavor to provide a safe and healthy working environment for all employees.

We strive to create working conditions that promote work-life balance and employee wellbeing.

We comply with all applicable health and safety policies and requirements such as:



Keeping our working area clean, healthy and free from hazards that can lead to accidents, emergencies, health issues or security risks.



Avoiding any behavior or actions that could put you or your colleagues at risk.



Promptly addressing and reporting any safety or health concerns, risks or hazards.



What does it mean for me?

Make sure that you are familiar with the safety program and the evacuation plan for your office building and floor.

Familiarize yourself with the Wellbeing Framework@Zurich and consult Human Resources to find out more about global and local employee wellbeing initiatives.

More information:

- Health & Safety and Physical Security*
- Wellbeing Framework @Zurich*

** internal link*

We care about our customers

... because they are the reason we are in business. Putting their needs at the heart of what we do and providing them with protection for the things and people they value has been our mission since Zurich was founded in 1872.

Watch the video online >



Focusing on the customer

Zurich was founded in 1872, and has long been a reliable and stable company in an unstable world, with dedication and a deep history of using our expertise to help care for society and people.

Our purpose is to create a brighter future together with our customers across the world. Our customers range from individuals, small businesses, mid-sized and large companies to multinational corporations. We strive to make them feel confident that they are doing their best to protect themselves, their families, their businesses and our world. Additionally, they should have peace of mind that they contribute towards sustainable businesses and practices.

We are committed to become the sustainable choice for our customers, because we understand that our role as an insurer is not only to help our customers protect themselves today, but to help them and our world adapt to the risks of tomorrow.

We endeavor to provide our customers with personalized services, expert advice and peer-to-peer information to assist them in identifying and mitigating risks – and with reliable protection and support in case something happens.

All employees have an important part to play in our quest to create a brighter future together with our customers. Regardless of our role within the company, we are all working to serve our customers. Our actions should be driven by our customers and the goal to have a positive impact towards a brighter future for society and our planet.





What does it mean for me?

In all business activities, make sure you keep the customer at the heart of what you do and promote positive customer outcomes.

Never put short-term gains over long-term success. Our company will succeed through building long term relationships with our customers and by empowering sustainable practices.

Never lose focus on the customer when driving forward innovation.

More information:

- Our purpose and values

Ensuring appropriate Customer Facing Conduct

We are committed to delivering on our promises and standing up for what is right. This includes fostering behavior that puts our customers' needs at the center of our business.

We strive to manage the risks of poor outcomes for our customers and we conduct our business in a way that seeks to treat customers fairly.

Customer Facing Conduct describes the activities we undertake every day as we aim to maximize the likelihood of fair and positive outcomes for our customers, regardless of whether they are individuals or organizations.





What does it mean for me?

Consult with your manager or Compliance whenever you have doubts about whether our Customer Facing Conduct is meeting the standards of conduct outlined in this Code.

Customer Facing Conduct encompasses four main areas:



Proposition Management

We design products, services or experiences that meet the needs of our target customers.



Sales and Distribution

We sell products and services that are appropriate for our customers' needs.



Claims and Payouts

We deliver on the promises made to our customers through the appropriate handling of claims and payouts.



Customer Service and Complaints

We provide considerate service to our customers and deal with customer complaints fairly and in a timely fashion.

More information:

- Customer Facing Conduct*

** internal link*

Protecting data and safeguarding confidential information

Trust is at the core of our business, and we have a responsibility to keep the data of our customers, as well as of employees and other stakeholders, secure and only use it in a legal and transparent manner. In line with this, Zurich is committed to high standards of data protection and privacy.

We protect personal data and respect the privacy rights of customers, employees and other individuals across our operations globally.

We honor our customers' long-standing trust with our data commitment and make a promise to our customers to:

- Keep their data safe;
- Never sell their personal data;
- Not share their personal data without being transparent about it; and
- Put their data to work so Zurich can better protect them, and so they can get the most out of life.

We collect, process and share personal data of our customers, employees and other individuals fairly and only for specified and legitimate purposes.

We respect the privacy rights and preferences of the individuals whose data we process. We access, use and share confidential information, including personal data, on a "need-to-know" basis only. In addition, before transferring data across national borders, including to other Zurich entities, we confirm whether special requirements apply.





What does it mean for me?

Familiarize yourself with the key processes and tools that will enable you to be compliant with applicable data protection and privacy requirements. You can find further information in our Group Policy: Data Protection and Privacy (linked below).

I have sent a confidential email that includes an attachment with personal data to the private email address of my colleague instead of the work email. What should I do? – **This is a personal data incident. Keep in mind that data incidents and potential breaches must be reported through appropriate management channels as quickly as possible. Consult with your local data protection and privacy contact or Data Protection Officer if you have any questions or concerns.**

More information:

- Group Policy: Data Protection and Privacy*
- Data commitment and privacy protection

** internal link*



We care about business integrity

... and ethical behavior because conducting all our business in a compliant and fair manner helps prevent criminal, illegal and unethical activities and preserves the transparency and integrity of the markets.

Watch the video online >

Preventing financial crime

In all aspects of our business, we know the legal requirements and internal guidelines and comply with them. We have an unwavering commitment to fair and responsible business conduct and to preventing and detecting potential misuse of our products and services for illegal, criminal or unethical purposes.



What does it mean for me?

A broker has offered me tickets to a local sporting event. Can I accept them? **– Possibly, however, you must consider whether there are any negotiations under way or whether the invitation could be considered lavish. You may need to obtain line manager approval if the value is over the local GEOA threshold and, in any event, record it appropriately in your local GEOA tool or via the applicable local process.**

A supplier has invited me to a business dinner, can I accept the invitation? **– Business lunches and dinners are addressed by the Anti-Bribery and Anti-Corruption Policy and if the purpose of the invitation is to maintain business relationships, it is likely acceptable. However, if the value of the dinner is above the local threshold, you must obtain line manager approval and, in any event, record it appropriately in your local GEOA tool or via the applicable local process.**

Anti-bribery and anti-corruption

Zurich is committed to fair and responsible business and prohibits all forms of bribery and corruption, as well as any business conduct that could create the appearance of improper influence.



We refrain from giving or accepting any gifts, entertainment or other advantages (GEOA) in connection with business activities unless they are appropriate to the circumstances, moderate in terms of value and frequency and in line with local GEOA thresholds.



In particular, we do not give, offer, or accept GEOA that are cash payments or cash equivalents; may create the appearance of obtaining or retaining an improper business or personal benefit or undue government action; or could cause a conflict of interest for either party.



We comply with applicable laws and Zurich's Group Policy: Anti-Bribery and Anti-Corruption so that political, charitable and similar contributions and sponsorships made by Zurich are not, nor are seen to be, used for any illegal, criminal or unethical purpose.



We also take all reasonable steps so that all payments to and from third parties are appropriate, supported by sound business rationale, and are correctly recorded and accounted for. This includes completing appropriate due diligence on third parties before engagement and throughout the duration of the relationship.

More information:

- Group Policy: Anti-Bribery and Anti-Corruption*

** internal link*

Anti-money laundering, counter-terrorist financing and customer tax compliance

We are committed to high standards of anti-money laundering, counter-terrorist financing and tax compliance. This includes protecting Zurich's reputation by promoting a sound culture of risk awareness as well as disciplined and informed risk taking.

Zurich does not permit engaging in transactions that are illegal or compromise our values or engaging in business with any person attempting to use our products or services for illegal purposes.

We adhere to Group and local anti-money laundering rules and requirements and know that we should contact Compliance in a proactive and timely manner in case of any doubts or suspicions related to a business partner or transaction.

We are committed to sustainable, well-governed and transparent Group tax affairs.

We comply with applicable governmental reporting obligations for customer tax compliance, and have adopted policies and controls which support compliance with the Foreign Account Tax Compliance Act and the Common Reporting Standard, as well as other applicable tax regulations.





What does it mean for me?

I have received a request from a customer to terminate their life insurance contract only three months after encashment of the single premium, and to issue the payment to a third party. What should I do? **– You should consult with your line manager and contact Compliance.**

More information:

- Zurich tax strategy
- Group Policy: Anti-Money Laundering and Counter-Terrorist Financing*
- International Automatic Exchange of Information for tax purposes*

** internal link*

Trade and economic sanctions

We adhere to all applicable trade and economic sanctions in all our business activities.

We make sure that we are aware of laws and regulations that prohibit or restrict doing business with certain countries, entities or individuals, as well as laws and regulations that prohibit or restrict business activities with exposure to certain underlying activities that Zurich's clients may perform.

We understand applicable business processes that are in place to mitigate applicable sanctions risk of relevant activities. This includes understanding regulations that apply based on our roles and nationality, e.g., the U.S. Office of Foreign Assets Control (OFAC) regulations for U.S. persons worldwide.



What does it mean for me?

I am an underwriter, and a U.S. citizen based in Europe. Do I have to follow U.S. Sanctions requirements, as the business I am working on has no U.S. exposure? **– Yes, the nationality / citizenship of any U.S. employee, even if based overseas, makes the individual a 'U.S. person', in which case the U.S. OFAC sanctions would apply, even to a non-U.S. business. Contact Compliance for further guidance.**

More information:

- Group Policy: Trade & Economic Sanctions*

** internal link*

Promoting fair and free markets

We firmly believe that our customers, employees, shareholders and communities are best served through a strong, competitive and fair marketplace for insurance. It is up to each of us to protect and preserve the integrity and transparency of the markets.

Antitrust and fair competition

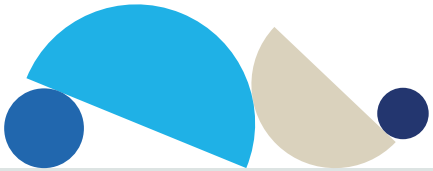
Any activities that impact free and fair competition could have a significant negative impact on the marketplace, our clients as well as our reputation. We do not engage in any anti-competitive practices or behaviors that are illegal or inconsistent with this Code.

Therefore, we do not enter into agreements, understandings or coordinated activities with actual or potential competitors that may eliminate or lessen free and fair competition. In particular, we do not agree or coordinate with competitors to fix prices, premiums or specific elements thereof. We do not limit or restrict the type or quantity of products or services supplied; or allocate markets geographically or according to trading partners, customers segments or product lines.

We also do not enter into agreements or arrangements with entities operating at different levels of the distribution chain, such as agents, distributors or suppliers, that may eliminate or lessen free and fair competition, in violation of applicable laws.

We do not abuse a dominant position in a particular market, nor use competitors' confidential information without proper authorization or misuse intellectual property.

There are many situations that can create the potential for violations of antitrust and competition laws. So, if we participate in insurance associations, industry trade organizations and other meetings or events involving our competitors, we are especially mindful of all applicable laws and regulations.





What does it mean for me?

A competitor's representative suggests that Zurich sell insurance products only in certain regions of a country, whereas the competitor would sell its insurance products in other regions of the same country. Is this arrangement acceptable? **– No! This is not permissible as it would violate antitrust laws prohibiting market diversion. The geographical allocation would hurt the insurance market in the country as Zurich and the competitor would no longer have an incentive to develop and offer better and/or more competitive products to customers in the country in order to gain a competitive advantage on each other.**

More information:

- Group Policy: Antitrust and Competition*

** internal link*

Dealing in securities

As part of our day-to-day work, we may obtain inside information, which is any non-public information that could be price-sensitive, i.e., affect the price of a security. We protect inside information we possess and do not use or misuse such information whether for our own or anyone else's investments.

We understand that we should never trade in Zurich securities or securities of other companies (either directly or through other persons) while in possession of inside information. We also do not provide tips or make recommendations about any securities while in possession of inside information.



Before trading Zurich securities, we exercise particular care and seek all necessary approvals.

Trading includes any sale, purchase, or agreement to sell or purchase any securities or interest in such securities, including if it is done off-market.

It is illegal to give false or misleading signals capable of influencing market behavior (i.e., 'market manipulation').



What does it mean for me?

My friend is a trader. Can I give him a head start and provide him with Zurich figures before they are publicly announced? **– No. You are not allowed to disclose Zurich financial results at any time before their public announcement.**

More information:

- Group Policy: Dealing in Securities*
- Zurich Risk Policy: MR 3a - Market and Investment*
- Zurich Risk Policy: MR 5g - Information Security*
- Zurich Risk Policy: MR 6a - M&A*

** internal link*



Respecting human rights

We respect the protection of international human rights within our sphere of influence and will work hard to avoid being complicit in human rights abuses.

When interacting with customers, employees, shareholders, suppliers, the public at large or any other stakeholder, we aim to promote the following international best practice standards to manage potential adverse human rights impacts:

- Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework
- OECD Guidelines for Multinational Enterprises
- United Nations Global Compact

By signing the UN Global Compact in 2011, we committed to aligning our strategy, culture and day-to-day operations with the Global Compact's ten universally accepted principles in the areas of human rights, labor, environment and anti-corruption.

We pay special attention to transactions that might contravene human rights and forced labor.

Working with suppliers

We endeavor to work with suppliers who share our values, and we expect high standards of ethical conduct from those who represent us or do business with us. We expect our suppliers to operate their business with integrity and using high standards of business conduct, such as the UN Global Compact or international labor standards as outlined in the eight International Labour Organization (ILO) conventions considered fundamental to the rights of human beings at work, as set out in our Supplier Code of Conduct.



What does it mean for me?

It has come to my attention that one of our suppliers is sourcing goods from a country that is known for human rights abuses. What should I do? **– You should seek advice from your local Sourcing & Procurement team.**

More information:

- Respecting human rights
- ILO Conventions
- Supplier Code of Conduct

We care about our company



... because we are proud of Zurich's heritage and brand, and understand that protecting our reputation and our assets is critical for our long-term success.

Watch the video online >

Retaining and managing records

Managing our records and maintaining accurate data helps us make sound business decisions, comply with laws and regulations, and maintain the trust of our stakeholders.



We accurately and completely record all relevant business transactions and deal with financial data accurately, promptly and with due care while following Zurich's accounting principles.

Records and data, including paper-based, electronic files, and emails, should be kept as long as required by law, regulation or policy. If a Legal Hold is in place, the disposal of all or certain categories of documents has been suspended. We pay careful attention to the details of any such Legal Hold and comply with its obligations strictly. We seek guidance if we have questions regarding how it applies to us.

We understand that we should report any order or instruction to destroy or delete records and data to our manager or consult with Legal or Compliance if the retention period for the document has not yet expired.

Records and data must be available and accessible to authorized persons within the appropriate timeframe, and we must never alter or falsify information on any record. Fraudulent alteration, correction or falsification can never be justified by any business goal.



What does it mean for me?

How do I know which documents are considered to be "records"? **– Check with your Records Coordinator in your business unit to understand what defines a "record" in your jurisdiction, as not all documents are deemed "records".**

How do I know how long I should keep records? **– Each business unit or function has a local Records Retention Inventory and Schedule which sets forth applicable retention periods for records. If you do not know how to locate your local Records Retention Inventory and Schedule, check with the Information Owner before taking any action.**

More information:

- Group Policy: Records Retention*
- Zurich Risk Policy: MR 5g – Information Security*
- Zurich Risk Policy: MR 5k – Fraud*

** internal link*



Disclosing conflicts of interest and external engagements

Zurich's reputation depends on our actions and integrity. It is important that our decisions are based on the interests of our company and shareholders, and not based on self-interest.

Every day we make business decisions and occasionally we may be presented with a conflict of interest between Zurich's interest and our own personal interests.

We maintain our objectivity and do not compromise our judgment by personal interest.

We refrain from any activity if a potential conflict of interest arises and speak to our line managers.

We disclose any potential conflict of interest to our line manager and we properly manage or eliminate the conflict.

Serving as a director, officer, or advisor of a company or organization outside of the Zurich Group (where Zurich is not the majority shareholder) requires us to employ particular care and obtain prior approval from our line manager before accepting such a position.



What does it mean for me?

My wife is the CEO of a local software company that is bidding for a contract with Zurich. Do I need to disclose this connection? **– Yes. This could create a conflict of interest and should be disclosed to your line manager who will determine how the conflict should be managed.**

I have been asked to serve on the board of directors of a non-Zurich corporation that supplies services to Zurich. Do I need to disclose this to Zurich? **– Yes, this is an external engagement and approval is required from your line manager.**

More information:

- Group Policy: Conflicts of Interest and External Engagements*

** internal link*

Protecting our assets and preventing fraud and crime

The misuse of Zurich's property or the property entrusted to us would negatively impact our reputation and our interests.

Protecting our assets and preventing fraud and crime are key to building and maintaining the trust of our stakeholders. We must all take precautions to safeguard and protect Zurich property.

We comply with information security standards and employ best practices to protect Zurich's data and information assets from loss, theft or misuse.

We use Zurich property and resources for business purposes and not for personal or professional gain or for inappropriate or unlawful purposes. We avoid unauthorized or improper use or disclosure of the Zurich name, logo, service mark, trademark, trade secret, confidential document, patent or copyright.

We also never misuse our position, including for fraudulent or illegal purposes.

We understand that it is prohibited to misappropriate or illegally conceal, divert or obtain money, assets, data, information or services, as well as to misrepresent or falsify information.



What does it mean for me?

While away on leave, may I lend my access badge to a Zurich colleague from another office so he can access the building if required? **– No. You should never give your access badge to anyone else, as this compromises our access control systems, which are designed to prevent unauthorized entry and help to protect the safety and security of our people and assets.**

Use of electronic devices provided by Zurich for private purposes is allowed only to a limited degree, as outlined in the Regulation on the use of electronic information / communications systems.

More information:

- Zurich Risk Policy: MR5g – Information Security*
- Zurich Risk Policy: MR5k – Fraud*
- Zurich Risk Policy: MR5e – Security and Safety*
- Regulation on the use of electronic information / communications systems*

** internal link*



Communicating with external parties

Forthright and accurate communication with our stakeholders helps us to successfully manage both our reputation and brand.

We direct requests for information from outside Zurich to the appropriate function according to local guidelines. Special rules apply to responding to inquiries from certain external parties.

We refer all requests for information from the media, including via social media channels, to the respective local Media Relations office, local spokesperson or the Media Relations department.

Queries from investors, analysts or shareholders should be directed to the Investor Relations & Rating Agency Management department. Inquiries from regulators, supervisors, public officials or policy makers should be forwarded to the local Legal, Compliance, or Government Affairs team, or to Group Public Affairs or Group Regulatory Affairs, as appropriate.

Posting information on social media is considered to be communicating with external parties, hence the same rules apply.

We are encouraged to like and share Zurich posts and publications on social media. When commenting on Zurich posts and publications, we remember to speak with our own voice and comply with the terms of the Social Media Guidelines.

If we make our affiliation with Zurich known on any social media, we become an unofficial spokesperson and everything we post may be associated with or have an impact on our business and Zurich's reputation.

What does it mean for me?

I have been contacted by a journalist who would like to learn more about a project I am working on. I believe an article on this would help our reputation. Can I share information about the project with him? **– No. Refer all requests for information from the media to your local Media spokesperson or Media Relations department. You must not speak on behalf of Zurich unless you are an approved spokesperson.**

If you have any questions about your use of social media in a professional or personal capacity, contact **social.media@zurich.com** or read the Social Media Guidelines.

More information:

- Social Media Guidelines*
- ZRP**: MR 5g - Information Security*
- ZRP: MR 6f – Group Regulatory Relations*
- ZRP: MR 6h – Public Affairs*

** internal link*
***(ZRP) Zurich Risk Policy*



We care about our future

… and want to be one of the most sustainable companies in the world. We understand that we must always consider the consequences that today's actions could have on tomorrow.

Watch the video online ›

Driving change for a sustainable future

For Zurich, sustainability is at the heart of our culture, and forward-thinking is one of our values. That means doing business today in a way that endeavors to safeguard the future of our company and our society.

We want to be known as one of the most responsible and impactful businesses in the world. Risks are becoming more complex and interconnected as a result of climate change, globalization, urbanization and technological development. Insurers are increasingly expected to use their core capabilities to help communities and society become more resilient to these interconnected risks.

We endeavor to work with our colleagues, customers, brokers and other distribution partners to foster responsible and sustainable business practices, while promoting industry-leading practices in managing environmental, social and governance (ESG) risks. We want to be advocates, advisors and role models for a thriving future.

We have policies in place that define the business activities in which Zurich has no underwriting or investment appetite.

We strive to develop relevant products and services that can help address some of today's most pressing societal and environmental issues.



We have identified three priorities to scale our impact and our role in society:

1



Planet Sustainability

As an insurer of the physical world, we must do everything we can to help accelerate emissions reductions, enhance resilience to climate change, and regenerate nature.

2



Customer Sustainability

We have a unique opportunity to provide positive impact by helping our customers on their own sustainability journeys. We also need to invest our assets in the most responsible and impactful way.

3



People Sustainability

As a large employer and a provider of protection solutions to millions of people, our purpose calls us to help create a more resilient, skilled and inclusive society through our customer solutions, our own workforce and in our communities.





What does it mean for me?

Consider how you can contribute to Zurich's sustainability ambition, whether it is in our operations or in underwriting or investment activities.

Ask yourself how you can support our customers and partners in their sustainability journeys, whether it is through products and services, claims handling or new innovations.

More information:

- Our sustainability ambition
- Sustainable operations
- Data commitment and privacy protection

ZURICH

The Code of Conduct is published in English, Chinese (Simplified), Chinese (Traditional), French, German, Indonesian, Italian, Japanese, Polish, Portuguese, Spanish and Turkish.

In the case of inconsistencies in the language translations, the latest English version shall prevail. The latest version can be found on our Group website: www.zurich.com.

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