



ZURICH®

Our Group's Code of Conduct

WE CARE.

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.

A handwritten signature in dark ink that reads "Mario Greco".

Mario Greco
Group Chief Executive Officer

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online

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A photograph of four business professionals sitting in a circle on blue armchairs in a modern office setting. They are engaged in a discussion. The background features large windows and whiteboards with faint diagrams.

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's next in their lives and their businesses while maintaining the peace of mind that should they need us, we are here.

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.



Our values

Optimism	Caring	Reliability
Determination	Togetherness	Forward-Thinking

More information:

- > [Our strategy](#)
- > [Our purpose and values](#)
- > [Our behaviors*](#)



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:



1 Is it legal?

Consider whether the decision complies with applicable laws and regulation.

2 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.

3 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.

4 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 an environment where employees feel comfortable to share their views and raise their concerns. We speak up promptly and report conduct that we believe, in good faith, violates laws, regulations, internal policies or this Code.

Don't support it. Raise it.

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, working conditions or treatment that we or our colleagues are receiving.

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.

No retaliation.

All reported concerns are treated in strict confidence to the maximum extent possible, and Zurich does not tolerate retaliation against any employee who reports a concern in good faith. Protection against retaliation is also extended to those who assist in any investigation of such concerns.

More information:

- > [Zurich Ethics Line*](#)
- > [Group Policy: Reporting of Improper Conduct and Concerns*](#)



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 all employees of Zurich, its subsidiaries and affiliates worldwide. Regardless of our rank, 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 work with third parties such as consultants, advisers, service 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 by an employee 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 doing the right thing

We care
about our colleagues

We care
about our customers

We care
about business integrity

We care
about our company

We care
about our future



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.

More information:

- > [Diversity, inclusion & wellbeing](#)
- > [Zurich Ethics Line*](#)



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.



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.

We expect our managers to create an inclusive working environment through exemplary behavior.

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.

More information:

- › [Diversity, inclusion & wellbeing](#)



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.**



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

More information:

- > Diversity, inclusion & wellbeing
- > Wellbeing Framework@Zurich*



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.



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.

More information:

› [Customer Stories](#)



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.



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.

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*](#)



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.



Protecting data and safeguarding confidential information

Trust is at the core of our business. Our customers trust us to protect them and settle their claims fairly and quickly. And that trust extends to their data as we strive to inspire confidence in a digital society.

We are honoring our customers' long-standing trust with a commitment to use data to do what is best for customers. As part of our Data Commitment, we 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 adhere to the Zurich Data Commitment and collect, process and share personal data fairly, only for specified and legitimate purposes, and only to the benefit and in the interest of the customer.

We respect the privacy rights and preferences of the people whose data we process. We understand that confidential information, including personal data, is intended for use within Zurich and may only be accessed, used and shared on a "need-to-know" basis. In addition, before transferring data across national borders, including to other Zurich entities, we confirm whether special requirements apply.

More information:

- › [Group Policy: Data Protection and Privacy*](#)
- › [Zurich Data Commitment](#)



What does it mean for me?

I have lost my laptop. What should I do? – **You should immediately inform your local Risk Officer, Security and your manager.**

Keep in mind that data breaches and data security 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.



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.

Anti-bribery and anti-corruption

Zurich is committed to fair and responsible business and prohibits all forms of bribery and corruption by employees and representatives, 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 Anti-Bribery and Anti-Corruption Policy 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



What does it mean for me?

A broker has offered me tickets to a local sporting event. Can I accept them? – **Possibly, however, you should 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 record them on your local GEOA log.**

A supplier has invited me to a business dinner, can I accept the invitation? – **Business lunches and dinners fall under the Anti-Bribery and Anti-Corruption Policy and if the purpose of the invitation is to maintain business relationships, it is acceptable. However, if the value of the dinner is above the local threshold, you should record it on the GEOA log and obtain line manager approval.**

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.

We are committed to establishing our customers' identities and understanding the sources of the funds they bring to Zurich. 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.

More information:

- › [Group Policy: Anti-Money Laundering and Counter-Terrorist Financing*](#)
- › [International Automatic Exchange of Information for tax purposes*](#)



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 manager and contact Compliance.**

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. And we seek advice from Compliance or Legal on these regulations as required.

More information:

- › [Group Policy: Trade & Economic Sanctions*](#)



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.**



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.

More information:

› [Group Policy: Antitrust and Competition*](#)



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.**

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').

More information:

› [Group Policy: Dealing in Securities*](#)



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.**



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.

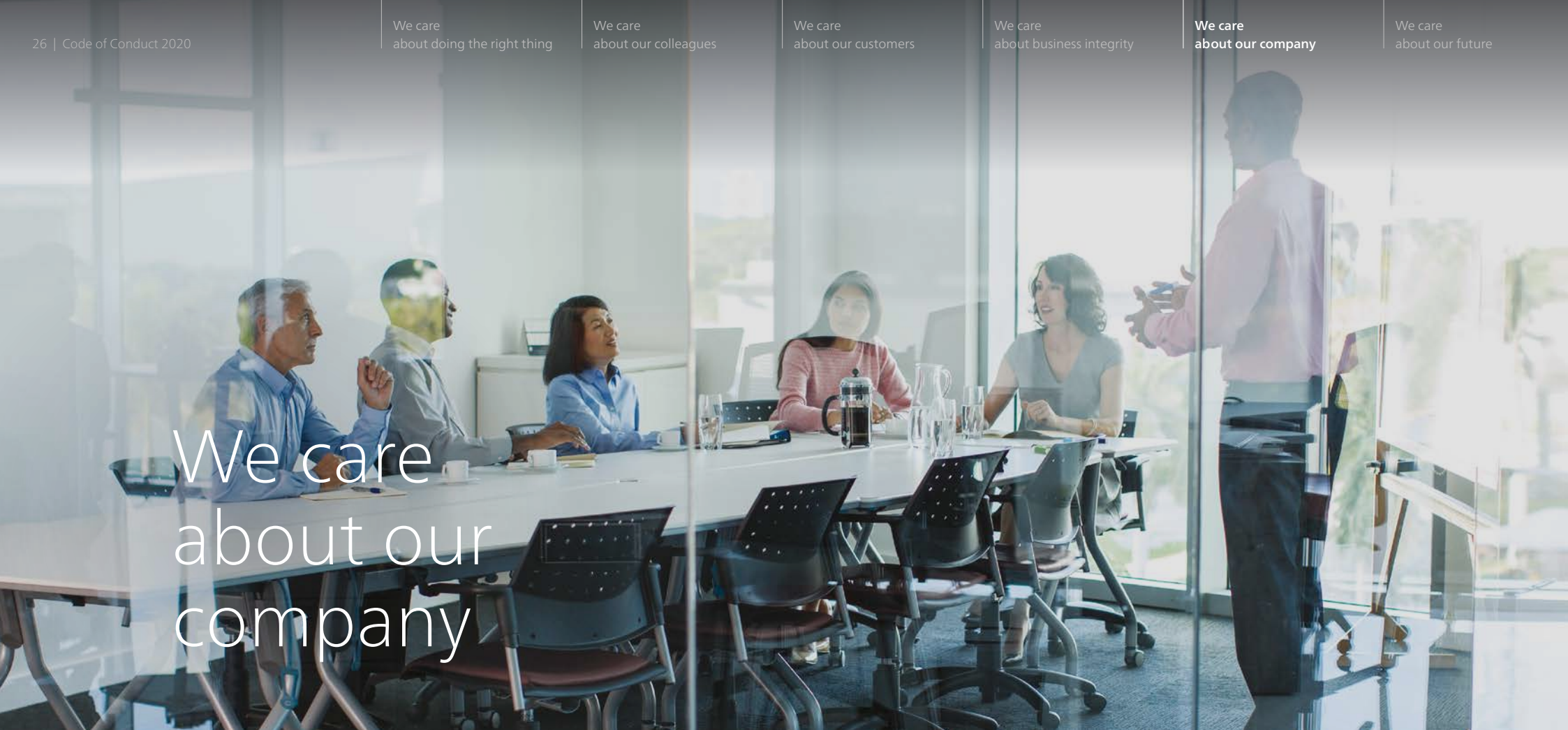
More information:

- › Respecting human rights
- › ILO Conventions



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.**



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 Document Preservation Notice or 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 Notice or hold and comply with its obligations strictly. We seek guidance as directed in the Notice or hold 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 requested 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.

More information:

> [Group Policy: Records Retention*](#)



What does it mean for me?

How do I know which documents are considered to be 'records'? – **Check with your local contact 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 has a local data inventory or records catalogue which sets forth applicable retention periods for records. If you do not know how to locate your local data inventory, check with the data owner before taking any action.**



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.

More information:

- › [Group Policy: Conflicts of Interest and External Engagements*](#)



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 reported 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.**



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 only 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.

More information:

- › Regulation on the use of electronic information / communications systems*



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.



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 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 such as Twitter and LinkedIn is considered to be communicating with external parties, hence the same rules apply.

Of course we may engage on social media platforms; however, we remember to speak with our own voice and share our own opinions – which can be private or work-related – and clearly state that these views are our own and may differ from the views of Zurich.

More information:

› [Social Media Guidelines*](#)



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.



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.

More information:

- > [Group Environmental Policy*](#)
- > [Our sustainability commitment](#)
- > [Work sustainability*](#)

Three societal transformations are key to Zurich's future success:



Climate change

We continue to accelerate action to reduce climate risks. Zurich was the first insurer to commit to the Business Ambition for 1.5°C, which will require us to outline a roadmap for how we will transition to a net-zero emissions future by 2050.



Confidence in a digital society

The digital transformation is well advanced, and it is affecting people worldwide. We understand that we need to support this development with a new generation of products and services to make people and organizations more resilient in a digital society.



Work sustainability

We support our colleagues and customers to navigate the changing nature of work by offering innovative solutions and adapting our own people practices, focusing on reskilling, promoting from within, life-long learning, and wellbeing.



What does it mean for me?

Consider what you can do to perform your job in an environmentally friendly manner.

Ask yourself how you can support our customers and colleagues in making decisions that reduce the risks from societal transformation.

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