



# CHUBB®

## **U.S. Public Policy Engagement & Disclosure of Political Activity**

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# U.S. Public Policy Engagement & Disclosure of Political Activity



Chubb is committed to constructive and responsible engagement in the U.S. political process. We believe that this engagement is essential to protect and advance the company's interests. The company is subject to extensive regulation and our interests can be affected by a wide range of regulatory and legislative action in areas as diverse as flood and terrorism risk mitigation, tax policy, tort reform and industry-specific capital requirements. We seek to educate and inform public officials about the company's positions on these and other policy issues that are important to our business, employees, policyholders and shareholders.

Our activities include engagement with state and federal elected officials, supporting business and industry trade associations, political action committee (PAC) sponsorship, and providing PAC or corporate funds (where permitted by law) to state candidates and/or ballot initiatives. In all cases, Chubb political activities are intended to reflect and further Chubb's corporate interest, and not the personal interest of any of our officers, directors or employees.

Chubb's public policy priorities are determined in consultation with the company's business units and the company's most senior executives. Chubb maintains policies and procedures to ensure that its political activities in the U.S. are conducted in accordance with applicable federal and state laws and regulations.

Chubb conducts its political and public policy activities through its Government and Industry Affairs group, which employs government affairs professionals in the U.S. who are responsible for analyzing proposed political contributions and

related expenditures. Outside the U.S., the company does not make political contributions as a matter of general policy and its advocacy activities are managed at the country, regional or local level, with support from regional and corporate executive leadership, as well as Chubb's international government affairs professionals. The government affairs team reports to Chubb's General Counsel and regularly engages with other members of the senior management team.

## **Federal and State Political Contributions**

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As a corporate entity, Chubb does not make contributions to candidates for federal office, national political parties or federal PACs. To advance Chubb's public policy interests, the Chubb Group Holdings Inc. Political Action Committee (Chubb PAC) was established to promote and facilitate the accumulation of voluntary, personal contributions from the eligible employees of Chubb and its U.S. subsidiaries for the support of political candidates for election to federal and/or state office, where allowable under the law. The PAC may also raise funds from eligible members of the Chubb Limited Board of Directors.

Chubb PAC maintains a Board of Directors, which oversees the activities of Chubb PAC, including compliance. The PAC Board includes senior Chubb managers from various business units, a member of the General Counsel's office and a representative from Government Affairs.

Chubb PAC supports candidates who will likely have an interest in issues of

importance to Chubb and the insurance industry. Chubb PAC does not contribute PAC funds to any presidential exploratory committee or presidential campaign committee. Chubb PAC publicly discloses all contributions as required by applicable laws. Federal Election Commission filings for Chubb PAC can be found [here](#).

Neither Chubb nor its subsidiaries own, operate or sponsor any state-only PACs or political committees. However, Chubb PAC may give to state political committees where allowed by law.

In addition to Chubb PAC contributions in several states, Chubb and its U.S. subsidiaries make direct corporate political contributions to state-level candidates, political parties, 527 organizations, trade association PACs, and may support 501(c)(4)'s and other non-lobbying related political communications, as well as ballot initiatives where allowed by law. Contributions in these areas above a nominal threshold amount will be disclosed.

#### **Affiliated Political Action Committee - Rain & Hail Insurance Society PAC**

Rain and Hail Insurance Service, Inc. (Rain and Hail) is a U.S. subsidiary of Chubb that provides crop insurance and other insurance products to farmers and the agriculture industry in the U.S. When Chubb acquired Rain and Hail in 2010, Rain and Hail operated Rain and

Hail Insurance Society (RHIS). RHIS is a non-profit membership association made up of local crop insurance agents, independent adjusters, Chubb employees and ranchers. RHIS established a Political Action Committee (RHIS PAC) to support the election of candidates for public office who have demonstrated support of rural development issues, such as crop insurance through the private sector. RHIS members may participate in RHIS PAC.

Under FEC rules, Chubb PAC and RHIS PAC share contribution limits but file separate FEC Reports. FEC filings for RHIS can be found [here](#).

#### **Lobbying Activity and Disclosure**

Chubb and its U.S. subsidiaries actively lobby public officials at the federal and state level on issues that impact the company. Chubb and its U.S. subsidiaries also retain outside consultants and lobbyists to advocate on our behalf, as needed.

In compliance with federal law, Chubb and its outside consultants file lobbying reports (LD-2) on a quarterly basis to disclose federal lobbying activities and expenses. In addition, Chubb's internal federal lobbyists are required to file semiannual LD-203 reports on any personal funds contributed to federal candidates and certain other activities. A separate semiannual LD-203 report is filed on behalf of Chubb and its U.S. subsidiaries, including Chubb PAC and RHIS PAC.

#### **Employee Activities**

All Chubb North America personnel are required to review and attest to Chubb's Code of Conduct, which includes Chubb's policy on Avoiding Bribery and Corruption and the policy on Doing Business with Government Officials. Through the Chubb Code of Conduct, employees are regularly notified and continuously subject to the requirement that Chubb funds may not be made to any political candidate, election committee, government official, ballot initiative or political fundraising event without consultation and approval of Chubb Government Affairs. The attestation process requires review of applicable requirements and secures an electronic record of employees' compliance.

#### **Chubb Limited - Restricted Board Oversight**

U.S. law prohibits a foreign national or principal (including a corporation that is organized under the laws of a foreign country) from directing or participating in the decision-making process of entities involved in U.S. elections, including decisions regarding the making of contributions, donations, expenditures, or disbursements in connection with any U.S. election or decisions concerning the administration of a political committee (PAC). In compliance with this law, neither Chubb's parent company Chubb Limited, nor the Chubb Limited Board of Directors, engages in any such activities.